KINROSS Great Bear

Great Bear Gold Project
Impact Statement

Section 13: Predicted Changes to Indigenous Peoples – Northwestern Ontario Métis Community

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Appendix

Table 13.1-1: Summary of Linked pVC and fVC Key Mitigation and Changes After Mitigation

Acronyms and Abbreviations

%	Percent
%HA	Percent Highly Annoyed
2SLGBTQQIA+	Two-spirit, lesbian, gay, bisexual, transgender, queer, questioning, intersex, and asexual communities, along with other sexual and gender identities represented by the + symbol
2SLGBTQIA plus	Two-Spirit, lesbian, gay, bisexual, transgender, queer, questioning, intersex, and asexual plus
AEX	Advanced Exploration
ALCM	Additional Lung Cancer Mortality
ALIA	Anishinaabe-Led Impact Assessment
ANA	Asubpeeschoseewagong Netum Anishinabek (Grassy Narrows First Nation)
CCHS	Canadian Community Health Survey
CHER	Cultural Heritage Evaluation Report
CHR	Cultural Heritage Resource
CHVI	cultural heritage value or interest
cm	Centimetre
CO	Carbon Monoxide
COVID-19	Coronavirus Disease 2019
CSI	Crime Severity Index
CSIN	Community Services and Infrastructure
CSWB	Community Safety and Well-Being
CULRTP	Current use of lands and resources for traditional purposes
CWB	Community Well-Being
DDSAB	Data from district social services administration boards
DPM	Diesel Particulate Matter
EAP	Employee Assistance Program
EPC	Exposure Point Concentration
ERA	Ecological Risk Assessment
FNFNES	First Nations Food, Nutrition and Environment Study
fVC	Valued component under federal jurisdiction (federal valued component)
GBA Plus	Gender-Based Analysis Plus
Great Bear Resources	Great Bear Resources Ltd.
ha	Hectares
HHERA	Human Health and Ecological Risk Assessment

HHRA	Human Health Risk Assessment
HIA	Health Impact Assessment
HIV	Human Immunodeficiency Virus
HQ	Hazard Quotient
HR	Human Resources
IAA	*Impact Assessment Act*
IAAC	Impact Assessment Agency of Canada
ILCR	Incremental Lifetime Cancer Risk
KDSB	Kenora District Services Board
LAeq-1hr	A-weighted equivalent sound level
LIM-AT	Low-Income Measure After Tax
LSA	Local Study Area
LSFN	Lac Seul First Nation
MNO	Métis Nation of Ontario
MPOI	Maximum Point of Impingement
MMIWG	Missing and Murdered Indigenous Women and Girls
MMIWG2S+	Missing and Murdered Indigenous Women and Girls, Two-Spirit, Transgender, and Gender-Diverse+ peoples
N/A	Not Applicable
NCCIH	National Collaborating Centre for Indigenous Health
NO_2	Nitrogen dioxide
NOS	National Occupancy Standard
NWHU	Northwestern Health Unit
NWOMC	Northwestern Ontario Métis Community
OHA	*Ontario Heritage Act*
PA	Project Area
PAH	Polycyclic Aromatic Hydrocarbon
PHAC	Public Health Agency of Canada
PIT	Point-in-Time
$PM_{2.5}$	Particulate matter less than 2.5 microns in diameter
POD	Point of Departure
POPC	Parameter of Potential Concern
POR	Point of Reception
PPE	Personal Protection Equipment

pVC	pathway valued component
RJ	Restorative Justice
RL/EF	Red Lake/Ear Falls
RLEF	Indigenous peoples in the Red Lake and Ear Falls Area
RSA	Regional Study Area
RSPP	Regional Social Performance Plan
SLaFN	Sioux Lookout area First Nations
SLFNHA	Sioux Lookout First Nations Health Authority
SO_2	Sulphur dioxide
TISG	Tailored Impact Statement Guidelines
TKLUS	Traditional Knowledge Land Use Study
TMF	Tailings Management Facility
TRV	Toxicity reference value
$\mu g/m^3$	Micrograms per cubic metre
UNDRIP	The *United Nations Declaration on the Rights of Indigenous Peoples Act*
VOC	Volatile Organic Compound
WFN	Wabauskang First Nation
WHO	World Health Organization

Table of Anishinaabe Words, with English Translations

Anishinaabe	Used to describe oneself or a collective group of First Nations peoples belonging to this particular cultural and linguistic family. Individuals use Anishinaabe (or plural form, Anishinaabeg/Anishinabek) to indicate membership and belonging to that group. Commonly used to describe Ojibwe people, but can also refer to other First Nations that also identify as Anishinaabe.
Anishinaabeg	plural form of Anishinaabe, referring to Anishinaabe Peoples
Manoomin	Wild rice
Nibi	Water

13.0 Predicted Changes to Indigenous Peoples – Northwestern Ontario Métis Community

This Impact Statement complies with the requirements of the *Impact Assessment Act* (IAA), a federal Act that evaluates how major projects may impact the environment, health, economy, and well-being of local Indigenous communities.

The IAA requires consideration of the impact that a designated project may have on an interested Indigenous group or the rights of the Indigenous Peoples of Canada recognized and affirmed by section 35 of the *Constitution Act, 1982.* This consideration is also reaffirmed by Tailored Impact Statement Guidelines (TISG) for the Project as issued by the Impact Assessment Agency of Canada (IAAC).

Great Bear Resources, a wholly owned subsidiary of Kinross Gold Corporation, is seeking to develop and operate the Great Bear Gold Project (the Project), a proposed gold mine located near the Municipality of Red Lake in the District of Kenora, Northwestern Ontario within Treaty 3 territory.

Figure 13.1-1 illustrates the Project location relative to Treaty 3 territory, participating Indigenous Nations, and nearby municipalities including the Municipality of Red Lake and the Township of Ear Falls.

This assessment describes the current health and socio-economic conditions and assesses potential effects of the Project on Northwestern Ontario Métis Community (NWOMC), based on the definition of adverse effects in the *Impact Assessment Act (IAA)*, which includes:

> "adverse effects within federal jurisdiction means, with respect to a physical activity or a designated project,
>
> (e) with respect to the Indigenous Peoples of Canada, a non-negligible adverse impact occurring in Canada and resulting from any change to the environment on
>
> (i) physical and cultural heritage,
>
> (ii) the current use of lands and resources for traditional purposes, or
>
> (iii) any structure, site or thing that is of historical, archaeological, paleontological or architectural significance;
>
> (f) a non-negligible adverse change occurring in Canada to the health, social or economic conditions of the Indigenous Peoples of Canada; and…"

The impact assessment process requires proponents to examine aspects of projects in different ways. These are referred to in this report as pathway valued components (pVCs) and federal valued components (fVCs). As outlined in Section 6, fVCs and pVCs are defined:

- fVCs are valued components within federal jurisdiction, as guided by key issues identified in the TISG for the Project
- pVCs are valued components that provide a pathway for direct or indirect effects to fVCs.

This assessment follows the framework used for other fVCs and pVCs, and has been adapted to reflect the nature of social science analysis and assessment of changes to Indigenous health, which considers the human experience. This includes supplemental text and tables to add broader context.

The assessment of the Project and its potential effects on Indigenous Peoples and their interests are considered based on the following areas, based on the requirements of the TISG (Appendix A-1):

- **Community Services and Infrastructure**, to assess the potential effects of the Project on the use of services and infrastructure in the region by Indigenous Peoples (Section 13.5)
- **Current Use of Lands and Resources for Traditional Purposes**, to assess the potential effects of the Project on the current use of lands and resources by Indigenous Peoples for traditional purposes, including hunting, trapping, gathering, and experience of using the land (Section 13.6)
- **Indigenous Physical and Cultural Heritage, and Structures, Sites, or Things of Significance**, to assess the potential effects of the Project on sites or areas of Indigenous heritage importance (including archaeological, historical, or architectural sites), as well as associated ceremonial, spiritual and cultural values (Section 13.7)
- **Community Well-being**, to assess the potential effects of the Project on the broader social and economic conditions that contribute that contribute to the health, well-being, stability, resilience, and quality of life for Indigenous Peoples (Section 13.8)
- **Health**, to assess the potential effects of the Project on environmental and socio-economic conditions that contribute to overall health and wellness for Indigenous Peoples, such as how changes in air or water quality impact biophysical human health outcomes, and how changes to community cohesion impact cultural continuity thus impacting mental, emotional and spiritual health (Section 13.9).

The assessment also considers potential effects of the Project on the exercise or practice of the rights of Indigenous Peoples[1] or the rights arising from treaties in the PA (Section 13.10).

The assessment process, and associated Project TISG, is not a process for rights determination. The discussion that follows assesses the predicted changes and effects for each of the Indigenous communities identified as potentially affected by the Project in the TISG (Appendix A-1):

- **Northwestern Ontario Métis Community (NWOMC) i.e., this section;**
- Asubpeeschoseewagong Netum Anishinabek (ANA; Section 12)
- Lac Seul First Nation (LSFN; Section 10);
- Wabauskang First Nation (WFN; Section 11); and
- Indigenous Peoples living in the Red Lake and Ear Falls area (Section 14).

[1] “Rights of Indigenous Peoples” and “Rights” refers to the rights of the Indigenous Peoples of Canada, as recognized and affirmed in section 35 of the Constitution Act, 1982. (Guidance: Assessment of Potential Impacts on the Rights of Indigenous Peoples)

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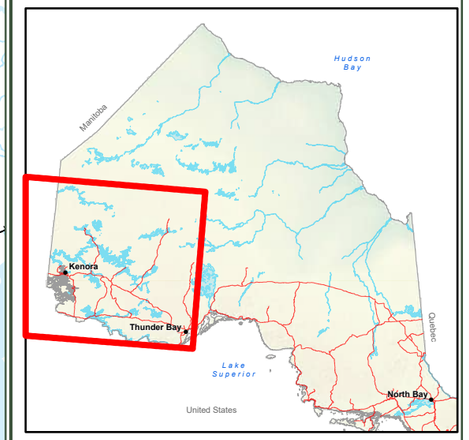
Berens River
Pigeon River
Goose Creek
Leyond River
Minago Creek
Bloodvein River
Rice River
Beaver Creek
Gammon River
Wanipigow River
Manigotagan River
Sandy River
O'Hanly River
Black River
Moose River
Maskwa River
Cat Creek
Bird River
Stout Lake
Qoooowee Sahkaheekahn/ McInnes Lake
MacDowell Lake
Peekahchekahmeewee Sahkaheekahn/ Pikangikum Lake
Keechewahshaykahmeeshek/ Cairns Lake
Ooshkahtahkahwee Sahkaheekahn/ Nungesser Lake
Trout Lake
Red Lake
Gullrock Lake
Pakwash Lake
Sydney Lake
Lac Seul
Wabauskang 21
English River 21
Lac Seul 28
Umfreville Lake
Separation Lake
Crowduck Lake
Rennie River
Bog River
Whitedell River
Hazel Creek
Birch River
Boggy River
Seine River
Touromd Creek
Whitemouth River
Rat River
Roseau River
Sprague Creek
Reed River
Lake of the Woods
Shoal Lake
Lake of the Woods (lac des Bois)
Dryberry Lake
Atikwa Lake
Rowan Lake
Kakagi Lake
Upper Manitou Lake
Lower Manitou Lake
Eagle Lake
Wabigoon Lake
Cat Lake
Birch Lake
Zionz Lake
Gull Lake
Bamaji Lake
Lake St. Joseph
Pashkokogan Lake
McCrea Lake
Miniss Lake
Whitewater Lake
Smoothrock Lake
Caribou Lake
Savant Lake
Tarp Creek
WINTER ROAD
Postelnic Creek
Seseganaga Lake
Sturgeon Lake
Big Vermilion Lake
Minnitaki Lake
Mameigwess Lake
Lake Nipigon
White Otter Lake
Otukamamoan Lake
Rainy Lake (lac à la Pluie)
Marmion Lake
Lac des Mille Lacs
Dog Lake
Pickerel Lake
Rainy Lake
Kabetogama Lake
Namakan Lake
Lac la Croix
Northern Light Lake
Lake Superior (lac Supérieur)
Upper Red Lake
Lower Red Lake
HIGHWAY 72
HIGHWAY 17
HIGHWAY 11
HIGHWAY 11 & 71
HIGHWAY 11 & 17
Minnesota
Michigan

N

LEGEND:

- PROJECT AREA
- TREATY 3 BOUNDARY
- HIGHWAY
- RAILWAY
- WATERCOURSE
- WATERBODY
- FIRST NATION RESERVE
- MUNICIPAL BOUNDARY (LOWER TIER)



NOTES:
NOTE1: BASE DATA ACQUIRED FROM LAND INFORMATION ONTARIO.

0 5 10 20 30 km

SCALE 1:1,800,000
PAGE SIZE: 11 x 17
NAD 1983 UTM Zone 15N

THIS MAP IS FOR CONCEPTUAL PURPOSES ONLY AND SHOULD NOT BE USED FOR NAVIGATION

GREAT BEAR RESOURCES

GREAT BEAR GOLD PROJECT

TREATY 3 BOUNDARY

SLR

FIGURE NO:
13.1-1

DATE: November 19, 2025

PROJECT NO: 241.030825

13.1 Linkages to other Valued Components

Predicted social economic and health changes to Indigenous Peoples who may be affected by the Project are presented in this assessment. Other potential effects are covered in the appropriate sections as noted:

Pathway Valued Components (pVCs):

- **Air Quality** (Section 7.2), **Sound** (Section 7.3) and **Vibration** (Section 7.4): Project-related activities which may create changes to air quality, sound or vibration may cause changes to the current use of land and resources for traditional purposes and affect the quality of their experiences. A change in the quality of these experiences may also cause changes to the health and well-being of the community.
- **Groundwater** (Section 7.5): Project-related activities may result in changes to groundwater flows and levels which may impact use of land, water, and resources for traditional purposes and affect the quality of experiences. A change in quality of experiences may also cause changes to the well-being of the community.
- **Surface Water Levels and Flows** (Section 7.6): Project-related activities may result in changes to surface water quantity which may impact navigation and water-based activities related to the current use of lands for traditional purposes and health.
- **Water Quality** (Section 7.7): Project-related activities may result in changes to surface water quality which may impact navigation and water-based activities (i.e., fishing) related to the current use of lands and resources for traditional purposes and health.
- **Vegetation Communities** (Section 7.8) and **Wild Rice** (Section 7.9): Project-related activities may result in changes to vegetation communities or wild rice availability that may impact the use of the land and resources for traditional purposes and affect the quality of their experiences. A change in the quality of these experiences may also cause changes to the health and well-being of the community.
- **Moose** (Section 7.10), **Other Wildlife** (Section 7.11), and **Species at Risk** (Section 7.12): Project-related activities may affect moose, other wildlife (e.g., furbearers and other ungulates), and species at risk, resulting in changes to the ability to use the land or resources for traditional hunting, trapping, and harvesting purposes.
- **Land and Resource Use** (Section 7.13): Potential changes to land and resource use (particularly changes in land use, access, and navigation) may affect the current use of land and resources for traditional purposes and the quality of experience for the NWOMC while practicing their traditional activities near the Project.
- **Cultural Heritage** (Section 7.14): potential changes to cultural heritage during the construction, operations and closure phases of the Project may affect Indigenous physical and cultural heritage, including structures, sites, or things of significance.
- **Archaeology** (Section 7.15): potential changes to archaeology during the construction, operations and closure phases of the Project may affect Indigenous physical and cultural heritage, including structures, sites, or things of significance.
- **Local and Regional Economy** (Section 7.16): Project-related activities that result in changes to the local and regional economy may affect Community Services and Infrastructure and Community Well-being due to linkages with the employment and economy within the region.

Federal Valued Components (fVCs):

- **Fish and Fish Habitat** (Section 8): Project-related activities may affect fish and fish habitat resulting in changes to the ability to use the land for traditional purposes, such as fishing and the consumption of traditional foods.
- **Migratory Birds** (Section 9): Project-related activities may affect migratory birds (e.g., migration patterns, behaviours), resulting in changes in the ability to use the land for traditional purposes, such as hunting and the consumption of traditional foods.

Attached Table 13.1-1 provides a summary of the pVC and fVC mitigation measures and the residual changes or effects after mitigation. Detailed description of the methods, existing conditions, mitigation measures, and residual effects can be found in the respective section.

13.2 Regulatory Setting

Government environmental regulations, objectives, policy or guidelines most relevant to Indigenous Peoples are summarized in the following. Further information regarding anticipated approval requirements is provided in Section 19. Further information regarding treaty, self-government, land claims or other agreements between federal and provincial governments and Indigenous Nations is presented in Section 13.10. Further information regarding negotiated agreements between Great Bear Resources and Indigenous communities is presented in Section 13.2.3.

13.2.1 Federal Legislation, Policies and Guidelines

Federal regulatory requirements related to Indigenous communities and populations are summarized in the following.

13.2.1.1 Impact Assessment Act

The Project follows the IAAC guidance when assessing and reviewing information from Indigenous communities, including:

- *Assessment of Potential Impacts on the Rights of Indigenous People* (Impact Assessment Agency of Canada 2024a)
- *Indigenous Knowledge Policy Framework for Project Reviews and Regulatory Decisions* (Impact Assessment Agency of Canada 2021)
- *Guidance: Indigenous Knowledge under the Impact Assessment Act* (Impact Assessment Agency of Canada 2024b)
- *Guidance: Protecting Confidential Indigenous Knowledge under the Impact Assessment Act* (Impact Assessment Agency of Canada 2024c).

The assessment of human health considers the following guidance from IAAC, and provided by Health Canada for used under the *Impact Assessment Act*:

- Interim Guidance – Health Impact Assessment of Designated Projects under the Impact Assessment Act. December 2024 (Health Canada 2024a)
- Analyzing Health, Social and Economic Effects under the Impact Assessment Act. 27 November 2020 (Impact Assessment Agency of Canada 2020)

- Guidance for Evaluating Human Health Impacts in Impact Assessment: Human Health Risk Assessment (Health Canada 2023a)
- Guidance for Evaluating Human Health Impacts in Impact Assessment: Air Quality (Health Canada 2023b)
- Guidance for Evaluating Human Health Impacts in Impact Assessment: Country Foods (Health Canada 2023c)
- Guidance for Evaluating Human Health Impacts in Impact Assessment: Drinking and Recreational Water Quality (Health Canada 2023d)

Additional guidance specific to the HHERA and HIA is presented in Appendix N-1 and Appendix N-2, respectively. In addition, relevant guidance related to other specific determinants of health are referenced in Section 13.9.

In addition to the *Impact Assessment Act*, this assessment also considers the regulations and requirements related to Indigenous communities and populations presented in Table 13.2-1.

Table 13.2-1: Indigenous Communities and Populations-Related Federal Regulatory Requirements

Act or Requirement	Ministry or Agency	Details
The United Nations Declaration on the Rights of Indigenous Peoples Act, 2021 (UNDRIP Act)	Government of Canada, and IAAC.	This federal legislation affirms UNDRIP as a universal international human rights instrument, with application in Canadian law.
Constitution Act, 1982	Government of Canada	Section 35 recognizes and affirms existing Aboriginal and treaty rights.
Indian Act, 1876	Government of Canada	Governs matters pertaining to Indian Bands and reserves.
Migratory Birds Convention Act, 2005	Environment and Climate Change Canada	Contains broad legal safeguards and key protections that prohibit the killing, harming or disturbance of migratory birds and their nests or eggs. This includes impacts from any lawful and permitted activities like construction and development related to the project.
Canadian Navigable Waters Act, 2019 (CNWA)	Transport Canada	Prohibits the construction or placement of any works in a navigable waterway that may interfere with the right to navigation, including Indigenous use as a means to exercise aboriginal or treaty rights, without complying with the requirements of the CNWA. The Project may require approvals under Section 5, 10, and 24 of the CNWA, and has completed a Navigable Waters Report.
Species At Risk Act, 2002	Environment and Climate Change Canada	Prevents the harm and disappearance of wildlife species in Canada. The Act imposes critical habitat protection, permitting and compliance for activities that could affect listed species or their habitats, action plans, recovery strategies, and enforcement.

Act or Requirement	Ministry or Agency	Details
Fisheries Act, 1868/2019	Fisheries and Oceans Canada	Responsible for the proper management and control of fisheries; and the conservation and protection of fish and fish habitat including by preventing pollution. Environment and Climate Change Canada (ECCC) may also be involved in fisheries issues, particularly in relation to the prevention provisions within the *Fisheries Act*.

13.2.1.2 Tailored Impact Statement Guidelines

The TISG, developed by IAAC for the Project, indicate that the proponent must:

- Provide an analysis of any potential effects on Indigenous communities including effects on: Community Infrastructure and Services (Section 13.5); Current Use of Land and Resources for Traditional Purposes (Section 13.6); Indigenous Physical and Cultural Heritage, Structures, Sites, or Things of Significance (Section 13.7); Community Well-being (Section 13.8); and Health Section 13.9);
- Provide an analysis on the impacts on the exercise or practice of Rights of Indigenous Peoples (Section 13.10).
- Work with each Indigenous community in the development of the Impact Statement, should they wish to participate. If communities choose to not participate, the proponent will continue to share information through preferred contact methods, such as providing Project updates through email, letter, or phone conversations.
- Describe the local and regional economic conditions and trends (Section 13.8). This includes information on any use of lands and water for economic activity (e.g., fishing and hunting guides, trapping, or seasonal resorts).

The TISG also references the implementation and consideration of responsibilities under the *Constitution Act*, 1982, the *Impact Assessment Act*, and the *UNDRIP Act*.

13.2.2 Provincial Legislation, Policies and Guidelines

Provincial regulatory requirements that have ties to Indigenous interests, or that may require the participation of or deeper engagement with Indigenous communities are summarized in Table 13.2-2. Section 19 contains details related to permitting requirements, some of which will require Indigenous consultation or notification.

Table 13.2-2: Indigenous Communities and Populations-Related Provincial Regulatory Requirements

Act or Requirement	Ministry or Agency	Details
Ontario *Heritage Act*, 1975/2005 (OHA)	Ministry of Citizenship and Multiculturalism	Governs the practice of archaeology and protecting archaeological and cultural / heritage sites. Consultation and verification with Indigenous communities is required during the preparation of a Cultural Heritage Evaluation Report (CHER).

Act or Requirement	Ministry or Agency	Details
Ontario *Water Resources Act*, 1990	Ministry of the Environment, Conservation and Parks	Governs mine development through water management permits, pollution prevention measures, and environmental compliance measures. There are multiple authorizations under this legislation that are informed by technical considerations and consultation with affected Indigenous Peoples.
Clean Water Act, 2006	Ministry of the Environment, Conservation, and Parks	This Act protects existing and future sources of drinking water through source water protection and prevention. The Act establishes locally led protection of drinking water supplies through prevention. It requires collaborative, watershed-based source protection. No source water protection plans are currently available for Red Lake and Ear Falls or surrounding areas.
Mining Act, 1990	Ministry of Energy and Mines	Governs mineral exploration and mining activities. Advanced exploration permits and the Closure Plan (rehabilitation measures) for the Project
Crown Forest Sustainability Act	Ministry of Natural Resources	The cutting of merchantable timber reserved to the provincial Crown for site development will require a provincial license and an agreement with the Sustainable Forest License holder.
Lakes and Rivers Improvement Act, Public Lands Act	Ministry of Natural Resources	Work Permits (or Letter of Authority) are required for work on provincial Crown land including within any setback and / or below the high-water mark of watercourses and waterbodies. Also required for construction of a dam below the high-water level of a lake or river requires approval for the location of the dam, and its plans and specifications

13.2.3 Other Requirements and Negotiated Commitments

Further details on agreements and negotiated commitments between by Kinross – Great Bear Resources with participating Indigenous communities can be found in Section 3 (Participation and Engagement).

An amended Exploration Agreement was signed jointly with Lac Seul First Nation and Wabauskang First Nation on July 19, 2023.

This includes a commitment to enter into negotiations for a Project Agreement for mine construction and operation. A Process Agreement was signed jointly with Lac Seul and Wabauskang on April 24, 2024, to assist with the negotiation of the Project Agreement. The parties are currently negotiating a Project Agreement.

A Relationship and Capacity Building Agreement was signed with the NWOMC and MNO on November 1, 2024, to provide Métis Parties with adequate capacity to participate in the regulatory process. This agreement also includes the commitment to negotiate and conclude a Community Benefit Agreement. Métis parties are currently negotiating a Benefit Agreement.

A Capacity Funding Agreement was signed with ANA on September 1, 2024, to support ANA's engagement with Great Bear Resources and the provincial and federal agencies related to this Project.

13.3 Assessment Approach

The assessment approach for the Project followed a step-by-step process as shown in Figure 13.3-1. A more thorough explanation of the approach is described in Section 6.

Sections 13.3.1 through 13.4 provide additional details on the assessment approach, and influence of consultation and engagement. Sections 13.5 through 13.9 document the existing conditions, effects assessment, mitigation and enhancements, and residual effects. Residual effects after mitigation that are linked to the exercise or practice of rights as affirmed under the *Constitution Act*, 1982 are assessed in Section 13.10 to determine the Project's potential impacts on the ability of NWOMC to exercise or practice rights. Cumulative effects (if applicable) are assessed in Section 15.

Figure 13.3-1: Assessment Approach

13.3.1 Spatial and Temporal Boundaries

Spatial and temporal boundaries were established to describe the baseline existing conditions for, and to guide the assessment of, each criteria. The boundaries vary depending on the valued component and are generally considered separately for each one. Where appropriate, criteria share spatial boundaries.

13.3.1.1 Spatial Boundaries

Each boundary is described and defined, including justification, in each individual criteria section (e.g., Sections 13.5.1, 13.6.1, 13.7.1, 13.8.1, and 13.9.1). Maps for each spatial boundary are provided in their respective section.

13.3.1.2 Temporal Boundaries

Temporal boundaries were defined by the schedule of phases of the Project (i.e., construction, operations, and decommissioning and closure), past conditions, and historical context of the Project.

The temporal boundaries for the assessment as defined in Section 6.5 are:

- Construction phase:
  - Years -3 to -1 (3 years) representing the primary period of Project construction

- Mining of the Viggo pit will be completed during this phase and will be initiated in the last year of construction in the LP Central pit.

- Operations phase:
  - Years 1 to 26 (26 years), during year 1 the Project will transition from construction into operations and will not be at full capacity
- Closure phase:
  - Years 27 to 29 (3 years) represent the active closure period when most of the decommissioning and reclamation of the Project area is completed
  - Year 30 is a passive closure period
  - Year 31 is the final closure (removal of water management infrastructure).

13.3.2 Effects Assessment Criteria

In undertaking the assessment of effects to NWOMC, the following criteria were used:

- Change in Community Services and Infrastructure
- Change in Current Use of Lands and Resources for Traditional Purposes
- Change in Indigenous Physical and Cultural Heritage, and Structures, Sites, or Things of Significance
- Change in Community Well-being
- Change in Health

To identify how the Project may result in positive or negative changes to the criteria, potential Project-related effects are assessed against the existing conditions. Indicators characterize the existing conditions and used to measure the change due to the Project-related activities. The criteria, potential effects, and indicators are summarized in Table 13.3-1.

Table 13.3-1: Criteria, Potential Effects, and Indicators for Northwestern Ontario Métis Community

Criteria	Potential Effect	Indicators
Change in Community Services and Infrastructure	• Change in housing and accommodations.	• Existing housing (by type, quality, number of available units, vacancy rates) • Housing costs ($) • Planned builds ($, number of housing starts per year) • Size of anticipated non-local Project construction workforce (from Project Description and Employment and Economy pVC modelling).
	• Change in municipal, provincial, and non-profit service delivery capacity.	• Number, capacity, and location of social service facilities, programs, and providers • Current accessibility, and planned upgrades for services (e.g., schools, Elder, youth, and women's services, health services, mental health and addiction services, and community recreation) – to be measured as a percent (%) where available.
	• Change in transportation infrastructure.	• Availability and timeliness of community transportation programs.
Change in Current Use of Lands and Resources for Traditional Purposes	• Change in availability, access to, and quality of experience related to traditional terrestrial wildlife harvesting (hunting and trapping).	• Location of areas for hunting, trapping, and wildlife harvesting in relation to the PA • Qualitative understanding of quality of experience, including spiritual and cultural activities and practices relating to transmission of knowledge, laws, customs, and traditions.
	• Change in availability, access to, and quality of experience related to traditional aquatic harvesting (fishing).	• Location of areas for fishing and aquatic resources in relation to the PA • Qualitative understanding of quality of experience, including spiritual and cultural activities and practices relating to transmission of knowledge, laws, customs, and traditions.
	• Change in availability, access to, and quality of experience related to traditional plant (food and medicinal) harvesting.	• Location of areas for plant harvesting (for food and medicinal purposes) in relation to the PA • Qualitative understanding of quality of experience, including spiritual and cultural activities and practices relating to transmission of knowledge, laws, customs, and traditions.
	• Change in availability, access to, and quality of experience related to traditional habitation, cultural, spiritual sites/areas.	• Location of sites and areas for Indigenous traditional habitation, cultural and spiritual activities in relation to the PA. • Qualitative understanding of quality of experience, including spiritual and cultural activities and practices relating to transmission of knowledge, laws, customs, and traditions.

Criteria	Potential Effect	Indicators
Change in Indigenous Physical and Cultural Heritage, and Structures, Sites, or Things of Significance	• Alteration or destruction of sites or areas of Indigenous heritage importance, including archaeological, historical, or architectural sites.	• Number and area of affected sites or areas of Indigenous heritage importance, including archaeological, historical, or architectural sites • Indigenous cultural importance of sites, including current use for Indigenous social, cultural, economic, ceremonial, spiritual and other cultural practices and activities
	• Change in access to or quality of experience with sites or areas of Indigenous heritage importance, including archaeological, historical, or architectural sites.	• Number and area of affected currently visited / used sites or areas of Indigenous heritage importance, including archaeological, historical, or architectural sites • Importance of sites, including current use for Indigenous social, cultural, economic, ceremonial, spiritual and other cultural practices and activities • Detectable changes to sensory conditions, including acoustic changes (sound and vibration), visual quality (including changes to sightlines and viewsheds), and air quality (including fugitive dust and airborne particles).
	• Change in sacred, ceremonial, spiritual and cultural values (including language, stories and traditions) associated with sites or areas of Indigenous heritage importance, including archaeological, historical, or architectural sites.	• Number and area of currently visited / used sites or areas of Indigenous heritage importance, including archaeological, historical, or architectural sites • Importance of sites, including current use for Indigenous social, cultural, economic, ceremonial, spiritual and other cultural practices and activities • Detectable changes to sensory conditions, including acoustic changes (sound and vibration), visual quality (including changes to sightlines and viewsheds), and air quality (including fugitive dust and airborne particles).

Criteria	Potential Effect	Indicators
Change in Community Well-being	• Change in community well-being.	• Changes in housing availability, and rental prices over time (e.g., housing unit counts, planned additional units, and population change percentages) • Cost of living metrics for goods and services (e.g., cost of living trends) • Safety statistics in RSA (e.g., number of incidents per year, rates per 100,000 population, Crime severity index values, and population change percentages) • Local crime rates (violent and non-violent) with a focus on crimes committed against women+ and girls • Employment participation data by gender • Access to lands and resources (e.g. proximity to harvesting areas and the presence of access constraints) • Service provider assessments of wait times, capacity limitations, and staffing needs in health, social, and education sectors • Community feedback and historical documentation on household pressures and caregiver challenges (e.g., interviews, service provider input) • Regional community feedback on perceived cohesion, division, or well-being collected through engagement and interviews • Proximity to traditional use areas, interview data on access and use.

Criteria	Potential Effect	Indicators
Change in Health (1)	• Change in Health (Biophysical Determinants of Health)	Air Quality: • Change in air quality (measured as µg/m^3) • Change in health risks from exposure to air (measured as calculated Hazard Quotients, Incremental Lifetime Cancer Risks and / or Additional Lung Cancer Mortality) Multi-media Environmental Quality: • Change in soil quality (measured as milligrams per kilogram; mg/kg) • Change in water quality (measured as milligrams per litre; mg/L) • Change in traditional food quality (measured as mg/kg in food, mg/kg of body weight per day as dose) • Change in health risks from exposure to multiple environmental media including soil, water and traditional foods (measured as calculated Hazard Quotients and / or calculated Incremental Lifetime Cancer Risks) Access and Availability of Water: • Change in access (location), and availability of water (flow, levels) for drinking, recreational and cultural uses • Change in perception of environmental quality (avoidance) Access and Availability of Traditional Foods: • Change in traditional foods access and availability via wildlife, vegetation and fish population changes (measured as qualified and / or quantified population-level changes and land use) • Change in risks to ecological receptors, including plants, mammals, birds, fish (measured as calculated Hazard Quotients) • Change in perception of environmental quality (avoidance) Sensory Disturbances (Sound, Vibration, Light): • Change in sound levels (measured in dBA) and % Highly Annoyed (%HA) • Change in vibration levels (measured as air overpressure in dB) • Change in light emissions (measured as sky glow and light trespass levels) • Change in environmental quality (avoidance)

	• Change in Health (Social Determinants of Health) (1,2)	Economics (Employment, Income, Education): • Change in cost of living and traditional economy (measured as change in cost of living metrics for goods and services, cost of living trends, traditional economy practices) • Change in economic opportunity and inequality (measured as people-years of employment, Project revenues, employment participation, access to employment, income $CAD) • Change in access to health and social services (measured by capacity for service delivery, availability of services) • Education and training statistics as it relates to employment opportunities Housing: • Change in Availability (measured as size of non-local workforce, and existing housing type, quality, available units, vacancy rates, planned builds) • Change in Home Value, Affordability and Ownership (measured as size of non-local workforce, and existing housing costs $CAD; change in cost of living metrics for goods and services; change in economic opportunity and inequality) Access to Health and Social Services: • Change in access to health and social services (measured as number, capacity, and location of facilities, programs, providers, and planned upgrades e.g., schools, Elder, youth, and women's services, health services, mental health and addiction services, and community recreation) • Change in municipal, provincial, and non-profit service delivery (measured number, capacity, demand, planned upgrades) • Service provider assessments of wait times, capacity limitations, and staffing needs in health, social, and education sectors • Information on household pressures and caregiver challenges Food Security: • Changes in Food Security (measured by access, availability and utilization [quality and use] and stability of traditional foods; cost of living changes; perceptions of effects) • Changes in use (avoidance) of certain traditional food sources or drinking or recreational water sources, and resultant changes to traditional economy, due to the perception of environmental quality

Criteria	Potential Effect	Indicators
		• Perceived changes in environmental quality and tranquillity and effects on diet Mental Wellness and Personal Behaviours Community Cohesion: • Change in mental wellness and personal behaviours (including perceived stress, depression, anxiety, concern for future generations) via qualitative discussion analysis of community feedback and regional data on the state of intergenerational trauma, mental wellbeing, cultural continuity, poverty, community cohesion, perception of wellness, and if applicable, substance use in the absence of site-specific quantitative data on mental wellness • Change in community cohesion and perception of wellness (qualitative discussion of community feedback and regional data to describe potential changes to community cohesion in the absence of site-specific quantitative data) Actual and Perceived Safety (Accidents and Malfunctions): • Change in actual and perceived public safety, including emotional and social stress factors, due to risk of accidents and malfunctions (measured as risk characterization per potential accident type; qualitative analysis using community feedback in the absence of site-specific quantitative data on emotional and social stress) Safety of Indigenous Women and Girls: • Change in the safety of Indigenous Women and Girls (local crime rates [violent and non-violent] with a focus on crimes committed against women and girls) • Statistics on Missing and Murdered Indigenous Women and Girls (MMIWG)

Notes:

1 Health is assessed through consideration of upstream conditions and changes to biophysical and social determinants of health; therefore, the indicators identified above are for the assessment of the determinants of health, in accordance with HIA guidelines. The existing conditions and assessment of potential effects for these determinants are described in detail in the relevant Impact Statement sections and appendices, the Human Health and Ecological Risk Assessment (Appendix N-1) and in the Health Impact Assessment (Appendix N-2). To provide additional context for health, existing conditions around current health status for Indigenous communities in the region are summarized in the health sections below, and described in detail in Attachment A of the Health Impact Assessment (Appendix N-2).

2 Some indicators are the same as indicators/assessment criteria for upstream conditions (environment, social, cultural, economic); however, they are considered through a different lens in terms of effects (i.e., Indigenous health)

$CAD = Canadian dollars; dB = decibel; dBA = adjusted decibels; %HA = percent highly annoyed; mg/kg = milligram per kilogram; mg/L = milligrams per litre; PA = Project Area; pVC = pathway valued component; RSA = Regional Study Area; µg/m^3 = micrograms per cubic metre

13.3.2.1 Mitigation and Enhancement Measures

Following the identification of potential effects, each interaction between Project activities and community services and infrastructure indicators was evaluated to determine whether the proposed mitigation measures would manage any risk associated with the effect. Where mitigation measures were determined to effectively avoid the interaction, no residual effect was identified. Where the mitigation measures reduced, but did not fully eliminate, the potential for an effect, the interaction was carried forward for residual characterization.

Great Bear Resources believes that responsible mining includes the following characteristics: 1) generates sustainable value for investors, host countries and communities, 2) priorities health and safety, 3) strives to create positive economic and social benefits, 4) improves the overall quality of people's lives during and after the mine operation, and 5) employs responsible stewardship of the environment. Great Bear Resources' policy statement includes the following objectives:

- Align biodiversity practices with regulatory requirements and industry best practices to support responsible land use and long-term environmental benefits. Through proactive stewardship, we aim to support ecosystem recovery, promote sustainable land management, and leave a positive environmental legacy beyond mining.
- Develop and operate projects in a manner that respects and strengthens Indigenous communities and brings positive contributions to their quality of life which are sustainable after mine closure.

13.3.3 Assessment of Significance

An assessment of significance is completed in a structured format described in Section 6.6.2 if residual effects are identified. The significance of residual effects to these criteria is evaluated utilizing the following attributes according the three threshold levels listed in Table 13.3-2 and Table 13.3-3:

- Ecological and social context: a qualitative measure of the sensitivity and / or resilience of the criteria to the potential effect
- Magnitude: a quantitative (statistical desktop data, usually collected from Statistics Canada's Census) or qualitative (information collected through interviews, questionnaires and focus groups) measure of the size or severity of the effect after mitigation relative to the baseline condition and / or applicable guideline
- Extent: the geographic area where the effect is expected to occur
- Duration: the period of time over which an effect is expected to occur
- Frequency: how often an effect is expected to occur
- Reversibility: the ability for the effect to be reversed
- Timing: the degree to which the effect is expected to occur during a sensitive period for the criteria (applicable to select criteria).

For a residual effect of a criteria to be determined to be significant, the following conditions must both be satisfied:

- A Level II or III rating is attained for ecological and social context; and

- A Level II or III rating is attained for all of the attributes involving magnitude, extent, duration, frequency, reversibility, and timing, as applicable.

Similarly, the effect is not likely to be significant if it has low or limited importance to the ecological and / or social context.

- A Level I rating is achieved for any of the attributes involving magnitude, extent, duration, frequency, reversibility or timing; or, if a Level I rating is achieved for the ecological and / or social context, then the residual effect is not considered to be significant.

Table 13.3-2: Significance Determination Attributes and Rankings – Northwestern Ontario Métis Community

Attribute	Description	Category
Ecological and Social Context	A qualitative measure of the sensitivity and / or resilience to change, based on professional judgement, consultation and Indigenous Knowledge.	• Level I: Criteria may or may not be sensitive, and can support the predicted change with typical mitigation measures • Level II: Criteria is sensitive and requires special measures to support the predicted change • Level III: Criteria is sensitive and unable to support the predicted change even with special measures.
Magnitude	A qualitative or quantitative measure to describe the size or degree of the residual effects relative to baseline conditions.	• Defined separately for each criteria in Table 13.3-3.
Geographic Extent	The spatial extent over which the residual effect will take place.	• Level I: Effect is restricted to the LSA • Level II: Effect extends beyond the LSA but within the RSA • Level III: Effect extends beyond the RSA.
Duration	The time period over which the residual effect will or is expected to occur.	• Level I: Effect occurs over the short-term: less than or equal to three years (1) • Level II: Effect occurs over the medium term: more than three years but less than 32 years (1) • Level III: Effect occurs over the long-term: greater than 32 years (1).
Frequency	The rate of occurrence of the residual effect.	• Level I: Effect occurs once, infrequently • Level II: Effect occurs intermittently or regularly • Level III: Effect occurs frequently or continuously.
Reversibility	The extent to which the residual effect can be reversed.	• Level I: Effect is fully reversible during the Project phases • Level II: Effect is partially reversible during the Project phases • Level III: Effect is not reversible during the Project phases.

Attribute	Description	Category
Timing [2]	A measure of whether the residual effect occurs during a sensitive period of the year.	• Level I: Effects do not occur during a sensitive period, or related effects are fully mitigated • Level II: Effects occur during a sensitive period and are partially mitigated • Level III: Effects occur during a sensitive period and are not mitigated.

Notes:
1. These timelines approximately align with the Project: construction phase is approximately three years, operations phase is approximately 26 years, and the active closure period is an additional three years.
2. As applicable.

Table 13.3-3: Criteria-specific Magnitude Rankings - Northwestern Ontario Métis Community

Criteria	Category
Change in Community Services and Infrastructure	• Level I: Project-related demand for regional services and infrastructure used by local Indigenous People are manageable, and well within the existing regional capacity. • Level II: Some elements of regional services and infrastructure used by local Indigenous People are operating close to or beyond capacity; however, the Project-related demand for regional services and infrastructure can be managed with mitigation measures. • Level III: Some elements of regional services and infrastructure used by local Indigenous People are operating tenuously close to or beyond capacity, and the Project-related demand for regional services and infrastructure cannot be managed with mitigation measures.
Change in Current Use of Lands and Resources for Traditional Purposes	• Level I: Project-related changes may increase the effort necessary but will not reduce the ability of Indigenous Peoples to practice traditional activities related to the current use of lands and resources for traditional purposes. • Level II: Project-related changes may reduce but not eliminate the ability of Indigenous Peoples to practice traditional activities related to the current use of lands and resources for traditional purposes. • Level III: Project-related changes will greatly reduce or eliminate the ability of Indigenous Peoples to practice traditional activities related to the current use of land and resources for traditional purposes.
Change in Physical and Cultural Heritage, and Structures, Sites, or Things of Significance	• Level I Project-related change that is insufficient to alter how Indigenous heritage structures, sites or things, are used, accessed or experienced. • Level II: Project-related change that may alter how Indigenous heritage structures, sites or things are used, accessed or experienced. Associated Indigenous interests (such as intergenerational knowledge transfer) may be affected. • Level III: Project-related change that will result in a loss of Indigenous heritage structures, sites or things, and loss of access or use. Associated Indigenous interests (such as intergenerational knowledge transfer) are impeded

Criteria	Category
Change in Community Well-being	• Level I: Measurable Project-related change in social determinants of well-being that may result in a slight adverse change in the population-level social and / or economic conditions of local Indigenous people. • Level II: Measurable Project-related change in social determinants of well-being that will result in a material adverse change in the population-level social and / or economic conditions of local Indigenous people. • Level III: Measurable Project-related change in social determinants of well-being that will result in a substantive adverse change in the population-level social and / or economic conditions of local Indigenous people.
Change in Health	• Level I: measurable Project-related changes in environmental exposures and / or social determinants of health are unlikely to result in a material adverse change in population-level health status of local Indigenous people. • Level II: measurable Project-related changes in environmental exposures and / or social determinants of health may result in a material adverse change in population-level health status of local Indigenous people. • Level III: measurable Project-related changes in environmental exposures and / or social determinants of health will result in a substantial adverse change in population-level health status of local Indigenous people

13.3.4 Analytical Methods

The assessment of the potential effects of the Project has been completed in accordance with standard regulatory methods. The methods used to assess Indigenous health are provided in the health section below (Section 13.9) and detailed in the HHERA (Appendix N-1) and the HIA (Appendix N-2).

The Project's effects on the criteria were assessed by first collecting data via desktop research from reputable sources, such as Statistics Canada and municipal websites. While Statistics Canada remains the standard data source in the assessment process, due to the timing of the census, some of the data may reflect pandemic related limitations of the time. The 2021 census data was primarily collected in 2020 during the COVID-19 pandemic. In addition, when reporting statistics for small populations, there may be data suppression, or rounding errors. This can result in the total counts not matching the reported data.

While community-maintained population records may reflect more current or locally specific information, Statistics Canada data were used across the Impact Statement to support consistency and comparability across communities and assessment components.

As part of the methods, Gender-Based Analysis Plus (GBA Plus) was applied to understand how the Project may affect different groups. GBA Plus is a framework that considers how intersecting identity factors, including but not limited to, gender, age, culture, and education levels can shape diverse experiences of project effects. Within this framework, the terms men+ and women+ are used to acknowledge diversity within gender groups, recognizing that individuals may experience impacts differently depending on these intersecting identities.

GBA Plus considerations are applied throughout this section, with each valued component including a dedicated subsection that addresses subgroup-specific effects in its context.Following the collection of the desktop data, information packages were developed and distributed to NWOMC service providers that responded to a request for interview.
The information packages included:

- desktop data, which required validation by key service providers,
- Project summary, and
- tailored interview questions, designed to collect information about resources, capacity, thresholds and targeted information about vulnerable, and at-risk groups (populations that would be considered within the Gender Based Analysis Plus umbrella) within the communities.

The information was reviewed and collaboratively revised based on feedback from the service provider interviews. Once verified, the desktop data and collected qualitative socio-economic data, including information on vulnerable groups, was used to inform the Community Services and Infrastructure and Community Well-being.

Where feasible, additional data from other sources have been added to reflect more current statistics or provide additional information on restrictions or limitations of the data.

In addition to publicly available sources of information, the description of existing conditions was informed by the confidential reports prepared by or for NWOMC:

- A report titled Northwestern Ontario Métis Community Traditional Knowledge and Land Use Study for the Great Bear Gold Mine, prepared for the Northwestern Ontario Métis Community

Great Bear Resources will continue to consider supporting studies and future monitoring identified by Indigenous communities during all phases of the Project.

The use of Indigenous Knowledge received by Indigenous Nations alligns with digital data governance principles for Indigenous data sovereignty, such as OCAP Principles (Ownership, Control, Access, and Possession) that were established by the First Nations Information Governance Centre. Information received by Indigenous Nations relating to land use documentation, cultural and heritage sites, community services and infrastructure, and community well-being is considered proprietary to the respective Indigenous communities.

To maintain confidentiality for these received documents, direct quotation from Indigenous Knowledge studies and documents (including traditional land use studies) are avoided, and the documents are broadly identified as confidential reports, where applicable, throughout this assessment.

Complementing these qualitative sources, the assessment of Indigenous health is conducted through a single comprehensive assessment. This approach relies on the combined findings of the Human Health and Ecological Risk Assessment (HHERA; Appendix N-1) and Health Impact Assessment (HIA; Appendix N-2) for all participating Indigenous communities (i.e., LSFN, WFN, ANA, NWOMC and RLEF). The health subsection includes the assessment and discussion of Indigenous health overall, presenting findings for all five Indigenous communities.

Interactions between the Project and pVCs and fVCs were determined based on professional judgment and technical expertise based on experience with other projects similar in breadth, along with input from consultation / engagement activities.

It is acknowledged that changes to pVCs and residual effects on fVCs represent distinct concepts. However, for the purpose of consistency in reporting across this Section, the terminology of “residual effects” may be applied uniformly to both pVCs and fVCs. This approach supports consistency while recognizing the methodological distinction.

The overall assessment methodology for the Project is further described in Section 6.

13.3.5 Assumptions and the Use of the Conservative Approach

Given the limited information available, the assessment of effects and significance is based on a conservative approach. This means assuming a ‘worst-case’ or less favorable scenario when considering the effect of a change. The details on the use of conservatism in the Indigenous health assessment are provided in the HHERA (Appendix N-1) and the HIA (Appendix N-2).

The available information may not reflect all activities for an Indigenous community and may also reflect cultural sensitivity about sharing such information in a study of this nature. In these instances, information from other sources, such as projects of similar nature or within the same region, was also used to supplement information to inform this assessment of Project-related changes.

The best available information is included, and if new information emerges about physical and cultural heritage sites, there are regulatory processes to identify and manage any such resources. The Project Area will continue to be subject to monitoring, and additional steps will be taken as required to support appropriate consideration of potential cultural and heritage values.

13.4 Influence of Consultation and Engagement

Engagement with NWOMC started in June 2023, and has been ongoing throughout the impact assessment process, and will continue with NWOMC over the life of the Project. Section 3 provides more detail on the extensive consultation and engagement processes to date. The Record of Consultation (Appendix C) includes detailed comments received, and responses provided, during the development of the Impact Statement

NWOMC’s feedback on technical documents and study plans was reviewed in detail during the preparation of the Impact Statement. Comments were assessed against baseline data and technical studies, and revisions were made where appropriate to reflect NWOMC perspectives. The Indigenous Peoples NWOMC and Red Lake/Ear Falls chapters (excluding health) were shared with NWOMC on February 27 2026. A presentation was also shared on interim health results. This approach aimed to maximize the time for NWOMC review.

At the time of writing this document, the majority of the consultation records highlight NWOMCs focus on the development and delivery of their Traditional Knowledge Land Use Study.

While the TKLUS has been a central focus, engagement with NWOMC has also extended to formal agreements, technical discussions, and socio-economic collaboration. In November 2024, Great Bear Resources and NWOMC signed a Relationship Building and Capacity Agreement, and negotiations toward a Community Benefit Agreement have continued since. These agreements established a framework for respectful dialogue and provided capacity funding to support NWOMC’s participation in the Impact Assessment process. Alongside this, Great Bear shared a broad set of technical documents with NWOMC, including the Mercury and Methylmercury Study Plan.

NWOMC submitted detailed comments on the plan in February 2025 and requested additional time for review, which was granted. Socio-economic data collection was also carried out in partnership with NWOMC, who validated desktop data and contributed through interviews with service providers. Project updates were delivered throughout, including an October 20, 2025 session that addressed fish offsetting, species at risk, closure planning, and methylmercury modelling. These contributions have been incorporated into the Impact Statement, helping to reflect NWOMC perspectives across socio-economic, and cultural dimensions of the assessment.

There have been a few concerns raised so far regarding the scope of the Project and assessment study outcomes. All those concerns have been fully captured in this assessment of the NWOMC.

For the purposes of completeness, this assessment takes a conservative approach, and includes criteria and indicators based on concerns expressed by Indigenous Peoples living in the Red Lake and Ear Falls area due to the number of regional services and infrastructure provided to NWOMC members in these areas (Section 14.4).

13.4.1 Impact Statement Valued Components

As required by the Tailored Impact Statement Guidelines (TISG; Appendix A-1), the Impact Statement must identify the pVCs and fVCs of the environment that will be the focal points for the impact assessment. pVCs and fVCs are components of the natural and human environment that are of particular concern or value to participants and that may be affected by the Project.

Great Bear Resources identified a preliminary list of potential pVCs and fVCs based on comments raised during consultation on the Project, as well as data from extensive biophysical and human environment baseline studies, and literature sources.

A preliminary list of pVCs and fVCs was developed and consulted upon during preparation of the Impact Statement as summarized in Section 6. The pVCs and fVCs confirmed as important by participating Indigenous Nations include air, wildlife. lands, water, and people. Based on the TISG and feedback received through consultation, the pVCs and fVCs were identified for assessment in the Impact Statement include Indigenous Peoples and their interests: Community Services and Infrastructure; Current Use of Lands and Resources for Traditional Purposes; Indigenous Physical and Cultural Heritage and Structures, Sites, or Things of Significance; Community Well-being; and Health.

The NWOMC TKLUS, which was presented to Great Bear Resources at a meeting on October 15, 2025, also identifies the following valued components: wildlife related to hunting and trapping; fishing; gathering plants and natural materials; water, watersheds, rivers, and streams; climate change; areas of use and occupation; travel; land use patterns; knowledge transmission; sense of place; and governance, management and stewardship.

On October 8, 2025, a Project update was provided to members of the NWOMC Regional Community Councils, which also included an overview of Fish Compensation, Species at Risk, and Closure Planning. Additional workshops were offered as needed.

13.4.1.1 Community Services and Infrastructure

During the Project Overview meeting in September 2023, NWOMC raised concerns regarding the demands the Project could place on the existing power infrastructure (there are currently regular power outages, and changes in population related to the Project may further these challenges with electricity reliability), and sustaining Project-related population growth in the area (Zone One Métis Nation of Ontario 2023).

Based on engagement and consultation to date, and confidential reports prepared by or for NWOMC, the primary issue under community services and infrastructure (Section 13.5) is increased power demands by the Project will reduce the available power for area residents.

13.4.1.2 Current Use of Lands and Resources for Traditional Purposes

While early questions submitted by NWOMC for Great Bear Resources were focused on the general scope of the Project, the balance of communications since the September 2023 Project kick-off meeting have been centred around the Traditional Knowledge Land Use Study (TKLUS) that NWOMC was developing.

NWOMC acknowledged the interconnectedness of their study (Northwestern Ontario Métis Community, email communication, March 14, 2025) with many of the disciplines being evaluated by the Impact Statement (e.g., Terrestrial Wildlife, Fish and Fish Habitat, Socio-Economic, and Surface Water Quality and Quantity).

Key information from the TKLUS report includes details on land use, large and small game, birds and waterflow, moose habitat, trapping, fishing, plant and natural materials harvesting, water, cultural sites, overnight stay sites, travel and knowledge transmission. The Project Area (PA) was identified as containing habitat that supports large and small game harvesting. Moose habitat was also identified in the PA, with terrestrial wildlife harvesting occurring in the LSA and RSA. Traditional land uses, including plant harvesting, hunting/trapping and fishing were noted in the LSA.

Based on available consultation information from NWOMC, key issues incorporated under current use of lands and resources for traditional purposes (Section 13.6) include: changes to access, availability, and quality of experience related to terrestrial wildlife harvesting (wildlife and land quality), changes to access, availability, and quality of experience related to traditional aquatic harvesting (fishing and water quality), changes to access, availability, and quality of experience related to plant harvesting (vegetation and land quality), and change in access to culturally important areas and the experience (traditional habitation, spiritual, and cultural sites).

13.4.1.3 Indigenous Physical and Cultural Heritage Sites, Areas or Things of Significance

The NWOMC interim and final TKLUS have been the main context in which information on NWOMC culture and heritage have been provided in relation to the Project. The final TKLUS notes that, of the Métis VCs used to frame NWOMC's interests, the culture-based Métis VCs of knowledge transmission and sense of place were identified by study participants. Information collected for TKLUS did not highlight physical heritage sites and areas; however, it emphasized current use of areas around the PA for cultural activities, as well as the central role of traditional land- and water-based activities in passing Métis knowledge and culture to new generations.

In particular, active plant harvesting in an area of the LSA along Highway 105, adjacent to the PA, was noted as an important context for intergenerational teaching and learning. The potential for Project-related sensory effects to displace plant and wildlife harvesting and disrupt knowledge transfer about harvested resources in the PA and LSA was noted.

Based on engagement and consultation to date with NWOMC, key issues incorporated under physical and cultural heritage, and structures or things of significance (Section 13.7) include: alteration or loss of these physical and cultural areas; associated changes to the quality of experience and practices of NWOMC members potentially undertaking traditional activities in these locations; and implications for cultural continuity and NWOMC's ability to transmit Indigenous Knowledge intergenerationally.

13.4.1.4 Community Well-being

At the September 2023 Project kick-off meeting, NWOMC questioned the impacts the Project-related population could bring to the Red Lake and Ear Falls communities, which is in alignment with concerns expressed by the Indigenous Peoples living in the two communities, as well as LSFN and WFN. This included concerns with changes in power use, resource challenges (e.g., housing, power supply, skilled local workers, health care), and Indigenous workforce quotas.

Regarding potential changes to water quality, Great Bear Resources shared a Mercury Study Plan with the Métis Nation of Ontario Lands, Resources and Consultation, who responded February 2025 with 23 general feedback comments to improve the accuracy of the Study Plan, including additional monitoring, and the inclusion of plants as bioindicators (Métis Nation of Ontario, email communication, February 4, 2025).

Based on engagement with regional service providers in the Kenora District and consultation to date with NWOMC, and confidential reports prepared by or for NWOMC, key issues incorporated under community well-being (Section 13.8) include: increased cost of living in the region due to the changes in population; food security and access to hunting areas; increase of crime within the community; potential impacts to water, wildlife, fish, and vegetation that will impact the health and well-being of the community members.

13.4.1.5 Health

This section provides a summary of the past and ongoing activities that have supported the discussion, scoping and assessment of Indigenous health.

As detailed in Impact Statement Section 3 (Participation and Engagement), engagement activities between Great Bear Resources and Indigenous communities have included in-person and virtual small group meetings, in-person and virtual community meetings, site visits, small workshops, formal presentations, public engagements, one-on-one in-person engagements, letters, and emails.

Feedback from Indigenous Nations and stakeholders has directly influenced the assessment of potential effects on Indigenous health and the development of mitigation and enhancement measures, including:

- **Potential Points of Reception:** Confidential reports in the form of Traditional Knowledge Land Use Study (TKLUS) for LSFN, WFN, and NWOMC included information on land and resource use, species of importance for subsistence and cultural purposes, and cultural areas of importance.

The assessment of human health, including the selection of surrogate species and points of reception (PORs) used in the HHERA included consideration of this information. Further detail on this process is provided in Section 4.4 of Appendix N-2.

- **Wild Rice Enhancement Project:** At the request of LSFN and WFN, Great Bear Resources has funded a collaborative study to address the loss of historic Wild Rice production on Wabauskang Lake. The enhancement project, located on the WFN reserve and supported by LSFN, will develop options for habitat restoration and knowledge-sharing on sustainable harvesting practices, supporting long-term stewardship by community members. Wild Rice has been highlighted as a key interest by Indigenous communities. This mitigation measure supports Indigenous health and wellness.
- **Contamination:** In response to concerns about waterfowl exposure to contaminants (e.g., tailings and toxins), the Project has committed to robust tailings management, regular environmental monitoring, and transparent communication of results. Wildlife will be discouraged from inhabiting contact water ponds, including but not limited to the Tailings Management Facility (TMF) pond, mine water pond and collection water pond. In order to address concerns surrounding the possibility of the Project further contributing to ongoing mercury levels and risk of methylation, Great Bear Resources undertook a study requested by IAAC to evaluate potential methylmercury generation from Project in downstream watersheds and evaluated potential risk to human health associated with fish consumption. This study can be referenced in Appendix T.
- **Environmental monitoring and Indigenous participation:** Great Bear Resources has committed to ongoing engagement with Indigenous environmental monitors and the Environmental Management Committee, to support Indigenous knowledge informing the monitoring of species of importance.
- **Communication and adaptive management:** The Project will maintain open communication with communities regarding monitoring results, adaptive management measures, and opportunities for community input throughout the Project lifecycle.

At the time of writing this document, the majority of the consultation records highlight the NWOMC focus on the development and delivery of their TKLUS.

NWOMC indicated that environmental contamination could change the experience of land users and result in changes to food security, the transfer of cultural knowledge and health. NWOMC noted that potential surface water contamination could adversely affect the safety and quality of traditional food sources, including hunted and trapped game, harvested plants and fish. NWOMC raised concerns about the potential for water contamination in the larger English River system and emphasized its effects on fish habitat, health and populations was also a concern.

Additionally, concerns were raised that visual and sensory disturbances, traffic, habitat loss due to vegetation clearing, changes to air quality as a result of Project activities, as well as changes to water quality may change the experience of land users, change access to traditional harvesting areas, change resource quality, and pose health risks.

NWOMC also raised concerns that the increased population due to employment may result in changes to hunting and fishing around the Project, affecting food availability, as well as increased drug and alcohol use that could impact communities and local infrastructure, including healthcare.

Great Bear Resources provided NWOMC their applicable Indigenous Peoples effects assessment chapter and the RLEF effects assessment chapter on date February 27 ,2026 (excluding health). A presentation was also shared on interim health results. This approach aimed to maximize the time for NWOMC review. Great Bear Resources will address comments following submission of the Impact Statement.

Based on engagement and consultation to date, and confidential reports prepared by or for NWOMC, key considerations incorporated under health include: ongoing communication, increased cost of living due to the increase in population; food security and access to water and harvesting areas; increased use of drugs and alcohol; potential effects to water, wildlife, fish, and vegetation that could potentially affect the health of community members.

13.5 Community Services and Infrastructure

Community services and infrastructure was selected as a criteria to evaluate how the Project may interact with the capacity of regional and local facilities, services, and infrastructure, including transportation networks utilized by NWOMC. These components are assessed individually and collectively. Collectively, they help evaluate the broader social and economic conditions of NWOMC that depend on the stability and reliability of these programs, services and systems. The assessment of community services and infrastructure includes a review of:

- Housing and accommodations (including short term rentals and temporary lodgings)
- Social services (e.g., childcare, daycare, Elder care, youth programs, community wellness workers, women's shelters, and mental health and addictions counselling)
- Healthcare services (including primary and secondary care)
- Emergency response services (e.g., fire, police, ambulance, and other emergency responders)
- Infrastructure (e.g., power, utilities, landfill and waste disposal, water and wastewater treatment)
- Traffic networks and infrastructure.

This assessment focuses on services available specifically to NWOMC, while also acknowledging the regional health, social, and education programs and infrastructure accessed by NWOMC in the Kenora District.

For a more comprehensive assessment of predicted changes to Indigenous Peoples' access to services and infrastructure in the Red Lake and Ear Falls area, including broader systems not specific to NWOMC, refer to Section 14, Predicted Changes to Indigenous Peoples living in the Red Lake and Ear Falls Area.

13.5.1 Spatial Boundaries

There are three study areas within the spatial boundaries. They are the Project Area (PA), the Local Study Area (LSA), and the Regional Study Area (RSA), which includes both the PA and the LSA. The spatial boundaries used for the assessment of community services and infrastructure are shown in Figure 13.5-1 and are defined:

- The PA is defined as the footprint of the Project including all temporary and permanent areas associated with the Project, as well as a buffer to allow for design optimizations prior to construction and over the mine life (Section 6.4). The PA is approximately 3,349 hectares (ha) in size.
- The LSA is the area within which Project-related effects may reasonably be expected to occur and can be predicted or measured with a reasonable degree of accuracy and confidence. The regions that the Project's socio-economic demands are expected to influence, possibly causing direct, indirect and / or induced effects on community services and infrastructure, include the Indigenous communities of ANA, LSFN,NWOMC (the community of Métis citizens in the region), WFN, and Indigenous Peoples living in the Red Lake and Ear Falls area.
- The RSA encompasses the LSA and is used to provide regional context for the significance of residual effects. It is also the area within which potential for cumulative effects of the Project, in combination with other past, present or reasonably foreseeable projects or activities are considered. The region surrounding the LSA and the PA may also experience direct, indirect, and / or induced effects on community services and infrastructure due to the Project's socio-economic demands. This could include transportation corridors, or regionally operated services. The RSA for community services and infrastructure is the District of Kenora. The RSA is the region which cumulative effects on the pVCs and fVCs are likely to occur.

These boundaries are consistent with those used for other social valued components, including community well-being (Section 13.8) and health (Section 13.9).

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KAHNAHMAYKOOSAYSEEKAHK
WOODLAND CARIBOU PROVINCIAL PARK (WILDERNESS CLASS)
TROUT LAKE PROVINCIAL PARK (NATURE RESERVE CLASS)
MUNICIPALITY OF RED LAKE
HIGHWAY 125
PAKWASH PROVINCIAL PARK (NATURAL ENVIRONMENT CLASS)
TOWNSHIP OF EAR FALLS
HIGHWAY 105
WEST ENGLISH RIVER PROVINCIAL PARK (WATERWAY CLASS)
MAYNARD LAKE PROVINCIAL PARK (NATURE RESERVE CLASS)
TIDE LAKE PROVINCIAL PARK (NATURE RESERVE CLASS)
Asubpeeschoseewagong Netum Anishinabek
Grassy Narrows
Wabauskang First Nation
WINDIGO POINT PROVINCIAL PARK (NATURE RESERVE CLASS)
Lac Seul First Nation
MUNICIPALITY OF SIOUX LOOKOUT

Olive Lake, Kahnahmaykoosaysensikahk/ Valhalla Lake, Little Vermilion Lake, Coli Lake, Linge Lake, Golden Creek, Bloodvein River, Paishk Lake, Knox Lake, Alford Lake, Ranger Creek, Red Lake, Hammell Lake, Indian House Lake, Otter Lake, Ranger Lake, Douglas Lake, Parker Lake, Keg Lake, Starrau Channel, Embryo Lake, Telescope Lake, Medicine Stone Lake, Upper Medicine Stone Lake, Two Island Lake, Gullrock Lake, Moose Creek, Caribou Creek, Ten Mile Creek, Dixie Creek, Pakwash Lake, Bruce Lake, Longlegged Lake, Kilburn Lake, Confusion Lake, Pineneedle Lake, Sydney Lake, Rowdy Lake, Camping Lake, Wegg Lake, Barnston Lake, Goose Lake, Sumach Lake, Conifer Lake, Unexpected Lake, Wilcox Lake, Roger Lake, Fletcher Lake, Oak Lake, Anishinabi Lake, Wine Lake, Lac Seul, Scout Lake, Salvesen Lake, Treelined Lake, Scotty Lake, Maynard Lake, Lennan Lake, Bornite Lake, Aerobus Lake, Sup Lake, Wabaskang Lake, Perrault Lake, Ball Lake, Separation Lake, Brown Bear Lake, Scenic Lake, Wabigoon River, Indian Lake, Big Fox Lake, Little Fox Lake, Lount Lake, Delaney Lake, Wonderland Lake, Segise Bay, Segise Lake, Cliff Lake, Cedar Lake, Ord Lake, Thaddeus Lake, Clay Lake, Big Canon Lake, Williams Lake, Clear Lake, Whitefish Lake, Lost Lake, Pelican Lake, Route Lake, Big Vermilion Lake, Aerofoil Lake, Celt Lake, Fork Creek, Pilot Lake, Wenasaga Lake, Chukuni River, Sandy Creek, Cedar River, Anishinabi River, Wapesi Lake, Aerial Lake, Sunlight Lake, Broad Lake, Broadcast Lake, Twain Lake, Wapesi River, Spruce River, Altimeter Creek, Hall Creek, Lizamia Creek, Wegwas Creek, Williams Creek, Pelican Creek, Route Creek, Ord River, Segise River, Cat River, Pashkokogan River, Wenasaga River, Papaonga River, Papaonga Lake, Whitemud Lake, Whitemud River, Bluffy Lake, Fly Lake, Little Bear Lake, Little Trout Lake, Trout Lake, Joyce Lake, Joyce River, Uchi Lake, Uchi River, Slate Lake, Jubilee Lake, Wakeman Lake, Jeanette Lake, Tarpley Lake, Sesikinaga Lake, Sesikinaga River, Hailstone Lake, Margaret Lake, Perrigo Lake, Confederation Lake, Woman River, Woman Lake, Narrow Lake, Okanse Lake, Washagomis Lake, Bertha Lake, Birch Lake, Birch River, Seagrave Lake, Springpole Lake, Gull Lake, Shabumeni Lake, Shabumeni River, Bathurst Creek, Ten Mile Creek, Moose Creek, Caribou Creek, Trout Lake River, Uchi River, Roadhouse River, Wesley River, Brokenmouth River, Pikay Creek, Whitemud River, Williams Creek, Ord River, Cedar River, Anishinabi River, Segise River, Cat River, Pashkokogan River, Pelican Creek, Route Creek, Pauline River, Lost Lake, Big Vermilion Lake, Lake Creek, Dixie Creek, Rice Creek, Longlegged River, Confusion River, Bloodvein River, Camp Pine River, Oliver Creek, Separation Creek, Deadee Creek, Pinewood Creek, Ranger Creek, Golden Creek, Bug River, Moose Creek, Ten Mile Creek, Caribou Creek, Trout Lake River, Joyce

13.5.2 Existing Conditions

A summary of existing conditions for community services and infrastructure, and the methods used to characterize baseline conditions is presented. Additional details are provided in the Socio-Economic Baseline Study (Appendix O-1).

Current services and infrastructure that are specific NWOMC is included, however, it is acknowledged that Métis citizens also rely on services and infrastructure available in Red Lake, Ear Falls, and other larger centers within the RSA, such as the City of Kenora. Many essential services, such as hospitals, secondary education institutions, and specialized social programs, are only available in these larger communities and may require travel to access.

While the discussion centers on NWOMC-specific service delivery, Section 14, Predicted Changes to Indigenous Peoples living in the Red Lake and Ear Falls Area, provides insight for a broader assessment of general community services and infrastructure used by NWOMC in the Red Lake and Ear Falls area.

13.5.2.1 Methods

A description of existing community services and infrastructure conditions for Red Lake, Ear Falls, and Kenora District is presented. These existing conditions were collected through desktop research of publicly available data sources, including statistical data from the 2021 Census and other public sources, and if available, qualitative information gathered through interviews with key service providers and community organizations.

The TISG also states that the description of baseline economic conditions must include “any relevant treaty provisions pertaining to economic development for Indigenous Peoples”. Great Bear Resources is not aware of any treaty provisions pertaining to economic development for NWOMC.

Due to limitations in community-specific statistical information for NWOMC, regional community-level data was used where relevant to characterize the existing conditions. This data was supplemented with information shared during interviews with NWOMC service providers to provide additional context and clarify community level considerations.

Additional information from related criteria sections, including community well-being, the Project Description, and employment and economy studies were used to understand the potential for effects on community services and infrastructure.

This quantitative and qualitative information is used to describe the current existing conditions. The potential Project-related changes to community services and infrastructure are relative to these existing (or baseline) conditions. The assessment of potential effects from these changes informs the development of appropriate mitigation measures, which in turn support the prediction of residual effects. The finding of this assessment will inform the mitigation measures and long-term monitoring proposed for the Project.

13.5.2.2 Description

Community services and infrastructure within the RSA are provided primarily by the municipalities within the Kenora District, including the Municipality of Red Lake and the Township of Ear Falls. Métis citizens can also access regional services and support provided through the Métis Nation of Ontario (MNO).

The demographic characteristics of the Métis citizens in the region (the NWOMC) and information on community services, infrastructure, and related uses, values, and concerns identified through engagement with the NWOMC are summarized.

Community services and infrastructure reflect the overall social and economic conditions that support Métis citizens living within the RSA. The existing capacity and challenges for infrastructure and service areas are closely connected with other criteria including:

- Current Use of Lands and Resources for Traditional Purposes (Section 13.6)
- Community Well-being (Section 13.8)
- Health (Section 13.9)
- Local and Regional Economy (Section 7.16).

Existing conditions are based on both statistical information (e.g., income, employment, housing) and insights from some community-based organizations. When presented together, these sources offer a foundation for evaluating how potential future changes may affect overall well-being in the LSA and RSA.

For the purposes of this assessment, the focus will be primarily on the services that are provided by the MNO to the NWOMC. The MNO delivers provincial programs to NWOMC members, and it is also recognized that NWOMC members have access to additional services available within the Kenora District, as well as those located in Red Lake and Ear Falls (Chapter 14).

13.5.2.2.1 Accommodation and Lodging

In addition to the regional services (see Section 14), MNO offers housing and homelessness services for members of NWOMC, through MNO's Housing and Infrastructure Branch. These services include:

- Métis Housing Stabilization Program: Provides financial assistance and housing supports to prevent homelessness and promote stable housing.
- Emergency Repair Program: Supports urgent home repairs to provide safety for Métis citizens.
- Financial Literacy Program: Offers workshops and one-on-one support to improve budgeting skills and financial management.
- Home Buyers Contribution Program: Assists first-time Métis home buyers with down payment and closing costs.
- Infinity Property Services: A Property management agency providing affordable housing options to Métis citizens (The Métis Nation of Ontario 2023).

There is limited data on current capacity, waitlists, or availability in the region.

13.5.2.2.2 Municipal, Provincial and Non-Profit Service Delivery Capacity

13.5.2.2.2.1 Recreation and Leisure

In addition to the regional services (see Section 14), MNO offers an Extra-Curricular Reimbursement Program for members of the NWOMC. Through this program, families can apply to have child extra-curricular fees reimbursed, including but not limited to:

- March Break camps;
- Summer camps;
- Early Learning science, technology, engineering and math (STEM) Programs;
- Early Learning Arts (music, visual arts, dance, drama) and Language Courses;
- Sports and Skills Development;
- Community Programs including Scouting and Girl Guides; and
- Virtual / Online programs (Métis Nation of Ontario 2023).

13.5.2.2.2.2 Social Services

Table 13.5-1 outlines social services available to NWOMC members, in addition to those available in the Red Lake and Ear Falls area in which they live.

Table 13.5-1: Social Services - Métis Nation of Ontario, 2025

Social Services	Description
Community Support Services (CSS) Program	• Helps Métis individuals, especially seniors and those with chronic or terminal illnesses, remain independent in their homes by providing culturally appropriate, practical support. • Through regionally based CSS Coordinators, the program offers information and advocacy to access services like Meals on Wheels, adult day programs, home care, and income supports, friendly visits, and safety checks, medical transportation, caregiver respite, and bereavement support, assistance with applications, and referrals to community agencies (The Métis Nation of Ontario 2025d).
Métis Community Justice Program	• Supports Métis citizens through culturally grounded, restorative approaches to justice. • Offers legal education through workshops and resources, and the Métis Court Worker Program, where court workers provide guidance and support throughout the legal process. • Includes the Gladue Aftercare Program, helping Métis citizens reintegrate after involvement with the justice system, and the Métis Community Diversion program, which works with Crown prosecutors to offer alternatives to traditional sentence ING. • Justice liaisons further assist with legal system navigation, advocacy, and referrals (The Métis Nation of Ontario 2025a).

Social Services	Description
Community Diversion Program	• Provides a restorative-justice alternative to traditional criminal sentencing for Métis citizens charged with offences, emphasizing healing, accountability, and cultural reconciliation. • Delivered through regional Restorative Justice Coordinators, Métis Court Workers, and Justice Liaison Coordinators who organize diversion circles, intake and action-plan development, court support, and post-diversion follow-up, leveraging Métis values, Elders, peer volunteers, and internal supports such as mental health and victim services. • Not currently available to the NWOMC, only available in Region 8 and Region 6 but has plans to expand across Ontario and actively involves community engagement to shape its implementation through regional sessions (The Métis Nation of Ontario 2025a).
Métis Family Well-being Program	• Provides free, culturally grounded support to Métis children, youth (ages 0-18), and families who are healing from violence or navigating systems such as child welfare or justice systems. • Funded by Ontario's Ministry of Children, Community and Social Services, the program offers individualized and family wellness planning, one-on-one peer support, advocacy, referrals, and culturally based programming. • Coordinators assist families in navigating school, health, and court systems while also connecting them with Métis knowledge and community gatherings. • Activities may include after-school programs, workshops, family culturally events, and leadership development (The Métis Nation of Ontario 2025h).
Community Wellness Worker Program	• Funded through Ontario's Indigenous Healing and wellness strategy and administered by MNO's Healing and Wellness branch. • Offers culturally informed client-focused support across Ontario including in Kenora. • Coordinators provide one-on-one coaching and advocacy to individuals and families, particularly those affected by family violence or needing holistic wellness support. • Services include wellness needs assessments, referrals and help filling in forms, crisis intervention, peer counselling, traditional sharing circles, fitness and recreation activities, nutrition education, and broader community workshops and gatherings. • Aims to reduce family violence and promote health through culturally rooted prevention and education efforts, delivered both in person and virtually (The Métis Nation of Ontario 2025e).
Anti-Human Trafficking Program	• Supports Métis communities by raising awareness, building partnerships, and delivering trauma-informed education and resources at both a provincial and regional level. • Coordinators develop tools and training, facilitate workshops and drop-in support, and offer confidential, client-centred services to individuals currently being trafficked or at risk. • Operates alongside MNO's broader Victim Services and Community Wellness effort (The Métis Nation of Ontario, 2025b).

13.5.2.2.2.3 Health Services, Elder Care, Mental Health and Addiction Services

Table 13.5-2 outlines health services available to NWOMC, in addition to those available in the municipalities in which they live. These MNO programs focus on holistic, culturally grounded approaches to health, emphasizing family well-being, maternal and infant care, and mental health supports tailored to Métis citizens across Ontario.

Table 13.5-2: Health Services – Métis Nation of Ontario, 2025

Health Services	Description
Mental Health and Addictions Program	• Offers culturally grounded and accessible support to Métis citizens of all ages, in person, by phone, or via video call. • Services include comprehensive assessments, individual counselling for issues like trauma, stress, depression, and addiction, family therapy, and addiction-focused treatments such as gaming, technology dependency, tobacco cessation, and gambling supports. • Created an Intensive Community Based Substance Use Program by offering 9-12 months of virtual group and individual counselling integrated with Métis cultural teachings. • The program emphasizes holistic healing, encompassing mental, emotional, spiritual, and cultural well-being and connects users to crisis lines, peer support, health promotion initiatives, and OneMNO navigation (The Métis Nation of Ontario 2025g).
Métis Healthy Babies Healthy Children Program	• Funded by Ontario's Indigenous Healing and Wellness Strategy and delivered by the MNO. • Is a free, culturally grounded pre-natal to age six support service for Métis families across the province. • Offers pre-natal education, post-natal care, home visits by health care workers, parenting preparation, breastfeeding and nutrition guidance, child development activities, advocacy, crisis intervention, emergency supplies such as diapers and formula, and referrals to services such as infant development program and FASD support. • Coordinators prioritize at-risk families through voluntary participation (The Métis Nation of Ontario 2025i).
Canada Pre-Natal Nutrition Program	• The Canada Pre-Natal Nutrition Program if offered through the Métis Healthy Babies Healthy Children initiative to support Métis Families, particularly expectant mothers and caregivers of children aged 0-6 by providing free, culturally safe services across the province. • Services include pre-natal nutrition education, breastfeeding support, access to healthy foods and vitamins, emergency supplies like diapers and formula, as well as home visits, group sessions, and referrals to community resources. • Services are delivered by MNO coordinators and community health workers, with a focus on promoting maternal and infant health while reducing barriers to care (The Métis Nation of Ontario 2025c).
Source: (Métis Nation of Ontario 2023)	

While these province-wide programs provide culturally specific services, access within the RSA remains limited. The Community Safety and Well-Being Plan for Red Lake and Ear Falls identifies gaps in the availability of local emotional health and addiction services, highlighting that residents often rely on regional providers or virtual delivery models. This creates challenges for timely and culturally appropriate care, particularly in smaller communities where transportation and confidentiality barriers may deter individuals from seeking support (MNP LLP 2020).

13.5.2.2.2.4 Burial Services

NWOMC have access to burial services in the municipalities in which they live (See Section 14 for more detail).

13.5.2.2.2.5 Educational Services and Facilities

Table 13.5-3 outlines educational services available to NWOMC members, in addition to those available in the municipalities in which they live (See Section 14 for more detail).

Table 13.5-3: Educational Services - Métis Nation of Ontario, 2025

Educational Services	Description
Education Support Advocacy Program	• Helps MNO citizens navigate the Ontario public school system from Kindergarten to Grade 12 by offering virtual support for a range of challenges, including attendance issues, suspensions, individual education plans, behaviour and safety plans, individual placement review committee meetings, mental health support, learning concerns, and improving communication between home and school. • Aims to enhance student and parent understanding of school processes, strengthen advocacy skills, and support the overall wellbeing and confidence of Métis students.
Post-Secondary Education Program	• Supports Métis Learners in post-secondary education through programs that improve access, success, and culturally relevant services. • Their six focus areas of the PSEP include student success and transitions, tailored curriculum and institutional changes, community involvement, research and curriculum development, partnerships with post-secondary institutions, and direct student support.
Early Learning and Child Care Program	• Aims to improve access to culturally grounded early learning opportunities for Métis Families by fostering community development and providing supportive services. • Following the signing of the Canada-Métis Nation Early Learning and Child Care (ELCC) Accord in 2019, which committed over $45 Million over 10 years, the Métis Nation of Ontario gained the authority to design and deliver Métis-specific ELCC services across Ontario. • Focuses on expanding access, creating safe and inclusive spaces, and offering culturally relevant programming that supports children's growth and connection to the land and Métis culture.

Educational Services	Description
Employment / Training Programs	• Supports Métis citizens in gaining meaningful, long-term employment. • Focuses on high-demand sectors such as apprenticeships, tourism and hospitality, energy, housing, and mining, and provide targeted training, job placements, and financial assistance. • Initiatives include the Métis Employability Program, Métis Apprenticeship Program, Métis Wage Subsidy Program, Summer Career Placement Program, and Métis Youth Program, along with supports for mobility, entrepreneurship, and culture-based careers. • Partners with employers and post-secondary institutions to create strategic training and job opportunities tailored to Métis learners and job seekers. • Designed to reduce barriers, enhance job readiness, and help individuals secure and sustain employment in both traditional and emerging industries across Ontario.

13.5.2.2.2.6 Emergency Services

NWOMC members have access to emergency services provided within the municipalities in which they reside. For further details on the availability and capacity of these services, refer to Section 14, Indigenous Peoples living in the Red Lake and Ear Falls area.

13.5.2.2.3 Infrastructure

NWOMC members access infrastructure and transportation services through the municipalities in which they live. Additional information on regional systems, municipal infrastructure, and service capacity is provided in Section 14, Indigenous Peoples living in the Red Lake and Ear Falls area.

13.5.3 Potential Effects

The potential interactions between proposed Project-related activities and community services and infrastructure for the NWOMC are used to identify potential effects (positive and negative), and whether they are direct or indirect effects.

A detailed overview of the Project's potential interactions with community services and infrastructure for NWOMC is presented in Table 13.5-4. Project interactions are characterized as either having no interaction (-) or a potential interaction (✓). Project activities that result in no interaction were not considered further in the assessment. Project interactions that were identified as a potential interaction are carried forward to the potential effects assessment to determine the positive (desirable and beneficial) and negative (undesirable or adverse) potential effects on the community services and infrastructure criteria.

Table 13.5-4: Potential Interactions Between Project Activities and Community Services and Infrastructure – Northwestern Ontario Métis Community

Project Component / Activity	Change in Housing and Accommodations	Change in Municipal, Provincial, and Non-Profit Service Delivery Capacity	Change in Transportation Infrastructure
Construction Phase			
Site preparation activities	-	-	-
Establishment and operation of water management and treatment facilities	-	-	-
Open pit mining	-	-	-
Underground mining	-	-	-
Management of rock and unconsolidated materials in stockpiles	-	-	-
Establishment of onsite fish habitat and compensation measures	-	-	-
Establishment of onsite aggregate operations	-	-	-
Construction of the starter embankments for the tailings management facility	-	-	-
Construction and operation of buildings and infrastructure	-	-	-
Waste management	-	-	-
Commissioning of the process plant	-	-	-
Power supply	-	-	-
Employment and expenditures	✓	✓	✓
Operations Phase			
Underground mining	-	-	-
Mining of the LP Central pit	-	-	-
Management of rock and unconsolidated materials in stockpiles	-	-	-
Process plant operation	-	-	-
Management of desulphurized tailings in the tailings management facility	-	-	-
Management of concentrate tailings and contact water in the Viggo management facility	-	-	-
Operation of water management and treatment facilities	-	-	-
Construction of a mine water pond	-	-	-

Project Component / Activity	Change in Housing and Accommodations	Change in Municipal, Provincial, and Non-Profit Service Delivery Capacity	Change in Transportation Infrastructure
Operation and maintenance of buildings and infrastructure	-	-	-
Waste management	-	-	-
Power supply	-	-	-
Progressive reclamation activities	-	-	-
Employment and expenditures	✓	✓	✓
Closure Phase			
Active closure	-	-	-
Passive closure	-	-	-
Final reclamation	-	-	-
Employment and expenditures	✓	✓	✓

Legend: ✓ = Interaction exists
- No interaction exists

The assessment considers potential Project effects on community services and infrastructure for NWOMC as a result of these interactions. This considers the potential effects on current conditions for housing and accommodations, community social and health services, emergency services, infrastructure (including waste, water, power, and sewage facilities), and local transportation infrastructure. These potential effects informed the selection and design of mitigation measures (in Section 13.5.4) to reduce, avoid, and minimize negative potential effects, and enhance positive potential effects.

13.5.3.1 Construction Phase

The construction phase of the Project is expected to occur over a three-year period and will include preparation of the site and the construction of Project infrastructure. The construction phase is expected to result in short-term population increases due to non-local workforce population growth. This may change short-term demand for housing and temporary accommodations, and place increased and temporary demands on local infrastructure and services.

Collectively, these interactions could affect local NWOMC members living within the LSA, and across the RSA

13.5.3.1.1 Change in Housing and Accommodation

During the construction phase, the Project is expected to drive temporary population growth within the region due to an influx of construction workers for a period of three years. Workforce demands are anticipated to peak during this phase, with approximately 1,300 workers required in the first year, and around 1,000 workers staying on site at any given time. The Project will aim to source workers locally where possible.

To meet accommodation needs, the Project includes an on-site camp. The camp is designed to accommodate approximately 1,000 people on a temporary basis during construction and approximately 300 people during operations The camp will support construction-related workforce accommodations as well as early development of the LP Central pit and underground mine.

If on-site accommodations are not available at the time when workers are needed, particularly during early construction activities, there may be short-term demand for offsite housing and rental properties.

Other temporary accommodations such as hotels, motels, and lodges in Red Lake and Ear Falls may also be required for specialized or short-duration service providers. During construction, the use of these facilities is expected to be limited.

While there are housing-specific services available to NWOMC (including the Housing Stabilization Program, and the Emergency Repair Program listed in section 13.5.2.2) which aim to improve housing stability, the effectiveness of these services are difficult to assess due to limited primary and secondary data. Therefore, during the construction phase of the Project, there is potential for indirect effects if temporary workers seek offsite accommodations in surrounding communities, which could reduce the availability of affordable housing options for NWOMC households or increase pressure on already limited housing supplies.

13.5.3.1.2 Change in Municipal, Provincial and Non-Profit Service Delivery Capacity

Potential interactions between Project activities and service delivery capacity for NWOMC members rely on the same municipal, provincial, and non-profit systems assessed in Section 14 Indigenous Peoples Living Off-Reserve in Red Lake and Ear Falls. Given that some Project workers will be housed in on-site accommodations, only limited indirect pressures on community services are anticipated. However, if some workers or their families temporarily relocate to nearby communities, modest changes in demand for housing, healthcare, childcare, and social supports could occur. These changes would affect NWOMC members primarily through shared service systems.

Population increases may also affect childcare and education systems, where staff retention and affordability already present barriers to service continuity. MNO-administered programs, such as the Healthy Babies Healthy Children and Mental Health and Addictions initiatives (see Section 13.5.2.2.2), may help enhance service accessibility and provide culturally specific support to NWOMC members. In remote areas like Red Lake and Ear Falls, school systems already face challenges recruiting and retaining teachers due to limited housing availability and service infrastructure. Transportation barriers remain a particular challenge for Indigenous students living outside of core town centres or traveling from more remote locations. Without proactive planning, these cumulative pressures could lead to persistent gaps in service availability and accessibility for both existing and new residents. These factors influence not only educational attainment but also family well-being, caregiver stress, and children’s social development

Given that some Project workers will be housed in on-site accommodations, only limited indirect pressures on community services are anticipated. However, if some workers or their families temporarily relocate to nearby communities, modest changes in demand for housing, healthcare, childcare, and social supports could occur. These changes would affect NWOMC members primarily through shared service systems.

MNO-administered programs, such as the Healthy Babies Healthy Children and Mental Health and Addictions initiatives (see Section 13.5.2.2.2), may help enhance service accessibility and provide culturally specific support to NWOMC members.

However, data are insufficient to determine whether these programs could offset local service capacity challenges during Project construction and operations.

13.5.3.1.3 Change in Transportation Infrastructure

Transportation infrastructure in the region is currently limited, particularly active and public transit options. Access to affordable and reliable transportation remains a challenge for residents in some parts of the Red Lake municipality, particularly for those without private vehicles (Stirling-Kattler 2025). The Project is not expected to create substantial strain on the regional transportation network or public transportation services

Traffic volumes along regional highways are currently low, and no substantial change in local traffic levels are anticipated due to construction activities or Project-related population growth. During construction, there will be limited personal vehicle traffic, with carpooling, shuttle busses, and other consolidations employed for Project employees working rotational shifts.

Bussing may be employed to transport contractors and employees from larger hubs, such as Thunder Bay and Winnipeg, during the construction phase. Additional use of the Red Lake airport may be used for rotational workforce. These approaches would also help consolidate workforce movement and minimize traffic effects on local roads.

13.5.3.2 Operations Phase

The operations phase is anticipated to be a 26-year period. Project activities during this phase are expected to result in long-term population stability, sustained workforce presence, and change in demand on local infrastructure and services for Red Lake and Ear Falls populations including NWOMC members. This section outlines the potential effects on community services and infrastructure during operations, based on housing affordability and availability, community social and health service capacity, and local infrastructure and transportation capacities. Collectively these interactions could negatively affect local NWOMC members living within the Red Lake and Ear Falls area.

13.5.3.2.1 Change in Housing and Accommodations

During the operations phase, the Project is expected to result in sustained population growth in the Red Lake and Ear Falls area due to a long-term workforce presence. Peak employment is anticipated to reach approximately 1,100 workers during periods when both the LP Central pit and underground mines are active. When only underground mining is underway, the workforce is expected to decrease to approximately 700 workers. To accommodate this workforce, the Project will include an on-site operations camp with a capacity of 300 personnel. This facility is intended to house a portion of the workforce on a rotational basis.

If the operations workforce cannot be fully sourced from the local population, new workers may relocate to the LSA. Given the current housing market has affordability concerns and limited rental availability there is potential that increasing demand for permanent housing and rental accommodations may further compound these challenges (Hendry 2025; Stirling-Kattler 2025). Without expanded capacity, housing services may struggle to meet growing demands.

Operational staff are expected to be accommodated through rotational shift schedules and will have permanent residence off-site and stay in camp when on shift. Some personnel will have regular work week with fixed hours and report daily and will have off-site housing. This need for off site housing could further contribute to ongoing housing pressures, particularly during peak workforce periods.

Occasional short-term contractors will also be present for on-going construction and maintenance activities (sustaining capital work), but their accommodation needs are expected to be met by the on-site camp and are unlikely to substantially affect local temporary lodging capacity. Need for offsite housing could further contribute to ongoing housing pressures, particularly during peak workforce periods. Occasional short-term contractors will also be present for on-going construction and maintenance activities (sustaining capital work), but their accommodation needs are expected to be met by the on-site camp and are unlikely to substantially affect local temporary lodging capacity.

Given the current limitations in housing availability and affordability in Red Lake and Ear Falls, even modest additional demand from operations-phase staff could intensify existing challenges. Without coordinated efforts to expand local housing supply, the Project's operational workforce may intensify existing barriers for Indigenous and non-Indigenous community members seeking affordable housing in the region.

13.5.3.2.2 Change in Municipal, Provincial and Non-Profit Service Delivery Capacity

During the operations phase, the Project's long-term workforce presence may result in sustained population growth in Red Lake and Ear Falls, leading to increased demand for municipal, provincial, and non-profit services that NWOMC members rely on. While a portion of the workforce will reside in on-site accommodations, other workers and their families may relocate to nearby communities, placing ongoing pressure on existing service systems.

Healthcare and emergency services may experience higher utilization as population levels stabilize. Existing physician shortages, limited emergency department coverage, and the absence of obstetrical and specialized care in Red Lake could be further strained by additional residents. Police, fire, and ambulance services may face increased call volumes and staffing challenges, particularly in smaller municipalities that rely on volunteer or limited personnel.

Social programs, counselling, and addictions services currently operating at or near capacity may see higher and more sustained demand, particularly if population growth contributes to greater social or mental health pressures. Families relocating to the area may increase the need for childcare and educational services, which already face recruitment and retention difficulties. High housing costs and limited service availability could reduce equitable access for vulnerable and Indigenous residents.

Although these pressures may amplify existing capacity limitations, the Project's long-term presence also has the potential to generate indirect benefits. Sustained employment and associated economic activity may contribute to community stability, encourage workforce retention, and support incremental improvements in municipal revenues and local service delivery capacity over time.

13.5.3.2.3 Change in Transportation Infrastructure

During the operations phase, rotational and temporary workforce travel will continue to rely in part on commercial or charter flights into the Red Lake airport.

While airport usage is not expected to place undue strain on transport systems, staff recruitment and retention challenges at the airport may be compounded by the mining sector's higher wages, with several current staff nearing retirement (Riddell 2025).

Traffic levels across the regional transportation network are not expected to change beyond current capacities. Existing transportation networks are not expected to experience additional stress as a result of Project activities.

Indirectly, population growth associated with the Project may contribute to new demand for expanded transportation services in the area. While a formal public transit system is not currently in place, the municipality has initiated a feasibility study to assess potential transit options. Although school busing services are available, access remains limited in some areas. For example, Red Lake District High School has reported challenges with certain routes and student access to regular transportation (Vachon 2025). These existing gaps in service are not expected to be directly affected by Project-related transportation demand.

13.5.3.3 Closure Phase

The closure phase is anticipated to occur over a three-year period, immediately after operations stop. These activities will be similar to those during the construction phase (e.g., similar mining and construction equipment used), though activities will be on a much smaller scale.

This passive closure period includes occasional maintenance, limited use of mining and construction equipment, and a short final close-out period where water treatment infrastructure will be removed. Vehicle movement is anticipated to mimic the construction phase activities. Project activities during the closure phase are expected to result in temporary and short-term population changes. This has the potential to change demand for temporary accommodations (once camp has been decommissioned), increase demand for some community and health services (such as emergency response and medical services) and transportation infrastructure.

13.5.3.3.1 Change in Housing and Accommodations

Closure activities are anticipated to occur over a three-year period and may result in temporary and short-term demands on temporary accommodations (including hotels, motels, or rental units) increases in Red Lake and Ear Falls.

It is anticipated that dismantling the site and water treatment facility will be final activities during the passive closure phase. Contractor-provided accommodations are not expected to be available during the closure phase. Short-duration or specialized contractors may rely on limited hotel and motel capacity in the region, which is already minimal. For longer-term assignments, increased demand could place additional strain on the already limited rental housing market in Red Lake and Ear Falls, where challenges related to affordability and flexible housing options have been previously identified (Hendry 2025; Stirling-Kattler 2025). As closure activities are completed and workforce levels decline, reduced population levels may contribute to a softening of housing demand, with potential implications for rental availability, vacancy rates, and property values. Consideration of timing for these closure activities should be considered to avoid peak-tourist times for the region.

13.5.3.3.2 Change in Municipal, Provincial and Non-Profit Service Delivery Capacity

During the closure phase, the Project workforce is expected to be substantially reduced. Most personnel employed by the Project are anticipated to be on a temporary basis and accommodated in temporary on-site facilities. As a result, no measurable effect on municipal, provincial, or non-profit service delivery capacity in Red Lake or Ear Falls is anticipated.

While NWOMC members may continue to access both, general and Métis-specific programs, limited information on the capacity or utilization of these services prevents a detailed assessment of their potential role in mitigating localized service pressures.

Recreational, Social, and Education Services
No measurable Project-related effects are anticipated on childcare, educational, or recreational services during closure, given the transient nature of the workforce and absence of family relocation to the region.

Healthcare and Emergency Services
Potential effects on health or emergency services during closure are expected to be minor. Interactions may occur in relation to occasional on-site medical incidents, but these would likely be limited to emergency response. Fire, police, and EMS services in Red Lake and Ear Falls could experience intermittent short-term demand, though the reduced workforce and ongoing on-site first-aid capacity would minimize this effect.

Infrastructure Services
Project-related effects on infrastructure capacity are expected to be negligible. As site decommissioning progresses and workforce numbers decline, demand for municipal water, wastewater, and power systems would decrease. Any remaining wastewater and energy requirements would be managed on site without additional pressure on regional infrastructure.

13.5.3.3.3 Change in Transportation Infrastructure

During the closure phase, vehicle movements are expected to resemble those during the construction phase due to continued use of strategies such as bussing and carpooling to consolidate workforce travel. Transportation patterns are not anticipated to change as regional traffic counts remain low and no considerable change in traffic levels is expected.

Although the Project is not expected to directly impact regional transportation infrastructure during closure, any associated population changes could contribute to longer-term opportunities to improve local transit options.

13.5.4 Mitigation and Enhancement

Effects mitigation and management approaches for community services and infrastructure have been developed to address the potential effects identified in Section 13.5.3.

Identified mitigation measures proposed to minimize and reduce potential effects to community services and infrastructure to NWOMC (Table 13.5-5). Mitigation efforts consider both direct and indirect effects including a mix of Project design measures, operational policies, community partnerships, and regionally targeted supports. The goal with these limitations is to reduce the magnitude, duration, and likelihood of adverse residual effects on community services and infrastructure.

Table 13.5-5 outlines mitigation measures thematically, aligning with the interactions identified in Table 13.5-4. These are anticipated to apply to all phases, unless indicated otherwise.

Table 13.5-5: Project Design, Mitigation, and Enhancement Measures for Community Services and Infrastructure - Northwestern Ontario Métis Community

Potential Effects	Project Design, Mitigation and Enhancement Measures
Change in housing and accommodations	Camp Operations and Services: A camp complex will be established on the Property. The camp will accommodate 1,000 people during construction and then scaled down to approximately 300 people during operations. As a portion of the workforce is expected to come from outside the local community, and work on a rotational basis, a camp is required. Great Bear Resources will also continue discussions with local municipalities regarding potential housing and / or infrastructure initiatives in the region. The camp complex will include recreation, and a non-denominational spiritual space.
	Community Financial Support (Housing): Great Bear Resources will engage with municipalities, Indigenous communities, and Kenora District Services Board (KDSB) regarding regional housing issues. Great Bear Resources will work collaboratively to support for culturally appropriate housing initiatives led by Indigenous and municipal partners. This will include development of a housing strategy and plans for ongoing monitoring of housing capacity issues, and an adaptive management approach (as part of the Social Performance Plan) to address additional pressures imposed from the influx of workers and their families. Great Bear Resources will work closely with Municipality of Red Lake and the Township of Ear Falls to support housing strategies that encourage workers to relocate to the area for work.

Potential Effects	Project Design, Mitigation and Enhancement Measures
	Education and training (Region): Provide bursaries and targeted mentorship. Mentorship programs may include new hire initiatives which pair up new employees with a senior staff member who will provide guidance and support during the onboarding process, internships and summer programming for youth. Deliver training locally using mobile facilities and simulators. Implement job-matching, retraining programs, and economic diversification supports in anticipation of closure. Great Bear Resources has committed to the establishment of the Industrial Research Chair (IRC) in Mineral Exploration with Lakehead University. Great Bear Resources recognizes the importance of this research and its potential to drive advancements in mineral exploration, which directly supports our business and the broader mining sector in northwestern Ontario and the community in which we operate. In addition, Great Bear Resources has, and will continue to support STEM and training strategy to focus on a range of opportunities including apprenticeship opportunities, on-the-job training, work readiness, and scholarships and bursaries. Great Bear Resources will offer training to local Indigenous job seekers and contractors. Great Bear Resources are committed to working with local suppliers, including Indigenous owned businesses, to develop their capacity to effectively compete and win business while meeting the Company's standards for ethical conduct, due diligence, quality of goods and services, health and environmental safety. Identify critical roles and recruitment barriers; provide job-readiness scholarships / bursaries Develop equity-based hiring protocols, Indigenous procurement policies, and job coaching programs.

Potential Effects	Project Design, Mitigation and Enhancement Measures
Change in municipal, provincial, and non-profit service delivery capacity	Camp Operations and Services (Healthcare): Create access to Telus telehealth or similar provider for employees (and immediate family members) throughout the life of the Project helping to alleviate pressures on local services. Provide emergency response and basic health services on site to reduce workforce-related pressures on local social and healthcare services. On-site medical facilities and staff will be in place to address health services for emergencies, injuries, and other routine needs. Medical personnel will be trained on supports that are available through Employee Assistance Program (EAP), Telus telehealth (or similar service/provider), and local/regional providers to foster connected health care on and off-site. Information about these services and supports (available to employees and their immediate families), will be posted in a visible location at the medical facilities and accommodations.
	Community Financial Support: Sponsor cultural awareness initiatives and social integration programming. Address barriers to training or employment through transport assistance, and inclusive program design. Support regional communities to expand social services and health care services in the region, including mental health and addiction services, and implement an adaptive management approach (as part of the Social Performance Plan) to address additional pressures resulting from the influx of workers and their families. Great Bear Resources will work collaboratively to fund programming through the Friendship Centre and community partners, including programing and supports to promote physical and mental health outcomes for Indigenous adults and youth. Establish and maintain Community Liaison Committee to monitor changes and service capacities and / or the effectiveness of mitigation measures. Continue to partner with community organizations and educational institutions to support youth programming through summer camps and in-school programming, provide workshops, tours and presentations to youth that promote careers and opportunities in Mining and STEM fields. Partner with local Indigenous communities to evaluate community health and well-being to prevent negative pathways associated with the Project from developing.
	Community Liaison Committee: Great Bear Resources will maintain relationships and discussions through the establishment of the Community Liaison Committee to monitor social and health service capacities.
	Community Services: Great Bear Resources will work with provincial and Indigenous health and education authorities to plan for projected demand on social services, healthcare services (including secondary healthcare services), and education capacities. Great Bear Resources will work with local health care providers to support recruitment initiatives and potential job share arrangements for increased local resident opportunities.

Potential Effects	Project Design, Mitigation and Enhancement Measures
	Education and Training (Project): Provide voluntary health and wellness seminars, nutrition and substance use seminars for interested employees through the Employee Assistance Program. Provide opportunities for youth with vocational skills, including those that prepare them for local job markets and mining-related knowledge.
	Education and training (Region): Provide bursaries and targeted mentorship. Mentorship programs may include new hire initiatives which pair up new employees with a senior staff member who will provide guidance and support during the onboarding process, internships and summer programming for youth. Deliver training locally using mobile facilities and simulators. Implement job-matching, retraining programs, and economic diversification supports in anticipation of closure. Great Bear Resources has committed to the establishment of the Industrial Research Chair (IRC) in Mineral Exploration with Lakehead University. Great Bear Resources recognizes the importance of this research and its potential to drive advancements in mineral exploration, which directly supports our business and the broader mining sector in northwestern Ontario and the community in which we operate. In addition, Great Bear Resources has, and will continue to support STEM and training strategy to focus on a range of opportunities including apprenticeship opportunities, on-the-job training, work readiness, and scholarships and bursaries. Great Bear Resources will offer training to local Indigenous job seekers and contractors. Great Bear Resources are committed to working with local suppliers, including Indigenous owned businesses, to develop their capacity to effectively compete and win business while meeting the Company's standards for ethical conduct, due diligence, quality of goods and services, health and environmental safety. Identify critical roles and recruitment barriers; provide job-readiness scholarships / bursaries. Develop equity-based hiring protocols, Indigenous procurement policies, and job coaching programs.
	Social Performance Plan: Through the development and implementation of its Social Performance Plan, Great Bear Resources will work with provincial and Indigenous infrastructure authorities, if and where appropriate. In collaboration with local health care providers, support recruitment initiatives and potential job share arrangements for increased local resident opportunities. In collaboration with regional organizations and government representatives, develop a social performance plan to outline activities and plans to invest in a range of focus areas, including local infrastructure development, education, and skill-building

Potential Effects	Project Design, Mitigation and Enhancement Measures
	Social Closure Plan: Support consistent communication and planning throughout closure with emphasis on legacy, continuity, and shared decision-making. Develop a community transition plan in consultation with local Indigenous communities and groups so that decisions are made with integrity, based on cultural, spiritual and Indigenous well-being in mind. The plan will include collaborative planning, implement job-matching, retraining programs, financial literacy workshops, and economic diversification supports in anticipation of closure.
Change in transportation infrastructure	Transportation Management: Buses may be offered if there is sufficient interest (e.g., from the Red Lake Municipal Airport and from Ear Falls and Red Lake as well as local Indigenous communities) to limit personal vehicle traffic on the road, and reduce the risk of driver fatigue and travel during poor weather conditions. Car-pooling will also be encouraged, as appropriate. Busing may also be utilized to gather contractors and employees from larger hubs (i.e., Thunder Bay and Winnipeg) during the construction phase to consolidate transportation to and from the Project. Provision of buses reduces commuting burdens for employees and contractors and has the potential to support other community services.

Attached Table 13.1-1 includes the mitigation measures applicable to the management of effects on pVCs and fVCs that are linked with community services and infrastructure. It includes relevant plans, policy, and measures from predictive reporting on linked pVCs and fVCs. These will be applied for effects management.

13.5.5 GBA Plus Considerations

While the Project will provide housing in the form of a camp in the PA, there will most likely be some Project staff who will relocate to the area during the operations phase to Red Lake, as it is the largest community in close proximity to the Project, and offers the most amenities and range of services for families.

There are key demographics which are particularly vulnerable within this community due in part (but not limited to) to systemic racism, historical traumas, and barriers including location and poverty. These demographics are reliant on service and infrastructure provided in the communities of Red Lake. A change to the existing Red Lake population will apply pressure to existing services and infrastructure and has the potential to further alienate sub-groups that are already at risk.

As presented in Appendix X, these groups include:

- Young men aged 16 to 18 in need of emergency housing;
- Indigenous women+ and girls' safety and well-being (more on this in Section 13.8.5);
- Indigenous Peoples without training / education; and
- Indigenous women+ and youth lack of employment opportunities.

While mitigation measures are expected to reduce the potential for negative pathways, some project interactions could still affect these sub-groups differently, and this has been reflected in the assessment.

13.5.6 Residual Effects after Mitigation

The assessment and characterization of potential residual effects on community services and infrastructure following the implementation of mitigation measures uses the methodology outlined in Section 6. Further details on residual effect criteria ratings that are specific to community services and infrastructure are defined in Section 6 and in Section 13.3.2.

The attached Table 13.1-1 summarizes the results of the assessment for the linked pVC and fVC components. Detailed description on the methods, existing conditions, mitigation measures, and residual effects can be found in their respective sections.

Based on the assessment of linked pVCs and fVCs, residual changes after mitigation considered as part of the assessment of residual effects on community services and infrastructure after mitigation include:

- Local and Regional Economy (pVC)

There are no other pVCs and fVCs listed in Table 12.1-1 linked to community services and infrastructure.

13.5.6.1 Residual Effects Remaining after Mitigation – Northwestern Ontario Métis Community

Following the identification of potential effects between Project activities and community services and infrastructure indicators, potential effects were evaluated to determine whether the proposed mitigation measures would fully address the effect. Where mitigation measures were determined to effectively avoid interaction, no residual effect was carried forward. Where the mitigation measures reduced but did not fully eliminate the potential for an effect, the interaction was carried forward for residual effects characterization. This process made sure that only unmitigated or partially mitigated effects were included in the residual effects assessment.

Table 13.5-6 summarizes the potential effects that remain after mitigation and enhancement measures are implemented.

Table 13.5-6: Summary of Potential Residual Effects for Community Services and Infrastructure

Potential Effect	Potential Residual Effect Remaining After Mitigation (Y/N)
Change in the region's housing and accommodations	N
Change in the region's municipal, provincial and non-profit service delivery capacity	Y
Change in region's transportation infrastructure	N

Following implementation of mitigation measures, only one residual effect remains for the community services and infrastructure criteria:

- Change in the region's municipal, provincial and non-profit service delivery capacity.

All other effects identified in Table 13.5-6 are anticipated to be fully addressed through Project design measures and mitigation and are not predicted to result in residual effects.

13.5.6.2 Change in the region's Municipal, Provincial and Non-Profit Service Delivery Capacity

Project-related workforce changes during construction and early operations may result in additional demand for local social services, childcare, daycare, and healthcare services.

While mitigation measures such as hiring initiatives, on-site programs, community partnerships, and coordination with service providers are expected to reduce potential effects, broader systemic limitations related to staffing, service capacity, and funding persist.

These pressures may be experienced by Indigenous communities in Red Lake and Ear Falls, including NWOMC, who often face additional barriers to culturally appropriate care and support. While NWOMC individuals may access both general and Métis-specific services, structural constraints, such as geographic dispersion, limited funding, and jurisdictional exclusion, can restrict actual access, particularly in remote or under-served areas. In addition, there is limited information available regarding the current capacity, reach, or utilization of these services, making it difficult to determine whether they could absorb any increase in demand.

After implementation of mitigation measures, a Level I residual effect is predicted for access to social and healthcare services for most attributes. This residual effect is anticipated to be temporary, low in magnitude, and reversible through coordinated management.

Characterization of the residual effect is provided in Table 13.5-7.

Table 13.5-7: Characterization for Negative Residual Effect on region's Change in Municipal, Provincial, and Non-Profit Service Delivery Area Capacity

Attribute	Category	Description
Ecological or Social Context	Level I	Criteria may or may not be sensitive, and can support the predicted change with typical mitigation measures.
Magnitude	Level I	Measurable Project-related change that is insufficient to alter the social and / or economic conditions of local Indigenous Peoples. Expected strain on social and health services resulting from the Project's incoming workforce could be moderate; however, initiatives including collaboration, on-site provisions and resources could negate demand.
Geographic Extent	Level I	Effect is restricted to the LSA.
Duration	Level II	Effect occurs over the medium term: more than three years but less than 32 years.
Frequency	Level II	Effect occurs intermittently or regularly
Reversibility	Level I	Effect is fully reversible during the Project phases.
Timing	Level I	Effects do not occur during a sensitive period, or related effects are fully mitigated.

13.5.7 Significance of Residual Effects

Residual effects after mitigation to community services and infrastructure as a result of Project-related activities are limited to a change in municipal, provincial, and non-profit service delivery capacity. The magnitude of the residual effect is low (Level I) and restricted to the LSA (Level I). The effect will occur infrequently (Level I), will occur over the medium term of more than three years but less than 32 years (Level II), and will be fully reversible at closure (Level I). The small, localized effect can be accommodated in terms of social context (Level I). The residual effect is therefore not significant.

13.5.8 Confidence

The prediction confidence assignment reflects the information available through Project-specific TKLUS reports, publicly available data (statistical websites, government pages, previously completed EA/IS reports), understanding of the effectiveness of applicable mitigation measures, and outcomes of other pVCs and fVCs. The assessment is informed by substantial primary and secondary information and robust analysis.

With the proposed management and mitigation measures, including careful implementation of normal planning procedures by the relevant authorities, and liaison between GBR and those local authorities, the residual environmental effect of a change in capacity of community services and infrastructure has been determined with a high level of confidence.

13.6 Current Use of Lands and Resources for Traditional Purposes

Current use of lands and resources for traditional purposes (CULRTP) includes activities related to the current harvesting of species and resources, such as trapping, hunting, fishing, gathering plants, use of areas where the transfer of knowledge regarding cultural practices occurs, such as traditional habitation sites, ceremonial sites, travel routes or sacred sites.

The CULRTP criteria reflects traditional or Indigenous Knowledge that are adaptive, intergenerational, and responsive to social, economic and environmental changes. Information regarding MNO and NWOMC rights and history, and the assessment of impacts on the right to exercise or practice traditional activities is provided in Section 13.10

The CULRTP criteria evaluates how the Project may affect the ability of NWOMC members current use of lands and resources for traditional purposes, such as changes to access, use, and quality of experience while engaging in these activities.

As outlined in Assessment Approach (Section 13.3), the assessment includes consideration of the following potential effects:

- Change in the availability, access to, and quality of experience related to traditional terrestrial wildlife harvesting (hunting and trapping)
- Change in the availability, access to, and quality of experience related to traditional aquatic harvesting (fishing and aquatic resources)
- Change in availability, access to, and quality of experience related to traditional plant harvesting (food and medicinal purposes, and natural resources)
- Change in availability, access to, and quality of experience related to traditional habitation, cultural, and spiritual sites and areas.

While both Section 13.6 and 13.7 assess traditional habitation, cultural, and spiritual use sites and areas, Section 13.6 (CULRTP) assesses the current use of these sites, inclusive of currently used campsites, cabins, and culturally important sites and areas. Section 13.7 assesses these sites and areas in relation to their heritage values (e.g., potential changes to their physical and cultural heritage values).

13.6.1 Spatial Boundaries

There are three study areas within the spatial boundaries. They are the Project Area (PA), the Local Study Area (LSA), and the Regional Study Area (RSA). The RSA includes both the PA and the LSA. The spatial boundaries used for the assessment of CULRTP are shown in Figure 13.6-1 and are defined:

- The PA is defined as the footprint of the Project including all temporary and permanent areas associated with the mine site, as well as a buffer to allow flexibility for design optimizations prior to construction and over the mine life (Section 6.4). The PA is approximately 3,349 ha in size.
- The LSA is the area within which Project-related effects may reasonably be predicted or measured with a reasonable degree of accuracy and confidence. For CULRTP, the LSA is defined based on the LSA for the Moose and Other Wildlife pVCs. This defines an area over which ongoing traditional use forms the basis for continuing practices integral to CULRTP, as well as associated intergenerational transfer of associated knowledge, values, beliefs and traditions. Specifically, the Moose and Other Wildlife pVCs captures the largest extent across which traditional use may be affected.
- The RSA encompasses the LSA and is used to provide regional context for the significance of residual effects and is also the area within which potential for cumulative effects of the Project in combination with other past, present or reasonably foreseeable projects or activities are considered. For current use of lands and resources for traditional purposes, the RSA is also defined based on the Moose and Other Wildlife RSAs for the same reasons as identified for the LSA. The Moose and Other Wildlife pVCs have relevance for past, present, and future traditional activities and captures the largest extent across which traditional use may be affected.

CULRTP uses these spatial boundaries to assess the potential for changes to occur to NWOMC current use of lands and resources for traditional purposes. However, it is acknowledged that NWOMC provided separate spatial boundaries in their TKLUS report. Where place names and spatial information was made available, current use information from NWOMC's TKLUS report is interpreted within these spatial boundaries.

These boundaries are consistent with those used for Indigenous Physical and Cultural Heritage and Structures, Sites, or Things of Significance.

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WEESKAYJAHK OHTAHZHOGANEENG

BEEKAHNCHEEKAHMEENG DEEBAHNCHEEKAYWEEHN EENAHOHNAHNUHN

KAHNAHMAYKOOSAYSEEKAHK

WOODLAND CARIBOU PROVINCIAL PARK (WILDERNESS CLASS)

TROUT LAKE PROVINCIAL PARK (NATURE RESERVE CLASS)

MUNICIPALITY OF RED LAKE

HIGHWAY 125

PAKWASH PROVINCIAL PARK (NATURAL ENVIRONMENT CLASS)

TOWNSHIP OF EAR FALLS

HIGHWAY 105

WEST ENGLISH RIVER PROVINCIAL PARK (WATERWAY CLASS)

MAYNARD LAKE PROVINCIAL PARK (NATURE RESERVE CLASS)

TIDE LAKE PROVINCIAL PARK (NATURE RESERVE CLASS)

WINDIGO POINT PROVINCIAL PARK (NATURE RESERVE CLASS)

Wabauskang First Nation

Asubpeeschoseewagong Netum Anishinabek

Lac Seul First Nation

Dutch River, Bigshell Lake, Sabourin Lake, Thicketwood Lake, Sabourin River, Olive Lake, Larus Lake, Bloodvein River, Laurus Creek, Linge Lake, Murdock Lake, Paishk Lake, Knox Lake, Indian House Creek, Indian House Lake, Royd Lake, Gammon Lake, Douglas Lake, Rostoul Lake, Domain Lake, Embryo Lake, Telescope Lake, Glenn Lake, Hansen Lake, Aegean Lake, Big River, Zelon River, Kilburn Lake, Sydney Lake, Pineneedle Lake, Confusion Lake, Rowdy Lake, Confusion River, Roger Lake, Fletcher Lake, Rex Lake, Winding River, English River, Salvesen Lake, Umfreville Lake, Treelined Lake, Lennan Lake, Goshawk Lake, Separation Lake, Brown Bear Lake, Scenic Lake, Big Sand Lake, Lount Lake, Big Fox Lake, Little Fox Lake, Indian Lake, Grassy Narrows Lake, Ball Lake, Scotty Lake, Maynard Lake, Umfreville Lake, Longlegged Lake, Deluce Creek, Kahnahmaykoosaysensikahk/ Valhalla Lake, Little Vermilion Lake, Coli Lake, Golden Creek, Alford Lake, Hammell Lake, Red Lake, Ranger Creek, Ranger Lake, Parker Lake, Keg Lake, Starratt Channel, Two Island Lake, Gullrock Lake, Medicine Stone Lake, Upper Medicine Stone Lake, Dixie Creek, Pakwash Lake, Bruce Lake, Longlegged River, Rice Creek, Chukzmi River, Camping Lake, Wegg Lake, Barnston Lake, Goose Lake, Sumach Lake, Conifer Lake, Unexpected Lake, Wilcox Lake, Oak Lake, Tizzana Creek, Anishinabi River, Wine Lake, Anishinabi Lake, Wabaskang Lake, Scout Lake, Bornite Lake, Aerobus Lake, Sup Lake, Trevors Creek, Perrault Lake, Ord River, Cliff Lake, Cedar Lake, Segise Bay, Segise Lake, Wabigoon River, Dam Creek, Trout Lake, Bathurst Creek, Narrow Lake, Woman Lake, Joyce Lake, Otter Lake, Little Trout Lake, Little Bear Lake, Joyce River, Moose Creek, Caribou Creek, Ten Mile Creek, Trout Lake River, Wenasaga River, Whitemud Lake, Whitemud River, Bluffy Lake, Wenasaga Lake, Celt Lake, Crown Creek, Celt Lake, Aerofoil Lake, Fork Creek, Williams Lake, Williams Creek, Clear Lake, Thaddeus Lake, Ord Lake, Whitefish Lake, Rice River, Lacky Creek, Papaonga River, Uchi River, Slate Lake, Jubilee Lake, Fly Lake, Uchi Lake, Wakeman Lake, Margaret Lake, Perrigo Lake, Okanse Lake, Washagomis Lake, Confederation Lake, Woman River, Shabumeni River, Shabumeni Lake, Birch Lake, Birch River, Bertha Lake, Serpent River, Julia Creek, Rice River, Sturgeon River, Sturgeon Creek, Lacy Creek, Wapesi Lake, Sunlight Lake, Altimeter Creek, Broad Lake, Broadcast Lake, Spruce River, Wapesi River, Lac Seul, Whitefish Lake, Clear Lake, Williams Creek, Thaddeus Lake, Ord Lake, Cliff Lake, Cedar Lake, Segise Lake, Segise Bay, Wabigoon River, Dam Creek, Grassy Narrows Lake, Big Sand Lake, Lount Lake, Big Fox Lake, Little Fox Lake, Indian Lake, Separation Lake, Brown Bear Lake, Scenic Lake, Goshawk Lake, Ball Lake, Scotty Lake, Maynard Lake, Umfreville Lake, Treelined Lake, Lennan Lake, Sup Lake, Aerobus Lake, Bornite Lake, Wabaskang Lake, Perrault Lake, Scout Lake, Wine Lake, Anishinabi Lake, Oak Lake, Tizzana Creek, Anishinabi River, Wegg Lake, Barnston Lake, Goose Lake, Sumach Lake, Conifer Lake, Unexpected Lake, Wilcox Lake, Rex Lake, Fletcher Lake, Rowdy Lake, Roger Lake, Confusion River, Sydney Lake, Pineneedle Lake, Confusion Lake, Rice Creek, Longlegged River, Chukzmi River, Camping Lake, Longlegged Lake, Deluce Creek, Kilburn Lake, Zelon River, Big River, Aegean Lake, Dutch River, Treepet River, Bigshell Lake, Sabourin Lake, Thicketwood Lake, Sabourin River, Olive Lake, Larus Lake, Bloodvein River, Laurus Creek, Linge Lake, Murdock Lake, Paishk Lake, Knox Lake, Indian House Creek, Indian House Lake, Royd Lake, Gammon Lake, Douglas Lake, Rostoul Lake, Domain Lake, Embryo Lake, Telescope Lake, Glenn Lake, Hansen Lake, Knox Creek, Trans Creek, Murdock Creek, Parker Creek, Dam Creek, Keg Creek, Moose Creek, Caribou Creek, Ten Mile Creek, Trout Lake River, Wenasaga River, Whitemud Lake, Whitemud River, Lacky Creek, Bluffy Lake, Wenasaga Lake, Celt Lake, Crown Creek, Celt Lake, Aerofoil Lake, Fork Creek, Williams Lake, Williams Creek, Clear Lake, Thaddeus Lake, Ord Lake, Whitefish Lake, Rice River, Papaonga River, Uchi River, Slate Lake, Jubilee Lake, Fly Lake, Uchi Lake, Wakeman Lake, Margaret Lake, Perrigo Lake, Okanse Lake, Washagomis Lake, Confederation Lake, Woman River, Shabumeni River, Shabumeni Lake, Birch Lake, Birch River, Bertha Lake, Serpent River, Julia Creek, Rice River, Sturgeon River, Sturgeon Creek, Lacy Creek, Wapesi Lake, Sunlight Lake, Altimeter Creek, Broad Lake, Broadcast Lake, Spruce River, Wapesi River, Lac Seul, Whitefish Lake, Clear Lake, Williams Creek, Thaddeus Lake, Ord Lake, Cliff Lake, Cedar Lake, Segise Lake, Segise Bay, Wabigoon River, Dam Creek, Grassy Narrows Lake, Big Sand Lake, Lount Lake, Big Fox Lake, Little Fox Lake, Indian Lake, Separation Lake, Brown Bear Lake, Scenic Lake, Goshawk Lake, Ball Lake, Scotty Lake, Maynard Lake, Umfreville Lake, Treelined Lake, Lennan Lake, Sup Lake, Aerobus Lake, Bornite Lake, Wabaskang Lake, Perrault Lake, Scout Lake, Wine Lake, Anishinabi Lake, Oak Lake, Tizzana Creek, Anishinabi River, Wegg Lake, Barnston Lake, Goose Lake, Sumach Lake, Conifer Lake, Unexpected Lake, Wilcox Lake, Rex Lake, Fletcher Lake, Rowdy Lake, Roger Lake, Confusion River, Sydney Lake, Pineneedle Lake, Confusion Lake, Rice Creek, Longlegged River, Chukzmi River, Camping Lake, Longlegged Lake, Deluce Creek, Kilburn Lake, Zelon River, Big River, Aegean Lake

N

LEGEND:

- PROJECT AREA
- LOCAL STUDY AREA
- REGIONAL STUDY AREA
- HIGHWAY
- MAJOR ROAD
- LOCAL ROAD
- RAILWAY
- WATERCOURSE
- WATERBODY
- INDIGENOUS COMMUNITY
- PROVINCIAL PARK
- MUNICIPAL BOUNDARY (LOWER TIER)

NOTES:
NOTE1: BASE DATA ACQUIRED FROM LAND INFORMATION ONTARIO.

0 5 10 20 30 km

SCALE 1:550,000
PAGE SIZE 11 x 17
NAD 1983 UTM Zone 15N
THIS MAP IS FOR CONCEPTUAL PURPOSES ONLY AND SHOULD NOT BE USED FOR NAVIGATION

GREAT BEAR RESOURCES

GREAT BEAR GOLD PROJECT

SPATIAL BOUNDARIES FOR CURRENT USE OF LANDS AND RESOURCES FOR TRADITIONAL PURPOSES

SLR

FIGURE NO:
13.6-1

DATE: November 28, 2025 PROJECT NO: 241.030825

13.6.2 Existing Conditions

An overview of CULRTP by NWOMC includes demographic context, land governance, and spatial patterns of current cultural use (where available). It outlines known practices of harvesting and ceremonial land use, which are central to Métis identity, health, and cultural continuity.

This Section focuses on NWOMC with additional information for existing conditions of other participating Indigenous Nations provided in Sections 10 (LSFN), 11 (WFN), 12 (ANA), and 14 (Indigenous Peoples living in the Red Lake and Ear Falls area).

13.6.2.1 Methods

A description of the existing conditions is presented to characterize known and existing conditions for CULRTP by NWOMC members. This is based on:

- Community knowledge: received through engagement activities such as meetings, oral and written input traditional land use information, and Indigenous knowledge for the area around the Project, and additional input as described in Section 13.4, Influence of Consultation and Engagement;
- Publicly available secondary sources: relevant documents and publicly available studies which contain biophysical, cultural heritage, archaeological aspects, Indigenous Knowledge and traditional land use information for the area around the Project; and
- Socio-Economic Baseline Study for the Great Bear Project (2024) (Appendix O-1).

In addition to these publicly available sources of information and ongoing engagement, the existing conditions have been informed by confidential reports prepared by or for NWOMC.

These combined information sources provide an understanding of the current CULRTP information. The existing conditions are used to support the assessment of potential effects from the Project on CULRTP and will support the long-term monitoring for the Project with interested NWOMC citizens.

13.6.2.1.1 Terminology Used for Métis

Throughout CULRTP, several terms and acronyms are used to support the description of NWOMC's existing conditions. These are defined as follows:

- **Métis**: To describe broader cultural components that relate to Métis-specific values and practices that extend beyond regional and provincial boundaries
- **NWOMC**: To refer to the Northwestern Ontario Métis Community, which is a community that represents and serves Métis citizens in Northwestern Ontario
- **MNO**: To refer to the Métis Nation of Ontario, established through Métis communities and people coming together in Ontario for a Métis-specific governance structure for the Métis Nation in Ontario
- **The historic Métis community**: To refer to the distinct historic group of families and community that was present in the northwestern Ontario region by the mid-to-late 1800s (prior to the establishment of the current NWOMC).

13.6.2.1.2 Importance of Land and Resource Use for Traditional Purposes

The nature and importance of current land and resource use for traditional purposes is based on the unique, and deeply rooted relationships that Indigenous Peoples have with the land, water, animals, and ecosystems. These relationships are holistic, incorporating physical, economic, spiritual, cultural, and communal components. These cultural relationships with the natural world foster a sense of responsibility and stewardship, where caring for the land is a sacred duty passed down through generations. Access to land and resources is essential for Indigenous Peoples maintenance of their cultural practices, intergenerational knowledge sharing, food sovereignty, and community well-being.

Indigenous Knowledge systems are based on observation, experience, and adaptation. They offer valuable insight into land and resource use patterns. It is through traditional, and current land and resource use studies that an understanding of the existing nature and importance can be described and changes due to the Project can be determined. Important areas and sites of current use for NWOMC members may reflect both past Indigenous community areas (e.g., village sites, historic harvesting, spawning, or hunting sites), and the ongoing importance of present-day campsites, tourist camps, water travel routes, or harvesting and social areas. These sites and areas are still used by NWOMC members throughout the year to connect with the land and traditional values, sharing harvesting knowledge and socializing with entire families as they return to work together. Harvesting sites and areas for fishing, plant gathering, and hunting or trapping also reflect how many generations have accumulated knowledge through their deep relationships with the land and water and are still used by NWOMC members to maintain these connections to land and place.

13.6.2.1.3 Quality of Experience of Current Land and Resource Use for Traditional Purposes

Quality of experience for current use of land and resources for traditional purposes refers to the preferred and / or required conditions (e.g., not disturbed by changes in sensory conditions) needed to use or maintain traditional and current use practices (e.g., technologies, methods, and habits). This includes changes to environmental, biophysical, or spiritual and cultural qualities of areas, sites, and resources that would make them inappropriate for Indigenous use or value. These may change the ability of these lands, waters, and resources to support NWOMC cultural practices and traditions. Disturbances to lands, waters, and resources include changes to sensory conditions (e.g., air and dust emissions, sound, light) which may affect tangible and intangible aspects of culture. Tangible aspects of culture include traditional current use areas, cultural sites, and landscapes. Intangible aspects of culture include gatherings, rituals, and embedded Indigenous Knowledge.

13.6.2.2 Description

The description of CULRTP by NWOMC members includes demographic context, land governance, and spatial patterns of use by NWOMC. It also outlines known practices of harvesting and ceremonial land use, which are central to Indigenous identity, health, and cultural continuity. It is understood that NWOMC citizens rely on Treaty 3 territory that extend beyond the Red Lake and Ear Falls area. For this reason, the description of existing conditions for CULRTP focuses on high-use and high-value areas within Treaty 3 territory that overlaps with the PA, LSA, and RSA, including between Lac Seul Watershed, the English-Wabigoon Watershed, and the Chukuni River and its greater watershed (including Pakwash Lake, Gullrock Lake, Wabauskang Lake, Red Lake, and Trout Lake).

13.6.2.2.1 Governance and Legal Characteristics

The description of governance includes legal characteristics and historic and modern governance of NWOMC. Further information regarding the history Treaty 3 (Figure 13.1-1) and the Métis Adhesion, MNO and NWOMC harvesting rights, and history is provided in Section 13.10, Impact on the Exercise and Practice of Rights. This information regarding MNO and NWOMC rights and history is provided as advised by MNO and NWOMC. Some matters are subject to differing interpretations, and the MNO and NWOMC source is highlighted in those instances.

Métis Nation of Ontario (MNO) has nine regions across the province of Ontario. The Project is located within Region 1, where NWOMC resides. Historically, a distinct Métis community was present in northwestern Ontario (the historic Métis community) by the mid to late 1800s through interconnected Métis populations in and around:

- Lac La Pluie (Fort Frances);
- Rat Portage (Kenora);
- Eagle Lake (Dryden and Wabigoon); and
- Hungry Hall (Rainy River).

The Lake of the Woods area of NWOMC territory includes:

- Rat Portage;
- White Fish Lake;
- Northwest Angle;
- Wabigoon; and
- Long Sault.

Fur trade and census records document a "*persistent, identifiable, and inter-connected Métis population*" through these areas in the early 1800s and into the early 1900s. The modern NWOMC is represented by MNO and is comprised of descendants of this historic Métis community (The Métis Nation of Ontario 2024).

Today, the NWOMC represents and serves over 3,000 Métis citizens across Northwestern Ontario, and is made up of four chartered community councils:

- Atikokan Métis Council;
- Kenora Métis Council;
- Northwest Métis Council; and
- Sunset Country Métis Council.

NWOMC is also represented by a Regional Counsellor who sits on the Provisional Council of the Métis Nation of Ontario (The Northwestern Ontario Métis Community 2025a).
The Northwest Métis Council is based in Dryden, and has its own community charter, council electoral code, and by-laws.

While the *MNO Harvesting Policy* has been in effect since 1995, subsequent iterations of the policy have been updated to reflect advancements in Métis rights through Ontario. As of 2018, the Framework Agreement replaces previous interim agreements and consolidates collaborations between MNO and the provincial government.

This Framework Agreement does not include caps on the number of MNO Harvester Cards that can be issued by the MNO and confirms that the agreement aligns with the identification of Métis rights-holders identified in *R. v. Powley.* The Framework Agreement, in a first-of-its-kind data sharing protocol, also commits the MNO to sharing data collected about the Métis harvest with the Ministry of Natural Resource (MNR) to support and improve provincial management of natural resources (The Métis Nation of Ontario 2025f).

Within the MNO Harvesting Policy, traditional Métis harvesting territories are mapped within MNO regional zones. For NWOMC harvesting in Zone 1, there are three distinct harvesting territories: Lake of the Woods, Lac Seul, Rainy River and Rainy Lake, and a portion of Lakehead. NWOMC identifies that the PA is within the Lake of the Woods and Lac Seul harvesting territory.

In 2019, the MNO and the Government of Canada signed a Métis self-government agreement (the Self-Government Agreement). The Self-Government Agreement recognizes that the Métis communities represented by the MNO, including NWOMC, have an inherent and constitutionally protected right to self-governance and self-determination. The Self-Government Agreement establishes for the first time a path to the full and formal recognition of a Métis government in Ontario and establishes a mandate to negotiate Métis self-government based on this inherent right (The Métis Nation of Ontario 2019).

13.6.2.2.2 Traditional Harvesting of Wildlife Species, Including Hunting and Trapping

NWOMC practices traditional harvesting and trapping activities in their traditional territories, which is a central cultural and subsistence practice.

NWOMC has identified large and small game harvesting areas and moose habitat in the PA and LSA. However, no kill sites have been identified in the PA by NWOMC, and no specific species of cultural importance are identified in relation to the wildlife harvesting areas that overlap with the PA. NWOMC has identified hunting, trapping, and kill sites in the LSA for terrestrial species of cultural importance, including moose, partridge, grouse, and rabbit.

In the RSA, NWOMC has noted large game kill sites, additional large game harvesting sites, small game harvesting areas, and waterfowl harvesting areas. In the RSA, NWOMC have confirmed hunting for large and small game, including moose, partridge, deer, grouse, rabbit, spruce hen, wolf, bear, goose, and duck. NWOMC also traps species in the LSA and RSA, including beaver, lynx, marten, otter, wolf, fox, fisher, rabbit, muskrat, mink, coyote, weasel, bear, wolverine, and bobcat. Generally, NWOMC trapping and hunting locations are common around lakes, where wildlife takes advantage of trails and resource movement patterns within the surrounding forest (The Northwestern Ontario Métis Community 2024).. Along with hunting and trapping, members also reported gathering of terrestrial wildlife sheds such as antlers and feathers (The Government of Ontario 2025; First Mining Gold 2024).

MNO has provided updated guidance across NWOMC Harvester Card holders to hunt for moose in areas where calf and adult populations are the most robust, citing existing declines in moose populations (The Métis Nation of Ontario 2016).

NWOMC moose hunting occurs in Cervid Ecological Zone B, which requires moose to maintain a low to moderate density population, and Cervid Ecological Zone C1, which requires a moderate to high density moose population to be maintained (The Métis Nation of Ontario 2016).

MNO encourages its NWOMC Harvester Card holders to consider hunting other species in areas where moose populations are less robust, such as bear or deer.

Both Cervid Ecological Zones B and C1 are experiencing some decline in moose population, though this varies by subzone from substantial decline to steady or increasing population (Froh 2016).

MNO identifies moose hunting occurring during two periods of the year: the early fall season (which aligns with moose mating and rut season), and the winter season (though this is a less popular time). Prior to the use of deep freezers, Métis hunted moose only in winter or preserved the meat in mason jars when a moose happened to be hunted during warmer weather (The Métis Nation of Ontario 2016).

13.6.2.2.3 Traditional Harvesting of Aquatic Resources, Including Fishing

Fishing occurs throughout MNO Harvesting Zone 1 as an important source of food, economic livelihood, cultural traditions, and connection to the land. No current use of the PA for fishing has been identified by NWOMC. However, NWOMC has identified their right to fish and gather aquatic resources. NWOMC identify that their community members fish in the LSA at the mouth of the Chukuni River, Dixie Lake Two Island Lake, and Pakwash Lake, and in the RSA at Gullrock Lake, Red Lake, Trout Lake and several other areas. NWOMC noted fished species in the LSA and RSA include walleye (pickerel), minnows, crappie, whitefish, northern pike, perch, bass, muskie, trout, lake trout, tullibee / northern cisco, sucker, sauger, whitefish, and other non-commercial fish. NWOMC has not identified any watercourses in the PA as navigable. No groundwater sites (e.g., springs) or systems have been identified by NWOMC.

In addition to traditional fishing and aquatic resource harvesting, NWOMC also engages with commercial fishery work. Historic records indicate that Métis in the area have had ongoing participation in fishing activities, including commercial fishing operations regulated by the government. Métis have a long history of commercial fishing, with early contracts through the Hudson's Bay Company in the 1800s onward solidifying the practice as remaining "integral to Métis participation in the industry." (Coates, Ferguson, Pearce, & Finnegan 2023). Strict fishing regulations introduced in the 1970s and 1980s made it difficult for Métis to maintain their traditional fishing practices (The Northwestern Ontario Métis Community 2023).

Many Métis families have felt pushed out of the commercial fishing industry due to government policies (Coates, Ferguson, Pearce, & Finnegan 2023). Typically, when Métis fishers have tried to achieve commercial fishing rights, litigation is necessary, and this has "*made it difficult for Indigenous Peoples to expand constitutional commercial fishing rights in the face of the Crown's competing right to manage fisheries*" in Canada (Coates, Ferguson, Pearce, & Finnegan 2023). MNO advises that the 2019 Self-Government Agreement with MNO and the federal government represents a path to expanding Métis commercial fishing rights more broadly.

Fishing practices are also included in NWOMC events, such as hosting other Indigenous Nations or gathering to fight for harvesting rights in Kenora and Lake of the Woods. In these events, fishing contests, net fishing, fish fries, and fishing derbies were included (The Northwestern Ontario Métis Community 2023).

Beginning in the early 2000s, annual fishing derbies have been hosted by Kenora as part of a broader effort to foster a sense of community, celebrating Métis culture and tradition (The Northwestern Ontario Métis Community 2023). NWOMC has an appointed representative sitting on the Indigenous Advisory Council for the broader Lake of the Wood Fisheries Plan. Within this plan, several Indigenous communities have partnered with the Ministry of Natural Resources to develop draft recreational fishing plants for walleye and plans to increase walleye population in Lake of the Woods (The Northwestern Ontario Métis Community 2024).

13.6.2.2.4 Traditional Harvesting of Plants for Food, Medicine, and Natural Resources

Harvesting plants for NWOMC includes for food sources, medicines, and cultural materials. Knowledge of plant harvesting areas and uses are passed down in families through generations. No current use of the PA for gathering plants or natural resources was identified by NWOMC. Current use has been identified by NWOMC in the LSA along Highway 105.

NWOMC has noted plants and natural resources gathered in the LSA include fiddleheads, mushrooms, blueberries, firewood, cranberries, raspberries, pin cherries, choke cherries, chaga, plantain, elderberries, sage, rosehips, Labrador tea, saskatoon berries, wild rice, ginseng, clover, mint, and other natural materials. No groundwater sites (e.g., springs) or systems related to manoomin or terrestrial plant harvesting have been identified by NWOMC.

Secondary sources have identified current use in the RSA and Crown land by NWOMC to harvest a variety of plants, including blueberries, chokecherries, cranberries, fiddleheads, labrador tea, nuts, raspberries, wild rice, chaga, mushrooms, wood, and birch bark. Under the amended MNO Harvesting Policy, firewood was added as a natural plant resource for heating (The Métis Nation of Ontario 2023). Harvesting of wood from Crown Land for personal use is protected for NWOMC under Section 35 of the *Constitution Act, 1982* (under Aboriginal or Treaty Rights) (The Government of Ontario 2025).

In the Cultural Heritage Report, two cultural heritage sites were identified that were associated with wild rice fields: Cultural Heritage Resource (CHR) 3 in the PA and CHR 5 in the LSA. No changes to CHR 5 are anticipated as it is located outside the PA.

13.6.2.2.5 Use of Traditional Habitation, and Cultural and Spiritual Sites and Areas

NWOMC land use is inseparable from culturally important spaces, as land and water hold knowledge about cultural identifies, stories, traditions, and relations. Cultural and spiritual sites and areas can include traditional habitation sites, birth and marriage sites, burial sites, settlement areas, historic and contemporary harvesting and gathering sites, and sacred or spiritual areas. This section includes an assessment of NWOMC's current use of these sites and areas. An assessment of these sites physical and cultural heritage value for NWOMC is assessed in Section 13.7.

Cultural landscapes are places that are "*alive and contemporary pathways to maintaining traditional knowledge*" for NWOMC (Fedyk 2016). These important sites and areas allow Métis to practice traditional ways of life, anchored by traditional knowledge continuity while maintaining spiritual connections to land and water (Fedyk 2016). No current use of the PA was identified by NWOMC for traditional habitation, cultural, or spiritual sites or areas. NWOMC did identify overnight stay sites in the LSA (one located south of Stone Lake, and one located between Dixie Lake and Genesse Lake).

In the LSA, NWOMC has identified waterbodies and waterways that remain important networks for hunting, trapping, fishing, travel, and overnight stays.

These include the Chukuni River and Pakwash Lake. No groundwater sites (e.g., springs) or systems relating to spiritual or cultural use have been identified by NWOMC.

Several historic use and occupation sites have been identified in the LSA by members of NWOMC. These include locations of historic pictographs and rock paintings, historic burial grounds, and a former residential school. Additional current use sites and areas identified in the LSA include: historic trading or Hudson Bay Company posts, historic occupation sites (including camps and cabins), trailheads, boat launches, and portage sites, as well as other undisclosed cultural and historic sites.

Important high-use cultural areas in the LSA include Pakwash Lake and Ear Falls. Additional high-use areas of cultural and spiritual importance for NWOMC in the RSA include Jones Road, Longlegged Lake, and Sydney Lake. These are areas that many NWOMC members have been using with their families for decades, spending time on land and water of these places to connect them with their culture and way of life.

In the RSA NWOMC members identified culturally important travel ways and sites, including boat launches, footpaths, roads, ATV trails, water routes, portages, camping places, and areas where time was spent on land to transfer intergenerational knowledge.

Cultural landscapes are important areas for NWOMC, in that they hold harvesting opportunities, as well as the ability to maintain cultural heritage and knowledge. They are also landscapes that support travelling, maintaining ceremonies, collecting supplies for resources, and supplementing income (Fedyk 2016).

13.6.3 Potential Effects

Potential interactions between proposed Project-related activities and CULRTP criteria for NWOMC identify the potential effects (positive and negative), and whether they are direct or indirect effects.

A detailed overview of the Project's potential interactions with current use of land and resources for traditional purposes for NWOMC is presented in Table 13.6-2. Project interactions are characterized as either having no interaction (-) or a potential interaction (✓). Project activities that result in no interaction are not considered further in the assessment. Project interactions that were identified as a potential interaction are carried forward to the potential effects assessment to determine the positive (desirable and beneficial) and negative (undesirable or adverse) potential effects on the CULRTP criteria.

Table 13.6-1: Potential Interactions Between Project Activities and Current Use of Land and Resources for Traditional Purposes – Northwestern Ontario Métis Community

Project Component / Activity	Change in availability, access to and quality of experience related to traditional terrestrial wildlife harvesting (hunting and trapping)	Change in availability, access to and quality of experience related to traditional aquatic harvesting (fishing)	Change in availability, access to and quality of experience related to traditional plant (food and medicinal) harvesting	Change in availability, access to and quality of experience related to traditional habitation, cultural, spiritual sites / areas
Construction Phase				
Site preparation activities	✓	✓	✓	✓
Establishment and operation of water management and treatment facilities	✓	✓	✓	✓
Open pit mining	✓	✓	✓	✓
Underground mining	-	-	-	-
Management of rock and unconsolidated materials in stockpiles	✓	✓	✓	✓
Establishment of onsite fish habitat and compensation measures	✓	✓	✓	✓
Establishment of onsite aggregate operations	✓	✓	✓	✓
Construction of the starter embankments for the tailings management facility	✓	✓	✓	✓
Construction and operation of buildings and infrastructure	✓	✓	✓	✓
Waste management	-	-	-	-
Commissioning of the process plant	✓	✓	✓	✓
Power supply	✓	✓	✓	✓
Employment and expenditures	-	-	-	-

Project Component / Activity	Change in availability, access to and quality of experience related to traditional terrestrial wildlife harvesting (hunting and trapping)	Change in availability, access to and quality of experience related to traditional aquatic harvesting (fishing)	Change in availability, access to and quality of experience related to traditional plant (food and medicinal) harvesting	Change in availability, access to and quality of experience related to traditional habitation, cultural, spiritual sites / areas
Operations Phase				
Underground mining	-	-	-	-
Mining of the LP Central pit	✓	✓	✓	✓
Management of rock and unconsolidated materials in stockpiles	✓	✓	✓	✓
Process plant operation	✓	✓	✓	✓
Management of desulphurized tailings in the tailings management facility	✓	✓	✓	✓
Management of concentrate tailings and contact water in the Viggo management facility	✓	✓	✓	✓
Operation of water management and treatment facilities	✓	✓	✓	✓
Construction of a mine water pond	✓	✓	✓	✓
Operation and maintenance of buildings and infrastructure	-	-	-	-
Waste management	-	-	-	-
Power supply	-	-	-	-
Progressive reclamation activities	✓	✓	✓	✓
Employment and expenditures	-	-	-	-

Project Component / Activity	Change in availability, access to and quality of experience related to traditional terrestrial wildlife harvesting (hunting and trapping)	Change in availability, access to and quality of experience related to traditional aquatic harvesting (fishing)	Change in availability, access to and quality of experience related to traditional plant (food and medicinal) harvesting	Change in availability, access to and quality of experience related to traditional habitation, cultural, spiritual sites / areas
Closure Phase				
Active closure	-	-	-	-
Passive closure	-	-	-	-
Final reclamation	✓	✓	✓	✓
Employment and expenditures	-	-	-	-

Legend: ✓ = Interaction exists

- No interaction exists

The interactions identified in Table 13.6-2 are used in Sections 13.6.3.1 to 13.6.3.3 to identify potential effects on CULRTP prior to the application of mitigation measures. These potential effects may be direct or indirect negative effects, where applicable.

13.6.3.1 Construction Phase

The construction phase of the Project is expected to occur over a three-year period and will include preparation of the site and construction of Project infrastructure. Since the construction phase is expected to cause potential interactions with the natural environment and landscape, there may be direct or indirect effects on NWOMC use of land and resources for traditional purposes.

During the construction phases, interactions and effects may occur within the PA, LSA, and RSA. Project activities identified in Table 13.6-1 have the potential to result in effects to current land and resource use for traditional purposes including for wildlife harvesting, fish and aquatic resource harvesting, plant gathering, and traditional habitation, cultural, and spiritual sites and areas.

13.6.3.1.1 Wildlife Harvesting (Hunting and Trapping)

There is no identified current use of the PA for hunting or trapping by NWOMC citizens. NWOMC has identified current use of the LSA for hunting and trapping of terrestrial wildlife species. Interactions with Project activities may lead to direct and indirect effects on NWOMC's current use of the LSA for hunting and trapping activities.

The availability of traditionally hunted and trapped terrestrial wildlife species may be indirectly affected by habitat loss or alteration, changes in surface water quality, and sensory disturbances such as dust and visual changes. These factors can disrupt ecosystems that support traditional harvesting activities.

Wildlife availability in the LSA may be also indirectly affected by habitat changes and disturbances due to changes in sound and vibration that can alter wildlife behavior, distribution, and presence.

Access to areas where NWOMC citizens traditionally hunt and trap species are not anticipated to change, since there is no identified current use of the PA where access would be restricted. While NWOMC does hunt and trap in the LSA and RSA, this access is not anticipated to be altered during construction.

The quality of experience for NWOMC members while hunting and trapping in the LSA may change due to sensory disturbances, immediately adjacent to the PA. Sound, dust, vibration, light and visual changes to the landscape may make these areas less culturally suitable for hunting and trapping activities. As detailed in Section 7.13, land and resource use, changes to visual setting will commence during construction and will continue throughout all phases of the Project. Construction-related activities, such as vegetation clearing and development of Project infrastructure may also influence the quality of harvesting experiences near the site.

13.6.3.1.2 Fishing and Aquatic Resource Harvesting

While there is no identified current use of the PA by NWOMC for fishing or aquatic resource harvesting, NWOMC identified current use of the LSA. Indirect potential effects are anticipated as a result of Project activities.

There may be an indirect change to the availability of fished species or aquatic resources in the LSA due to Project-related changes. Aquatic habitats may be indirectly affected by changes in vibration, surface water runoff, and sedimentation, which may in turn affect fish and aquatic species population and distribution. These changes can damage fish habitats, alter spawning areas in Pakwash Lake and the Chukuni River, and reduce the availability of culturally significant fish species. Additionally, treated effluent discharge into the Chukuni River may impact water quality and fish health. The Cultural Heritage Report (Appendix P-1) indicates that while a segment of the Chukuni River (comprising CHR 1) falls partly within the PA, it will not be subjected to direct or indirect effects from the Project. The Cultural Heritage Report predicts that the planned effluent pipe will not hinder river use for travel, and the discharge from the pipe will avoid changes to water and fish by adhering to regulatory requirements for water quality and quantity (Appendix P-1, p. 27).

Since there is no identified current use of the PA for fishing identified by NWOMC, no potential effects on access to fishing and aquatic resource harvesting areas and sites are anticipated. None of the watercourses or waterbodies identified in the mining footprint have met the definition of ‘navigable waters’ as defined by the *Canadian Navigable Waters Act.*

The quality of experience of fishing in traditional areas within the LSA may be affected due to sensory disturbances. A reduction of groundwater flows and levels during construction and operations will reduce groundwater contributions to the baseflow of some watercourses and waterbodies within or adjacent to the PA. Project activities may lead to a change in the quality of fishing and aquatic harvesting experiences. Changes in sound, vibration, and dust, along with changes to the landscape and view, can disrupt the experience and make these fishing areas less suitable for cultural activities immediately adjacent to the PA.

13.6.3.1.3 Traditional Plant Harvesting (Including for Food and Medicinal Purposes and Natural Resources)

While there is no identified current use of the PA by NWOMC for terrestrial or aquatic plant gathering, there is identified current use of the LSA. Indirect negative potential effects are anticipated as a result of Project activities.

The availability of plant species for harvesting in the LSA NWOMC may change as a result of indirect effects to vegetation health and availability. Vegetation health and availability may change as a result of several factors, including dust, changes in surface water quality and flow, and alteration to vegetation areas caused by vegetation removal and clearing. As a result, the availability of plant harvesting areas in the LSA may change due to indirect environmental changes.

Since there is no current use of the PA for plant gathering identified, no potential effects on access to harvesting areas and sites are anticipated.

The quality of experience at traditional plant harvesting areas in the LSA may be reduced due to sensory disturbances from Project activities. A reduction of groundwater flows and levels during construction and operations will reduce groundwater contributions to the baseflow of some watercourses and waterbodies within or adjacent to the PA. Sound, dust, and vibrations during closure activities can interfere with the culturally meaningful nature of harvesting practices. Project components, such as the mine rock storage areas and tailings management area, may change the landscape and viewscape, which may make these areas less suitable for traditional plant gathering activities.

13.6.3.1.4 Traditional Habitation, Cultural, and Spiritual Sites and Areas

There is no identified current use of traditional habitation, cultural, or spiritual sites and areas for NWOMC in the PA. As such, there are no potential effects anticipated that would change access or availability in the PA. However, the Project has the potential to indirectly change detectable changes to sensory conditions for quality of experience with traditional habitation, cultural, and spiritual sites and areas in the LSA. The assessment of these sites' cultural and physical heritage value is found in Section 13.7.

Sensory disturbances that have the potential to change quality of experience for NWOMC in the LSA include elevated levels of sound and increased dust deposition. Changes to groundwater flows and levels are expected to return to near baseline conditions post-closure, after the cessation of open pit and underground mining. Changes to the landscape, particularly from the development of Project components such as the Mine Rock Storage Areas and Tailings Management Area, may visually alter culturally important areas for NWOMC while in the LSA. Additionally, modifications to surface water flow conditions can affect water travel routes in the LSA, which are often used to access traditional sites. These disruptions from sensory disturbances, altered travel routes, or environmental changes may make traditional areas less suitable for cultural use.

13.6.3.2 Operations Phase

The operation phase is anticipated to occur over a 26-year period. Similar interactions as the construction phase will continue, and potential effects to CULRTP for NWOMC may occur within the LSA, and RSA during operations.

Availability of wildlife for hunting and trapping, fishing and aquatic areas, and plant harvesting areas will continue to be directly and indirectly affected by Project-related activities, though on a larger area, as the footprint of the operations will advance during the operations phase.

There will be no access to areas within the PA for harvesting throughout operations. However, access to land and resource areas within the LSA will remain available during Project operations.

Quality of experience for NWOMC citizens harvesting or using traditional sites and areas in the LSA may continue to be affected by changes in groundwater flows and levels for waterbodies adjacent to the PA from interactions with open pit and underground mining activities in the PA, or sensory disturbances from sound and visual changes during operations for those sites and areas in the LSA that are immediately adjacent to the PA. Project facilities, such as the tailings management facility and the mine rock storage Area, will be at maximum height and extent during operations.

These additional features on the landscape may have the potential to affect land users visual experience while accessing or visiting harvesting or traditional sites and areas within the LSA where the Project is visible (refer to Appendix O-3 for further detail on viewshed analysis).

13.6.3.3 Closure Phase

The active closure phase is anticipated to occur over a three-year period, immediately after operations stop. Closure activities will start the initial reclamation and revegetation of mining areas and stockpiles. Mining and equipment used during closure will be similar to those used during construction, but on a much smaller scale. The passive closure period includes occasional maintenance, limited use of mining and construction equipment, and a short final close-out period where water treatment infrastructure will be removed.

Project activities during the closure phases are expected to result in temporary and short-term ground and sensory disturbances, and continued changes to harvesting site access related to the Project.

Interactions similar to those identified during the construction and operation phases will continue during closure activities for NWOMC in the PA, LSA and RSA. This includes potential effects relating to availability of traditionally harvested species and traditional habitation, cultural, and spiritual use sites and areas, as well as potential changes to the quality of experience while harvesting or accessing current use sites and areas.

With progressive and active rehabilitation, the re-establishment of vegetation communities would allow wildlife to return to the PA and surrounding area. Progressive and final reclamation, including active and passive revegetation, will minimize visual effects.

A viewshed analysis conducted for the Project (Appendix O-3) concluded that there will be very limited viewing of the Project facilities even at their maximum extent and height, generally later in operations and only in the far distance. Once progressive and final reclamation activities are completed, supplemented by natural regrowth after closure, the residual stockpiles are expected to visually blend into the natural landscape in the limited location where they are visible in the far distance.

Sensory disturbances due to sound and vibration are expected to change over the active closure phase as mining and milling operations cease. Changes to groundwater flows and levels are expected to return to near baseline conditions post-closure, after the cessation of open pit and underground mining.

With the closure of the PA and site rehabilitation allowing for the return of wildlife, there is the possibility of a return of use of the PA for harvesting for food and medicinal purposes.

13.6.4 Mitigation and Enhancement

Mitigation measures for CULRTP have been developed to address potential interactions identified in Section 13.6.3. Mitigation measures are technical measures proposed by the Project, informed by baseline studies, predictive reports, and engagement with Indigenous communities.

Great Bear Resources is designing the mine operation with appropriate safeguards and believes in the spirit of cooperation and consultation; the mine will be a strong source of positive benefits for host communities and Indigenous groups. This commitment is illustrated through Great Bear Resources funding a regional community-based Chukuni Watershed Aquatic Monitoring Program. This will focus on the transfer of knowledge from Elder Advisors from each Nation to youth throughout all phases of the Project. The program will also serve to increase capacity of the Indigenous Nations to complete future monitoring programs to protect the waters throughout Treaty 3 territory.

Mitigation measures include a mix of Project design measures, operational policies, and community partnerships for environmental monitoring. The goal with these mitigation measures is to reduce the magnitude, duration, and likelihood of adverse residual effects on CULRTP.

Table 13.6-2 outlines mitigations thematically, aligning with the interactions identified in Section 13.6.3. These are anticipated to apply to all phases, unless indicated otherwise. Anticipated residual effects after the application of these mitigation measures are discussed in more detail in Section 13.6.6.

Table 13.6-2: Project Design, Mitigation, and Enhancement Measures for CULRTP – Northwestern Ontario Métis Community

Potential Effects	Project Design, Mitigation and Enhancement Measures
Change in availability, access to, and quality of quality of experience related to traditional terrestrial wildlife harvesting (hunting and trapping)	Access: There will be no access within the PA (the active mine site), due to safety. Access will be maintained to the LSA, via the existing road / trail network or planned forestry roads. Environment Management Committee: Great Bear Resources will work with the environmental management committee(s) and interested Indigenous members throughout the duration of the Project (all phases), to facilitate ongoing communications, sharing and integration of Indigenous Knowledge and environmental information, and share and evaluate Project approvals, adaptive management and monitoring plans, and address emerging issues and interests identified by Indigenous Nations. Environmental Monitors: Great Bear Resources will continue to work with the Environmental Management Committee and engage Indigenous environmental monitors from local communities in the implementation of mitigation and monitoring practices for Project activities. Herbicide use: Avoid the use of chemical herbicides Inclusive and Local Hiring Strategy (Project policies): Support reasonable requests and work schedule flexibility for Indigenous employees relating to time off to pursue traditional land use and harvesting activities.

Potential Effects	Project Design, Mitigation and Enhancement Measures
	Great Bear Resources (GBR) will offer employees an Annual Fitness and Mental Health Benefit fund ($500 per annum) which may be used to purchase gear and equipment which would facilitate land-based activities including but not limited to fishing equipment and snowshoes. Integrated Mine Closure: Great Bear Resources is committed to progressively rehabilitating the mine site wherever practical to reduce potential erosion, improve stability and work towards meeting end land use objectives. Closure end land use objectives will be informed by ongoing consultation with local Indigenous Nations. Test plot revegetation studies may occur during operation as part of the commitment to progressive rehabilitation. These studies will evaluate the most effective revegetation approach for various application areas. The results will be used to update and inform the revegetation approach with respect to growth medium, seed mixes and nutrient mixes. Active and passive re-vegetation of the PA to encourage and support terrestrial and aquatic species Prohibition of Fishing and Hunting: Prohibit fishing and hunting within the PA by employees, suppliers, and contractors while working or residing on site. Project Design (visual, dust, and sound): Infrastructure and mine stockpile height has been limited to reduce effects on standard viewscapes; Controlling dust and debris from roads through water sprays and potentially chemical suppressants. The Project has also been designed to minimize construction sounds where applicable (e.g., reduction of generator noise, reduced sound haul trucks); where practical, maintain trees and other vegetation to provide a buffer for the view of Project components. Trapline Engagement: Maintain regular communication with trapline holders regarding activities and opportunities to facilitate their land use activities. Work with MNR and trapline license holders (LSFN members) to determine alternative options for trapline losses
Change in availability, access to, and quality of experience related to traditional aquatic harvesting (fishing and aquatic resources)	Environment Management Committee: Great Bear Resources will work with the environmental management committee(s) and interested Indigenous members throughout the duration of the Project (all phases), to facilitate ongoing communications, sharing and integration of Indigenous Knowledge and environmental information, and share and evaluate Project approvals, adaptive management and monitoring plans, and address emerging issues and interests identified by Indigenous Nations. Environmental Monitors: Great Bear Resources will continue to work with the Environmental Management Committee and engage Indigenous environmental monitors from local communities in the implementation of mitigation and monitoring practices for Project activities. Fish Offsetting Plan: Develop and implement Fish Habitat Offset and Compensation plan, including habitat diversion plans, and fish relocation from affected watercourses. Inclusive and Local Hiring Strategy (Project policies): Support reasonable requests and work schedule flexibility for Indigenous employees relating to time off to pursue traditional land use and harvesting activities. Great Bear Resources will offer employees an Annual Fitness and Mental Health Benefit fund ($500 per annum) which may be used to purchase gear and equipment which would facilitate land-based activities including but not limited to fishing equipment and snowshoes.

Potential Effects	Project Design, Mitigation and Enhancement Measures
	Integrated Mine Closure: Great Bear Resources is committed to progressively rehabilitating the mine site wherever practical to reduce potential erosion, improve stability and work towards meeting end land use objectives. Closure end land use objectives will be informed by ongoing consultation with local Indigenous Nations. Test plot revegetation studies may occur during operation as part of the commitment to progressive rehabilitation. These studies will evaluate the most effective revegetation approach for various application areas. The results will be used to update and inform the revegetation approach with respect to growth medium, seed mixes and nutrient mixes. Active and passive re-vegetation of Project area to encourage and support terrestrial and aquatic species Prohibition of Fishing and Hunting: Prohibit fishing and hunting within the PA by employees, suppliers, and contractors while working or residing on site.
Change in availability, access to, and quality of experience related to traditional plant harvesting (food and medicinal)	Access: There will be no access within the PA (the active mine site), due to safety. Access will be maintained to the LSA, via the existing road/trail network or planned forestry roads. Environment Management Committee: Great Bear Resources will work with the environmental management committee(s) and interested Indigenous members throughout the duration of the Project (all phases), to facilitate ongoing communications, sharing and integration of Indigenous Knowledge and environmental information, and share and evaluate Project approvals, adaptive management and monitoring plans, and address emerging issues and interests identified by Indigenous Nations. Environmental Monitors: Great Bear Resources will continue to work with the Environmental Management Committee and engage Indigenous environmental monitors from local communities in the implementation of mitigation and monitoring practices for Project activities. Herbicide use: Avoid the use of chemical herbicides. Inclusive and Local Hiring Strategy (Project policies): Support reasonable requests and work schedule flexibility for Indigenous employees relating to time off to pursue traditional land use and harvesting activities. Great Bear Resources will offer employees an Annual Fitness and Mental Health Benefit fund ($500 per annum) which may be used to purchase gear and equipment which would facilitate land-based activities including but not limited to fishing equipment and snowshoes. Integrated Mine Closure: Great Bear Resources is committed to progressively rehabilitating the mine site wherever practical to reduce potential erosion, improve stability and work towards meeting end land use objectives. Closure end land use objectives will be informed by ongoing consultation with local Indigenous Nations. Test plot revegetation studies may occur during operation as part of the commitment to progressive rehabilitation. These studies will evaluate the most effective revegetation approach for various application areas. The results will be used to update and inform the revegetation approach with respect to growth medium, seed mixes and nutrient mixes. Active and passive re-vegetation of the PA to encourage and support terrestrial and aquatic species. Plant Harvesting (for food and medicinal purposes): Where there is interest, provide opportunities to local Indigenous community members to harvest plants for traditional purposes prior to construction activities.

Potential Effects	Project Design, Mitigation and Enhancement Measures
	Project Design (visual, dust, and sound): Infrastructure and mine stockpile height has been limited to reduce effects on standard viewscapes; Controlling dust and debris from roads through water sprays and potentially chemical suppressants. The Project has also been designed to minimize construction sounds where applicable (e.g., reduction of generator noise, reduced sound haul trucks); where practical, maintain trees and other vegetation to provide a buffer for the view of Project components. Wild Rice Enhancement Project: Great Bear Resources has funded a study by Northern Bioscience and Harris Ecological Consulting, upon the request of Lac SFN and WFN. The purpose of this study is to help address the loss of historic wild rice (Manoomin) production on Wabauskang Lake. Potential effects on wild rice are anticipated because of an overprint at Unnamed Waterbody 1 by Project infrastructure. The enhancement study is anticipated to offset potential effects on wild rice as a result of the Project. The wild rice enhancement location, on WFN reserve, has been recommended by the WFN and supported by LSFN. The study will develop potential enhancement options for implementation in 2026. In addition to habitat restoration, the project will incorporate education and knowledge-sharing on sustainable harvesting practices, supporting long-term stewardship by community members. This collaborative initiative could support broader wild rice revitalization projects in the future and could be shared with other Indigenous communities in the local area if there is interest, advancing the understanding, and recovery of this culturally and ecologically significant plant. Together, these efforts will support a more holistic understanding of Wild Rice habitats, cultural values, and their continued importance to the region.
Change in availability, access to, and quality of experience related to traditional habitation cultural, and spiritual sites and areas	Access: There will be no access within the PA (the active mine site), due to safety. Access will be maintained to the LSA, via the existing road / trail network or planned forestry roads. Environment Management Committee: Great Bear Resources will work with the environmental management committee(s) and interested Indigenous members throughout the duration of the Project (all phases), to facilitate ongoing communications, sharing and integration of Indigenous Knowledge and environmental information, and share and evaluate Project approvals, adaptive management and monitoring plans, and address emerging issues and interests identified by Indigenous Nations. Environmental Monitors: Great Bear Resources will continue to work with the Environmental Management Committee and engage Indigenous environmental monitors from local communities in the implementation of mitigation and monitoring practices for Project activities. Inclusive and Local Hiring Strategy (Project policies): Support reasonable requests and work schedule flexibility for Indigenous employees relating to time off to pursue traditional land use and harvesting activities. Great Bear Resources will offer employees an Annual Fitness and Mental Health Benefit fund ($500 per annum) which may be used to purchase gear and equipment which would facilitate land-based activities including but not limited to fishing equipment and snowshoes. Integrated Mine Closure: Great Bear Resources is committed to progressively rehabilitating the mine site wherever practical to reduce potential erosion, improve stability and work towards meeting end land use objectives.

Potential Effects	Project Design, Mitigation and Enhancement Measures
	Closure end land use objectives will be informed by ongoing consultation with local Indigenous Nations. Test plot revegetation studies may occur during operation as part of the commitment to progressive rehabilitation. These studies will evaluate the most effective revegetation approach for various application areas. The results will be used to update and inform the revegetation approach with respect to growth medium, seed mixes and nutrient mixes. Active and passive re-vegetation of Project area to encourage and support terrestrial and aquatic species. Project Design (visual, dust, and sound): Infrastructure and mine stockpile height has been limited to reduce effects on standard viewscapes; Controlling dust and debris from roads through water sprays and potentially chemical suppressants. The Project has also been designed to minimize construction sounds where applicable (e.g., reduction of generator noise, reduced sound haul trucks); where practical, maintain trees and other vegetation to provide a buffer for the view of Project components.

Attached Table 13.1-1 includes mitigation measures applicable to the management of effects on pVCs and fVCs that are linked with CULRTP for NWOMC. It includes plans, policy and measures from predictive reporting on Project pVCs and fVCs. These will be applied for effects management.

13.6.5 GBA Plus Considerations

During the life of the Project, the PA will be inaccessible. This is expected to last for approximately 32 years once construction begins until the end of active closure. As presented in Appendix X, the Gender-Based Analysis Plus (GBA Plus) subgroups who could experience negative effects by restricted access include:

- Indigenous Peoples. This includes men+, women+, Elders and youth. The inability to access areas associated with wildlife harvesting may result in the loss of transmission of knowledge across multiple generations.

While the PA will be inaccessible, traditional land use activities reported in the LSA and RSA, ranging from trapping to plant gathering and wild rice harvesting can continue.

13.6.6 Residual Effects after Mitigation

After the implementation of mitigation measures, assessment and characterization of potential residual effects on CULRTP is completed using the methodology outlined in Section 6. Further details on residual effect criteria ratings that are specific to CULRTP are defined in Section 6 and in Section 13.3.2.

The attached Table 13.1-1 summarizes the results of the assessment for the linked pVC and fVC components. Detailed description on the methods, existing conditions, mitigation measures, and residual effects can be found in their respective sections.

Based on the assessment of linked pVCs and fVCs, residual changes after mitigation considered as part of the assessment of residual effects on CULRTP are:

- Migratory birds (fVC)
- Air quality (pVC)

- Sound (pVC)
- Vibration (pVC)
- Visual Environment (pVC)
- Groundwater (pVC)
- Surface Water Flows and Levels (pVC)
- Water quality (pVC)
- Vegetation communities (pVC)
- Moose (pVC)
- Other wildlife (pVC)
- Species at Risk (pVC)
- Cultural Heritage (pVC)

There are other linked pVCs and fVCs listed in Table 13.1-1 and section 13.1 linked to CULRRP that residual effects after mitigation measures have been applied. This includes the fVC Fish and Fish Habitat, Wild Rice, Land and Resource Use, and Archaeology. This means that Project activities will not change their existing conditions over the Project life cycle. Therefore, those linked pVCs and fVCs are not carried forward into the residual effects assessment for NWOMC citizens.

13.6.6.1 Residual Effects Remaining after Mitigation – Northwestern Ontario Métis Community

Following the identification of potential effects between Project activities and CULRTP indicators, potential effects were evaluated to determine whether the proposed mitigation measures would fully address the effect. Where mitigation measures were determined to effectively avoid the interaction, no residual effect was carried forward. Where the mitigation measures reduced but did not fully eliminate the potential for an effect, the interaction was carried forward for residual effects characterization. This process made sure that only unmitigated or partially mitigated effects were included in the residual effects assessment.

Table 13.6-3 summarizes the potential effects that remain after mitigation and enhancement measures are implemented.

Table 13.6-3: Residual Effects Remaining After Mitigation – Current Use of Lands and Resources for Traditional Purposes for Northwestern Ontario Métis Community

Potential Effect		Potential Residual Effect Remaining after Mitigation (Y/N)
Change in availability, access to, and quality of experience related to traditional terrestrial wildlife harvesting (hunting and trapping)	Availability (quantity of traditionally hunted and trapped wildlife species available)	Y
	Access (to locations and areas for hunting and trapping)	N
	Quality of experience (detectable changes to sensory conditions at harvesting sites or areas)	Y

Potential Effect		Potential Residual Effect Remaining after Mitigation (Y/N)
Change in availability, access to, and quality of experience related to traditional aquatic harvesting (fishing)	Availability (quantity of traditionally fished species available)	N
	Access (to locations for fishing and aquatic harvesting)	N
	Quality of experience (detectable changes to sensory conditions at harvesting sites or areas)	N
Change in availability, access to, and quality of experience related to traditional plant harvesting (food and medicinal purposes)	Availability (quantity of traditionally gathered plant species available)	N
	Access (to locations for plant gathering and picking)	N
	Quality of experience (detectable changes to sensory conditions at harvesting sites or areas)	Y
Change in availability, access to, and quality of experience related to traditional habitation, cultural, and spiritual sites and areas	Availability (of traditional habitation, cultural, and spiritual sites and areas – e.g., not altered or destroyed)	N
	Access (changes to access to sites and areas identified)	N
	Quality of experience (detectable changes to sensory conditions at traditional habitation, cultural, or spiritual sites and areas currently used)	Y

13.6.6.1.1 Change in Availability, Access to, and Quality of Experience Related to Traditional Terrestrial Wildlife Harvesting (Hunting and Trapping)

NWOMC has identified large and small game harvesting areas/habitat in the PA, LSA and RSA. Hunting and trapping occurs in the LSA and RSA. Access to the PA will be restricted due to safety, however, access, availability and quality of experience relating to terrestrial wildlife harvesting areas in the LSA and RSA will not be affected. Given NWOMC's use of the LSA and RSA for harvesting, there may be indirect effects for NWOMC citizens relating to changes in availability and quality of experience.

Project activities through construction to closure may affect wildlife behaviour and responses directly in the PA. This may result in a localized change in environmental conditions within the PA, which could indirectly affect available wildlife harvesting opportunities within the LSA for NWOMC citizens. While it is acknowledged that the PA contains large and small game harvesting areas/habitat there is no current use identified of the PA for hunting and trapping. Access and availability of harvesting opportunities will remain in the LSA and RSA for NWOMC. Availability of hunted and trapped species and quality of experience while harvesting may be indirectly affected in the LSA and areas immediately adjacent to the PA. This is due to changes in wildlife behaviour as a result of sensory disturbance. Habitat in the RSA will remain for all wildlife species, and there are no Project features expected to affect any wildlife species or populations.

No critical moose habitat types are expected to be eliminated, and there are no residual changes to Moose, Other Wildlife, or Species at Risk pVCs assessment. Due to this, it is anticipated that availability of large and small game will not be reduced for hunting and trapping activities as a result of changes to wildlife populations. While residual effects were predicted for migratory birds, they were predicted to be not significant after mitigation has been applied.

Table 13.6-4 characterizes the residual effect attributes related to traditional terrestrial wildlife harvesting practices.

Table 13.6-4: Characterization for Negative Residual Effects on Change in Availability, Access to, and Quality of Experience Related to Traditional Terrestrial Wildlife Harvesting (Hunting and Trapping) for Northwestern Ontario Métis Community

Attribute	Category	Rationale
Ecological or Social Context	Level I	Criteria may or may not be sensitive and can support the predicted change with typical mitigation measures.
Magnitude	Level I	Project-related changes may increase the effort necessary but will not reduce the ability of Indigenous Peoples to practice traditional activities related to the current use of lands and resources for traditional purposes. Access and availability of terrestrial wildlife harvesting in the PA to be restricted due to safety regulations on site, however there is no identified current use of the PA by NWOMC for hunting and trapping. Harvesting opportunities will remain in the LSA and RSA. Changes to availability and quality of experience in the LSA may increase the effort necessary to harvest but not reduce the ability to practice these traditional activities.
Geographic Extent	Level I	Effect is restricted to the LSA.
Duration	Level II	Effect occurs over the medium term, more than three years but less than 32 years.
Frequency	Level II	Effect occurs intermittently or regularly.
Reversibility	Level I	Effect is fully reversible during the Project phases.
Timing	Level I	Effects do not occur during a sensitive period, or related effects are fully mitigated.

13.6.6.1.2 Change in Availability, Access to, and Quality of Experience Related to Traditional Plant Harvesting (Food and Medicine)

As NWOMC members gather terrestrial plants in the LSA, it is anticipated that changes to the quality of experience related to terrestrial plant gathering will have indirect effects on plant harvesting for food and medicinal purposes by NWOMC in the LSA.

For NWOMC gathering plants in the LSA, it is anticipated that access and availability will not be directly affected, as it is outside of the PA where de-vegetation would occur. Available terrestrial and aquatic plant harvesting sites in the LSA and RSA, which include yearly harvesting of wild berries and wild rice, will remain accessible. While access to the PA will be prohibited for safety purposes from the onset of construction until following active closure, Great Bear Resources will provide opportunities to local Indigenous community members to harvest plants for traditional purposes in the PA prior to initiating construction activities.

For NWOMC gathering plants in the LSA, their quality of experience while gathering plants for food, medicinal, and natural resource purposes may still be indirectly affected by Project activities at sites and areas immediately near the PA. This is due to changes in flows and levels of groundwater reducing groundwater contributions to waterways and waterbodies adjacent to the PA, and sensory disturbances (dust, sound, light, vibration) along roads where NWOMC gather plants and natural resources. The quality of experience while plant gathering near the PA may be affected by sensory disturbances and viewscape changes. Table 13.6-5 characterizes the residual effect attributes related to terrestrial plant gathering for food and medicinal purposes.

Table 13.6-5: Characterization for Negative Residual Effect on Change in Availability, Access to, and Quality of Experience Related to Traditional Plant Harvesting (Food, Medicine, and Natural Resources) for Northwestern Ontario Métis Community

Attribute	Category	Rationale
Ecological or Social Context	Level I	Criteria may or may not be sensitive and can support the predicted change with typical mitigation measures.
Magnitude	Level I	Project-related changes may increase the effort necessary but will not reduce the ability of Indigenous Peoples to practice traditional plant harvesting activities related to the current use of lands and resources for traditional purposes. NWOMC has not identified current use of the PA for plant gathering, and no change in access is anticipated for sites and areas in the LSA. In the LSA, quality of experience during plant harvesting may be affected due to changes in sensory (sound) disturbances and changes to viewscapes, however, they will not reduce the ability to practice these traditional activities.
Geographic Extent	Level I	Effect is restricted to the LSA.
Duration	Level II	Effect occurs over the medium term: more than three years but less than 32 years.
Frequency	Level II	Effect occurs intermittently or regularly
Reversibility	Level I	Effect is fully reversible during the Project phases.
Timing	Level I	Effects do not occur during a sensitive period, or related effects are fully mitigated.

13.6.6.1.3 Change in Availability, Access to, and Quality of Experience Related to Traditional Habitation, Cultural, and Spiritual Sites and Areas

As NWOMC members have identified overnight stay areas (including traditional campsite habitation areas) in the LSA approximately 3 to 5km away from the PA boundaries, it is anticipated that changes to the quality of experience related to visiting these sites will have indirect effects on NWOMC.

For NWOMC visiting traditional habitation sites in the LSA, access and availability of sites will not be directly or indirectly affected, as they are outside of the PA.

Available campsites, cultural and spiritual sites and areas and other habitation sites currently used will remain accessible in the LSA and RSA.

NWOMC visiting traditional habitation sites in the LSA may still be indirectly affected by changes in the quality of experience. This is due to (dust, sound, vibration) along roads where NWOMC gather plants and natural resources. The quality of experience of plant gathering near the PA may be affected by sensory (sound, dust, light, vibration) disturbances and viewscape changes around NWOMC habitation, cultural, and spiritual sites and areas in the LSA.

Table 13.6-6 characterizes the residual effect attributes related to traditional habitation, cultural, and spiritual sites and areas.

Table 13.6-6: Characterization of Negative Residual Effects on Change in Availability, Access to, and Quality of Experience Related to Traditional Habitation, Cultural, and Spiritual Sites and Areas for Northwestern Ontario Métis Community

Attribute	Category	Rationale
Ecological or Social Context	Level I	Criteria may or may not be sensitive and can support the predicted change with typical mitigation measures.
Magnitude	Level I	Project-related changes may increase the effort necessary but will not reduce the ability of Indigenous Peoples to practice traditional plant harvesting activities related to the current use of lands and resources for traditional purposes: NWOMC have not identified current use of the PA for traditional habitation, cultural, or spiritual sites and areas. No change in access for these sites and areas is anticipated in the LSA. In the LSA, quality of experience may be affected due to changes in sensory (sound) disturbances and change to viewscapes. This effect may increase the effort necessary but will not reduce the ability to practice these traditional activities.
Geographic Extent	Level I	Effect is restricted to the LSA.
Duration	Level II	Effect occurs over the medium term.
Frequency	Level II	Effect occurs intermittently or regularly
Reversibility	Level I	Effect is fully reversible during Project phases.
Timing	Level I	Effects do not occur over a sensitive period, or related effects are fully mitigated.

13.6.7 Significance of Residual Effects

The magnitude of the effect on CULRTP as a result of Project-related activities is low (Level I) and restricted to the LSA (Level I). The effect will occur infrequently (Level I), will occur over the medium term of more than three years but less than 32 years (Level II), and will be fully reversible at closure (Level I). The importance of conducting traditional practices is very high for Indigenous Peoples, however the small, localized effect can be accommodated in terms of social context (Level I). The residual effect is therefore not significant.

13.6.8 Confidence

The prediction confidence assignment reflects the information available through Project-specific TKLUS reports, publicly available data (statistical websites, government pages, previously completed EA/IS reports), understanding of the effectiveness of applicable mitigation measures, and outcomes of other pVCs and fVCs. The assessment is informed by substantial primary and secondary information and robust analysis however, as noted in the assessment, there are some instances where the information collected had data gaps or lacked detail.

The overall confidence in residual environmental effect and significance predictions for CULRTP is moderate. As additional information continues to be shared through Great Bear Resources' ongoing consultation with local Indigenous communities over Project life, relevant information will be incorporated into Project planning as practical.

13.7 Indigenous Physical and Cultural Heritage, Including Structures, Sites or Things of significance

Indigenous physical and cultural heritage was selected as a criteria to evaluate how the Project may interact with sites or areas of Indigenous heritage importance (including archaeological, historical, or architectural sites), as well as associated ceremonial, spiritual and cultural values. Indigenous physical and cultural heritage differs from the pVCs of archaeology and cultural heritage in that it is an fVC; also, it encompasses both tangible heritage, such as physical places of heritage value, and intangible heritage, such as customs, practices and teachings that convey cultural knowledge of heritage value. Potential effects are assessed to evaluate potential changes to these sites, areas as a whole. As outlined in the methods (Section 13.3.2), the assessment of Northwestern Ontario Métis Community (NWOMC) physical and cultural heritage considers the following criteria:

- Alteration or destruction of sites or areas of Indigenous heritage importance, including archaeological, historical, or architectural sites
- Change in access to or quality of experience with sites or areas of Indigenous heritage importance, including archaeological, historical, or architectural sites
- Change in sacred, ceremonial, spiritual and cultural values (including language, stories and traditions) associated with sites or areas of Indigenous heritage importance, including archaeological, historical, or architectural sites.

Publicly available summaries of Indigenous physical and cultural heritage for NWOMC are limited; however, NWOMC has provided input through ongoing engagement and confidential TKLUS reporting. This assessment incorporates that information while respecting confidentiality.

Sites and areas discussed in relation to the archaeology and cultural heritage pVCs include physical heritage sites and areas, as defined under the *Ontario Heritage Act* (OHA). These are considered OHA-defined physical heritage, which is also commonly regarded as having heritage importance to Indigenous communities. The current use of lands and resources for traditional purposes criteria was also considered to reflect forms of Indigenous physical and cultural heritage that are not defined or protected under the OHA but are commonly valued by Indigenous communities, including NWOMC, as indicated in their confidential TKLUS report.

13.7.1 Spatial Boundaries

There are three study areas within the spatial boundaries. They are the Project Area (PA), the Local Study Area (LSA), and the Regional Study Area (RSA), which includes both the PA and the LSA. The spatial boundaries used for the assessment of Indigenous physical and cultural heritage are shown in Figure 13.7-1 and are defined:

- The PA is defined as the footprint of the Project, including all temporary and permanent areas associated with the mine site, as well as a buffer to allow flexibility for design optimizations prior to construction and over the mine life (Section 6.4). The PA is approximately 3,349 hectares (ha) in size.
- The LSA is the area within which Project-related effects may reasonably be expected to occur and can be predicted or measured with reasonable accuracy and confidence. Based on the relationship between Indigenous heritage and the current use of lands and resources for traditional purposes, these Criteria share an LSA, which is defined using the LSAs of the moose and other wildlife pVCs.
  These LSAs integrate a range of resources and places that support traditional use, which in turn supports cultural practices integral to Indigenous physical and cultural heritage, along with associated intergenerational knowledge transfer. This LSA also encompasses the LSAs for the pVCs of archaeology and cultural heritage which are more narrowly defined by a buffer of 1 km around the PA for both; the selection of these areas as the LSAs for these pVCs is guided by the potential for direct physical effects to the integrity of archaeological and cultural heritage resource; the selection of this area as the LSA for these pVCs is guided by the potential for direct physical effects to the integrity of archaeological and cultural heritage resources.
- The RSA encompasses the LSA and is used to provide regional context for the significance of residual effects; it is also the area within which potential for cumulative effects of the Project in combination with other past, present or reasonably foreseeable projects or activities are considered. For Indigenous physical and cultural heritage, the RSA is again defined based on the RSAs for the moose and other wildlife pVCs for the same reasons as identified for the LSA. The RSAs for the related pVCs of archaeology and cultural heritage are the same as the LSAs, again reflecting these pVCs' primary concern with physical effects to archaeological and cultural heritage resources.

These boundaries are consistent with those used for Current Use of Lands and Resources for Traditional Purposes (CULRTP).

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WEESKAYJAHK OHTAHZHOGANEENG

BEEKAHNCHEEKAHMEENG DEEBAHNCHEEKAYWEEHN EENAHOHNAHNUHN

KAHNAHMAYKOOSAYSEEKAHK

TROUT LAKE PROVINCIAL PARK (NATURE RESERVE CLASS)

MUNICIPALITY OF RED LAKE

HIGHWAY 125

WOODLAND CARIBOU PROVINCIAL PARK (WILDERNESS CLASS)

PAKWASH PROVINCIAL PARK (NATURAL ENVIRONMENT CLASS)

TOWNSHIP OF EAR FALLS

HIGHWAY 105

WEST ENGLISH RIVER PROVINCIAL PARK (WATERWAY CLASS)

MAYNARD LAKE PROVINCIAL PARK (NATURE RESERVE CLASS)

TIDE LAKE PROVINCIAL PARK (NATURE RESERVE CLASS)

WINDIGO POINT PROVINCIAL PARK (NATURE RESERVE CLASS)

Wabauskang First Nation

Lac Seul First Nation

Asubpeeschoseewagong Netum Anishinabek

LEGEND:

- PROJECT AREA
- LOCAL STUDY AREA
- REGIONAL STUDY AREA
- HIGHWAY
- MAJOR ROAD
- LOCAL ROAD
- RAILWAY
- WATERCOURSE
- WATERBODY
- INDIGENOUS COMMUNITY
- PROVINCIAL PARK
- MUNICIPAL BOUNDARY (LOWER TIER)

NOTES:
NOTE1: BASE DATA ACQUIRED FROM LAND INFORMATION ONTARIO.

0 5 10 20 30 km

SCALE 1:550,000
PAGE SIZE 11 x 17
NAD 1983 UTM Zone 15N

THIS MAP IS FOR CONCEPTUAL PURPOSES ONLY AND SHOULD NOT BE USED FOR NAVIGATION

GREAT BEAR RESOURCES

GREAT BEAR GOLD PROJECT

SPATIAL BOUNDARIES FOR INDIGENOUS PHYSICAL AND CULTURAL HERITAGE AND STRUCTURES, SITES, OR THINGS

SLR

FIGURE NO:
13.7-1

DATE: November 28, 2025

PROJECT NO: 241.030825

13.7.2 Existing Conditions

A summary of existing conditions for Indigenous physical and cultural heritage, along with the methods used to characterize baseline conditions is informed by Project-specific TKLUS reporting provided by NWOMC that outlines traditional use of the PA, LSA, and RSA for harvesting and other cultural activities with links to NWOMC physical and cultural heritage.

The discussion also draws on publicly available sources, including academic literature, government reports, and information available on the MNO and NWOMC websites. The TKLUS reporting from NWOMC discusses both current and historical use in relation to traditional use activities and locations in the PA, LSA and RSA. For this assessment, it is assumed that any traditional use locations, whether current or historical, may hold heritage meaning and value to any Indigenous Peoples that use the area, which may include NWOMC.

13.7.2.1 Methods

This assessment includes consideration of the archaeology and cultural heritage pVCs, along with the current use of land and resources for traditional purposes criteria and Project-specific confidential TKLUS reports, since these collectively describe places and practices of possible heritage interest to the potentially affected Indigenous communities. Specifically, the archaeology and cultural heritage pVCs provide information on physical heritage places that are protected under the OHA and of potential importance to Indigenous communities.
The current use of lands and resources for traditional purposes criteria captures ongoing traditional activities that both extend from and pass forward these Indigenous communities' physical and cultural heritage places, values and teachings.

The archaeology studies (Appendix Q-1) and cultural heritage studies (Appendix P-1) undertaken in support of this Impact Statement were consulted for information on the identification of physical heritage as required under the Ontario Heritage Act (OHA) and Ontario Regulations (O. Reg.) 9/06 and 10/06 (Appendix P-1). The terrestrial archaeology assessment report is in Appendix Q-1, and the marine archaeological assessment report is in Appendix Q-2. Project-specific TKLUS reports provided by potentially affected Indigenous communities were used to further inform on the current use of lands and resources for traditional purposes. These confidential sources are not appended to the IS.

This assessment also used available public sources and engagement records. However, defining Indigenous physical and cultural heritage in relation to the Project remains somewhat interpretive, as its holistic continuity with traditional land- and water-based cultural places and activities, including the transfer of intergenerational knowledge, makes it challenging to consider in isolation. For this reason, a conservative approach to the identification of Indigenous physical and cultural heritage was used. An inclusive approach was also applied specifically to the current use of lands and resources for traditional purposes; that is, all places and practices considered in relation to the current use of lands and resources for traditional purposes were regarded as having possible heritage value.

The publicly available sources used in the assessment of Indigenous physical and cultural heritage include:

- Publicly available NWOMC submissions to IAAC regarding the Project and its assessment
- Academic literature, including published books and articles and unpublished theses and dissertations

- Sources available through the NWOMC and MNO websites, including federal and provincial agreements with MNO, information on NWOMC, its history and its constituent communities; and information on the organizational relationship between NWOMC and MNO
- Government documents and reports on the Rainy River / Lake of the Woods / Treaty 3 Historic Métis Community
- Recent news or information articles and websites
- Sources and summaries available from online resources.

In addition to the publicly available sources of information, the description of existing conditions was informed by a confidential report prepared by or for NWOMC. The information in this report is considered proprietary to the respective Indigenous community. Therefore, it is generally identified as confidential reports in this section.

13.7.2.2 Description

The description of physical and cultural heritage sites, areas or things of significance by NWOMC includes a description of the historic, and where applicable current land use and governance at these sites, areas or things.

13.7.2.3 Past and Current Traditional Use of Places and Practices

The heritage elements of traditional places and practices are rooted in past use, which often continues to the present day because of NWOMC's ongoing use of lands and waters. Heritage value also develops and evolves over time.

13.7.2.3.1 Historical Context of Northwestern Ontario Métis Community

The emergence of Métis identity is rooted in the expansion of the fur trade across Canada. As individuals of European descent established trade posts and relationships, they also established partnerships and families with women+ of Indigenous descent. These families became crucial to fur trade activities, using their geographic and linguistic knowledge, as well as their cultural fluency, to facilitate relations between Indigenous and non-Indigenous participants in the fur trade and to support the trading companies as interpreters, provisioners, guides and post staff (Government of Ontario 2017; Praxis Research Associates 2002; Reimer 1999; Van Kirk 1980).

Research based on fur trade records, early census data and historic accounts indicate that, in the RSA, Métis individuals and families played a prominent role starting in the eighteenth century, when the North West Company (NWC) and other fur traders based out of Quebec expanded westward from Lake Superior, while the competing Hudson's Bay Company (HBC) extended its reach from posts along Hudson's Bay (Praxis Research Associates 2002; Reimer 1999). Records are more substantial following the amalgamation of the NWC with the HBC in 1821, particularly for posts around Rainy Lake, Rainy River and Lake of the Woods; limited information is also available for posts in the area of Kenora and Dryden (Government of Ontario 2017; Praxis Research Associates 2002; Reimer 1999).

Historic documents chronicling the negotiation of Treaty 3 between 1871 and 1873 emphasize the importance of Métis as interpreters and facilitators (Praxis Research Associates 2002; Reimer 1999).

Negotiations began when the region's Anishinaabeg residents observed the efforts of the federal government to develop transportation routes through the region to the Red River colony, and Indigenous communities sought compensation and a formal agreement with the Government of Canada. The treaty involved multiple rounds of negotiation, and the Métis who assisted were given considerable credit for its conclusion (Filice 2025).

Nicolas Chatelain, a respected Métis resident of the region and trade post manager, was one of these intermediaries, serving as a federal government interpreter during the negotiation of Treaty 3 (Barkwell 2016.; Praxis Research Associates 2002; Reimer 1999). He also signed an 1875 adhesion to Treaty 3 on behalf of a group of Métis families living among the Anishinaabeg of the Rainy Lake area (Barkwell 2016.; The Métis Nation of Ontario n.d.). The adhesion of Métis to a treaty was unusual, as federal government policy was to create treaties with Indigenous Nations and to offer land in the form of scrip to Métis (The Métis Nation of Ontario n.d.). In this instance, Chief Mawedopenais of Fort Frances advocated during the Treaty 3 negotiations for the indication that, in addition to the Métis families at the Couchiching reserve, Métis people resided in McIrvine, a community also near Fort Frances, as well as in and around Kenora (Praxis Research Associates 2002, Reimer 1999). Moving into the twentieth century, information on the economic pursuits of Métis in the region suggests involvement with the development of mining, forestry, fishing and tourism industries. Oral history from descendant communities confirms this pattern, noting an ongoing relationship with occupations linked to the area's natural resources (Praxis Research Associates 2002; Reimer 1999). A confidential Project-specific report on NWOMC traditional land use highlights that, during this timeframe, Métis individuals and families engaged in harvesting activity were not recognized as Indigenous, excluding them from measures like exemptions from licensing for Indigenous fishers; moving into the twentieth century, it resulted in Métis trappers being categorized as non-Indigenous and not qualifying for current Ontario government policies that favour allocation of traplines to Indigenous owners.

This history underpins the physical and cultural heritage places and practices of the region's Métis people (e.g., creation of fur trade archaeological sites, continuation of traditional harvesting practices). At the same time, it has eroded both the tangible and intangible elements of Indigenous physical and cultural heritage (e.g., disruption of intergenerational knowledge transfer due to industrial development and challenges to Métis harvesting rights).

13.7.2.3.2 Current Heritage Perspectives of Northwestern Ontario Métis Community

The descendant groups of the Métis families who historically gathered in and around communities like Kenora and McIrvine, as well as the Couchiching reserve, are today recognized as one of Ontario's historical Métis communities (Government of Ontario 2017; The Northwestern Ontario Métis Community 2025a). Referred to as the Rainy River / Lake of the Woods / Treaty 3 Historic Métis Community in provincial government reports (Praxis Research Associates 2002; Reimer 1999), they are currently represented by NWOMC and the four community councils which comprise it: the Atikokan Métis Council, Kenora Métis Council, Northwest Métis Council, and Sunset Country Métis Council (The Northwestern Ontario Métis Community 2025b).

With over 3000 members, NWOMC identifies itself as:

> *…a distinct regional rights-bearing community with a unique history, identity, relationship to the land, and self-government structures. This history includes both historic and ongoing collective assertions as a distinct Métis collectivity, including, the negotiation of the Adhesion by Half breeds of Rainy River and Lake to Treaty No. 3 in 1875 as well as the establishment of distinct settlements at locations such as Rideout…* (The Northwestern Ontario Métis Community 2025a).

NWOMC's community councils are Métis Nation of Ontario (MNO) chartered communities, and NWOMC participates within MNO's self-government framework using a consultation committee comprised of one representative from each community; it is chaired by the MNO Regional Councillor and includes NWOMC's Captain of the Hunt as an ex officio member who with responsibilities linked to implementation and management of harvesting policies.

This committee, on behalf of NWOMC and MNO, entered into the 2017 Agreement on Advancing Reconciliation with the Northwestern Ontario Métis Community (MNO and Canada 2017) with the federal government to affirm their government-to-government relationships and the rights of NWOMC members, including harvesting rights, under Section 35 of the Constitution Act. The identity of NWOMC's members remains rooted in the historical experience of Métis in this region, and they maintain their traditional practices, including hunting, trapping, fishing, plant gathering and other cultural activities, reflecting their ongoing expression of their Métis heritage and their continued relationship with northwestern Ontario and its natural resources (The Métis Nation of Ontario 2025c).

Confidential Project-specific TKLUS reports prepared for NWOMC provide information on traditional use of the PA, LSA, and RSA. These reports provide map data indicating that these areas fall within NWOMC's Lake of the Woods / Lac Seul Traditional Harvesting Territory (THT), the more northerly of their two THTs. NWOMC identifies large and small game harvesting areas in the PA and the LSA. No kill sites have been identified in the PA by NWOMC, and no specific species of cultural importance have been identified in relation to the harvesting areas that overlap with the PA. NWOMC has identified hunting, trapping, and kill sites in the LSA for terrestrial species of cultural importance, including moose, partridge, grouse, and rabbit. NWOMC notes that hunting and the places where animals are sought constitute an important context for familial sharing of Métis culture and knowledge. NWOMC also reports that one family gather blueberries, chanterelle mushrooms and fiddleheads in the LSA, along Highway 105; plant gathering is another activity in which intergenerational transmission of cultural knowledge commonly occurs.

NWOMC does not indicate any fishing locations in the PA, but expresses concerns about the downstream health of the English River system due to their extensive use for fishing activities. Several overnight stay locations have been documented in the LSA, but none occur within the PA. One cultural heritage site has been documented at the far eastern edge of the LSA; the nature of this site is not indicated in NWOMC's confidential reporting.

13.7.2.4 Archaeological Sites

Archaeology is a Western-based science that uses material remains to understand past ways of life. It relies on physical evidence to define archaeological sites, so it may not capture less tangible forms of heritage, although these are often discussed in the context of cultural heritage and TKLUS reports (see Section 7.14 and Section 7.15).

As required under the OHA, archaeological studies supporting the Project to date have included Stage 1, 2, and 3 desktop and field studies for terrestrial areas (Appendix Q-1).

Additionally, a marine archaeological study focused on waterbodies was conducted, involving both desktop and fieldwork (Appendix Q-2). In both cases, initial desktop studies and subsequent field surveys extended to the boundary of the Great Bear Resources Property, covering the PA and nearby areas. All archaeological work to date falls within the LSA of the Indigenous physical and cultural heritage criteria (see Section 7.15).

The desktop component of the marine archaeological studies identified Unnamed Waterbody 1, Unnamed Waterbody 2, Unnamed Waterbody 6, Pakwash Lake, Dixie Lake, Dixie Creek and the Chukuni River in the PA and adjacent portions of the LSA as having archaeological potential(Appendix Q-2 2025).

The 2024 and 2025 fieldwork supporting the marine archaeological study involved visual inspections of Unnamed Waterbody 1, as well as the Chukuni River, where an effluent discharge pipe is planned; no archaeological materials were identified (Appendix Q-2).

The survey work carried out for the Stage 2 terrestrial archaeological studies resulted in the identification of five previously undocumented Pre-contact archaeological sites within the surveyed area (Appendix Q-1). These sites include:

- EfKj-1: a Late Woodland period site within the PA on Unnamed Waterbody 1
- EfKj-2: a Pre-contact period site on Dixie Creek within the LSA
- EfKj-3: a Late Paleo period site within the LSA on Unnamed Waterbody 6, adjacent to EfKj-4
- EfKj-4: a Late Paleo period site on Unnamed Waterbody 6, within the LSA
- EeKi-4: a Middle and Late Woodland period site on Pakwash Lake within the LSA

Stage 3 work has been undertaken at EfKj-1, EfKj-2, EfKj-3, and EfKj-4; no further work was pursued at EeKi-4 due to its distance from the PA. As outlined in Ontario's *Standards and Guidelines for Consulting Archaeologists* (MTCG, 2011), affected Indigenous communities must be engaged during Stage 3 when assessing the cultural heritage value or interest of sites which are (a) the subject of Indigenous oral history, (b) have known or potential sacred or spiritual importance, or (c) show an association with traditional land use or geographic features of cultural heritage interest. These communities must also be engaged when formulating the Stage 4 mitigation strategy for Indigenous sites characterized as rare, sacred or of Woodland age.

These requirements are applicable to EfKj-1, EfKj-2, EfKj-3, and EfKj-4, and based on these sites' Pre-Contact cultural materials and affiliations, LSFN and WFN have shared Anishinaabe perspectives on them during site visits during the Stage 3 work in 2024 and 2025 (Appendix Q-1), indicating, in the course of their site visits, that they regard EfKj-1, EfKj-2, EfKj-3 and EfKj-4 as holding clear cultural interest and community value. On this basis, avoidance has been selected as the means to mitigate potential effects on these sites.

These archaeological findings have been shared with NWOMC through the provision of the associated archaeological reporting.

13.7.2.5 Cultural Heritage Landscapes and Built Heritage Resources

For regulatory purposes in Ontario, cultural heritage landscapes are defined as:

> *…a defined geographical area that may have been modified by human activity and is identified as having cultural heritage value or interest by a community, including an Indigenous community. The area may include features such as buildings, structures, spaces, views, archaeological sites or natural elements that are valued together for their interrelationship, meaning or association. (Ontario 2024: 41)*

Built heritage resources may be part of a cultural heritage landscape or occur discretely. In Ontario, they are defined as:

> *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. (Ontario 2024: 40)*

Cultural heritage landscapes are important in considerations of Métis heritage in Ontario due to the frequently mobile character of traditional Métis lifeways and the associated distribution of culturally and historically meaningful places, including harvesting areas, across their THTs. These places may include, but are not limited to, natural features, built structures, archaeological sites and / or traditional use places.

For the purposes of cultural heritage studies in Ontario, including the one undertaken for this Project, cultural heritage landscape features may be individually identified and described as cultural heritage resources (CHR) to simplify and facilitate discussion of elements indicative of cultural heritage landscapes (see Section 7.14).

A 40-year moving window is commonly used as a nationally and provincially recognized threshold for identifying when a building or landscape has cultural heritage value or interest, as discussed under the OHA and reflected in these definitions. However, the ongoing use of Indigenous heritage places or resources may not fit with this approach, and Indigenous heritage may include elements that are not captured by federal or provincial regulatory frameworks.

In the RSA, waterbodies once used for wild rice harvesting may no longer support wild rice stands due to changes in water levels caused by hydroelectric damming in the English-Wabigoon River system. However, these areas, as well as waterbodies used for fishing and travel, may still form parts of cultural heritage landscapes because of their known historical use Unnamed Waterbody 6 also hold potential for future Indigenous use through the restoration of suitable conditions or access. NWOMC's confidential Project-specific reports indicate that wild rice is among the plants gathered by its members.

The background research and field review undertaken for the Project's Cultural Heritage Report (Appendix P-1) identifies five potential CHRs within a study area comprised of the PA and a 1-km buffer around it. This study area only covers the portions of the Indigenous physical and cultural heritage LSA that are closest to the PA. Of these five CHRs, three (CHR 2, 4 and 5) were found to be located entirely outside the PA, beyond Project-related disturbance. The fourth, designated Chukuni River (CHR 1), is located within the PA and adjacent parts of the LSA. It was identified because:

> *"The river may have cultural heritage significance for local Indigenous Nations as it supports customary practices such as harvesting, hunting and was historically used as a canoe transportation route. This watercourse may have heritage significance for historical / associative and contextual reasons." (Appendix P-1, p.22))*

The Cultural Heritage Report (Appendix P-1) indicates that, while the segment of the Chukuni River that comprises CHR 1 falls partly within the PA, it will not be subject to direct or indirect effects from the Project. Specifically, the report anticipates that the planned effluent pipe to be installed in this location will not hinder river use for travel, and discharge from the pipe will avoid changing water and fish by adhering to regulatory requirements for water quality and quantity (Appendix P-1, p.27).

The Project cannot avoid CHR 3, which is comprised of wild rice fields between Unnamed Waterbodies 1 and 2. A Cultural Heritage Evaluation Report (CHER) for CHR 3 was undertaken to determine if it has cultural heritage value or interest (CHVI) per Ontario Regulation (O. Reg. 9/06) of the OHA.

Based on publicly available sources and confidential reports shared by Indigenous communities, the CHER determined that CHR 3 meets multiple criteria for CHVI based on its historical / associative and contextual value (Appendix P-2). A Cultural Heritage Impact Assessment (CHIA) prepared in consultation with Indigenous communities is required to identify appropriate conservation strategies and / or mitigation measures (Appendix P-3). Consistent with the findings of the CHIA, Great Bear Resources' engagement with LSFN and WFN regarding Unnamed Waterbody 1's manoomin (wild rice) stands has resulted in collaborative development of the Wild Rice Enhancement Project (see section 7.14)

13.7.3 Potential Effects

Potential interactions between the proposed Project activities and NWOMC's Indigenous physical and cultural heritage identifies the possible effects including both positive and negative effects, as well as whether they are direct or indirect. It examines the current use of land and resources for traditional purposes criteria and the pVCs of archaeology and cultural heritage (Sections 7.14 and 7.15), along with Project-specific studies conducted to support their assessment; for the two pVCs, the focus is on Indigenous input as required under the OHA. The results of engagement and consultation, beyond archaeological and cultural heritage studies, are also considered in relation to the potential Project effects on aspects of current traditional land and resource use with heritage significance.

A detailed overview of the Project's potential interactions with Indigenous physical and cultural heritage prior to mitigation, is provided in Table 13.7-1. Project interactions are classified as either having no interaction (-) or a potential interaction (✓). Project activities that result in no interaction are not further considered in the assessment. Project interactions identified as potential interactions are carried forward to the effects assessment to determine the positive (desirable and beneficial) and negative (undesirable or adverse) potential effects on Indigenous physical and cultural heritage.

Table 13.7-1: Potential Interactions Between Project Activities and Indigenous Physical and Cultural Heritage and Structures, Sites or Things of Significance - Northwestern Ontario Métis Community

Project Component / Activity	Alteration or destruction of sites or areas of Indigenous heritage importance, including archaeological, historical, or architectural sites	Change in access to or quality of experience with sites or areas of Indigenous heritage importance, including archaeological, historical, or architectural sites	Change in sacred, ceremonial, spiritual and cultural values (including language, stories and traditions) associated with sites or areas of Indigenous heritage importance, including archaeological, historical, or architectural sites
Construction Phase			
Site preparation activities	✓	✓	✓
Establishment and operation of water management and treatment facilities	✓	✓	✓
Open pit mining	✓	✓	✓
Underground mining	-	-	-
Management of rock and unconsolidated materials in stockpiles	✓	✓	✓
Establishment of onsite fish habitat and compensation measures	✓	✓	✓
Establishment of onsite aggregate operations	✓	✓	✓
Construction of the starter embankments for the tailings management facility	✓	✓	✓
Construction and operation of buildings and infrastructure	✓	✓	✓
Waste management	-	-	-
Commissioning of the process plant	✓	✓	✓
Power supply	✓	✓	✓
Employment and expenditures	-	-	-
Operations Phase			
Underground mining	-	-	-

Project Component / Activity	Alteration or destruction of sites or areas of Indigenous heritage importance, including archaeological, historical, or architectural sites	Change in access to or quality of experience with sites or areas of Indigenous heritage importance, including archaeological, historical, or architectural sites	Change in sacred, ceremonial, spiritual and cultural values (including language, stories and traditions) associated with sites or areas of Indigenous heritage importance, including archaeological, historical, or architectural sites
Mining of the LP Central pit	✓	✓	✓
Management of rock and unconsolidated materials in stockpiles	✓	✓	✓
Process plant operation	✓	✓	✓
Management of desulphurized tailings in the tailings management facility	✓	✓	✓
Management of concentrate tailings and contact water in the Viggo management facility	✓	✓	✓
Operation of water management and treatment facilities	✓	✓	✓
Construction of a mine water pond	✓	✓	✓
Operation and maintenance of buildings and infrastructure	✓	✓	✓
Waste management	-	-	-
Power supply	✓	✓	✓
Progressive reclamation activities	✓	✓	✓
Employment and expenditures	-	-	-
Closure Phase			
Active closure	✓	✓	✓
Passive closure	-	-	-
Final reclamation	✓	✓	✓
Employment and expenditures	-	-	-

Legend: ✓ = Interaction exists

- No interaction exists

13.7.3.1 Construction Phase

The construction phase of the Project is expected to occur over a three-year period and will include site preparation and the construction of mine infrastructure.

The construction phase activities checked off in Table 13.7-2 were specifically identified and included for consideration due to their potential physical, sensory and experiential effects on Indigenous physical and cultural heritage places and practices. These activities may result in pathways to potential direct and indirect effects on Indigenous physical and cultural heritage as follows:

- A loss or alteration of vegetation which may affect:
  - plant habitat, and current plant harvesting places and opportunities, as well as embedded cultural activities and intergenerational knowledge transfer
  - wildlife habitat, and current hunting places and opportunities, as well as embedded cultural activities and intergenerational knowledge transfer
  - fishing habitat, and current fishing places and opportunities, as well as embedded cultural activities and intergenerational knowledge transfer
  - current camping and habitation places and opportunities, as well as embedded cultural activities and intergenerational knowledge transfer
  - current trails and travelways, as well as embedded cultural activities and intergenerational knowledge transfer
  - the condition of archaeological sites, historical sites, cultural heritage landscapes and other places with Indigenous heritage value (e.g., harvesting areas used in past, old trails, landmarks used in navigation or discussed in oral traditions) in a way that affects that value
- Vegetation and ground disturbance, which may lead to erosion, sedimentation or other alteration of surface water quality and quantity, thereby affecting:
  - fish, wildlife and plant habitat, and current harvesting places and opportunities, as well as embedded cultural activities and intergenerational knowledge transfer
  - the condition of archaeological sites, historical sites, cultural heritage landscapes and other places with Indigenous heritage value in a way that affects that value
- Use of vehicles and equipment, blasting and human activity, which may lead to altered wildlife or fish behaviour or increased wildlife or fish mortality, thereby affecting:
  - wildlife and fish habitat, and current hunting and fishing places and opportunities, as well as embedded cultural activities and intergenerational knowledge transfer;
  - the quality of experience and condition of archaeological sites, historical sites, cultural heritage landscapes and other places with Indigenous heritage value
- Use of vehicles and equipment, blasting and human activity which may lead to changes to sensory qualities (e.g., sound and vibration levels, viewsheds, dustfall), thereby affecting:
  - the quality of experience of places and practices currently used for traditional harvesting and cultural activities, including sacred, spiritual and ceremonial activities, as well as intergenerational knowledge transfer;

- the quality of experience and condition of archaeological sites, historical sites, cultural heritage landscapes and other places with Indigenous heritage value.

- Changes in access to:
  - places currently used in past or present for traditional activities, including harvesting, camping and travelling, as well as sacred, spiritual and ceremonial practices, and intergenerational knowledge transfer;
  - places integrating archaeological sites, historical sites, cultural heritage landscapes and other places with Indigenous heritage value.

These interactions are similar to those involving the criteria of current use of lands and resources for traditional purposes because locations still subject to Indigenous use may have Indigenous heritage significance based on their role in ongoing cultural practices established at that place in the past, as well as their importance in passing those practices between generations. These interactions also resemble those in archaeology and cultural heritage (Section 7.14 and Section 7.15) because Indigenous physical and cultural heritage value can be tied to cultural heritage landscapes or archaeological sites.

Potential effects during the construction phase may affect NWOMC members, if they use this area for their land- and water-based activities, as well as teachers and learners involved in passing on cultural knowledge across generations.

These effects will include loss of access to the PA, although access to the LSA will continue. Direct effects are not predicted for the LSA, but some indirect effects, such as sensory disturbances, may occur in parts of the LSA that are proximal to the PA.

13.7.3.2 Operations Phase

The operations phase is anticipated to extend over a 26-year period. The operations phase activities checked off in Table 13.7-2 have been specifically identified, since they may result in the same pathways to potential physical, sensory and experiential effects on Indigenous physical and cultural heritage as construction phase activities.

While ground disturbance activities and vegetation removal are planned to occur during the construction phase, it is possible that additional ground disturbance or vegetation removal may occur during operations. Specifically, any further vegetation removal, ground disturbance, and related activities linked to expansion or progressive remediation of mining features and facilities may alter vegetation, wildlife and fish, as well as their habitats, and associated harvesting opportunities, thereby disrupting cultural activities linked to Indigenous heritage, including knowledge transmission. Such changes may also affect places and things that derive Indigenous heritage importance from sacred, spiritual, ceremonial, or other cultural practices not directly linked to or embedded in harvesting, as well as archaeological and historic sites, cultural heritage landscapes, and other places with Indigenous heritage value. Interactions with operational activities may also alter or hinder access to and use of heritage places and things. Indigenous physical and cultural heritage may experience further potential effects parallel to those of the archaeology and cultural heritage pVCs (Section 7.14 and Section 7.15).

Potential effects during the operations phase may affect NWOMC members, if they use this area for their land- and water-based activities, as well as teachers and learners involved in intergenerational transfer of cultural knowledge. These effects will include loss of access to the PA, although access to the LSA will remain.

Direct effects are not predicted for the LSA, but some indirect effects, such as sensory disturbances, may occur in parts of the LSA that are proximal to the PA.

13.7.3.3 Closure Phase

The closure phase will be initiated with a three-year active closure period immediately after operations cease, followed by a one-year passive closure period and then a final close-out period anticipated to extend for one year. While ground disturbance activities and vegetation removal are planned to occur during the construction phase, it is possible that additional ground disturbance or vegetation removal may occur during closure.

Closure phase activities may physically disturb plant, wildlife and fish habitats, as well as cultural activities associated with their harvesting, including intergenerational knowledge transfer. They may also alter the physical and sensory character of heritage places and things, thereby affecting the conditions preferred or required to maintain their heritage value, as well as cultural activities that rely on these places and things, including knowledge sharing. Access may also be altered or obstructed.

The closure phase will involve filling mine pits with water and removing infrastructure. Physical activities associated with infrastructure removal and associated remediation have the potential to affect Indigenous physical and cultural heritage through physical and sensory disturbances, and obstruction of, or alteration of access to, sites or areas of Indigenous heritage importance. Culturally valued places, as well as access to these places, may also be affected by physical alterations resulting from erosion or the redirection of surface water.

Potential effects during the closure phase may affect NWOMC members if they use this area for their land- and water-based activities, as well as teachers and learners who are actively involved in intergenerational transfer of cultural knowledge. These effects will include loss of access to the PA, although access to the LSA will continue. Direct effects are not predicted for the LSA, but some indirect effects, such as sensory disturbances, may occur in parts of the LSA that are proximal to the PA.

13.7.4 Mitigation and Enhancement

Mitigation of potential effects to Indigenous physical and cultural heritage is connected to mitigation for the archaeology and cultural heritage pVCs when the recognition of heritage importance by archaeological and cultural heritage practitioners aligns with the values of Indigenous communities. This occurs when Indigenous communities agree that an archaeological site or cultural heritage landscape feature identified under the OHA is also considered important from their perspective.

For the archaeological sites identified in or near the PA, archaeological reports have been shared with Indigenous communities, and, based on input from LSFN and WFN, avoidance of all potentially affected archaeological sites has been selected as the mitigation.

Potential effects to the locations identified by the cultural heritage studies within the PA will be mitigated by Project design features at CHR 1 (Chukuni River) and by a wild rice enhancement study for CHR 3 (wild rice stands between Unnamed Waterbodies 1 and 2).

Great Bear Resources has funded a study by Northern Bioscience and Harris Ecological Consulting to explore and address the loss of historic wild rice production on Wabauskang Lake through wild rice enhancement.

In addition to habitat restoration, the Project will incorporate education and knowledge sharing on sustainable harvesting practices, supporting long-term stewardship efforts. Results of this collaborative initiative have potential to inform Indigenous and other wild rice revitalization projects in the future and to support the ongoing presence and success of the species across the region.

The mitigation and enhancement measures for multiple biophysical pVCs and pVCs (Section 7), in combination with the mitigation measures for current use of lands and resources for traditional purposes (Section 13.6), further contribute to the mitigation of potential effects to Indigenous physical and cultural heritage. Protection of Indigenous access to and quality of experience of places and resources which are traditionally valued and used for cultural and heritage reasons will be mitigated through design and management measures aimed at limiting the physical and temporal extent of sensory effects outside the PA, as well as the need for land users to adjust patterns of movement in the LSA around the lack of access to the PA. Additional mitigations include vibration control and reducing visual disturbance through design, such as the height and placement of mine structures and stockpiles.

A commitment to support and respect ceremonial practices includes integrating ceremonial activities in collaboration with local Indigenous communities. Indigenous environmental monitoring, engagement with trapline holders, and continued feedback through the environmental committee, will provide opportunities for ongoing input on Project activities and mitigation measures concerning traditional activities and cultural heritage considerations. This committee will facilitate continuous sharing and application of Indigenous Knowledge, address new issues raised by Indigenous communities, and encourage communication and dialogue about Project activities, approvals, and adaptive management and monitoring plans.

The mitigation measures specific to potential effects on Indigenous physical and cultural heritage include:

- **Chance Find Procedure (CFP)**: An Archaeological Resources Protection Procedure (Chance Find Procedure) has been established for the Project.
- **Cultural Heritage Protection Plan (CHPP)**: The CHPP will be developed with participating Indigenous Nations to support consistent protection of Indigenous heritage (including intangible values), archaeological and cultural heritage sites. The CHPP will be a version-controlled living document, updated through the Chance Find Procedure, with decisions documented jointly.

For the archaeological sites identified in or near the PA, archaeological reports have been shared with Indigenous communities, and, based on input from LSFN and WFN, avoidance of all potentially affected archaeological sites has been selected as the mitigation.

- **Environmental Management Committee**: Great Bear Resources will work with the environmental management committee(s) and interested Indigenous members throughout the duration of the Project (all phases), to facilitate ongoing communications, sharing and integration of Indigenous Knowledge and environmental information, and share and evaluate Project approvals, adaptive management and monitoring plans, and address emerging issues and interests identified by Indigenous Nations.
- **Environmental monitors:** Great Bear Resources will continue to work with the Environmental Management Committee and engage Indigenous environmental monitors from local communities in the implementation of mitigation and monitoring.

- **Indigenous-led ceremonies:** Great Bear Resources is committed to incorporate appropriate ceremonial practices into the Project. Ceremonies will be held under the direction of local Indigenous Nations.

Table 13.1-1 includes mitigation measures applicable to the management of effects on pVCs and fVCs that are linked to Indigenous physical and cultural heritage by NWOMC. It includes relevant plans, policies, and measures from predictive reporting on linked pVCs and fVCs. These will be applied for effects management.

13.7.5 GBA Plus Considerations

During the life of the Project, the PA will be largely inaccessible. This is expected to last for approximately 30 years once construction commences. For NWOMC, intergenerational knowledge transfer is a potentially affected heritage-related activity.

As presented in Appendix X, the GBA Plus subgroups that may experience negative effects as a result of restricted access include:

- Indigenous Peoples. This includes men+, women+, Elders and youth. The inability to access sites of Indigenous physical and cultural heritage importance may result in the loss of knowledge transmission across multiple generations.

13.7.6 Residual Effects after Mitigation

After the implementation of mitigation measures assessment and characterization of potential residual effects on Indigenous physical and cultural heritage structures, sites, or things of significance is completed using the methodology outlined in Section 6. Further details on residual effect criteria ratings that are specific to physical and cultural heritage sites or things are defined in Section 6 and in Section 13.3.2.

The attached Table 13.1-1 summarizes the results of the assessment for the linked pVC and fVC components. Detailed description on the methods, existing conditions, mitigation measures, and residual effects can be found in their respective sections.

Based on the assessment of linked pVCs and fVCs, residual changes after mitigation considered as part of the assessment of residual effects on Indigenous physical and cultural heritage structures, sites, or things of significance include:

- Cultural Heritage

There are other linked pVCs and fVCs listed in Table 13.1-1 and section 13.1 that do not have residual effects after mitigation measures have been applied. This includes the linked fVC Fish and Fish Habitat, and linked pVCs Wild Rice, Land and Resource Use, and Archaeology. This means that Project activities will not change their existing conditions over the Project life cycle. Therefore, those linked pVCs and fVCs are not carried forward into the residual effects assessment for the NWOMC.

13.7.6.1 Residual Effects to Indigenous Physical and Cultural Heritage after Mitigation - Northwestern Ontario Métis Community

Sections 13.7.6.1.1., 13.7.6.1.2, and 13.7.6.1.3 summarize the results of the residual effects assessment for the three potential effects to Indigenous physical and cultural heritage. These sections draw from the two PVCs of archaeology and cultural heritage and the criteria of current use of land and resources for traditional purposes.

These are the three sources of information that encompass both tangible and intangible places and things relevant to the assessment of Indigenous physical and cultural heritage. Table 13.7-2 summarizes the potential effects that remain after mitigation and enhancement measures are implemented.

Table 13.7-2: Residual Effects Remaining after Mitigation Measures for Indigenous Physical and Cultural Heritage – Northwestern Ontario Métis Community

Potential Effect	Potential Residual Effect Remaining (Y/N)
Alteration or destruction of sites or areas of Indigenous heritage importance, including archaeological, historical, or architectural sites	N
Change in access to or quality of experience with sites or areas of Indigenous heritage importance, including archaeological, historical, or architectural sites	Y
Change in sacred, ceremonial, spiritual and cultural values (including language, stories and traditions) associated with sites or areas of Indigenous heritage importance, including archaeological, historical, or architectural sites.	Y

No residual effect involving alteration or destruction of sites or areas of Indigenous heritage importance is anticipated in relation to heritage-related past and current use of land and resources for traditional purposes, archaeological sites or cultural heritage landscapes. This is based on:

- NWOMC Project-specific TKLUS reporting identifies small and large game harvesting areas in the PA and LSA, as well as moose habitat, noting the cultural importance of intergenerational sharing of related hunting and habitat knowledge however, there is no confirmed current use of the PA by NWOMC and NWOMC indicate that members can relocate their hunting activities in relation to the Project.
- NWOMC describe plant gathering in the LSA, particularly harvesting of berries, mushrooms and fiddleheads in the Highway 105 corridor, adjacent to the PA. Again, NWOMC identifies these activities as an important context for intergenerational knowledge sharing, and they note member concerns about potential Project-related sensory disturbances as well as contamination. However, NWOMC indicates that members can and may relocate their gathering activities in relation to the Project.
- For archaeological heritage, Great Bear Resources has made design changes to components within the PA to protect EfKj-1 through avoidance. Archaeological work to date has confirmed that the Project will not have an effect on archaeological site EeKi-4 due to its location beyond the pVC archaeology LSA and RSA (Appendix Q-1). Although EfKj-2, EfKj-3 and EfKj-4 are located closer the PA, they are also beyond the archaeology VC LSA and RSA (Appendix Q-1).
- For cultural heritage landscapes, the Project cannot avoid CHR 3, the wild rice fields between Unnamed Waterbodies 1 and 2 (Appendix P-1). A wild rice study has been selected as the appropriate mitigation, based on input from LSFN and WFN. The results of this study have the potential to inform future Indigenous and non-Indigenous wild rice revitalization initiatives and to support the presence and success of the species across the region.

13.7.6.1.1 Residual Effects on Change in Access to or Quality of Experience with Sites or Areas of Indigenous Heritage Importance

NWOMC's Project-specific TKLUS report identifies small and large game harvesting areas, in the PA and LSA. NWOMC also notes that plant gathering occurs in the LSA, highlighting harvesting of berries, mushrooms and fiddleheads by one member and family in the Highway 105 corridor, adjacent to the PA. NWOMC notes member concerns with potential Project-related sensory disturbances (dust, sound, light, vibration) as well as effects to air and water quality.

NWOMC indicates that their members will be able to relocate traditional use activities in relation to the Project. They note that relocating these activities may induce pressures on and limitations to NWOMC traditional use elsewhere, potentially affecting access to and quality of experience of cultural and heritage practices associated with harvesting.

On this basis, a residual effect on Indigenous physical and cultural heritage is anticipated in relation to heritage-related past and current use of land and resources for traditional purposes. Residual effects involving changes in access to or quality of experience with archaeological sites or cultural heritage landscapes of Indigenous heritage importance are not anticipated for NWOMC.

The associated characterizations are presented in Table 13.7-3 and are based on the following assumptions regarding the effectiveness of relevant mitigations. It is assumed that application of mitigations for Indigenous physical and cultural heritage, as well as linked pVCs, protect Indigenous access to and quality of experience of heritage sites, areas or things. It is assumed that mitigation measures which restore NWOMC access and quality of experience at closure, e.g., reclamation, are sufficiently advanced that conditions after 32 years are consistent with those needed for heritage practices and quality of experience. It is also assumed that mitigation measures for sensory effects restrict residual effects to that PA such that their frequency in LSA accessible to NWOMC members during the Project is infrequent, and their timing does not affect sensitive seasonal periods (e.g., fall harvest of wildlife and plants in the LSA).

Table 13.7-3: Characterization for Negative Residual Effects on Change in Effect on Access to or Quality of Experience with Sites or Areas of Indigenous Heritage Importance – Northwestern Ontario Métis Community

Attribute	Category	Rationale
Ecological or Social Context	Level I	Criteria may or may not be sensitive, and can support the predicted change with typical mitigation measures:
Magnitude	Level I	Project-related change that is insufficient to alter how Indigenous heritage structures, sites or things, are used, accessed or experienced
Geographic Extent	Level I	Effect is restricted to the LSA:
Duration	Level II	Effect occurs over the medium term: more than three years but less than 32 years:
Frequency	Level II	Effect occurs infrequently:
Reversibility	Level I	Effect is fully reversible during the Project phases:
Timing	Level I	Effects do not occur during a sensitive period, or related effects are fully mitigated:

13.7.6.1.2 Residual Effects on Change in Sacred, Ceremonial, Spiritual and Cultural Values Associated with Sites or Areas of Indigenous Heritage Importance

NWOMC's Project-specific TKLUS report identifies small and large game harvesting areas, as well as moose habitat in the PA and LSA however there is no confirmed use of the PA by NWOMC. NWOMC also notes that plant gathering occurs in the LSA, highlighting harvesting of berries, mushrooms and fiddleheads by one family in the Highway 105 corridor, adjacent to the PA. NWOMC notes member concerns with potential Project-related sensory disturbances as well as effects to air and water quality. Concerns regarding these effects extend to NWOMC fishing; this activity does not currently occur within the PA, but it relies on downstream locations in the English River.

NWOMC indicates that their members can and may relocate traditional harvesting activities and the associated cultural and knowledge sharing practices in relation to the Project. They note that relocating these activities may induce pressures on and limitations to NWOMC traditional use elsewhere, potentially affecting access and quality of experience, including for intergenerational knowledge transfer. They also note that the 30-year life of the Project will impede transfer of knowledge as it relates to the PA and any areas of the LSA that NWOMC members cease using.

On this basis, a residual effect on Indigenous physical and cultural heritage is anticipated in relation to heritage-related past and current use of land and resources for traditional purposes. Residual effects involving changes in sacred, ceremonial, spiritual, and cultural values associated with archaeological sites or cultural heritage landscapes of Indigenous heritage importance are not anticipated for NWOMC.

The associated characterizations are presented in Table 13.7-4 and are based on the following assumptions regarding the effectiveness of relevant mitigations. It is assumed that application of mitigations for Indigenous physical and cultural heritage, as well as linked pVCs, protects heritage sites, areas or things that support cultural values and knowledge, as well as intergenerational knowledge transfer. It is assumed that mitigation measures which restore NWOMC access and quality of experience at closure (e.g., reclamation) are sufficiently advanced that conditions after 32 years are consistent with those needed for practicing, teaching and learning activities that support Indigenous cultural heritage. It is also assumed that mitigation measures for sensory effects restrict residual effects to the PA such that their frequency in areas accessible to NWOMC members during the Project is infrequent, and their timing does not affect sensitive seasonal periods key to practicing and sharing cultural activities (e.g., fall harvest of wildlife and plants in the LSA).

Table 13.7-4: Characterization for Negative Residual Effect Potential Effect on Sacred, Ceremonial, Spiritual and Cultural Values Associated with Sites or Areas of Indigenous Heritage Importance – Northwestern Ontario Métis Community

Attribute	Category	Rationale
Ecological or Social Context	Level I	Criteria may or may not be sensitive, and can support the predicted change with typical mitigation measures:
Magnitude	Level I	Project-related change that is insufficient to alter how Indigenous heritage structures, sites or things, are used, accessed or experienced
Geographic Extent	Level I	Effect is restricted to the LSA:

Attribute	Category	Rationale
Duration	Level II	Effect occurs over the medium term: more than three years but less than 32 years:
Frequency	Level II	Effect occurs intermittently or regularly:
Reversibility	Level I	Effect is fully reversible during the Project phases:
Timing	Level I	Effects do not occur during a sensitive period, or related effects are fully mitigated

13.7.7 Significance of Residual Effects

The magnitude of the residual effects on Indigenous physical and cultural heritage due to Project-related activities is low (Level I) and restricted to the PA and LSA (Level I). The effect will occur intermittently (Level II) and will be present throughout construction, operations, and closure (Level II). It will be fully reversible as of closure (Level I). The limited spatial extent of the Project, along with design and mitigation measures, including provision for ceremonies in the PA as appropriate, reduces any Project contribution (Level I). The residual effect is therefore not significant.

13.7.8 Confidence

The prediction confidence assignment reflects the information available through Project-specific TKLUS reports, publicly available data (statistical websites, government pages, previously completed EA/IS reports), understanding of the effectiveness of applicable mitigation measures, and outcomes of other pVCs and fVCs. The assessment is informed by substantial primary and secondary information and robust analysis however, as noted in the assessment, there are some instances where the information collected had data gaps or lacked detail.

The overall confidence in residual environmental effect and significance predictions for physical and cultural heritage and structures, sites or things of significance is moderate. As additional information continues to be shared through Great Bear Resources' ongoing consultation with local Indigenous communities over Project life, relevant information will be incorporated into Project planning as practical.

13.8 Community Well-being

Community well-being was identified as a criteria as it reflects the broader social and economic conditions that influence quality of life. These conditions may be directly or indirectly affected by Project-related changes to social determinants of health including, income, employment, housing affordability, food security, access to services, community cohesion, and access to land and resources. These factors are considered individually and collectively to assess the broader social and economic conditions that contribute to health, stability, resilience and quality of life of the Northwestern Ontario Métis Community (NWOMC) across the LSA and RSA.

The community well-being assessment incorporates the following key themes, reflected in the structure of the existing conditions and effects assessment:

- Social determinants of health (e.g. income, employment, housing, cost of living, traditional economy and education level, access to health and social services)
- Community cohesion (e.g. household dynamics, gender-based and caregiver vulnerabilities, family stability, and community inclusion)

- Public Safety (e.g. crime and gender-based violence, safety risks for women+, girls+, and 2SLGBTQIA plus people, where “women+” and “girls+” refer to women+, girls, and some non-binary individuals as defined by Statistics Canada)
- Access to land and resources (e.g. harvesting, cultural practices, and land stewardship)
- Population dynamics (e.g. regional population growth, mobility, and demographics)
- Economic opportunity and inequality (e.g. access to employment and training, and barriers for Indigenous and vulnerable groups).

A GBA Plus lens was applied to consider the experiences of diverse groups (e.g., Elders, youth, 2SLGBTQIA plus, women+). The assessment integrates desktop research and qualitative data from interviews with key service providers to develop a comprehensive understanding of existing conditions and potential effects on community well-being.

Information sources include a desktop baseline socio-economic report (Appendix O-1), publicly available statistics, academic literature, media reports, and non-confidential Indigenous Knowledge and land use information, where available.

As outlined in the Section 13.3.2, Effects Assessment Criteria and summarized in Table 13.3-1, the assessment draws on a set of quantitative and qualitative indicators covering housing and cost of living, income inequality, service capacity, safety, employment participation, household pressures, community cohesion, and access to land and resources. These indicators align directly with the themes and form the basis for evaluating changes in community well-being.

13.8.1 Spatial Boundaries

There are three study areas within the spatial boundaries. They are the Project Area (PA), the Local Study Area (LSA), and the Regional Study Area (RSA), which includes both the PA and the LSA. The spatial boundaries used for the assessment of community well-being are shown in Figure 13.8-1 and are defined:

- The PA is defined as the footprint of the Project including all temporary and permanent areas associated with the mine site, as well as a buffer to allow flexibility for design optimizations prior to construction and over the mine life (Section 6.4). The PA is approximately 3,349 hectares (ha) in size.
- The LSA is the area within which Project-related effects may reasonably be expected to occur and can be predicted or measured with a reasonable degree of accuracy and confidence. The region that the Project’s socio-economic demands are expected to influence, possibly causing direct, indirect and / or induced effects on community well-being include the Indigenous communities of ANA, LSFN, NWOMC (the community of Métis citizens in the region), WFN and Indigenous Peoples living in the Red Lake and Ear Falls area.
- The RSA encompasses the LSA and is used to provide regional context for the significance of residual effects and is also the area within which potential for cumulative effects of the Project in combination with other past, present or reasonably foreseeable projects or activities are considered. The region surrounding the LSA and the PA may also experience direct, indirect, and / or induced effects on community well-being due to the socio-economic demands of the Project. This could include transportation corridors, and / or services which operate throughout the region.

The RSA for community well-being is the District of Kenora. The RSA is the region which cumulative effects are likely to occur.

These boundaries are consistent with those used for community services and infrastructure (Section 13.5).

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KAHNAHMAYKOOSAYSEEKAHK
WOODLAND CARIBOU PROVINCIAL PARK (WILDERNESS CLASS)
TROUT LAKE PROVINCIAL PARK (NATURE RESERVE CLASS)
MUNICIPALITY OF RED LAKE
HIGHWAY 125
PAKWASH PROVINCIAL PARK (NATURAL ENVIRONMENT CLASS)
TOWNSHIP OF EAR FALLS
HIGHWAY 105
WEST ENGLISH RIVER PROVINCIAL PARK (WATERWAY CLASS)
MAYNARD LAKE PROVINCIAL PARK (NATURE RESERVE CLASS)
TIDE LAKE PROVINCIAL PARK (NATURE RESERVE CLASS)
Wabauskang First Nation
Asubpeeschoseewagong Netum Anishinabek
WINDIGO POINT PROVINCIAL PARK (NATURE RESERVE CLASS)
Lac Seul First Nation
MUNICIPALITY OF SIOUX LOOKOUT

Olive Lake
Kahnahmaykoosaysensikahk/ Valhalla Lake
Little Vermilion Lake
Coli Lake
Linge Lake
Golden Creek
Bloodvein River
Paishk Lake
Knox Lake
Alford Lake
Ranger Creek
Red Lake
Hammell Lake
Indian House Lake
Ranger Lake
Otter Lake
Trout Lake
Bathurst Creek
Shabumeni River
Shabumeni Lake
Birch Lake
Springpole Lake
Gull Lake
Birch River
Seagrave Lake
Oversee River
Bertha Lake
Washagomis Lake
Narrow Lake
Woman Lake
Okanse Lake
Confederation Lake
Hailstone Lake
Sesikinaga River
Margaret Lake
St. Roy Creek
Tarpley Lake
Sesikinaga Lake
Joyce Lake
Woman River
Perrigo Lake
Jeanette Lake
Wakeman Lake
Uchi Lake
Little Trout Lake
Little Bear Lake
Fly Lake
Joyce River
Brokenmouth River
Douglas Lake
Parker Lake
Keg Lake
Starrau Channel
Jubilee Lake
Embryo Lake
Telescope Lake
Medicine Stone Lake
Two Island Lake
Moose Creek
Ten Mile Creek
Uchi River
Slate Lake
Roadhouse River
Bug River
Gullrock Lake
Upper Medicine Stone Lake
Caribou Creek
Papaonga Lake
Wenasaga River
Trout Lake River
Papaonga River
Wesley River
Whitemud Lake
Dixie Creek
Pakwash Lake
Bruce Lake
Bluffy Lake
Whitemud River
Pinky Creek
Pinnacle Creek
Deadee Creek
Longlegged Lake
Kilburn Lake
Celt Lake
Fork Creek
Confusion Lake
Chukuni River
Wenasaga Lake
Cranny Creek
Pilot Lake
Aerofoil Lake
Sydney Lake
Pineneedle Lake
Confusion Lake
Rice Creek
Sandy Creek
Camping Lake
Rowdy Lake
Sumach Lake
Conifer Lake
Longlegged River
Wegg Lake
Barnston Lake
Goose Lake
Cedar River
Altimeter Creek
Wapesi Lake
Aerial Lake
Sturgeon River
Confusion River
Unexpected Lake
Wilcox Lake
Sunlight Lake
Hall Creek
Roger Lake
Camsell River
Tizamia Creek
Anishinabi River
Lac Seul
Fletcher Lake
Oak Lake
Anishinabi Lake
Wine Lake
Broad Lake
Spruce River
Wapesi River
Twain Lake
Broadcast Lake
Scout Lake
Salvesen Lake
Treelined Lake
Scotty Lake
Maynard Lake
Bornite Lake
Wabaskang Lake
Lennan Lake
Sup Lake
Aerobus Lake
Perrault Lake
Ball Lake
Separation Lake
Brown Bear Lake
Scenic Lake
Wabigoon River
Indian Lake
Big Fox Lake
Little Fox Lake
Lount Lake
Grassy Narrows Lake
Ord River
Williams Lake
Clear Lake
Whitefish Lake
Cliff Lake
Cedar Lake
Ord Lake
Thaddeus Lake
Delaney Lake
Segise Bay
Segise Lake
Lost Lake
Pelican Lake
Wonderland Lake
Big Canon Lake
Clay Lake
Pelican Creek
Route Lake
Big Vermilion Lake

N

LEGEND:

- PROJECT AREA
- LOCAL STUDY AREA
- REGIONAL STUDY AREA
- HIGHWAY
- MAJOR ROAD
- LOCAL ROAD
- RAILWAY
- WATERCOURSE
- WATERBODY
- INDIGENOUS COMMUNITY
- PROVINCIAL PARK
- MUNICIPAL BOUNDARY (LOWER TIER)

NOTES:
NOTE1: BASE DATA ACQUIRED FROM LAND INFORMATION ONTARIO.

0 5 10 20 30 km

SCALE 1:550,000
PAGE SIZE 11 x 17
NAD 1983 UTM Zone 15N

THIS MAP IS FOR CONCEPTUAL PURPOSES ONLY AND SHOULD NOT BE USED FOR NAVIGATION

GREAT BEAR RESOURCES

GREAT BEAR GOLD PROJECT

SPATIAL BOUNDARIES FOR COMMUNITY WELL-BEING

SLR

FIGURE NO:
13.8-1

DATE: November 19, 2025
PROJECT NO: 241.030825

13.8.2 Existing Conditions

Community well-being reflects the social, economic, cultural, and service conditions that influence overall quality of life for NWOMC members living in the Red Lake and Ear Falls area.

To align with the assessment indicators used in the effects analysis, information is organized by: social determinants of health (income, housing, cost of living, employment, education level); access to services (health and social); household dynamics (including gender-based and caregiver vulnerabilities); public safety (including gender-based violence); economic opportunity and inequality; community cohesion; access to land and resources; and population dynamics.

The baseline characterization draws on desktop research and some interviews with local service providers. Additional details are provided in the Socio-Economic Baseline Study (Appendix O-1).

13.8.2.1 Methods

The information presented was collected using publicly available data sources such as Statistics Canada and other public websites (e.g., municipal, Indigenous communities) as well as other quantitative and qualitative data collected through interviews with key service providers and community organizations. Where available, statistical data from the 2021 Census and other public sources are used to provide a quantitative baseline. However, statistical information specific to NWOMC members is limited. Based on 2021 Census data, self-identified Métis people represent approximately 9% of the population in Red Lake, 10% in Ear Falls, 6.8% and 6% across the Kenora District as a whole.

As a result, generalized regional data is supplemented with qualitative information gathered through some interviews with key service providers and community organizations. These insights help to contextualize community-specific challenges and strengths that may not be reflected in available statistical sources. This reflects the integration of both traditional and community-based knowledge sources to inform a comprehensive and balanced understanding of well-being in the LSA and RSA.

The analysis is guided by the TISG for the Project, which requires consideration of health, social, and economic conditions, with specific attention to the well-being of Indigenous Peoples. It is important to note that the reference year for income data is 2020, during the first year of the COVID-19 pandemic. This period was marked by considerable disruptions to employment, earnings, and government transfers, which may have had both short- and medium-term effects on reported income levels across Canada, particularly in small or remote communities.

The TISG also states that the description of baseline economic conditions must include “any relevant treaty provisions pertaining to economic development for Indigenous Peoples”. Great Bear Resources is not aware of any treaty provisions pertaining to economic development for NWOMC.

13.8.2.2 Description

Community well-being reflects the overall social and economic conditions that support the health, stability, and resilience of individuals, families, and communities. It is closely connected to other pVCs and fVCs, including:

- Local and Regional Economy (Section 7.16)
- Community Services and Infrastructure (Section 13.5)

- Current Use of Lands and Resources for Traditional Purposes (Section 13.6)
- Health (Section 13.9).

Statistical information (e.g., income, employment, housing) and qualitative insights from some community-based organizations provides an understanding of existing conditions. Together, these sources offer a foundation for evaluating how existing pressures and potential future changes may affect overall well-being in the LSA and RSA.

13.8.2.2.1 Community Well-being Index

The Community Well-Being (CWB) Index is a composite measure published by Indigenous Services Canada.The CWB provides a high-level snapshot of regional socio-economic conditions across communities.

While the CWB Index does not report data specific to Métis populations, many members of NWOMC live throughout the Red Lake and Ear Falls area, including in the municipalities and communities for which CWB scores are available and as a result, the CWB is used as a regional proxy for baseline conditions. This approach is taken with recognition of its limitations, as it does not allow for disaggregated analysis of Métis-specific trends. Interpretations throughout this section are made with this context in mind.

In the Kenora District, the CWB scores vary, reflecting differences in socio-economic conditions. These scores serve as a foundation for the assessment. Notably, Red Lake ranks highest overall, with a particularly strong performance in income and labour force activity. These scores are presented in Table 13.8-1.

Table 13.8-1: Community Well-Being Index Scores - Kenora District, 2025

Municipality	Overall CWB Score	Income	Education	Housing	Labour Force Activity
Kenora	82	83	64	94	86
Red Lake	83	88	63	94	87
Ear Falls	79	84	53	97	84
Source (Government of Canada 2024) Note: The CWB Index scores range from 0 to 100, with higher scores indicating higher levels of community well-being. Each component (Income, Education, Housing, Labour Force Activity) contributes to the overall CWB score.					

These scores provide an integrated baseline for assessing community well-being and are supplemented by additional Census data and qualitative findings from interviews with key service providers.

13.8.2.2.2 Social Determinants of Health

Social determinants of health, including income, education, housing, and employment are evaluated to understand baseline conditions across the LSA and RSA.

Where specific local data for NWOMC members living in Red Lake or Ear Falls are not available, Kenora District data is used to illustrate regional trends and context.

This analysis is focused on the Northwest Métis of Ontario; however, because there is no distinct Métis settlement, community-level data from Red Lake and Ear Falls is used as a proxy

where appropriate to reflect conditions experienced by NWOMC individuals living in these areas. This approach is important because the Kenora District reflects many of the systemic challenges and opportunities affecting small, remote, and Indigenous communities across northwestern Ontario. It is also important to note that residents of the LSA frequently access specialized services, such as healthcare, emergency shelters, and social supports, located in the City of Kenora and surrounding areas, reinforcing the connection between regional trends and local well-being.

While the RSA trends are presented to explain findings within a broader socio-economic environment, Project-related effects are expected to be most directly experienced within the LSA.

13.8.2.2.2.1 Income and Employment

Income is a key determinant of individual and household well-being, and determines access to housing, education, health care, and other basic needs. It informs financial security, quality of life, and the overall social and economic resilience of communities. Regional data on income levels, income inequality, income distribution and sources of income are included. Together, these indicators provide insight into financial stability, affordability pressures, and broader socio-economic conditions across the LSA and RSA.

Income and Income Status

In 2020, the average employment income among self-identified Métis who worked fulltime for the full year was:

- $69,600 in Kenora District ($78,000 for men+ and $58,600 for women+) (Statistics Canada 2023h)
- $82,000 in Red Lake ($104,000 for men+ and $62,000 for women+) (Statistics Canada 2023i)
- $80,000 in Ear Falls ($85,000 for men+ and $0 for women+) (Statistics Canada 2023j).

For comparison, the average employment income for all of Ontario in 2020 was $82,400 ($90,700 for men+ and $72,000 for women+) (Statistics Canada 2023f).

Low-income measure (LIM-AT)

In 2021, the prevalence of low income among self-identified Métis in the Kenora District was 6.8%, notably lower than the average for all Indigenous identities in the district (19.7%) and the same as the non-Indigenous population (6.8%) (Table 13.8-2). Age-disaggregated data show that 7.0% of Métis children aged 0 to 17 and 7.2% of adults aged 18 to 64 were living in low income, while the rate for Métis seniors aged 65 and over was slightly higher at 10.4%.

These figures suggest that, while overall low-income prevalence among Métis in Kenora District is relatively low compared to other Indigenous groups, some age groups, particularly seniors, may still face elevated financial vulnerability.

Table 13.8-2: Prevalence of Low Income (LIM-AT) Population –Kenora District (Métis Identity), 2025

Age Group	% in Low Income
All Ages	6.8%
0 to 17 years	7.0%
0 to 5 years	x (suppressed)
18 to 64 years	7.2%
65 years and over	10.4%

Source: (Statistics Canada 2023d)
Note: reference year is 2020
Note: "x" = data suppressed to meet the confidentiality requirements of the Statistics Act.

Income Inequality

The Gini Index is a commonly used measure of income inequality. It ranges from 0 to 1, where 0 represents perfect income equality (everyone has the same income), and 1 represents maximum inequality (one person has all the income, and everyone else has none). A higher Gini value indicates greater income inequality within a population. While the Gini Index for Kenora District is 0.327, indicating moderate income inequality, there is no disaggregated Gini Index available specifically for self-identified Métis populations. As such, this figure reflects overall district-wide inequality and should be interpreted with caution when considering the unique economic experiences of Métis communities.

Income Distribution

Detailed income distribution data for self-identified Métis individuals is not available at the district level. The distribution presented reflects the total population of Kenora District and may mask differences in income patterns among Métis and other Indigenous residents.

Income distribution data for Kenora, as shown in Table 13.8-3, indicates that approximately 56% of individuals are within the bottom half of the income distribution (deciles 1 through 5), while 44% are within the top half (deciles 6 through 10). The lowest decile accounts for 18% of individuals, while the highest decile accounts for 8%. This pattern suggests a less pronounced concentration in upper-income brackets and reflects more economic variation across the population (Statistics Canada 2024).

Table 13.8-3: Income Distribution - –Kenora District (Métis Identity), 2025

Decile Group	Total (%)	Men+ (%)	Women+ (%)
In bottom half of distribution	56	55.7	56.3
1st decile (lowest)	17.7	17.8	17.6
2nd decile	11.3	11	11.6
3rd decile	9.4	9.3	9.5
4th decile	9.2	9.1	9.3
5th decile	8.4	8.5	8.4
In top half of distribution	44	44.3	43.7

Decile Group	Total (%)	Men+ (%)	Women+ (%)
6th decile	8.5	8.5	8.5
7th decile	8.9	8.8	9
8th decile	9.1	9.1	9.1
9th decile	9.6	9.4	9.8
10th decile (highest)	7.8	8	7.6
Source: (Statistics Canada 2024) Note: reference year is 2020			

Employment and Economic Participation

Labour market engagement is a core component of community well-being, contributing to income security and access to services. The labour force indicators for self-identified Métis people in Kenora District, Red Lake, and Ear Falls are presented in Table 13.8-4.

- In Kenora District, the labour force participation rate for self-identified Métis people is 68.4% (69.4% for men+ and 67.4% for women+), and the unemployment rate is 8.8% (10.0% for men+ and 7.1% for women+) (Statistics Canada 2023h).
- In Red Lake, the labour force participation rate for self-identified Métis people is 70.4% (73.1% for men+ and 57.1% for women+), and the unemployment rate is 7.9% (0.0% for men+ and 11.1% for women+) (Statistics Canada 2023i).
- In Ear Falls, the labour force participation rate for self-identified Métis people is 62.5% (88.9% for men+ and 28.6% for women+), and the unemployment rate is 0.0% (Statistics Canada 2023j).

These findings are consistent with regional data from April 2024, which reported a Métis-specific unemployment rate of 8% across Northwestern Ontario, lower than the 17.2% rate reported for Indigenous Nations populations in the same region (Northwest Training and Adjustment Board 2025). This suggests relatively stronger labour force engagement among Métis individuals overall, although GBA+ analysis of local data shows gender disparities, particularly in Red Lake and Ear Falls.

Table 13.8-4: Labour Force Indicators -Kenora District, Red Lake, and Ear Falls (Métis Identity), 2025

Labour Force Indicator	Total	Men+	Women+
Kenora District (Métis identity)			
Population 15+ Years	3,215	1,650	1,565
In the labour force	2,205	1,145	1,055
Employed	2,010	1,030	980
Unemployed	195	115	75
Not in the labour force	1,015	505	505
Participation rate (%)	68.6	69.4	67.4
Employment rate (%)	62.5	62.4	62.6
Unemployment rate (%)	8.8	10	7.1

Labour Force Indicator	Total	Men+	Women+
Red Lake (Métis identity)			
Population 15+ Years	270	130	140
In the labour force	190	100	90
Employed	175	95	80
Unemployed	15	0	10
Not in the labour force	80	30	50
Participation rate (%)	70.4	76.9	64.3
Employment rate (%)	64.8	73.1	57.1
Unemployment rate (%)	7.9	0	11.1
Ear Falls (Métis identity)			
Population 15+ Years	80	45	35
In the labour force	50	40	10
Employed	40	40	0
Unemployed	0	0	0
Not in the labour force	35	10	25
Participation rate (%)	62.5	88.9	28.6
Employment rate (%)	50	88.9	0
Unemployment rate (%)	0	0	0
Ontario			
Population 15+ Years	11,782,820	5,733,360	6,049,460
In the labour force	7,399,200	3,847,325	3,551,880
Employed	6,492,895	3,416,955	3,075,940
Unemployed	906,310	430,365	475,940
Not in the labour force	4,383,620	1,886,035	2,497,580
Participation rate (%)	62.8	67.1	58.7
Employment rate (%)	55.1	59.6	50.8
Unemployment rate (%)	12.2	11.2	13.4

Source: (Statistics Canada 2023h, Statistics Canada 2023i, Statistics Canada 2023j, Statistics Canada 2023e)

Note: reference year is 2020

Note: The category men+ includes men, as well as some non-binary persons. The category women+ includes women, as well as some non-binary persons.

Sources of Income

The income composition for self-identified Métis people in Kenora District, Red Lake, and Ear Falls is presented in Table 13.8-5. While overall income sources are broadly similar to provincial patterns, there are notable gender-based and community-specific disparities:

- Women+ rely more heavily on government transfers than men+, particularly in Ear Falls, where transfers make up 50% of income for women+ compared to 13% for men+.

- Market and employment income is lowest for women+ in Ear Falls, where only 30% of total income comes from employment, compared to 90% for men+.
- In Red Lake and Kenora District, women+ also report lower employment income and higher reliance on government transfers, though the gap is less pronounced than in Ear Falls.

Compared to the Ontario average, Métis women+ in all three communities show higher reliance on transfers and lower employment income, reflecting potential barriers to labour market access (Statistics Canada 2023h, Statistics Canada 2023i, Statistics Canada 2023j, Statistics Canada 2023e)

Table 13.8-5: Income Composition Statistics - Kenora District, Red Lake, and Ear Falls (Métis Identity), 2025

Income Composition Kenora District	Total	Men+	Women+
Kenora District (Métis Identity)			
Market Income (%)	84.4	86.8	81.4
Employment Income (%)	74.4	76.0	72.4
Government Transfers (%)	15.5	13.3	18.6
Red Lake (Métis Identity)			
Market Income (%)	88.0	92.0	84.0
Employment Income (%)	77.0	84.0	68.0
Government Transfers (%)	11.6	6.2	18.0
Ear Falls (Métis Identity)			
Market Income (%)	76.0	85.0	45.0
Employment Income (%)	68.0	90.0	30.0
Government Transfers (%)	24.0	13.0	50.0
Ontario			
Market Income (%)	82.8	87.0	77.8
Employment Income (%)	67.4	71.4	62.3
Government Transfers (%)	17.1	13.0	22.3

Source: (Statistics Canada 2023h; Statistics Canada, 2023i; Statistics Canada, 2023j; Statistics Canada 2023f).
Note: reference year is 2020
Note - The category men+ includes men, as well as some non-binary persons. The category women+ includes women, as well as some non-binary persons.

Employment Income

The median employment income in 2020 among self-identified Métis income recipients was:

- $64,000 in Kenora District ($72,000 for men+ and $57,200 for women+),
- $83,000 in Red Lake ($96,000 for men+ and $54,600 for women+), and
- $0 in Ear Falls (Statistics Canada 2023h; Statistics Canada 2023i; Statistics Canada 2023j).

The average employment income in 2020 among self-identified Métis income recipients was:

- $69,600 in Kenora District ($78,000 for men+ and $58,600 for women+),
- $82,000 in Red Lake ($104,000 for men+ and $62,000 for women+), and
- $80,000 in Ear Falls ($85,000 for men+ and $0 for women+) (Statistics Canada, 2023h; Statistics Canada 2023j; Statistics Canada 2023i).

These income patterns as shown in Table 13.8-6 highlight notable gender and geographic disparities with implications for community well-being. Across Kenora District, Red Lake, and Ear Falls, Métis women+ consistently report lower employment income than men+.

In Red Lake, the median employment income for women+ was 43% lower than that of men+ in 2020, suggesting differences in access to higher-paying or stable employment.

In Ear Falls, reported employment income for Métis women+ was $0, reflecting both low labour force participation and the absence of recorded earnings during the census reference period. This contrasts with men+ in the same community, who reported relatively high average employment incomes compared to other communities in the district. These patterns point to structural barriers that may limit economic participation for women+ in smaller and more remote communities.

Further context on labour market access and sector-specific trends will be discussed in Section 7.16, Local and Regional Economy.

In addition to wage-based income, Métis households may rely on land-based and non-wage activities that support household well-being by offsetting living costs and strengthening food security; these activities are discussed further in section 13.8.2.2.2.3.

Table 13.8-6: Employment Income Statistics - Kenora District, Red Lake, and Ear Falls (Métis Identity), 2025

Income Statistics	Total	Men+	Women+
Kenora District (Métis Identity)			
Number of employment income recipients (aged 15 years and over in private households who worked full year full time in 2020)	1,165	635	530
Median employment income in 2020 among recipients (Full-year full-time workers)	$64,000	$72,000	$57,200
Average employment income in 2020 among recipients (Full-year full-time workers)	$69,600	$78,800	$58,600
Red Lake (Métis Identity)			
Number of employment income recipients (aged 15 years and over in private households who worked full year full time in 2020)	95	45	55
Median employment income in 2020 among recipients (Full-year full-time workers)	$83,000	$96,000	$54,400
Average employment income in 2020 among recipients (Full-year full-time workers)	$82,000	$104,000	$62,000
Ear Falls (Métis Identity)			
Number of employment income recipients (aged 15 years and over in private households who worked full year full time in 2020)	25	25	0
Median employment income in 2020 among recipients (Full-year full-time workers)	$0	$0	$0
Average employment income in 2020 among recipients (Full-year full-time workers)	$80,000	$85,000	$0
Ontario			
Number of employment income recipients (aged 15 years and over in private households who worked full year full time in 2020)	3,865,695	2,145,810	1,719,885
Median employment income in 2020 among recipients (Full-year full-time workers)	$67,000	$72,000	$61,600
Average employment income in 2020 among recipients (Full-year full-time workers)	$82,400	$90,700	$72,000

Source: (Statistics Canada 2023h, Statistics Canada 2023i, Statistics Canada 2023j, Statistics Canada 2023f).

Note: reference year is 2020

Note: The category men+ includes men, as well as some non-binary persons. The category women+ includes women, as well as some non-binary persons.

Education Level

Educational attainment is closely tied to income security, employment opportunity, and health outcomes. Table 13.8-7 presents educational attainment among self-identified Métis individuals aged 15 years and over in Kenora District based on 2021 Census data. While many Métis individuals have completed postsecondary education, a high share still report lower formal attainment, which can influence long-term well-being

Notably:

- 30% (630 individuals) of Métis adults had no certificate, diploma, or degree.
- Postsecondary attainment is slightly higher among Métis women+ (770) than men+ (700), particularly in college and university programs.

- Métis men+ are more likely to hold apprenticeship or trades certificates (210 versus 55), while Métis women+ are more likely to hold bachelor's degrees or higher (260 versus 125), suggesting gendered educational pathways.

It is important to recognize that publicly available statistics may not fully capture local realities or the role of community-based learning and TK systems. As such, these figures should be interpreted as a broad indication of formal attainment patterns rather than a complete picture of educational experience within the community.

Table 13.8-7: Educational Attainment - Kenora District (Métis Identity), 2025

Educational Attainment Level	Total	Métis Men+	Métis Women+
No certificate, diploma, or degree	630	380	245
High school diploma or equivalency	1,120	565	555
Postsecondary certificate, diploma, or degree	1,465	700	770
Apprenticeship or trades certificate or diploma	270	210	55
College / CEGEP / non-university certificate or diploma	755	325	425
University certificate or diploma below bachelor level	50	35	20
Bachelor's degree or higher	385	125	260
Bachelor's degree	300	95	205
University above bachelor level	25	15	10
Master's degree	60	20	45
Earned doctorate	0	0	0

Source: (Statistics Canada 2023d)
Note: reference year is 2020
Note: The category men+ includes men, as well as some non-binary persons. The category women+ includes women, as well as some non-binary persons.

Economic Opportunity and Inequality

The available income, labour force, and education indicators suggest that economic outcomes among Métis residents in the Kenora District vary across communities and demographic groups. While overall low-income prevalence among Métis populations in the District is low compared to other Indigenous groups, measures of income inequality and income distribution indicate variation in earnings across households. Gender-disaggregated data also show differences in employment income, labour force participation, and reliance on government transfers, particularly in smaller communities such as Ear Falls where labour market participation among women+ is lower. Educational attainment patterns and access to training opportunities may also influence who is able to access higher-paying or more stable employment. Together, these factors suggest that access to economic opportunities is not experienced uniformly across Métis populations in the LSA and RSA.

Workforce by Industry

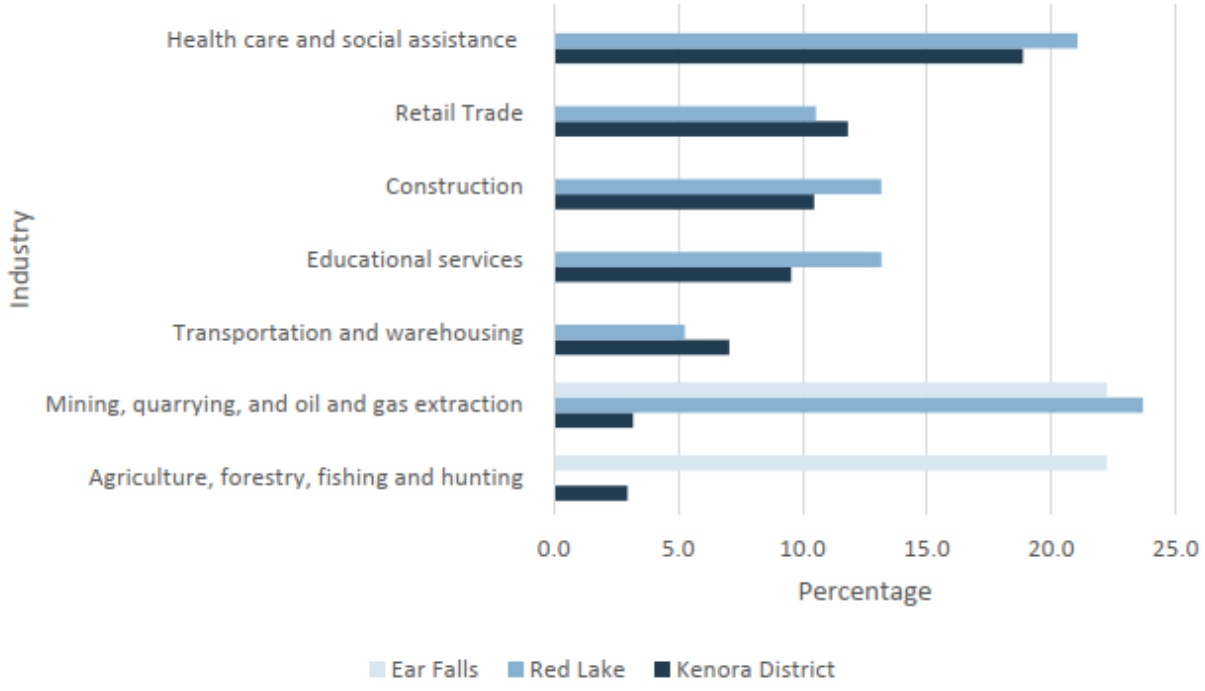
The workforce by industry for self-identified Métis people in Kenora District, Red Lake, and Ear Falls is presented in Figure 13.8-2. This figure demonstrates the top industries for self-identified Métis people in the District and municipalities:

- Health care and social assistance, followed by retail trade, represent the largest industry in the Kenora District (Statistics Canada 2023h).
- Mining, quarrying, and oil and gas extraction, followed by health care and social assistance, was the largest industry for self-identified Métis people in Red Lake (Statistics Canada 2023i).
- In Ear Falls, the largest industries for self-identified Métis people were mining, quarrying, and oil and gas extraction, and agriculture, forestry, fishing, and hunting (Statistics Canada 2023j).

In October 2025, Interfor announced the shutdown of the Ear Falls sawmill, the town's largest employer and primary economic driver. Local leadership reported that approximately 150 unionized workers were affected by the closure, representing a substantial share of the local labour force. The shutdown was widely characterized as a community-level crisis due to the community's reliance on resource-sector employment and the anticipated effects on household income stability, local spending, housing demand, and broader community well-being.

Regional stakeholders noted that the implications extend beyond immediate job losses, contributing to heightened economic uncertainty for residents (Sahota 2025)

Figure 13.8-2: Workforce by Industry - Kenora District, Red Lake, and Ear Falls (Métis Identity) 2025



Tourism

The area has an established tourism sector supported by its natural setting of lakes, beaches, forests, and recreational amenities. Common activities include cross-country skiing, off-road travel (e.g., snowmobiling, ATV), ice fishing, hunting, fishing, camping, and golfing. Annual community festivals and access to parks and trails also contribute to the tourism offer (Municipality of Red Lake n.d.; The Métis Nation of Ontario 2023). Regionally, the area forms part of Ontario's Sunset Country, a tourism destination encompassing over 100,000 km² of Boreal Forest and more than 70,000 waterways and waterbodies. Over 250 lodges and tourism businesses operate within this zone, offering services such as hunting and fishing (Northwestern Ontario Métis Community 2023).

Tourism development has become a strategic priority across the Kenora District, with Red Lake and Ear Falls implementing targeted initiatives to diversify their economies. Red Lake's 2024–2027 Strategic Plan emphasizes revitalizing tourism infrastructure and enhancing visitor experiences through trail development, event expansion, and digital promotion (Municipality of Red Lake n.d.). The Community Improvement Plan (CIP) provides financial incentives for projects that support tourism, including commercial façade improvements and heritage restoration (Stantec 2017). In Ear Falls, the Township collaborates with the Chukuni Communities Development Corporation to support local entrepreneurs in developing or expanding small businesses with tourism potential (Quesnel-Loessl 2023).

At the regional level, the Highway 105 Tourism Sector and Marketing Strategic Plan (2021) outlines objectives to diversify tourism offerings, enhance visitor experiences, and increase the number of market-ready tourism products (Forrest & Gutsche 2021). In 2022, the Ontario government allocated over $645,000 through the Northern Ontario Heritage Fund Corporation (NOHFC) to support five tourism, recreation, and culture projects in the Kenora and Rainy River areas (The Métis Nation of Ontario 2023).

Although some available data reflect broader geographic boundaries, 2019 provincial statistics for the Northwestern Ontario Region (13C), which includes the Kenora District, reported approximately 1.25 million visits, with 60% of visitors staying overnight. Total visitor spending was estimated at $552.8 million (Government of Ontario 2019). These figures underscore the significance of tourism as a contributor to the regional economy.

Barriers to Employment and Economic Participation

Economic participation is a determinant of community well-being, influencing access to stable income, housing, education, and health services. In the City of Kenora, Red Lake, and Ear Falls several factors are likely to affect labour force engagement and income stability for NWOMC members.

Childcare Access as a Barrier to Employment

Interviews with service providers in the region have consistently identified limited access to licensed childcare as a considerable constraint on employment, particularly for women+, lone parents, and low-income households (Hall & Lamme 2025; Stevenson & Lansdell-Roll 2025; Wesley 2025; Ramasaywak 2025; Parrish 2025). Existing childcare programs in the area are characterized by long wait lists, limited capacity, and insufficient hours to accommodate full-time employment.

As of 2025, the average cost of childcare in Ontario has been reduced to approximately $22 per day, or $6,600 annually, under the Canada-Wide Early Learning and Child Care agreement (Ontario Newsroom 2024)This represents a considerable reduction from previous averages of $7,557 in 2023 and $11,500 in 2018. However, cost reductions alone do not address structural gaps in service availability, particularly in rural and Indigenous Nations communities.

Interviews with Northwestern Ontario Métis Child and Family Services (NWOMCFS) highlighted a range of interrelated structural and cultural barriers affecting Métis families' ability to access employment, training, and wraparound supports (Friesen 2025).

Culturally Appropriate Supports for Métis Families

Access to culturally appropriate support is an important determinant of both employment participation and broader community well-being. NWOMCFS provides trauma-informed, culturally grounded programming to NWOMC families across Region 1, with outreach to Red Lake, Ear Falls, and other smaller communities. Services focus on family preservation, emotional and spiritual wellness, parenting education, and food security, and are delivered by a majority-Métis staff supported by Elders and cultural coordinators.

Interviews with NWOMCFS staff emphasized that systemic discrimination, geographic isolation, and jurisdictional ambiguity continue to affect NWOMC clients. Families often encounter barriers in both mainstream and Indigenous Nations-led services, reducing their ability to access childcare, job training, and other supports critical to economic participation (Friesen, 2025). These intersecting challenges contribute to underutilization of services and reinforce cycles of marginalization in remote communities.

Structural and Geographic Employment Barriers

Beyond culturally specific challenges, service providers and regional data identified a number of broader structural barriers to labour force participation. These constraints affect residents across demographic groups particularly in smaller and remote communities such as Red Lake and Ear Falls. Key barriers include:

- Limited transportation options, which restrict access to jobs located outside the community.
- Lack of nearby job training or certification programs, limiting skill development.
- A shortage of local employment opportunities that align with the skills, interests, and schedules of community members.
- Seasonal and Project-based employment, particularly in sectors such as mining, construction, and forestry, which may lead to workforce shortages in other sectors as available labour is drawn toward higher-paying jobs.

13.8.2.2.2.2 Housing

Housing is a key determinant of community well-being, shaping residents' health, safety, and overall quality of life. Access to safe, adequate, and affordable housing supports social stability and enables participation in education, employment, and community life.

Housing Affordability and Access

As of 2021, Kenora District had 32,914 private dwellings, with 24,818 occupied by usual residents. The majority (81%) were single-detached homes, reflecting NWOMC's low-density settlement pattern. While 83% of dwellings required only regular maintenance or minor repairs, 17% were in need of major repairs, higher than the Ontario average of 5.7%. Homeownership remained relatively high at 60%, while 20% of households were renters (Statistics Canada 2023b).

Key housing pressures reported by service providers include:

- Limited availability of affordable rental units and supportive housing;
- Infrastructure gaps in transitional and emergency shelter services;
- Barriers to recruitment and retention of staff in education, health care, and emergency services due to unaffordable or inaccessible housing; and
- Rising homelessness, with the 2024 Point-in-Time Count (Kenora District Services Board 2025). identifying 500 individuals experiencing homelessness across the district, up 168% from 2021.

Among respondents to the PIT Count:

- 58% identified as First Nations or Métis
- 81 individuals cited low income as a barrier to securing housing
- 89% expressed a desire to be housed.

While these figures reflect general conditions in the Kenora District, no disaggregated data on housing status or condition is available specifically for self-identified Métis households.

However, the overrepresentation of Indigenous identities in homelessness data suggests that NWOMC members may be impacted by regional housing challenges. It is also important to note that homelessness studies may not capture everyone experiencing housing insecurity. People who are couch-surfing, living in overcrowded homes, staying temporarily with friends or family, or in unsafe housing situations are often missed in traditional counts.

Barriers to Housing Access for Vulnerable Groups

Housing insecurity in the Kenora District is influenced by several intersecting structural factors. Regional homelessness reports identify trauma, mental health challenges, substance use, and limited availability of affordable housing as key contributors to housing instability. These pressures often interact with broader social determinants of health, including poverty, limited access to culturally appropriate supports, and barriers to stable employment.

Research across northern Ontario also highlights domestic violence as a leading cause of housing instability for women+ and children (Fustic, Guay, Khalid, & Hossain 2019)Access to emergency shelter and transitional housing options remains limited in smaller communities such as Red Lake and Ear Falls, which may require individuals to travel to larger centres to obtain support. These mobility and service access barriers can increase housing vulnerability for individuals who rely on regional services.

Although housing data are not disaggregated specifically for Métis households in the Kenora District, the overrepresentation of Indigenous identities in homelessness data suggests that Métis residents may also experience disproportionate exposure to these structural housing pressures.

Housing Services

The Métis Nation of Ontario offers housing and homelessness services for members of NWOMC, through the Métis Nation of Ontario's Housing and Infrastructure Branch. These services include:

- Métis Housing Stabilization Program
- Emergency Repair Program
- Financial Literacy Program
- Home Buyers Contribution Program
- Infinity Property Services (Métis Nation of Ontario 2023)

Supportive and Emergency Housing

NWOMC members in need would also have to access services in Red Lake, or the City of Kenora. Access to regional supportive and emergency housing plays a critical role in community well-being by helping individuals maintain safety, dignity, and social stability during periods of acute housing insecurity These services are especially vital for women+, Indigenous residents, and individuals with complex needs who may lack other forms of support, and may require specialized housing.

Local shelters and housing programs offer short-term accommodations, meals, and holistic supports that contribute to mental health, reduce the risk of chronic homelessness, and foster inclusion. For example, organizations such as New Starts for Women and the Red Lake Indian Friendship Centre delivers culturally appropriate outreach and housing support.

For detailed descriptions of shelter infrastructure, bed capacity, and service utilization rates, refer to Section 15.5.1.3.2, Accommodation and Lodging in Community Services and Infrastructure (Red Lake Indian Friendship Centre n.d.).

Additional data on housing affordability (including barriers to housing for vulnerable groups) across Kenora District, and the communities of Red Lake and Ear Falls is presented in Section 14.8.2.2.2.2.

13.8.2.2.2.3 Cost of Living and Traditional Economy

While there is no community-specific cost of living index available for the Kenora District, regional data for Northwestern Ontario suggests that the cost of goods, utilities, and services is elevated compared to other parts of the province. This is attributed to geographic remoteness, transportation limitations, and seasonal supply constraints. The Ontario Ministry of Health acknowledges these pressures through programs such as the Northern Health Travel Grant, which offsets travel costs for medical appointments in distant communities (Ministry of Health 2024).

NWOMCFS highlighted that the cost of living in Northwestern Ontario is higher than in many urban areas.

High rent, taxes, and transportation costs limit how far support dollars can go. Families frequently experience food insecurity and limited access to dental, vision, and healthcare, which affects overall stability and well-being. These challenges are particularly acute in remote communities where access to programs and supports is further constrained by geography and service gaps (Friesen 2025).

In the context of elevated living costs across Northwestern Ontario, land-based and non-wage economic activities continue to play an important role in supporting Métis household well-being by reducing reliance on purchased goods and services. Members of the Northwestern Ontario Métis Community (NWOMC) engage in activities such as commercial fishing, harvesting of plants and medicines, wild rice and berry gathering, and firewood collection, as described in Section 13.6 (Current Use of Lands and Resources for Traditional Purposes). While these activities may not consistently generate market income, they contribute directly to food security, household heating, cultural continuity, and reduced day-to-day expenses, particularly in remote communities such as Red Lake and Ear Falls.

Harvesting practices, including the collection of wild foods and firewood, reduce dependence on store-bought food and commercial energy sources, which are often more costly in remote and northern communities due to transportation and supply constraints.

Métis harvesting rights on Crown land are protected under Section 35 of the Constitution Act, and recent amendments to the Métis Nation of Ontario Harvesting Policy formally recognize firewood as a household heating resource. These land-based practices are often intergenerational in nature, supporting the transmission of cultural knowledge, reinforcing Métis identity, and contributing to physical, mental, and cultural well-being alongside their role in mitigating cost-of-living pressures (The Métis Nation of Ontario 2025f).

Many Indigenous communities, particularly those who are remote, and/or in an area with limited employment and income opportunities will participate in traditional economy activities. The Indigenous traditional economy is a land-based, community-centered economic system built on:

- Subsistence Activities – hunting, fishing, trapping, and gathering plants (e.g. medicinal, firewood, cooking) may replace and/or augment food sources and / or supplement household income
- Reciprocity and Sharing - this economy emphasizes sharing resources with family, Elders, and community members where giving creates social bonds, supporting collective well-being.
- Stewardship of the Land – maintaining balance so species and ecosystems regenerate (‘taking only what you need”) and viewing land and resources as a living relative, not a commodity (Seven Grandfather Teachings)
- Governance and Cultural Values – informed by Elders' knowledge, Band Councils, and cultural protocols.

Measuring Indigenous traditional economy is complex because it does not fit neatly into Western economic metrics like Community Wellness Index, Gross Domestic Product or income. Instead, it is described using qualitative and holistic information that reflect cultural, ecological, and social values.

13.8.2.2.3 Community Cohesion

NWOMC members demonstrate a strong sense of community connection that contributes meaningfully to community cohesion and well-being. Métis Community Councils play a central role in fostering this cohesion by offering culturally grounded spaces for gathering, mutual support, and community-led programming.

Though physically located within non-Indigenous municipalities, these councils represent self-governing Métis communities and operate independently of municipal governance structures (Northwest Training and Adjustment Board 2025).

This cohesion is evident in initiatives such as the 2021 virtual family camps hosted by the Northwest and Kenora Métis Councils. Activities included jigging, Elder storytelling, canoe safety, and traditional plant knowledge, reinforcing intergenerational bonds and cultural identity (The Métis Nation of Ontario 2024). During the 2020 Red Lake wildfire evacuation, both councils also mobilized rapidly to provide emergency funds and essentials for displaced Métis citizens, underscoring strong networks of mutual aid and resilience (The Métis Nation of Ontario 2024).

At the same time, the community faces growing social stresses that may affect long-term cohesion, particularly among youth. According to the Expert Panel on Métis Self-Government and Recognition (2025), tensions between Métis and Indigenous Nations leadership have generated uncertainty and identity conflict (The Métis Nation of Ontario 2024).

Youth in communities such as Fort William reported distancing themselves from their Métis identity due to accusations and external pressure, with one individual noting, the kids are not identifying as Métis anymore. Some community members described youth choosing to abandon their ethnicity altogether.

These patterns raise concerns about cultural disconnection and reduced engagement with Métis-led programming, especially for women+, girls, and gender-diverse individuals who may already face overlapping systemic barriers. The intersection of identity, legitimacy, and social fragmentation is an important social determinant of health, one that highlights the need for sustained investment in Métis youth leadership, mental wellness supports, and culturally safe community infrastructure.

13.8.2.2.4 Public Safety

Systemic racism, colonialism, and past and present government policies, Indigenous People face higher rates of victimization. A 2022 report from the Canadian Centre for Justice and Community Safety Statistics discusses victimization against Indigenous Peoples. Some of the issues identified in the report include, but not limited to the following (Perreault 2022):

- Four in ten experienced sexual or physical violence by an adult before the age of 15, according to self-reported data.
- 26% of Indigenous women+ experienced sexual violence by an adult during their childhood (9.2% for non-Indigenous women+, 5.8% for Indigenous men and 2.8% for non-Indigenous men).
- The homicide rate involving Indigenous victims is six times higher than non-Indigenous victims.
- 8.4% of Indigenous Peoples were victims of sexual assault, robbery or physical assault in 2019, about twice the proportion of non-Indigenous people (4.2%).

- Indigenous Peoples were about twice more likely than non-Indigenous Peoples to have little or no confidence in their local police service.

Additionally, research indicates that one in three Canadian women+ will experience sexual assault in their lifetime, with Indigenous women+ experiencing a higher rate of sexual assault compared to non-Indigenous women+ (Sexual Assault Support Centre n.d.). While sexual assault data specific to NWOMC members is not available, sexual assault statistics for the broader area include:

- Sexual assaults (430) reported in Northwestern Ontario in 2021, represented an increase of 31% from 2020 (Levesque 2022).
- In Kenora district, there were 211.5 reported sexual assaults per 100,000 of the population in 2020 (Canada Crime Index 2021).

In Canada, there is a relationship between industrial camp populations and a rise in crime, sexual violence, and the trafficking of Indigenous women+ (Keith MacMaster 2020).

The remote locations of projects and Indigenous communities result in low reporting rates. In addition, local community health centres lack the resources to address incidents of sexual assault (Prospectors and Developers Association 2019)

However, this is not specific to Indigenous women+ on reserves, but rural and urban Indigenous women+ that live near resource-intensive areas. Given the presence of mining projects in the area, Indigenous women+ are at a higher risk of increased violence.

NWOMC members have access to police services in the municipalities in which they live. As such, crime data is reported for Canada, Ontario, and northwestern Ontario to provide an overview of general crime trends in the area.

Crime statistics are reported to Statistics Canada using the Uniform Crime Reporting Survey. The survey measures the incidence of crime in Canada. The data reflects crimes reported to police and so it does not capture a count of all crimes as some go undetected or unreported to police (Statistics Canada 2024). Crime statistics for Canada and Ontario are shown in Table 13.8-8.

Table 13.8-8: Crime Statistics for 2019 and 2023 - Canada and Ontario, 2025

	Canada (total, all violations)		Ontario (total, all violations)	
	2019	2023	2019	2023
Actual Incidents	2,440,496	2,526,877	660,927	737,246
Rate per 100,000 population	6,487.49	6,301.79	4,535.11	4,723.40
Total, persons charged (adult & youth)	645,614	591,770	205,148	198,291
Source: (Statistics Canada 2024)				

Crime severity index (CSI) is a measure that analyses severity and number of crimes and is intended to complement other crime statistics such as crime rate and self-reported victimization data. The CSI has a base index value of 100 for 2006 (Statistics Canada 2024).

- In 2023, the CSI for Canada was 80.5, an increase of 2%, but still lower than in 2006 (Statistics Canada 2024).

- In Ontario, the CSI in 2023 was 60.9, an increase of 4%, again still much lower than in 2006 (Statistics Canada 2024).

A CSI specific to NWOMC is not available. However, the Nishnawbe Aski Police Service provides policing to Indigenous Nations communities throughout much of Northern Ontario (Nishnawbe Aski Police n.d.). In 2023, they reported a CSI of 302.3 for their service area, 241. 4 higher than the provincial number (Nishnawbe Aski Police 2024). The Nishnawbe Aski Police Service police the area and communities in much of northern Ontario and so this statistic is meant to show general crime trends in remote communities in this part of the province and is not specific to NWOMC.

A study conducted by the Liard Aboriginal Women's Society found that women's jobs within the extractive industry jeopardizes their safety. This included exposure to harassment, discrimination and assault in the workplace and within mining camps. It also found that Indigenous and racialized women+ felt that they could not report incidents and felt that authorities (i.e., police, agencies, employers) failed to address violence in the industry. To address these issues, the report recommends that regulatory agencies and the criminal justice system focus on addressing systemic gaps to strengthen protections for workers' safety and human rights (Moodie, Mason, & Moorcroft 2021).

The National Inquiry into Missing and Murdered Indigenous Women and Girls sought to understand the systemic causes of violence against Indigenous women+, girls and 2SLGBTQIA plus people.

The inquiry found that extraction projects lead to increased violence against Indigenous women+ at the hands of non-Indigenous men and increased violence within Indigenous communities. This was associated with the nature of the industry including, transient workers and rotational shift work, as well as harassment and assault in the workplace, substance abuse and addictions, and economic insecurity (National Inquiry into Missing and Murdered Indigenous Women and Girls 2019).

The National Inquiry determined that no one knows exactly how many Indigenous women+, girls and 2SLGBTQIA plus people have going missing or been murdered, though it numbers in the thousands (National Inquiry into Missing and Murdered Indigenous Women and Girls 2019). The National Inquiry made 231 Calls for Justice that cover a range of actions to address violence and crimes against Indigenous women+, girls and 2SLGBTQIA plus people, including (National Inquiry into Missing and Murdered Indigenous Women and Girls 2019):

- Governance and Accountability

Calls for governments and institutions to take accountability and to create a national action plan that emphasises accountability and measurable outcomes.

- Public Safety and Justice
    - Calls for reform of policing and the criminal justice system to address biases, racism and lack of responsiveness to Indigenous Peoples.
- Cultural and Social Reconciliation
    - Calls for restoring cultures, languages and practices as well as inclusion of Indigenous history, cultures and rights in the Canadian educational system.
- Healing and Wellness

- Calls for Indigenous-led healing programs and safe spaces for the well-being of Indigenous women+, girls and 2SLGBTQIA plus people.

- Action on Poverty and Marginalization
  - Calls for economic, education and social policies that address poverty and marginalization and for increased access to economic opportunities, housing and healthcare.
- Support for Families and Survivors
  - Calls for support systems for the families and survivors of the missing and murdered.

13.8.2.2.5 Access to Land and Resources

Access to community and natural resources, including land, water, food systems, and social infrastructure, are central to community well-being and self-determination. For NWOMC, access to shared and exclusive resources and cultural landscapes is essential to their identity; a major determinant of physical, mental and spiritual health, and community cohesion (Statistics Canada 2023a)

Historical and contemporary policy decisions, from colonial land appropriation to the legacy of residential schools and settlement expansion, have disrupted Indigenous Peoples ability to access and steward the lands and resources they have long relied on.

These legacies continue to shape governance and economic frameworks today, at the risk of the health of local populations (Boska, Joober, & Kirmayer 2015) The information presented draws primarily on regional data and literature related to NWOMC populations within the broader Kenora District.

13.8.2.2.5.1 Land Tenure and Mineral Resources

Ontario's natural resource and extraction economy present both an opportunity and risk to Indigenous communities, adding pressure to an already historically affected landscape to practice traditional systems. Approximately 87% of Ontario's landmass is Crown land, the vast majority of which is managed by Ontario's Ministry of Natural Resources (Government of Ontario 2015). Crown land is made up of numerous tenures, including but not limited to mining and mineral claims, forestry tenures, and managed parks and conservation areas. Due to a surge in claims in the Ring of Fire area, mining claims in northern Ontario have grown 30% in the past year (Law 2023).

NWOMC often find themselves in the difficult position of seeking participation and inclusion in a rapidly growing resource economy, and seeking protections to their lands, resources, and livelihoods tied to the natural environment (Indigenous Relations and Northern Affairs Canada 2017). While Treaty 3 affirms Indigenous rights to traditional land use (such as hunting, fishing, gathering), it provides limited protection against industrial development. Notably, mineral rights were excluded from the treaty text, limiting community participation and benefit-sharing from resource extraction activities. Historical records indicate that while Indigenous signatories were promised protections within reserve lands, these rights were not extended beyond reserve boundaries and were omitted from the final treaty (Daugherty 1986).

Under Ontario law, mining claims can be registered without prior consultation with Indigenous Nations. While exploration permits cannot proceed without consultation, the initial staking and registration of mineral claims may still be perceived as occupation without consent, particularly in regions with limited consultation capacity or where historical mineral patents remain in force. Within the region, Indigenous Peoples have identified this may contribute to ongoing legal inequity, as it enables incursions on traditional territories that may disrupt constitutionally protected land use and traditional food systems (Carver 2023).

Additional barriers to economic participation that Ontario Indigenous Nations face include:

- Limited technical capacity to participate, review and respond to the high number of staked claims, including complex permitting and regulatory processes
- Limited access to capital and resources
- Competing social priorities, including protection and stewardship of the land, and social challenges including mental health and addictions, housing crises, access to clean water and food sources (Law 2023).

13.8.2.2.5.2 Food and Water Access

Under the MNO Harvesting Policy, the 2018 Framework Agreement reflect broader, ongoing efforts to recognize and implement Métis harvesting rights in Ontario.

As part of this, the MNO Harvesting Policy and MNO Harvesters Cards allow MNO citizens to harvest within identified areas, according to Métis laws and traditions (The Métis Nation of Ontario 2025f).

The region surrounding the Project is home to an expansive waterbody system that the traditional and cultural activity is inextricably linked to.

Water access and water quality are notable issues for Indigenous communities in the region. Industrial development including mining, forestry, and power generation disrupts the relationship and access to water resources for Indigenous communities in the Treaty 3 (Simpson, DaSilva, Riffel, & Sellers 2009). Traditional practices and cultural gathering spaces are generally tied to waterbodies where harvesting, trapping, fishing, and hunting opportunities tend to occur.

Food insecurity remains a public health concern in northwestern Ontario. According to the Northwestern Health Unit (NWHU), approximately 21% of households in the Kenora–Rainy River Districts face food insecurity, which is higher than the provincial average of 19% and the regional average of 19% (Northwestern Health Unit 2024). The monthly cost to feed a family of four in the region reached $1,537.84 in 2024, representing a 9% increase from 2023.

For those living on minimum wage or social assistance, food costs may consume 50% or more of monthly income, leaving minimal funds for housing, transportation, or other basic needs. A summary of regional food insecurity indicators is provided in Table 13.8-9.

While community food programs such as hampers, school nutrition programs, and food banks provide necessary short-term relief, the NWHU emphasizes that these are not long-term solutions and that income-based policy responses are needed to address the root causes of food insecurity. Additional regional challenges include:

- high transportation costs,
- limited grocery competition, and

- increased risk of food spoilage due to long-distance shipping, especially in remote areas.

The Nutritious Food Basket tool used to monitor affordability may also underestimate the true cost of food, as it does not reflect cultural preferences, processed or specialty diets, or real-world conditions such as limited time or access to quality stores (Northwestern Health Unit 2024).

Table 13.8-9: Food Insecurity and Cost Indicators - Kenora-Rainy River Region, 2025

Indicator	Value
% of households facing food insecurity	21.3%
Provincial average	18.7%
Regional average (Northwestern Ontario)	19.2%
Monthly cost to feed a family of four in 2024	$1,537.84
Year-to-year cost increase (2023 – 2024)	9%
Estimated monthly deficit for Ontario Works / Ontario Disability Support Program (ODSP) households	$700
Remaining income for minimum wage families after food + housing	~$599
Source: (Northwestern Health Unit, 2024)	

13.8.2.2.5.3 Drinking Water and Wastewater Systems

Access to clean, safe drinking water is essential to public health and community well-being in both urban and rural areas.

In the City of Kenora, access to clean drinking water is supported by a municipally operated system that sources from Lake of the Woods and treats up to 25 million litres per day. In 2024, water quality met provincial standards with no adverse findings, and over $1 million was invested in infrastructure upgrades. While the system allows for safe and reliable access for most residents, one low chlorine incident and aging infrastructure highlight the need for continued reinvestment to protect public health and long-term community well-being (Mundy 2025).

In Ear Falls, residents benefit from high-capacity municipal systems for drinking water and wastewater treatment. Although the systems are oversized for the current population, residents face challenges related to aging infrastructure, reliance on a flat-rate billing model, and frequent power outages that may affect service continuity.

Interviewees noted that while day-to-day needs are generally met, system resilience and staffing remain concerns, especially given the risk of skilled operators being recruited to mining jobs (Ballance 2025).

13.8.2.2.5.4 Social Infrastructure and Community Spaces

Access to gathering spaces such as community centres, cultural gathering spaces, recreation facilities, and libraries varies across the three municipalities. Common themes emerged during the assessment, including uneven access to shared facilities, and gaps in infrastructure (Parrish 2025). Gathering places and cultural spaces for regional Indigenous communities are also typically outdoor environments where cultural and spiritual activities take place.

Access and use of these culturally significant spaces vary across the communities because of past influences to watersheds (i.e., mercury contamination) and uneven access to areas where exploration or resource operations are occurring.

Social infrastructure for Indigenous communities also includes trapper cabins, traplines, and wild rice areas near waterbodies where hunting and harvesting occurs. For more information on current use and existing cultural spaces see sections on Current Use (Section 13.6) and Physical and Cultural Heritage (Section 13.7). These culturally significant spaces have the potential to be affected by Project development and general population increases in the region. To address potential effects, Mitigation and Residual Effects are also discussed in Sections 13.6 and 13.7.

Table 13.8-10 summarizes features and challenges related to social infrastructure and community spaces in each municipality. It highlights the types of facilities available, usage patterns, and community-identified gaps, as well as shared priorities across all three communities.

In Red Lake, the Evolution Recreation Centre plays a central role in promoting health, inclusion, and connection. Interviewees described it as essential to newcomer integration and youth engagement. However, concerns were raised about its accessibility infrastructure and staffing levels, with long wait lists for swimming lessons and day camps. Programs like Kids Are Recreationally Equal (KARE) help address cost-related barriers (StJean 2025).

In Ear Falls, residents value the availability of local amenities despite limited programming. Facilities like the KinFit Gym, arena, and community garden are well-utilized and supported through a blend of municipal and provincial funding sources (Ballance 2025).

Shared Priorities Across Municipalities

- Expanded youth programs and childcare options;
- Culturally safe and inclusive gathering spaces;
- Improved accessibility for seniors and people with disabilities;
- Transportation supports for children and youth; and
- Greater funding and staffing capacity to meet demand
  (St Jean 2025; Ramasaywak 2025).

For additional detail on recreational infrastructure see Section 13.5.2.2.2.1, Recreation and Leisure.

Table 13.8-10: Summary of Community Spaces and Infrastructure – City of Kenora, Red Lake and Ear Falls, 2025

Municipality	Facilities & Programs	Challenges
Kenora	Variety of community facilities concentrated in urban core	Uneven access in outlying areas
Red Lake	Evolution Recreation Centre: pool, gym, curling rink, bowling alley, day camps. Popular among newcomers, immigrants, and seniors	Limited accessibility (i.e., dismantled pool lifts, washroom design); part-time staffing; long wait lists for camps and swim programs

Municipality	Facilities & Programs	Challenges
Ear Falls	KinFit Gym, arena, golf course, splash pad, parks, community garden; supported by tax revenue, user fees, and provincial allocations	Limited programming due to small population base

13.8.2.2.6 Population Dynamics

Population size and stability are important in understanding how communities experience economic change, service pressures, and development effects. In smaller communities, even modest demographic shifts may affect housing, infrastructure needs, and cultural continuity.

13.8.2.2.6.1 Age and Gender

Table 13.8-11 shows age and gender statistics for self-identified Métis people in the district and municipalities in the PA. According to the 2021 Census, there were:

- 4,075 self-identified Métis people in the District of Kenora, of which 2,060 identified as men+ and 2,015 identified as women+;
- In the Municipality of Red Lake, there were 350 self-identified Métis people, of which 170 identified as men+ and 175 identified as women+;
- In the Township of Ear Falls, there were 90 self-identified Métis people, of which 45 identified as men+ and 40 identified as women+ (Statistics Canada, 2023h; Statistics Canada 2023i; Statistics Canada 2023j); and
- The median age of self-identified Métis people was 37.6 in the District of Kenora, 31.4 in the Municipality of Red Lake, and 54.0 in the Township of Ear Falls (Statistics Canada, 2023h; Statistics Canada 2023i; Statistics Canada 2023j)

Table 13.8-11: Age Characteristics - Kenora District, Red Lake, and Ear Falls (Métis Identity), 2025

Age Characteristic	Total	Men+	Women+
Kenora District (Métis identity)			
Total Population	4,075	2,060	2,015
Average Age	37.6	38.0	37.2
Median Age	37.6	37.6	37.6
Red Lake (Métis identity)			
Total Population	350	170	175
Average Age	35.2	34.0	36.4
Median Age	31.4	27.8	32.8
Ear Falls (Métis identity)			
Total Population	90	45	40
Average Age	53.6	56.0	51
Median Age	54	53.6	54

Source: (Statistics Canada 2023h, Statistics Canada 2023i, Statistics Canada 2023j).

Note: reference year is 2020

Note: The category men+ includes men, as well as some non-binary persons. The category women+ includes women, as well as some non-binary persons.

13.8.2.2.6.2 Migration and Mobility

The mobility characteristics of self-identified Métis people in Kenora District, Red Lake, and Ear Falls are presented in Table 13.8-12. According to 2021 Census data, most residents with Métis identity in these communities remained in place over the previous year:

- 86.5% of Métis individuals in Kenora District did not move in the past year.
- In Red Lake, the non-mobility rate was 87.0%, and in Ear Falls, all reported respondents (100%) were non-movers.

Women+ and men+ in Kenora District had nearly identical rates of stability (86.5% and 86.6%, respectively). However, Métis women+ were slightly more likely to move within Ontario (2.5%) than men+ (1.7%), a pattern that may reflect gendered factors such as caregiving responsibilities, employment transitions, or housing needs.

Red Lake displayed a slightly higher reported mobility among Métis men+ (14.7%) and women+ (14.3%), though no respondents reported movement within or into Ontario. In Ear Falls, all self-identified Métis respondents, men+ and women+, reported no residential movement over the prior year.

Compared to the general Kenora District population (90.5% non-movers), residents with Métis identity had slightly lower residential stability overall. Still, the vast majority remained in their communities, which may support community cohesion, continuity in services, and place-based identity.

It is important to note that the 2021 mobility data was collected during the COVID-19 pandemic, a period characterized by national travel restrictions and reduced relocation activity. Reported rates may therefore reflect temporary conditions rather than long-term mobility trends.

In some communities, youth are choosing to disengage from Métis cultural identity due to intergroup tensions and a lack of recognition (The Métis Nation of Ontario 2024; Friesen 2025). This disconnection can result in reduced participation in local cultural or community-based programming and may contribute to out-migration in search of inclusion or opportunity elsewhere.

Table 13.8-12: Mobility Characteristics - Kenora District, Red Lake, and Ear Falls (Métis Identity), 2025

Mobility Characteristics (Métis Identity)	Total	Men+	Women+
Kenora District (Métis identity)			
Total responses	4,040	2,045	1,995
Did not move in the past year (%)	86.5	86.6	86.5
Moved in the past year (%)	13.5	13.2	13.5
Moved within Ontario (%)	2.2	1.7	2.5
Moved into Ontario from a different province (%)	1.4	1.2	1.5
Red Lake (Métis identity)			
Total responses	345	170	175
Did not move in the past year (%)	87.0	88.2	88.6
Moved in the past year (%)	13.0	14.7	14.3

Mobility Characteristics (Métis Identity)	Total	Men+	Women+
Moved within Ontario (%)	0.0	0.0	0.0
Moved into Ontario from a different province (%)	0.0	0.0	0.0
Ear Falls (Métis identity)			
Total responses	85	50	40
Did not move in the past year (%)	100	100	100
Moved in the past year (%)	0.0	0.0	0.0
Moved within Ontario (%)	0.0	0.0	0.0
Moved into Ontario from a different province (%)	0.0	0.0	0.0
Source: (Statistics Canada 2023e; Statistics Canada 2023g; Statistics Canada 2023c). Note: reference year is 2020 Note - The category men+ includes men, as well as some non-binary persons. The category women+ includes women, as well as some non-binary persons.			

Regional Mobility and Immigration Trends

Mobility data from the 2021 Census presents a snapshot of stable populations across Red Lake, Kenora, and Ear Falls, with non-mover rates ranging from 88.5% to 90.5%. In all three municipalities, the majority of residents reported no change in residence in the year preceding the Census, and five-year data from 2016 similarly reflected high levels of long-term residential stability.

These findings should be interpreted cautiously, as the 2021 Census captured a period shaped by COVID-19. Travel restrictions, public health measures, and economic uncertainty likely suppressed mobility nationwide, contributing to the stability observed in the data.

While Census data portrays a picture of low mobility and limited population turnover, local interviews conducted as part of this assessment indicated a perceived change in immigration since the pandemic, particularly in Red Lake and Kenora. As described in Section 15, Red Lake and Ear Falls key service providers in the region noted a growing presence of newcomers. Recent arrivals may not be captured in the 2021 Census, which may underrepresent post-pandemic population dynamics and changes in community composition.

According to the 2021 Census data for the Kenora District, the region had a total population of 63,300, with 2,470 individuals (approximately 3.9%) identified as immigrants. Between 2016 and 2021, 285 new immigrants settled in the Kenora District, representing about 11.5% of the total immigrant population in the area. The majority of recent immigrants to the Kenora District between 2016 and 2021 originated from the Philippines (110 individuals), followed by the United States (55), India (50), the United Kingdom (10), and China (10) (Statistics Canada 2023d).

This aligns with local observations shared during interviews in 2025, which consistently identified the Filipino community as one of the most visible and growing newcomer groups in the region (Parrish 2025; StJean 2025).

While Filipino residents remain a visible part of Red Lake’s immigrant population, several service providers noted a recent shift in immigration trends that may not be reflected in Census data.

Staff at Golden Learning Centre in Red Lake observed a change in newcomers from African countries, alongside ongoing immigration from Asian countries, including those working in the restaurant sector. These families often face barriers related to childcare access, transportation, and community integration. Although at least one newcomer-focused organization is known to exist in the area, interviewees were not able to speak to its current activities, and there remains limited publicly available information on formal identity-based or cultural supports for immigrant families in the region (Parrish 2025).

In addition to pandemic-related effects, interviewees also highlighted persistent structural barriers to mobility, including:

- Limited availability of housing for renters or new arrivals
- High cost of transportation and geographic isolation
- Financial insecurity or lack of support networks.

These constraints can make it difficult for both residents and prospective newcomers to relocate, even when employment opportunities or services may be available elsewhere. For those who do arrive, the lack of formal settlement support in smaller municipalities can further complicate integration.

13.8.3 Potential Effects

For the Community Well-Being criteria, a single potential effect is assessed: change in community well-being. This assessment considers how Project-related activities may influence members of the NWOMC in the region for employment, education, healthcare, cultural, or social reasons.

In contrast to the Community Infrastructure and Services assessment, which focuses on physical assets and service capacity, this assessment addresses social and human outcomes, which are considered alongside cultural information shared through reported land use activities (see Section 13.6),including population change, housing availability and affordability, cost of living, access to services, safety, economic opportunity, community cohesion, and cultural continuity, with particular attention to groups that may experience disproportionate effects, including Indigenous women+, girls, and 2SLGBTQIA plus people.

Table 13.8-13 summarizes potential interactions between Project activities and community well-being for NWOMC (✓ = potential interaction; – = no interaction). Only potential interactions are carried forward to the phase-based assessment.

Given the regional distribution of NWOMC members, both direct and indirect effects may occur. Potential interactions include:

- Social Determinants
  - Housing availability and affordability
  - Cost of living and Traditional Economy
  - Access to services (health and social services),
- Public Safety
  - Public safety and gender-based violence
- Economic Opportunity and Inequality

- Community cohesion
    - Household dynamics
- Access to lands and resources

The assessment evaluates these potential interactions at a regional, population-level scale across the construction, operations, and closure phases.

Table 13.8-13: Potential Interactions Between Project Activities and Community Well-being – Northwestern Ontario Métis Community

Project Component / Activity	Change in Community Well-being
Construction Phase	
Site preparation activities	✓
Establishment and operation of water management and treatment facilities	✓
Open pit mining	✓
Underground mining	✓
Management of rock and unconsolidated materials in stockpiles	✓
Establishment of onsite fish habitat and compensation measures	✓
Establishment of onsite aggregate operations	✓
Construction of the starter embankments for the TMF	✓
Construction and operation of buildings and infrastructure	✓
Waste management	✓
Commissioning of the process plant	✓
Power supply	-
Employment and expenditures	✓
Operations Phase	
Underground mining	✓
Mining of the LP Central pit	✓
Management of rock and unconsolidated materials in stockpiles	✓
Process plant operation	✓
Management of desulphurized tailings in the tailings management facility	-
Management of concentrate tailings and contact water in the Viggo management facility	-
Operation of water management and treatment facilities	✓
Construction of a mine water pond	✓
Operation and maintenance of buildings and infrastructure	-
Waste management	✓
Power supply	-

Project Component / Activity	Change in Community Well-being
Progressive reclamation activities	✓
Employment and expenditures	✓
Closure Phase	
Active closure	✓
Passive closure	✓
Final reclamation	✓
Employment and expenditures	✓

Legend: ✓ = Interaction exists
- No interaction exists

13.8.3.1 Construction Phase

The construction phase of the Project is expected to occur over a three-year period and will include site preparation and the development of Project infrastructure. These activities are anticipated to result in a temporary population increase, with both direct and indirect implications for community well-being in Red Lake, Ear Falls, and surrounding areas. During the construction phase, a temporary influx of workers is expected, potentially increasing short-term population pressures. During construction, most workers will be housed in a temporary on-site camp designed for approximately 1,000 people while on shift.

Since the camp is not intended for off-shift or family residence, a small portion of workers may seek off-site accommodation, potentially leading to short-term population pressures.

13.8.3.1.1 Housing availability and Affordability

During the construction phase, a temporary influx of workers is expected, potentially increasing short-term population pressures. During construction, most workers will be housed in a temporary on-site camp designed for approximately 1,000 people while on shift.

Since the camp is not intended for off-shift or family residence, a small portion of workers may seek off-site accommodation, potentially leading to short-term population pressures.

The Project could contribute to short-term affordability pressures, particularly for renters, low- to moderate-income households, and individuals already experiencing housing precarity, thereby contributing to broader stress on community well-being by exacerbating housing precarity and deepening socio-economic divides. These issues are not new, communities in the region have long faced barriers to housing availability and affordability due to infrastructure limitations and slow-paced development.

13.8.3.1.2 Cost of Living and Traditional Economy

Communities in the region, including Red Lake and Ear Falls, already face elevated costs for food, fuel, and housing due to limited supply chains and regional market conditions. Project-related activity may temporarily increase demand for certain goods and services during construction and operations, contributing to localized affordability pressures for residents, particularly those on fixed or lower incomes.

These changes, along with reduced confidence or access to traditional harvesting areas, could increase household reliance on market goods and influence participation in land-based livelihoods that support food security and cultural well-being.

As described in Section 13.6, Current Use of Lands and Resources for Traditional Purposes, NWOMC members engage in hunting, trapping, fishing, and plant harvesting within the LSA and RSA. Construction-related activities may contribute to concerns about negative environmental change in the LSA, reducing the household benefits associated with participating in the traditional economy.

These concerns, even in the absence of direct overlap with active harvesting areas, could discourage the use of traditional resources, leading to reduced confidence in food and medicine harvesting. This, in turn, may change reliance on market-based goods and services over time, which could affect household expenditures and perceived cost of living. As described in Section 13.6, many of these areas form part of established land use patterns for hunting, trapping, fishing, and plant gathering. Any disruption to access, whether physical or perceptual, should therefore be understood in the context of ongoing and intergenerational land-based practices.

13.8.3.1.3 Access to Services (Social and Health Services)

The Project workforce and any relocated families are expected to rely on community-based health, and social services for non-emergency and specialized care. These systems already face staff shortages and capacity constraints, which may be compounded by population changes during construction and operations. Added demand for childcare, mental and health support, could contribute to longer wait times and changes to access, particularly for Indigenous residents who may already face barriers to culturally appropriate or geographically accessible care.

It is noted that NWOMC members in Red Lake and Ear Falls may have access to a broader range of services as described in Section 13.5, Community Services and Infrastructure, including both publicly accessible and Métis-specific programs, such as those offered by NWOMCFS.

However, NWOMCFS staff emphasized that capacity is constrained by funding limitations, geographic coverage, and jurisdictional exclusion from both Indigenous Nations and mainstream systems (Friesen 2025). As such, despite their presence, these services may not be able to fully absorb additional demand associated with population growth needs during construction.

The extent to which these culturally appropriate supports can mitigate access pressures remains uncertain. Education services may also be affected by the arrival of new families. Increased enrollment may outpace available classroom space, staff capacity, or specialized programming, including supports for students with special needs or culturally relevant curriculum.

If the Project contributes to population changes or changes in demand for regional services within the RSA, NWOMC members who travel to access care may face longer wait times or delayed access, especially for services that are already stretched. This could be particularly impactful (for Elders and caregivers who face transportation, mobility, or financial barriers). While these effects would be indirect, they may still influence individual and collective well-being by limiting access to time-sensitive or culturally appropriate care. Community services and infrastructure are described in detail in Section 13.5.

At the same time, employment opportunities with the Project (employees will have access to additional resources through the EAP, including telehealth) could lessen reliance on local health and social programs among participating members by improving household income stability and access to workplace supports

13.8.3.1.4 Public Safety and Gender-Based Violence

The influx new and transient workers may affect safety and the perception of safety, particularly for Indigenous women+, girls, and 2SLGBTQIA plus people. Human trafficking and sexual exploitation risks were raised by local service providers, consistent with regional trends documented in the Final Report on Missing and Murdered Indigenous Women and Girls (MMIWG). These concerns may not always be captured through quantitative data but are central to the lived experience and perceived safety in the community.

For individuals and groups who already experience disproportionate vulnerability to gender-based violence, increased presence of non-local and transient workers may contribute to heightened fear or unease within the community. This may also intersect with broader historical and systemic factors that contribute to lower levels of trust in public safety systems among some Indigenous and vulnerable populations.

Even in the absence of actual incidents, perceived increases in risk can have adverse effects on mental well-being, personal security, and overall community cohesion.

13.8.3.1.5 Economic Opportunity and Inequality

Project construction is expected to generate employment and training opportunities, improving income stability for some residents. Recent economic changes in the region have increased the importance of stable employment, particularly in Ear Falls, where the indefinite shutdown of the Interfor sawmill in October 2025 resulted in the loss of approximately 150 unionized jobs. As the community's largest employer and primary economic driver, the closure contributed to heightened economic uncertainty and reduced availability of local employment opportunities.

Within this context, Project-related construction jobs may offer short-term income stability for workers who have recently experienced job displacement. However, unequal access to jobs due to barriers such as childcare, transportation, or qualifications may reinforce existing inequities. Wage differences between Project workers and other residents could also contribute to uneven distribution of benefits and localized economic polarization.

13.8.3.1.6 Household Dynamics

Higher household incomes during construction may support family stability and provide resources to meet basic needs, reduce debt, and improve quality of life. For some families, increased earnings may create new opportunities for savings, education, or mobility. However, the demands of rotational work schedules, limited childcare, and extended periods of separation, which may place strain on caregivers and reduce time for family connection. Rotational work schedules, long shifts and physical demands of construction may contribute to pressures on household and family dynamics. When childcare is limited or unavailable, caregivers, often women+, may experience additional strain, which may reduce workforce participation and increase emotional stress.

For some households, differences in income or employment opportunities between family members may introduce financial stress or power imbalances, which can contribute to tension or conflict within the home. In some cases, these dynamics may elevate risks of family or intimate partner violence, particularly when combined with substance use during off-periods, social isolation, or emotional strain among transient workers. These factors may also affect broader community cohesion and community well-being.

13.8.3.1.7 Community Cohesion

The arrival of new workers and investment during construction may introduce new energy and resources into the community, supporting growth and shared activities when managed thoughtfully. There is an opportunity to strengthen cultural exchange, local pride, and regional collaboration through inclusive planning and events. However, without proactive integration efforts, communities may experience cultural disconnect, exclusion from benefits, or perceived marginalization, particularly among Indigenous residents and long-term locals.

Increased incomes and new economic opportunities may also shift patterns of resource use and cultural practice. For some families, higher wages may reduce reliance on land-based harvesting or traditional subsistence activities, potentially affecting intergenerational knowledge transfer, cultural identity, and connection to traditional lands. Over time, reduced participation in cultural and land-based practices may influence community cohesion and the continuity of shared cultural values.

13.8.3.1.8 Access to Lands and Resources

The ability to access, steward, and harvest (for consumables) from traditional lands and waters remains an important determinant of community well-being for Indigenous and non-Indigenous residents in the region. While Section 13.6, Current Use of Lands and Resources for Traditional Purposes, provides a detailed assessment of these interactions, this section acknowledges the interconnection between land-based resource access and mental, physical, social, cultural, and economic well-being.

Project-related infrastructure, population growth, or perceived changes in safety and privacy during the construction phase may discourage land users from accessing culturally significant spaces for activities such as hunting, fishing, wild rice harvesting, and plant gathering. Changes in access may be particularly concerning in areas near traditional harvesting or ceremonial sites. Additionally, changes to use of land and waterways for recreation or tourism may alter land-user dynamics, strain sensitive ecosystems, and contribute to perceived or real displacement from important areas.

Social infrastructure and community well-being is also shaped by the availability of traditional food systems. Changes to access to land-based food and medicines may deepen existing food insecurity, limit cultural continuity, and contribute to negative health outcomes, particularly where store-bought food is expensive or nutritionally inadequate. These effects are expected to vary by user group and geography but are broadly understood to influence community cohesion, identity, and individual wellness.

13.8.3.2 Operations Phase

The operations phase is anticipated to last approximately 26 years. As the workforce stabilizes, most potential interactions identified during construction are expected to persist or evolve over time. These relate primarily to housing availability, cost of living, access to health and social services, and community cohesion.

Sustained operations may reinforce community concerns about affordability, service capacity, and long-term population change, particularly where limited housing and infrastructure constrain growth. At the same time, steady employment and contracting opportunities could support income stability, local business activity, and workforce skill development, though participation barriers may continue to limit equitable access for some residents.

Family routines and caregiving roles may gradually adapt to rotational work schedules, yet these patterns can influence household cohesion and community participation over time. In the broader region, community cohesion may also shift as new workers and families settle in, altering local demographics and social networks.

Long-term operations may reinforce community concerns about environmental change and cultural continuity, including the collection and consumption of resources, particularly where access to areas of cultural importance is perceived as reduced.

Safety concerns are expected to remain moderate but ongoing, especially for Indigenous women+, girls, and 2SLGBTQIA plus people, consistent with patterns noted in the *Final Report of the National Inquiry into Missing and Murdered Indigenous Women and Girls (MMIWG)*. Overall, community well-being during operations will be shaped less by short-term disruption and more by long-term adjustments in economic, social, and demographic conditions across Red Lake, Ear Falls, and surrounding areas.

13.8.3.3 Closure Phase

The closure phase, anticipated to last approximately three years, will involve site rehabilitation and the gradual reduction of the Project workforce. Activities and associated effects are expected to resemble those observed during the construction phase but at a smaller scale. As employment opportunities decline and the Project transitions away from being a major regional employer, the closure period may introduce a short phase of economic and social adjustment for communities in the LSA.

As the workforce decreases, some workers who relocated for Project employment may leave the region, easing pressure on housing stock and community services. However, a sudden reduction in rental demand may also create temporary instability in the local housing market. In communities such as Red Lake and Ear Falls, where housing investment and population growth have historically followed mining cycles, the withdrawal of a major employer may reintroduce economic volatility and reduce incentives for further housing development.

Lower population levels and reduced business activity may decrease demand for goods and services across the region. While these changes may ease cost-of-living pressures, they may also affect local businesses that expanded during Project operations, including contractors and small or Indigenous-owned enterprises that provided goods and services to the Project. Households that relied on Project-related income may experience financial strain during this transition, particularly where alternative employment opportunities or retraining options are limited. These conditions may temporarily increase economic insecurity and widen existing income disparities in the region.

Changes in employment and household income may also affect family dynamics. Loss of stable employment can disrupt household routines and increase financial and emotional pressures, particularly for families with high caregiving responsibilities or limited financial resiliency.

At the community level, closure may influence community cohesion as residents adjust to declining activity and shifting expectations regarding regional development. Perceptions of reduced engagement or uncertainty regarding long-term commitments may affect trust in institutions if communication about closure planning and post-project conditions is limited. Conversely, continued engagement and transparency regarding transition planning and economic diversification may support community confidence during this period. As Project activity declines, workforce-related pressures such as increased crime or harassment risks may also decrease, contributing to improved social stability.

As industrial activity diminishes, access to lands and resource areas is generally expected to improve. Reduced disturbance, fewer safety restrictions, and quieter environmental conditions may support greater participation in hunting, harvesting, and other land-based activities. However, some land users may continue to perceive changes in environmental quality or sense of place associated with previous Project activities. Although the closure period may introduce short-term economic and social challenges, the gradual reduction in population and industrial activity is also expected to ease pressures on housing, community infrastructure, and local services. Improved access to lands and quieter regional conditions may support aspects of cultural well-being as the region transitions toward post-Project conditions.

13.8.4 Mitigation and Enhancement

Mitigation measures for community well-being consider both direct and indirect effects, and includes Project design measures, workforce policies, community partnerships, Indigenous engagement, and regionally targeted supports.

The goal of these measures is to reduce the magnitude, duration, and likelihood of adverse residual effects on social determinants of health, household dynamics, public safety, and overall well-being for both Indigenous and non-Indigenous communities.

For community well-being, mitigation approaches reflect a combination of:

- Physical design measures (e.g., construction of worker accommodations, on-site medical and recreation facilities, separation of workforce from community to reduce direct interaction);
- Programmatic measures (e.g., workforce training, cultural awareness programming, gender-based violence protocols, community engagement and advisory groups); and
- Service supports (e.g., partnerships with Indigenous service providers, coordination with local agencies, funding to expand community services where needed).

Table 13.8-14 outlines mitigations thematically, aligning with Project interactions.
These mitigations are anticipated to apply across all Project phases unless otherwise specified.

Table 13.8-14: Project Design, Mitigation, and Enhancement Measures for Community Well-being - Northwestern Ontario Métis Community

Potential Effects	Project Design, Mitigation and Enhancement Measures
Change in Community Well-being	Camp Operations and Services: A camp complex will be established on the Property. The camp will accommodate 1,000 people during construction and then scaled down to approximately 300 people during operations. A portion of the workforce will come from outside the local community and work on a rotational basis. Great Bear Resources will also continue discussions with local municipalities to discuss potential housing and / or infrastructure initiatives in the region. The camp complex will include recreation, and a non-denominational spiritual space.
	Camp Operations and Services ("dry: camp): Maintain a dry camp, managed through Human Resources (HR) policy and specific health and safety measures.
	Camp Operations and Services (health care) Project HR and medical staff will be specifically trained to recognize, prevent, and appropriately respond to incidents of violence, harassment, or trauma, in alignment with established protocols. Provide emergency response and basic health services to the on-site workforce. On-site medical facilities and staff will be in place to address health services for emergencies, injuries, and other routine needs. Medical personnel will be trained on supports that are available through Employee Assistance Program (EAP), Telus telehealth (or similar service/provider), and local/regional providers to foster connected health care on and off-site. Information about these services and supports (available to employees and their immediate families), will be posted in a visible location at the medical facilities and accommodations. Create access to Telus telehealth or similar provider for employees (and immediate family members) throughout the life of the Project helping to alleviate pressures on local services.
	Camp Operations and Services (PPE provision) Provision of required PPE including but not limited to boots, reflective clothing, gloves, and hard hats.
	Camp Operations and Services (site security) Controlled site access, perimeter security, and monitoring technology to deter and detect potential issues. Site security will be maintained and consistent with other Ontario mining operations. Access will be limited to Great Bear Resources' workers and contractors, and approved visitors. Security guardhouses will be positioned where appropriate Cameras, routine patrols and other methods will be utilized to monitor and ensure site security. Workers will be housed in separate accommodations by gender with locked access (e.g., keys) for each room and a separate mining dry / change rooms. Ongoing monitoring will occur throughout the mine life and policies will be updated as required.

Potential Effects	Project Design, Mitigation and Enhancement Measures
	Community Financial Support Sponsor cultural awareness initiatives and social integration programming. Address barriers to training or employment through transport assistance, and inclusive program design Support regional communities to expand social services and health care services in the region, including mental health and addiction services, and implement an adaptive management approach (as part of the Social Performance Plan) to address additional pressures resulting from the influx of workers and their families. Great Bear Resources will work collaboratively to fund programming through the Friendship Centre and community partners, including programing and supports to promote physical and mental health outcomes for Indigenous adults and youth Establish and maintain Community Liaison Committee to monitor changes and service capacities and / or the effectiveness of mitigation measures Continue to partner with community organizations and educational institutions to support youth programming through summer camps and in-school programming, provide workshops, tours and presentations to youth that promote careers and opportunities in Mining and STEM fields Partner with local Indigenous communities to evaluate community health and well-being to prevent negative pathways associated with the Project from developing
	Community Partnerships Collaborate with Friendship Centre, Kenora Sexual Assault Centre, and other safety advocates to support community-based safety networks. Partner with the Friendship Centre, the Evolution Centre, and other community organizations to co-develop inclusive events that reflect local traditions and cultural practices.
	Education and training (Project) Provide budgeting and financial literacy tools available to all employees through the EAP, including a combination of organized workshops during working hours and optional individual supports that employees and their families can access on their own time. Deliver mandatory Cultural Awareness training for employees and contractors (including supervisors and managers) on safety, harassment awareness and prevention, and MMIWG2S+ and human trafficking awareness training. Provide opportunities for youth with vocational skills, including those that prepare them for local job markets and mining-related knowledge Provide voluntary health and wellness seminars, nutrition and substance use seminars for interested employees through the EAP
	Education and Training (Region) Provide bursaries and targeted mentorship. Mentorship programs may include new hire initiatives which pair up new employees with a senior staff member who will provide guidance and support during the onboarding process, internships and summer programming for youth. Deliver training locally using mobile facilities and simulators. Implement job-matching, retraining programs, and economic diversification supports in anticipation of closure.

Potential Effects	Project Design, Mitigation and Enhancement Measures
	Great Bear Resources has committed to the establishment of the Industrial Research Chair (IRC) in Mineral Exploration with Lakehead University. Great Bear Resources recognizes the importance of this research and its potential to drive advancements in mineral exploration, which directly supports our business and the broader mining sector in northwestern Ontario and the community in which we operate. In addition, Great Bear Resources has and will continue to support STEM and educational based programming with youth consistent with Company standards. Great Bear Resources is also progressing a STEM-based and training strategy to focus on a range of opportunities including apprenticeship opportunities, on-the-job training, work readiness, and scholarships and bursaries. Great Bear Resources will offer training to local Indigenous job seekers and contractors. Great Bear Resources are committed to working with local suppliers, including Indigenous owned businesses, to develop their capacity to effectively compete and win business while meeting the Company's standards for ethical conduct, due diligence, quality of goods and services, health and environmental safety. Identify critical roles and recruitment barriers; provide job-readiness scholarships / bursaries. Develop equity-based hiring protocols, Indigenous procurement policies, and job coaching programs.
	<u>Inclusive and Local Hiring Strategy (Project policies):</u> Reduce employment barriers by offering on-the-job training for "almost qualified" candidates and providing entry-level skills development.
	<u>Inclusive and Local Hiring Strategy:</u> Provide timely workforce projections to communities and vendors to support planning. Collaborate with regional providers to support recruitment and job-sharing. Increase local household income by prioritizing regional employment, ensuring that wages remain within the community and support local businesses. This helps enhance quality of life for residents while reinforcing economic resilience. Identify critical roles and recruitment barriers; provide job-readiness scholarships/bursaries. Develop equity-based hiring protocols, Indigenous procurement policies, and job coaching programs Partner with Indigenous training and employment organizations to support employment of Indigenous workers, provide training, priority hiring and work towards continuous improvement including training and employment opportunities for Indigenous women+.
	<u>Procurement and Business Opportunities</u> Provide timely workforce projections to communities and vendors to support planning Coordinate with regional and Indigenous suppliers to reduce supply strain and inflationary effects.

Potential Effects	Project Design, Mitigation and Enhancement Measures
	Great Bear Resources is committed to working with local suppliers, including Indigenous owned businesses, to develop their capacity to effectively compete and win business while meeting the Company's standards for ethical conduct, due diligence, quality of goods and services, health and environmental safety. Great Bear Resources will offer training to local Indigenous job seekers.
	Social Closure Plan Support consistent communication and planning throughout closure with emphasis on legacy, continuity, and shared decision-making. Develop a community transition plan in consultation with local Indigenous communities and groups so that decisions are made with integrity, based on cultural, spiritual and Indigenous well-being in mind. The plan will include collaborative planning, Implement job-matching, retraining programs, financial literacy workshops, and economic diversification supports in anticipation of closure.
	Transportation Management Buses may be offered if there is sufficient interest (e.g., from the Red Lake Municipal Airport and from Ear Falls and Red Lake as well as local Indigenous communities) to limit personal vehicle traffic on the road, and reduce the risk of driver fatigue and travel during poor weather conditions. Car-pooling will also be encouraged, as appropriate. Busing may also be utilized to gather contractors and employees from larger hubs (i.e., Thunder Bay and Winnipeg) during the construction phase to consolidate transportation to and from the Project. Provision of buses reduces commuting burdens for employees and contractors and has the potential to support other community services

Attached Table 13.1-1 include mitigation measures applicable to the management of effects on pVCs and fVCs that are linked to community well-being for NWOMC. It includes relevant plans, policies, and measures from predictive reporting on linked pVCs and fVCs. These will be applied for effects management.

13.8.5 GBA Plus Considerations

The Project will focus on hiring working aged adults from within the LSA. While there is considerable benefit to hiring local, and limiting the social issues associated with outside workers (e.g., increased crime, no community social responsibility, shadow populations placing demands on services which are not funded by their tax dollars), there is the potential to shorthand household and community caregivers, meaning there are few able-bodies adults to help with chores, and / or family and community duties.

As presented in Appendix X, the GBA Plus subgroups that may experience negative effects as a result of a rotation schedule include:

- Indigenous women+ in caregiving roles (caring for Elders, children) will have less support in the home if their partners, or other family members are away from home for weeks at a time.
- Less inter-community support is available if working adults are outside the community for extended periods of time (e.g., less help driving Elders or Youth to appointments, taking Elders or Youth onto the land).

Great Bear Resources will make efforts to support time off requests if and where possible, and support important cultural events, however, the day-to-day absence of key community members can have a profound impact on close-knit communities.

Additionally, Indigenous communities value their rights and ability to access traditional lands to participate in cultural practices, including but not limited to hunting, fishing, and harvesting plants. These practices are essential to their individual and community well-being.
Often these practices are also vehicles for transmission of knowledge, wherein the next generation is taught ways of living and knowing, and for the community to come together.
When community members work in the resource sector, they are required to work long hours, and often, work away from home. This results in a reduced ability to participate in, and support land-based activities.

As presented in Appendix X, the GBA Plus subgroups that may experience negative effects as a result of their work schedules include:

- Indigenous Peoples. The inability to participate in land-based activities not only affects those who are on-site working, and their overall well-being, but it can affect those who are dependent on them to access traditional lands, and can degrade community cohesion. This includes Indigenous men+, women+, Elders and youth.

Great Bear Resources will make efforts, where feasible to support cultural activities and time off requests, however, the operation of the facility may supersede requests, and limit their Indigenous employee's ability to leave.

13.8.5.1 Indigenous Women, Indigenous Youth

While large projects like mines bring economic opportunities to rural / remote areas, the work is dominated by men+ with trades training, who regularly work 12+ hour days, or stay in camp on for a two-on-one-off rotation. The rates of women+ who work in these sectors is low.
Woman have reported not feelings safe, and harassed when working in primary resource sectors, and / or are unable to pursue these opportunities due to caregiving duties and little to no support resources.

As presented in Appendix X, the GBA Plus subgroups that may experience negative effects on their well-being as a result of their employment alienation include:

- Indigenous women+ with concerns over their safety and well-being, and / or with limited household support resources. The inability to access good paying jobs can result in economic dependency. Economic dependency can lead to household tensions, and result in partners, typically women+, staying in abusive relationships as they do not have the resources to leave.
- Indigenous youth who are intimated by the work environment, and / or due to location, have not trained in a trade are unable to access the jobs associated with primary resource.

Additionally, the higher wages associated with industry can lead to economic disparity, which can lead to tension across close-knit communities.

Great Bear Resources will provide polices and protocols which promote workplace inclusivity and safety, however, Great Bear Resources will be wholly unable to address or facilitate the aforementioned household and community issues.

13.8.6 Residual Effects after Mitigation

After the implementation of mitigation measures assessment and characterization of potential residual effects on community well-being are assessed using the methodology outlined in Section 6. Further details on residual effect criteria ratings that are specific to CWB are defined in Section 6 and in Section 13.3.2.

The attached Table 13.1-1 summarizes the results of the assessment for the linked pVC and fVC components. Detailed description on the methods, existing conditions, mitigation measures, and residual effects can be found in their respective sections.

Based on the assessment of linked pVCs and fVCs, residual changes after mitigation considered as part of the assessment of residual effects on community well-being include:

- Local and Regional Economy (pVC)

There are no other pVCs and fVCs listed in Table 13.1-1 linked to community well-being.

13.8.6.1 Characterization of Residual Effects After Mitigation - Northwestern Ontario Métis Community

Although NWOMC members represent a portion of the total population in Red Lake and Ear Falls, Métis-specific considerations have been fully integrated into the effects assessment and residual effects characterization. Table 13.8-15 summarizes the indicators used to assess residual change in the region's community well-being following the implementation of mitigation and enhancement measures.

Table 13.8-15: Potential Residual Effects for Community Well-being – Northwestern Ontario Métis Community

Potential Effect: Change in Community Well-Being	Potential Residual Effect Remaining (Y/N)
Indicators	
Housing Availability and Affordability	N
Cost of Living and Traditional Economy	Y
Access to Services (Health and Social))	Y
Community Cohesion	N
Household Dynamics	N
Public Safety and Gender-Based Violence	N
Access to Lands and Resources	Y
Economic Opportunity and Inequality	Y

13.8.6.1.1 Change in Region's Community Well-being - Cost of Living and Traditional Economy

Following implementation of Project design features and mitigation measures, residual effects may occur due to changes to the traditional economy. Restrictions to land access or perceived environmental risks may lead to decreased participation in traditional harvesting activities.

This could change household expenditure on store-bought food or reduce supplemental income from activities such as fur trading or craft production.

Based on the attributes outlined in Section 13.3.3, the residual effect is not considered significant. Most attributes are rated as Level I, except duration and frequency which are rated as Level II (see Table 13.8-16). This outcome reflects that, while the Project may contribute to perceived or indirect effects on traditional harvesting and household costs, these are expected to be limited in scale and reversible. Planned mitigation and monitoring measures are expected to effectively reduce risks to cost of living and traditional economic stability.

Table 13.8-16: Characterization for Negative Residual Effect for Cost of Living and Traditional Economy - Northwestern Ontario Métis Community

Attribute	Category	Rationale
Ecological or Social Context	Level I	Criteria may or may not be sensitive, and can support the predicted change with typical mitigation measures.
Magnitude	Level I	Measurable Project-related change that is insufficient to alter the social and / or economic conditions of local Indigenous People.
Geographic Extent	Level I	Effect is restricted to the LSA.
Duration	Level II	Effect occurs over the medium term: more than three years but less than 31 years.
Frequency	Level II	Effect occurs intermittently or regularly.
Reversibility	Level I	Effect is fully reversible during the Project phases.
Timing	Level I	Effects do not occur during a sensitive period, or related effects are fully mitigated.

13.8.6.1.2 Change in the region's Community Well-Being - Access to Services (Health, Social, and Education Services)

Population growth linked to Project development may worsen existing barriers to accessing health, social, and education services. These challenges include longer wait times, inconsistent availability, staffing shortages, transportation barriers, and limited culturally appropriate care, which can negatively affect individual and community well-being.

While planned supports and mitigation measures are expected to improve service capacity and coordination, pre-existing systemic limitations may persist, particularly for Indigenous residents and vulnerable groups.

For NWOMC members, it is acknowledged that they may have access to a broader set of services, including those available to the Red Lake and Ear Falls population as well as NWOMC-specific programs, which may enhance their overall service access.

However, in the absence of detailed information on the current capacity, uptake, or effectiveness of these additional services, it is not possible to determine whether this access substantively offsets anticipated pressures. As such, a Level I residual effect remains following mitigation, as summarized in Table 13.8-17.

Based on the criteria outlined in Section 13.4.3.3, the residual effect is not considered significant as most attributes are rated as Level I.

Table 13.8-17: Characterization for Negative Residual Effect on Access to Services - Northwestern Ontario Métis Community

Attribute	Category	Rationale
Ecological or Social Context	Level I	Criteria may or may not be sensitive, and can support the predicted change with typical mitigation measures.
Magnitude	Level I	Measurable Project-related change in social determinants of well-being that may result in a slight adverse change in the population-level social and / or economic conditions of local Indigenous Peoples.
Geographic Extent	Level I	Effect is restricted to the LSA.
Duration	Level II	Effect occurs over the medium term: more than three years but less than 32 years.
Frequency	Level II	Effect occurs intermittently or regularly
Reversibility	Level I	Effect is fully reversible during the Project phases.
Timing	Level I	Effects do not occur during a sensitive period, or related effects are fully mitigated.

13.8.6.1.3 Change in Region's Community Well-being - Economic Opportunity and Inequality

The Project is expected to generate new economic opportunities through job creation and change regional spending, particularly during the construction and operations phases. These outcomes are consistent with the residual positive effects identified for the Local and Regional Economy pVC (Section 7.16), which indicate broad regional benefits through employment and labour income.

However, at Project closure, the loss of direct and indirect employment opportunities could result in income instability and reduced community-level spending, particularly if transitions are not supported through advance planning or workforce development.

Nevertheless, the residual effect is not considered significant, as the magnitude is expected to be low, and the potential for benefit-sharing, training programs, and collaborative employment planning can mitigate long-term economic disruption. Most attributes are rated Level I (Table 13.8-18), and the outcome is considered reversible with appropriate engagement and supports.

Table 13.8-18: Characterization for Negative Residual Effect for Economic Opportunity and Inequality - Northwestern Ontario Métis Community

Attribute	Category	Rationale
Ecological or Social Context	Level I	Criteria may or may not be sensitive, and can support the predicted change with typical mitigation measures.
Magnitude	Level I	Measurable Project-related change that is insufficient to alter the social and / or economic conditions of local Indigenous People.
Geographic Extent	Level II	Effect extends beyond the LSA but within the RSA.
Duration	Level II	Effect occurs over the medium term: more than three years but less than 31 years

Attribute	Category	Rationale
Frequency	Level I	Effect occurs once, infrequently
Reversibility	Level I	Effect is fully reversible during the Project phases.
Timing	Level I	Effects do not occur during a sensitive period, or related effects are fully mitigated.

13.8.6.1.4 Change in the Region's Community Well-Being - Access to Lands and Resources

As described in Section 13.7.2, some NWOMC members who access the LSA for harvesting, including for culturally significant plant species may experience changes in the quality of harvesting activities due to sensory disturbances (sound, dust, light, visual changes) across all Project phases. While mitigations focus on culturally appropriate reclamation, engagement, and monitoring, temporary or longer-term avoidance of certain areas may occur, particularly where harvesting quality or cultural experience is diminished.

These changes may contribute to reduced opportunities for intergenerational knowledge transfer, cultural continuity, and land-based wellness practices that are important to community well-being.

The residual effect characterization is summarized in Table 13.8-19.

Table 13.8-19: Characterization for Negative Residual Effect on Access to Land and Resources - Northwestern Ontario Métis Community

Attribute	Category	Rationale
Ecological or Social Context	Level I	Criteria may or may not be sensitive, and can support the predicted change with typical mitigation measures.
Magnitude	Level I	Measurable Project-related change in social determinants of well-being that may result in a slight adverse change in the population-level social and / or economic conditions of local Indigenous Peoples.
Geographic Extent	Level I	Effect is restricted to the LSA.
Duration	Level II	Effect occurs over the medium term: more than three years but less than 32 years.
Frequency	Level II	Effect occurs intermittently or regularly
Reversibility	Level I	Effect is fully reversible during the Project phases.
Timing	Level I	Effects do not occur during a sensitive period, or related effects are fully mitigated.

13.8.7 Significance of Residual Effects

For all key themes, the ecological or social context and magnitude of the effects due to Project-related activities to Region's Community Well-being are low (Level I) and either restricted to the LSA (Level I) or extends beyond the LSA but within the RSA (Level II). The effect is expected to occur once (Level I),and will occur over the medium term of more than three years but less than 32 years (Level II) and fully reversible at closure (Level I). The residual effect is therefore not significant.

13.8.8 Confidence

The prediction confidence assignment reflects the information available through Project-specific TKLUS reports, publicly available data (statistical websites, government pages, previously completed EA/IS reports), understanding of the effectiveness of applicable mitigation measures, and outcomes of other pVCs and fVCs. The assessment is informed by substantial primary and secondary information and robust analysis however, as noted in the assessment, there are some instances where the information collected had data gaps or lacked detail.

The overall confidence in residual environmental effect and significance predictions for community well-being is moderate. As additional information continues to be shared through Great Bear Resources' ongoing consultation with local Indigenous communities over Project life, relevant information will be incorporated into Project planning as practical.

13.9 Health

The fVC Indigenous Peoples is inclusive of health consistent with the TISG (Section 6.3). Project-related changes to upstream of environmental, social, economic and cultural conditions may interact with Indigenous health. The assessment of Indigenous health expands upon pVCs and fVCs assessments provided in other Impact Statement sections to evaluate and interpret how the findings of these assessments may influence the biophysical and social determinants of health.

The objective of the health assessment summarized in this section is to assess potential Project-related changes to health of Indigenous communities identified as participants in the Impact Statement (LSFN, WFN, ANA, NWOMC and Indigenous people living in Red Lake and Ear Falls [RLEF]). To achieve this objective, detailed studies were completed to inform a holistic assessment of potential beneficial and adverse effects, that are appended to the Impact Statement:

- Human Health and Ecological Risk Assessment (HHERA; Appendix N-1)
- Health Impact Assessment (HIA; Appendix N-2).

The HHERA evaluated potential Project-related health effects on human and ecological receptors due to Project-related changes to air and multi-media (i.e., soil, water and traditional foods) quality. The HIA evaluated a wide range of biophysical and social determinants of health. The HIA drew on the findings from other assessments to understand the changes to upstream environmental, social, economic and cultural conditions that have the potential to influence Indigenous health, including the results of:

- HHERA for the assessment of biophysical determinants of health
- Assessment of changes to pVCs and fVCs with pathways to health
- Assessments of Community Services and Infrastructure (CSIN), CULRTP and CWB, associated with the fVC Indigenous Peoples.

Health is a complex and multi-faceted concept. *"[The World Health Organization's] WHO's definition of health is the most commonly used and cited definition in the field of HIA. This definition asserts that health is 'a state of complete physical, mental and social wellness and not merely the absence of disease or infirmity.' In 1986, the WHO further clarified that health is 'a resource for everyday life, not the objective of living. Health is a positive concept emphasizing social and personal resources, as well as physical capacities.'*

Expanding its understanding of health, the WHO has defined mental health as 'a state of well-being in which an individual realizes his or her own abilities, can cope with the normal stresses of life, can work productively and is able to make a contribution to his or her community" (Health Canada 2024a).

According to the WHO, *"many factors combine together to affect the health of individuals and communities. Whether people are healthy or not, is determined by their circumstances, environment and personal behaviours. To a large extent, factors such as where we live, the state of our environment, genetics, our income and education level, and our relationships with friends and family all has considerable impacts on health"* (WHO 2017). Stemming from a large body of literature, the social determinants of health help explain why health inequities exist, and how non-medical factors help to determine health outcomes for both the individual and population groups (Marmot 2005; PHAC 2011; Mancini and Sala 2018).

It is understood that health is viewed holistically by Indigenous communities, which is based on the interconnected nature of physical, mental, spiritual, and emotional health and wellness (Lewis et al. 2021). It is also recognized that cultural diversity exists across First Nations and Métis peoples, and that many Indigenous perspectives on health and wellness are unique and distinct. Therefore, how different communities define health, and what factors determine positive health outcomes, may vary.

The Indigenous health assessment evaluates the following determinants of health, reflected in the structure of the existing conditions and effects assessment detailed in Appendix N-2:

- Biophysical determinants of health, including:
  - Air Quality
  - Multi-media Environmental Quality
  - Access and Availability of Water
  - Access and Availability of Traditional Foods
  - Sensory Disturbances: Sound, Vibration and Light
- Social determinants of health, including:
  - Economics (Employment, Income and Education)
  - Housing
  - Access to Health and Social Services
  - Food Security
  - Mental Wellness and Personal Behaviours
  - Actual and Perceived Public Safety (Accidents and Malfunctions)
  - Safety of Indigenous Women and Girls

The assessment of Indigenous health draws on a set of quantitative and qualitative indicators to form the basis for evaluating changes in Indigenous health. The HIA (Appendix N-2) which is relied upon for the assessment of Indigenous health, drew on a variety of sources (qualitative and quantitative) to assess potential beneficial and adverse effects to health while incorporating existing conditions data, peer-reviewed scientific literature, publicly available data, community-specific information, and Indigenous knowledge where available and pertinent.

A GBA Plus lens was applied through the entirety of the assessment to consider the unique experiences of diverse population subgroups (e.g., Elders, youth, women+).

For Indigenous health, a single comprehensive assessment was completed that relies on the combined findings of the HHERA (Appendix N-1) and HIA (Appendix N-2) for all participating Indigenous communities (i.e., LSFN, WFN, ANA, NWOMC and RLEF). This subsection includes the assessment and discussion of Indigenous health overall, presenting findings for all five Indigenous communities.

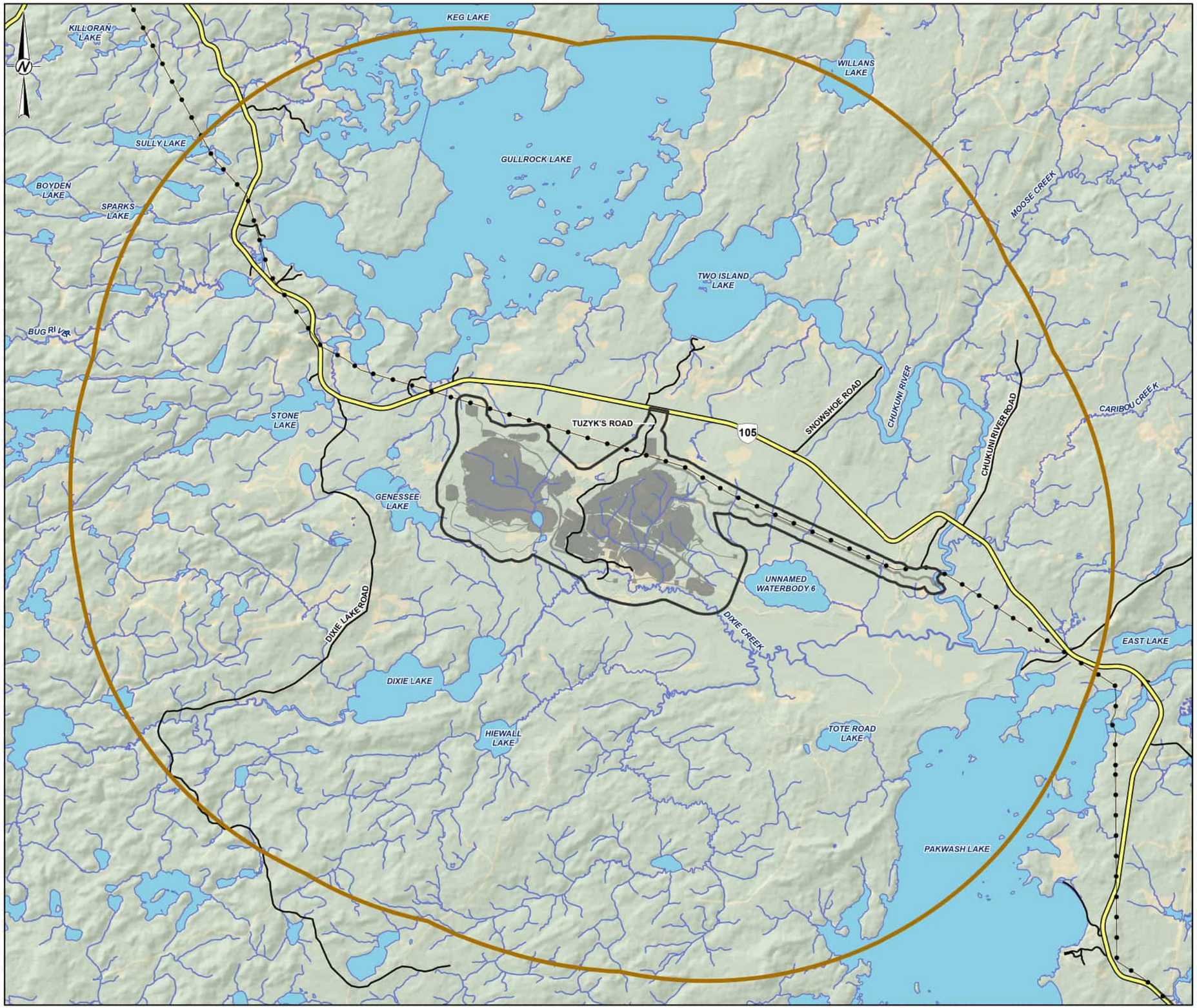
13.9.1 Spatial Boundaries

There are three study areas used as spatial boundaries for the Impact Statement (Section 6.4). They are the PA, the LSA and the RSA. The spatial boundaries used for the assessment of health are shown in Figure 13.9-1 and Figure 13.9-2 for biophysical determinants of health, and in Figure 13.9-3 for social determinants of health.

For biophysical determinants of health, the spatial boundaries are defined as:

- **PA:** the Project footprint including all temporary and permanent areas associated with the mine site development, as well as an outside buffer to allow flexibility for design optimizations prior to construction and over the mine life. The PA is approximately 3,349 hectares (ha) in size.
- **LSA:** is the area within which Project-related effects may reasonably be expected to occur and can be predicted or measured with a reasonable degree of accuracy and confidence. The LSA extends beyond the PA and is intended to capture potential direct effects from the Project (such as emissions, discharges and habitat loss) and indirect effects resulting from the Project.
    - The LSA for biophysical determinants of health is adopted from the HHERA LSA, and represents a combination of both the air quality and surface water system LSAs. The LSA encompasses the area adjacent to the PA to capture the maximum predicted ground-level concentrations due to the Project and where air quality can be predicted or measured with a reasonable degree of accuracy. This zone includes the leased claims boundary and extends approximately 10 km from the main area of the PA (excluding a buffer for the Chukuni River pipelines or pump house). For surface water, the LSA includes sub-watersheds of Dixie Creek that intersect with the PA, as well as the Chukuni River (the receiving environment). It also includes the Chukuni River upstream to the Snowshoe Rapids Dam, and downstream to the outlet of Pakwash Lake.
- **RSA:** encompasses the LSA and is used to provide regional context. The RSA extends beyond the PA and encompasses the LSA and, where appropriate, extends further to support a regional context in the assessment of potential Project effects. It is the maximum geographical extent or zone of influence in which potential effects from the Project are assessed.

- The RSA for biophysical determinants of health is adopted from the HHERA RSA, which represents a combination of both the air quality RSA which is 10 km further than the LSA, and surface water system RSA which encompasses the LSA and extends into the Dixie Creek watershed, encompassing Dixie Lake and Hiewall Lake. Upstream, it follows the Chukuni River to include Two-Island Lake, Gullrock Lake, Keg Lake and Red Lake. Downstream, the RSA continues through Pakwash Lake and along the Chukuni River to its confluence with the English River.



LEGEND

- GREAT BEAR PROJECT FOOTPRINT
- PROJECT AREA
- LOCAL STUDY AREA FOR BIOPHYSICAL DETERMINANTS OF HEALTH - HEALTH IMPACT ASSESSMENT
- HIGHWAY
- LOCAL ROAD
- EXISTING TRANSMISSION LINE
- WATERCOURSE
- WATERBODY

0 1 2 4

1:105,000 KILOMETRES

NOTE(S)

1. ALL LOCATIONS ARE APPROXIMATE

REFERENCE(S)

1. CONTAINS INFORMATION LICENSED UNDER THE OPEN GOVERNMENT LICENCE - ONTARIO
2. ROADS INFORMATION PROVIDED BY GREAT BEAR RESOURCES, AUGUST 2022.
3. SITE PLAN BASED ON INFORMATION PROVIDED BY GREAT BEAR RESOURCES, DECEMBER 2024 / JUNE 2025.
4. COORDINATE SYSTEM: NAD 1983 UTM ZONE 15N

CLIENT
GREAT BEAR RESOURCES

PROJECT
GREAT BEAR PROJECT

TITLE
LOCAL STUDY AREA FOR BIOPHYSICAL DETERMINANTS OF HEALTH - HEALTH IMPACT ASSESSMENT

CONSULTANT

wsp

YYYY-MM-DD	2026-03-31
DESIGNED	----
PREPARED	MD
REVIEWED	----
APPROVED	----

PROJECT NO.	CONTROL	REV.	FIGURE
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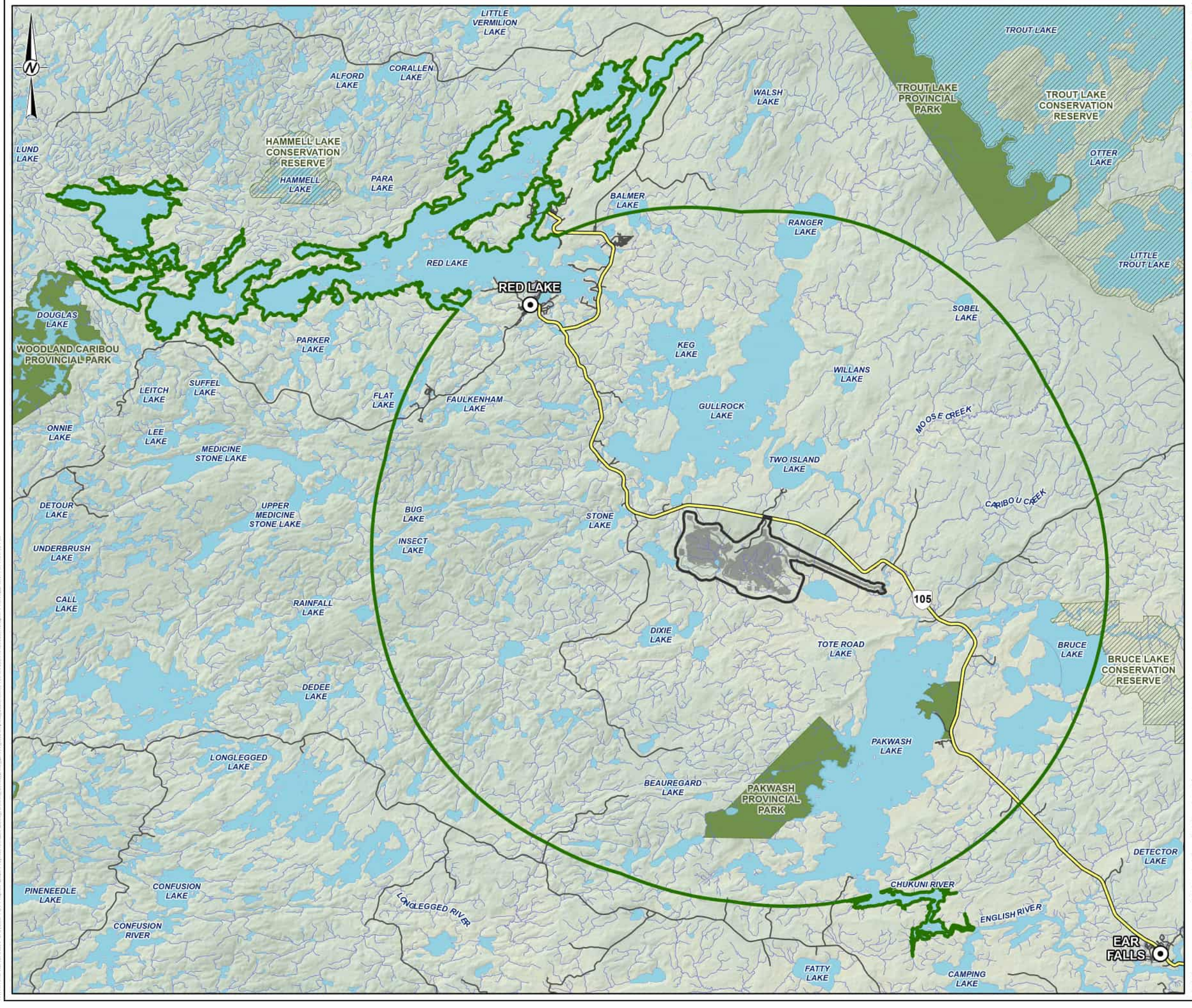

LEGEND

- GREAT BEAR PROJECT FOOTPRINT
- PROJECT AREA
- REGIONAL STUDY AREA FOR BIOPHYSICAL DETERMINANTS OF HEALTH - HEALTH IMPACT ASSESSMENT
- TOWN
- CONSERVATION RESERVE
- PROVINCIAL PARK
- HIGHWAY
- LOCAL ROAD
- WATERCOURSE
- WATERBODY

0 2.5 5 10

1:250,000 KILOMETRES

NOTE(S)

1. ALL LOCATIONS ARE APPROXIMATE

REFERENCE(S)

1. CONTAINS INFORMATION LICENSED UNDER THE OPEN GOVERNMENT LICENCE - ONTARIO
2. ROADS INFORMATION PROVIDED BY GREAT BEAR RESOURCES, AUGUST 2022.
3. SITE PLAN BASED ON INFORMATION PROVIDED BY GREAT BEAR RESOURCES, DECEMBER 2024 / JUNE 2025.
4. COORDINATE SYSTEM: NAD 1983 UTM ZONE 15N

CLIENT
GREAT BEAR RESOURCES

PROJECT
GREAT BEAR PROJECT

TITLE
REGIONAL STUDY AREA FOR BIOPHYSICAL DETERMINANTS OF HEALTH - HEALTH IMPACT ASSESSMENT

CONSULTANT

YYYY-MM-DD	2026-03-31
DESIGNED	---
PREPARED	MD
REVIEWED	---
APPROVED	---

PROJECT NO.	CONTROL	REV.	FIGURE
CA0031271	0001	A	13.9-2

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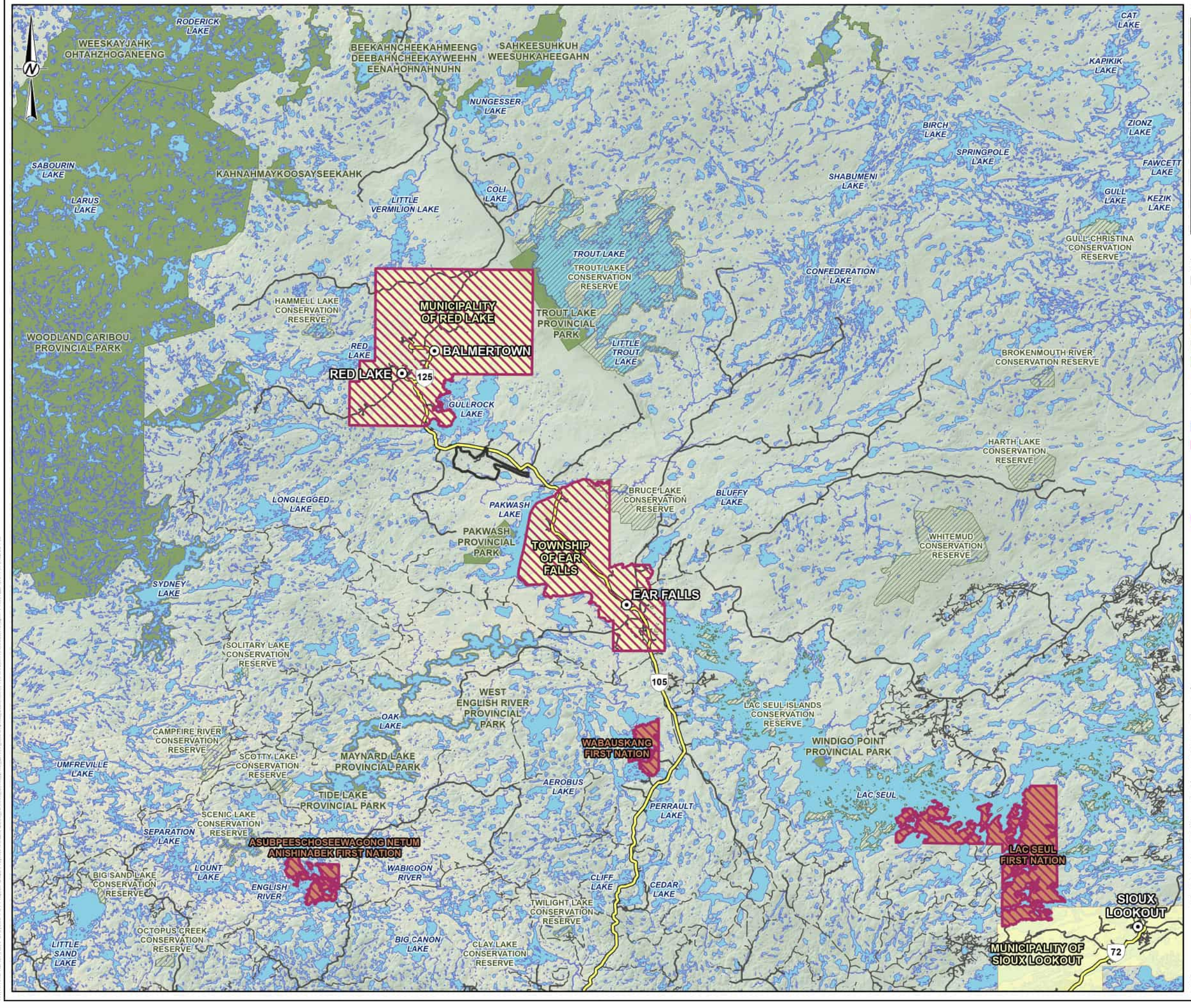
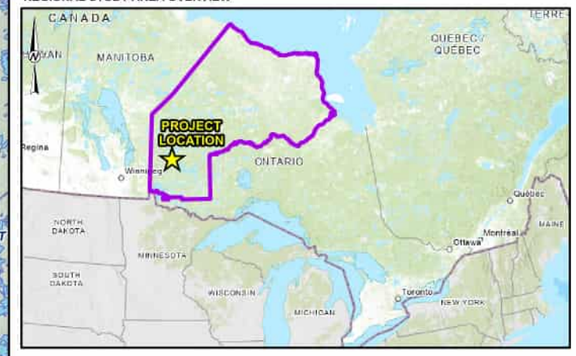
For social determinants of health, the spatial boundaries are defined as:

- **PA** (the same as for biophysical determinants of health): the footprint of the Project including all temporary and permanent areas associated with the mine site, as well as a buffer to allow flexibility for design optimizations prior to construction and over the mine life.
- **LSA:** is the area within which Project-related effects may reasonably be expected to occur and can be predicted or measured with a reasonable degree of accuracy and confidence. The regions that the Project's socio-economic demands are expected to influence, possibly causing direct, indirect and / or induced effects on Indigenous health, include the Indigenous communities of LSFN, WFN, ANA, NWOMC, and RLEF.
    - The LSA boundary is same as applied for community well-being (Section 13.8)
    - **RSA:** encompasses the LSA and is used to provide regional context. The region surrounding the LSA and the PA may also experience direct, indirect, and / or induced effects on Indigenous health due to the socio-economic demands of the Project. The RSA for Indigenous health, specifically the social determinants, is the District of Kenora.
        - The RSA boundary is same as applied for community well-being (Section 13.8).

The boundaries used for assessment of biophysical and social determinants of health are the same as utilized in the HIA (Appendix N-2).



REGIONAL STUDY AREA OVERVIEW



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LEGEND

- PROJECT AREA
- TOWN
- FIRST NATION RESERVE
- LOWER TIER MUNICIPAL BOUNDARY
- CONSERVATION RESERVE
- PROVINCIAL PARK
- HIGHWAY
- LOCAL ROAD
- RESOURCE / RECREATION ROAD
- WATERBODY
- LOCAL STUDY AREA FOR SOCIAL DETERMINANTS OF HEALTH - HEALTH IMPACT ASSESSMENT
  - LAC SEUL FIRST NATION
  - WABAUSKANG FIRST NATION
  - ASUBPEESCHOSEEWAGONG NETUM ANISHINABEK FIRST NATION
  - TOWNSHIP OF EAR FALLS
  - MUNICIPALITY OF RED LAKE
- REGIONAL STUDY AREA FOR SOCIAL DETERMINANTS OF HEALTH - HEALTH IMPACT ASSESSMENT (SHOWN IN OVERVIEW MAP)
  - DISTRICT OF KENORA

0 7.5 15 30

1:700,000 KILOMETRES

NOTE(S)
1. ALL LOCATIONS ARE APPROXIMATE

REFERENCE(S)
1. CONTAINS INFORMATION LICENSED UNDER THE OPEN GOVERNMENT LICENCE - ONTARIO
2. WATERCOURSES AND WATERBODY ACQUIRED FROM LAND INFORMATION ONTARIO (MNRF) AND MODIFIED TO MATCH AERIAL IMAGERY AND LIDAR.
3. ROADS INFORMATION PROVIDED BY GREAT BEAR RESOURCES, AUGUST 2022.
4. COORDINATE SYSTEM: NAD 1983 UTM ZONE 15N

CLIENT
GREAT BEAR RESOURCES

PROJECT
GREAT BEAR PROJECT

TITLE
SPATIAL BOUNDARIES FOR SOCIAL DETERMINANTS OF HEALTH - HEALTH IMPACT ASSESSMENT

CONSULTANT

wsp

YYYY-MM-DD	2026-03-31
DESIGNED	----
PREPARED	MD
REVIEWED	----
APPROVED	----

PROJECT NO.	CONTROL	REV.	FIGURE
CA0031271	0001	A	13.9-3

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13.9.2 Existing Conditions

Health is assessed through consideration of upstream conditions and changes to biophysical and social determinants of health; therefore, the indicators identified in Table 13.3-1, including existing conditions for these indicators, are collectively considered in the assessment of the determinants of health, in accordance with HIA guidelines (Health Canada, 2024a). The existing conditions for these determinants are described in detail in the relevant Impact Statement sections and appendices, the Human Health and Ecological Risk Assessment (Appendix N-1), and in the Health Impact Assessment (Appendix N-2).

A summary of existing conditions for Indigenous health, including physical health (e.g., chronic conditions, communicable diseases and demographics), health-related behaviours (e.g., food consumption, physical activity and substance use) and mental wellness (e.g., depression, stress / anxiety and perception of risk) are summarized below, along with the methods used to characterize baseline conditions. Further details, including community-specific profiles, are provided in the Baseline Health Profile included as Attachment A of Appendix N-2. Socio-economic conditions and community resources are reported in the Socio-economic Baseline Study (Appendix O-1).

It is important to note that the data presented are primarily from publicly available sources, with some local data from a community survey. Limited data on Indigenous health at the community-level were available to Great Bear Resources; therefore, the data presented may not necessarily be representative of the individual Indigenous communities being assessed (i.e., LSFN, WFN, ANA, NWOMC and RLEF). The information provided in this section is intended to reflect Indigenous health overall in the region and is assumed to be generally applicable to the local identified communities. Where possible, Indigenous-specific data were used; however, in the absence of these data, general population data were also included.

13.9.2.1 Methods

Baseline health-related information was identified from both publicly available sources, and confidential reports prepared by Indigenous communities in the region provided to Great Bear Resources. In addition to population health indicators (e.g., burden of disease, birth rates, injuries, and mental health rates and status), Indigenous-specific indicators such as land-based health, cultural continuity, community relationships, language and knowledge preservation, and spiritual wellness were also described. The existing (baseline health) conditions characterization was informed by primary (data collection) and secondary (desktop) research using a broad range of information sources, including:

- Data collected from local community members, including Indigenous members, via a Great Bear Project Community Health Survey administered in 2024 (details provided in Attachment A of Appendix N-2)
- Interviews with organizations within some of the local communities to investigate the tangible and intangible impacts that may occur during the development phases of the Project (records of contact from community engagement interviews completed for the Socio-economic Baseline Study; Appendix O-1)
- Municipal, provincial and federal government publications (e.g. policy and planning materials, government reports, municipal websites and plans)
- Statistical publications (e.g., Statistics Canada Community Profiles from both 2016 and any available 2021 data, and the results of the National Household Survey)

- Relevant publicly available information (e.g., community organization websites, business websites, primary and grey literature, and letters from Indigenous communities to government agencies)
- Media articles, including websites.

The baseline characterization also draws on information from the Socio-economic Baseline Study (Appendix O-1).

Baseline conditions were characterized using a tiered hierarchy of information sources. Indigenous knowledge studies, community-provided information, and consultation inputs were prioritized where available. Second, local First Nations specific health data were used, primarily sourced from publications by the Sioux Lookout First Nations Health Authority (SLFNHA). Third, to supplement these sources, regional health data from Public Health Ontario's NWHU were also considered, recognizing that these data are not specific to Indigenous health but to the general population in the area.

The smallest geographical scale for which health data are available through Public Health Ontario are public health units. The LSA and RSA communities fall within the NWHU. The boundaries of the NWHU encompasses several communities, including LSFN, WFN, ANA, NWOMC, the Municipality of Red Lake, the Township of Ear Falls, and the District of Kenora. Accordingly, unless otherwise stated, the health statistics presented throughout this section are drawn from the RSA's corresponding public health unit - NWHU.

Public health data for the NWHU are largely drawn from the database of statistics available through Statistics Canada and Public Health Ontario, which in turn have been sourced from the following: National Ambulatory Care Reporting System; the Ministry of Health and Long-Term Care; IntelliHealth, Discharge Abstract Database; Vital Statistics Mortality; Healthy Babies Healthy Children Integrated Services for Children Information System; Reporting Sub-System; the Ministry of Children, Community and Social Services; Statistics Canada; and the Canadian Community Health Survey (CCHS). Age-standardized rates have been adjusted by Public Health Ontario to the 2011 Canadian population.

It is recognized that public health datasets often do not fully capture people living on First Nations reserves or in small, remote communities, and are constrained by sampling limitations. As a result, some indicators presented in this section may underrepresent true health conditions within the local Indigenous communities and should be interpreted with this limitation in mind. The use of regional health data was not intended to replace or supersede Indigenous knowledge, community-led research, or community-specific health information. Rather, it complements those sources by providing additional context and addressing data limitations where they may exist. The limitations associated with applying regional datasets to community-level health characterization are further discussed in Appendix N-2.

In addition to compiling information from publicly available resources and databases, a Great Bear Project Community Health Survey was administered to collect primary data in order to better understand specific aspects of community health and wellness, including: community demographics; priority issues of importance; perceptions of health and wellbeing status; and to gather some information related to ways the land is used in the areas surrounding the Project. This survey was administered online and designed to collect information from local residents, including residents who identify as Indigenous.

The findings provide only a snapshot of information provided by some Indigenous participants and may not be representative of the interests, opinions, and values of the local Indigenous communities as a whole, or the interests, opinions, and values of individuals within those communities.

As applicable, health status information is sufficiently disaggregated and analyzed to support the analysis of potential effects to underrepresented groups and support GBA Plus. In addition, a summary of historical and current conditions related to Indigenous health is provided.

Unless explicitly stated, references to results being higher or lower throughout this section indicate comparative differences only and should not be interpreted otherwise.

13.9.2.2 Description

The description of existing conditions for health also requires consideration of the upstream environmental, social, cultural, and economic conditions that influence health and wellness. Therefore, health is connected (directly and / or indirectly) to other pVCs and fVCs and technical appendices, including:

- Air Quality (Section 7.2)
- Sound (Section 7.3)
- Vibration (Section 7.4)
- Groundwater Quantity (Section 7.5)
- Surface Water Flows and Levels (Section 7.6)
- Water Quality (Section 7.7)
- Vegetation Communities (Section 7.8)
- Wild Rice (Section 7.9)
- Moose (Section 7.10)
- Other Wildlife (Section 7.11)
- Species at Risk (Section 7.12)
- Local and Regional Economy (Section 7.16)
- Fish and Fish Habitat (Section 8)
- Migratory Birds (Section 9)
- Community Services and Infrastructure (Sections 10.5, 11.5, 12.5, 13.5 and 14.5)
- Current Use of Lands and Resources for Traditional Purposes (Sections 10.6, 11.6, 12.6, 13.6 and 14.6)
- Community Well-Being (Sections 10.8, 11.8, 12.8, 13.8 and 14.8)
- Night-Time Light Levels Baseline and Predictive Assessment (Appendix G)
- Socio-economic Baseline Study (Appendix O-1)
- HHERA (Appendix N-1).

A description of existing conditions of the linked pVCs, fVCs, and technical appendices listed above, as they relate to the biophysical and social determinants of health, is presented in Section 6 of the HIA (Appendix N-2). Collectively, the information from the upstream pVCs, fVCs, and technical appendices informed the existing conditions of the biophysical and social determinants of health.

In addition, the description of existing conditions for Indigenous health includes data and information on current health status and conditions within the LSA and RSA, as shaped by interrelated environmental, cultural, mental health, and socio-economic factors, with land-based practices, family and relationships, and cultural continuity identified as important indicators of health and wellness. This information is summarized below and detailed in Attachment A of Appendix N-2.

13.9.2.2.1 Historical Health Context

This section provides a summary of information for each of the local Indigenous communities that is relevant to health, including historical information. Further detail is provided in Attachment A of Appendix N-2.

Colonialism in Canada has operated as an interconnected system of laws, institutions, and policies, including the residential school system, that displaced First Nations, Inuit and Métis peoples from their lands, suppressed their cultures and governance systems, and undermined self determination (PHAC 2024). Many current health disparities observed in Indigenous populations are attributed to colonialism in Canada (PHAC 2024; SLFNHA 2024a). While there are common themes, such as land dispossession, forced assimilation and intergenerational trauma, there are also distinct forms for Indigenous groups, such as treaties and the *Indian Act* for First Nations, forced relocations and epidemics for Inuit, and land scrip and exclusion from treaties for Métis (PHAC 2024).

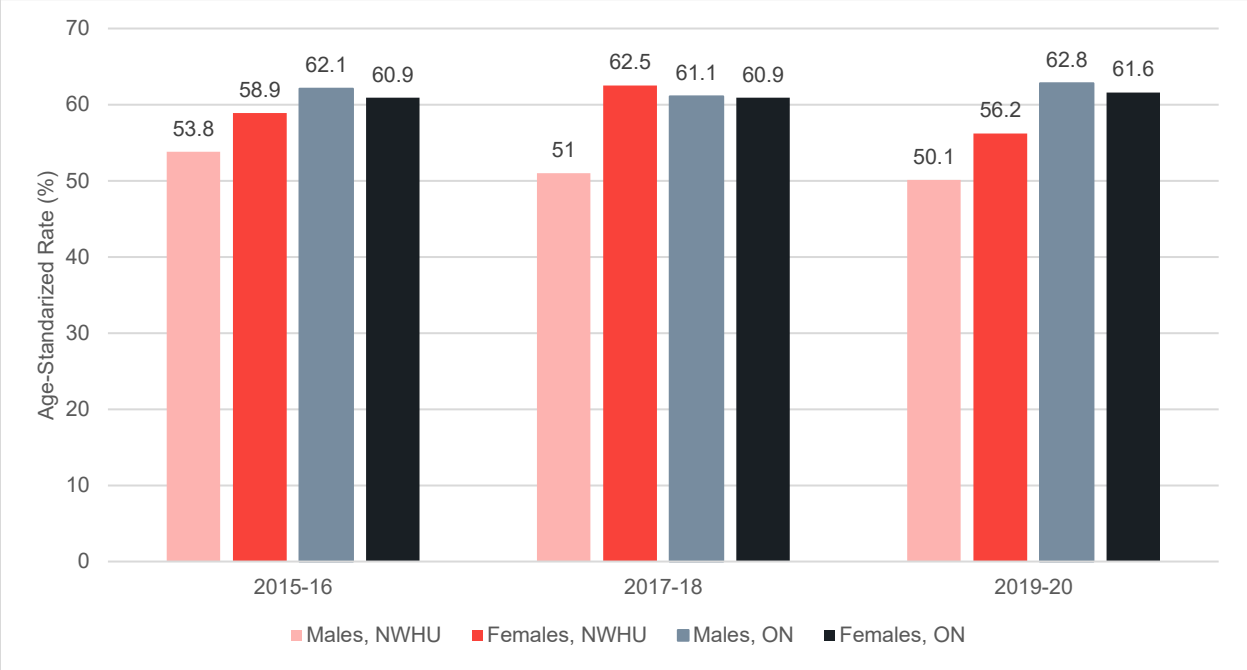
In a confidential report prepared for LSFN, some members described the effects of colonialism on their community. For example, community members shared how even the creation of the reserve boundaries had an impact, as the creation of these boundaries restricted their way of life and their culture to exist within artificial or colonial lines. They discuss how these impacts and the impacts of language loss and the residential school system are felt through generations. For ANA, colonial policies have *"led to intergenerational trauma and the loss of language, cultural teachings, and self-sufficiency"* (GNFN ANA 2025). For Métis populations in Canada, *"the root cause of poorer health outcomes suffered by the Métis lies in inter-generational family and individual experiences of trauma caused by colonial policies and adversity in their childhood"* (Métis National Council 2025). Perspectives on colonization from confidential reports prepared for WFN or community websites were not available. These examples are not intended to fully capture the complex history of colonial impacts on Indigenous people, but instead to highlight some of the distinct ways colonialism has shaped and continues to shape their experiences.

13.9.2.2.2 Perceptions of Health and Wellness

This section provides an overview of perceptions of health in the NWHU, in comparison to provincial averages. Figure 13.9-4 presents the age-standardized rates of respondents to the CCHS, from the NWHU and the province of Ontario, who reported a good or excellent perception of their overall health. The rates of males in the NWHU who reported a good or excellent perception of their overall health slightly declined from 2015-2016 to 2019 - 2020, and were lower than the rates for females in the NWHU (not statistically validated).

In addition, the rates for males in the NWHU were also lower than rates for males in the province (only significantly lower for the 2017-2018 and 2019-2020 period; no significant difference in the 2015-2016 period) (Ontario Agency for Health Protection and Promotion 2023a). The rates of females in the NWHU who reported a good or excellent perception of their overall health was relatively steady throughout the years. The rates for females in the NWHU were lower than the rates for females in the province in 2015-2016 and 2019-2020, however rates for females were not significantly lower than provincial rates.

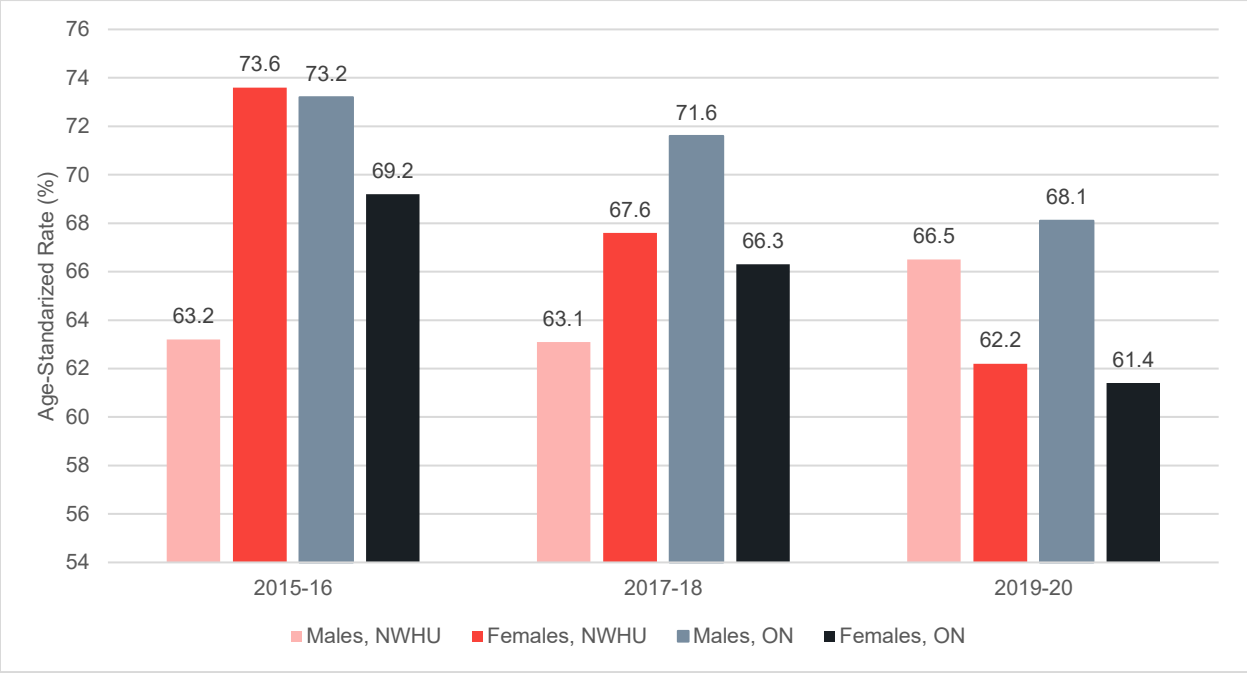
Figure 13.9-4: Perceived Health is Good or Excellent, Northwestern Health Unit and the Province of Ontario, 2015-2020



Source: (Ontario Agency for Health Protection and Promotion 2023a)

Figure 13.9-5 presents the age-standardized rates of respondents to the CCHS from the NWHU and the province who reported a good or excellent perception of their mental health. The rates of females in the NWHU who reported a good or excellent perception of their mental health were higher than the provincial average, while the rates for males were lower than the provincial average between 2015-2016 to 2019-2020 (Ontario Agency for Health Protection and Promotion 2023a). The rates of females in the NWHU who reported a good or excellent perception of their mental health were higher than the rates for males in NWHU in 2015-2016 and 2017-2018 and were lower than the rates for males in the NWHU in 2019-2020.

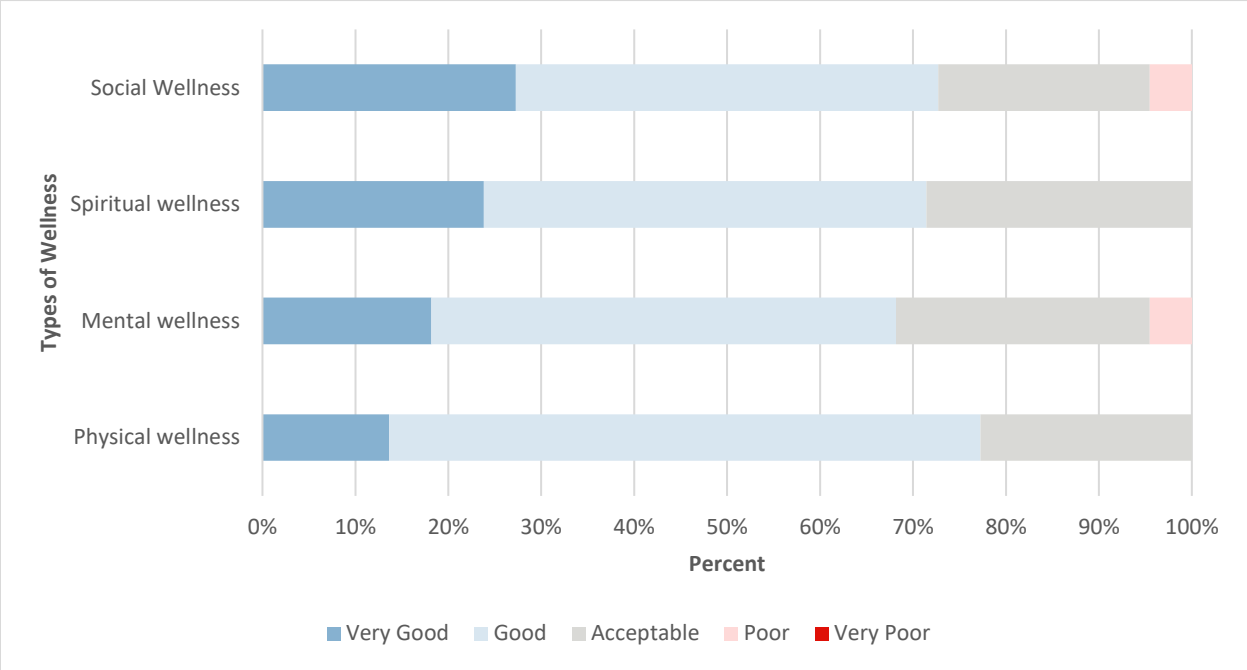
Figure 13.9-5: Perceived Mental Health is Good or Excellent, Northwestern Health Unit and the Province of Ontario, 2015-2020



Source: (Ontario Agency for Health Protection and Promotion 2023a)

The Great Bear Project Community Health Survey asked survey respondents to rate their current feelings of health and well-being for the following categories: physical, mental, spiritual, and social wellness on a scale from very good to very poor. Most self-identified Indigenous respondents selected positive answers (i.e., very good or good) across all categories, followed by neutral (i.e., acceptable), and negative (poor), as presented in Figure 13.9-6. No respondents selected very poor in any of the four categories queried.

Figure 13.9-6: Current State of Health and Well-Being, Self-Identified Indigenous Respondents (n=22)



Source: Great Bear Project Community Health Survey (Attachment A of Appendix N-2)

13.9.2.2.3 Lifestyle and Behaviours

Detailed information regarding lifestyle and behaviour is presented in Attachment A of the HIA (Appendix N-2) including referencing to source information. Data on lifestyles and behaviours were available for Métis people in Canada, and for the general public in the RSA health units' catchment areas (i.e., NWHU), in comparison to provincial averages.

Smoking rates among Métis adults in Ontario declined between 2007 and 2014, whereas the smoking rate among non-Indigenous adults remained relatively constant (Métis National Council 2022). In 2015-2016 and 2017-2018, males and females in the NWHU had higher rates of current daily smoking than the provincial averages, with higher rates of smoking among males for both NWHU and Ontario (Ontario Agency for Health Protection and Promotion 2023b).

NWHU had higher rates of self-reported age-standardized rates of heavy drinking than the province in 2015-2016 and 2017-2018, with rates among males being higher than rates among females in both the NWHU and the province (Ontario Agency for Health Protection and Promotion 2023c).

Despite similar levels of physical activity across all age groups and genders when compared with Ontario, NWHU reports self-reported obesity rates that are approximately twice the provincial average among individuals aged 45 and older in 2021, primarily among males. When disaggregated by age, those in age groups 45 to 64 and 65+ in the NWHU were significantly higher than their Ontario counterparts, whereas those aged 18 to 44 in the NWHU were similar to their Ontario counterparts (Ontario Agency for Health Protection and Promotion 2023d).

13.9.2.2.4 Hospitalizations and Safety

Hospitalizations and safety statistics provide an overview of injury and illness trends in the region.

The leading causes of hospital admissions for adults 20 years of age and older, among Sioux Lookout area First Nations were injuries (15% of hospital admissions) followed by digestive system issues (14%) (SLFNHA 2019a).

With respect to the causes of intentional injuries resulting in Sioux Lookout area First Nations hospital admissions for adults aged 20 years and older between 2012-2016, assault accounted for 49% of intentional injuries, followed by self-poisoning (40%) (SLFNHA 2019a).

The leading reasons for emergency department visits for adults 20 years of age and older, among Sioux Lookout area First Nations between 2012-2016 were: signs, symptoms and abnormal lab findings (21%); injuries (15%); and mental health, musculoskeletal system, and respiratory system (9% each) (SLFNHA 2019a).

Attachment A of Appendix N-2 provides additional information regarding hospitalization and safety in Sioux Lookout area First Nations and in the NWHU.

13.9.2.2.5 Chronic and Communicable Diseases

Chronic health conditions represent an existing and ongoing concern within Indigenous communities in northern Ontario.

Rates of diabetes-related hospital visits and diabetes-related deaths among Indigenous populations are approximately four times higher than the Ontario average. First Nations individuals age 20 and above from Sioux Lookout area were seen in the emergency department for diabetes at a rate three times the Ontario average (SLFNHA 2019a). In addition, First Nations from Sioux Lookout area individuals age 20 and above were admitted to hospital for diabetes at a rate four times the Ontario average (SLFNHA 2019a).

In contrast, regional public health data from the NWHU indicate lower reported prevalence rates of asthma and hypertension compared to provincial rates in 2020 (Ontario Agency for Health Protection and Promotion 2023e). The rates of hospitalization for asthma for males in NWHU between 2012 and 2019 were lower than the rates for women in NWHU, and for males in Ontario (Ontario Agency for Health Protection and Promotion 2023f). The rates of hospitalization for asthma for females in NWHU increased sharply in 2014, 2016 and 2019 as compared to the previous year.

The rates of hospitalization for cardiovascular disease in NWHU and the province were compared between 2012 and 2021. The rates for males in the NWHU showed a slight decreasing trend during this period and were higher than the rates for females in NWHU and males in the province (Ontario Agency for Health Protection and Promotion 2023f).

The rate of Human Immunodeficiency Virus (HIV) for both males and females in Ontario from 2013 to 2022 is generally stable, with males having higher rates than females over these years. In contrast, the rates for males and females in the NWHU display more noticeable fluctuations, with some periods of increase and decrease. Overall, males had higher rates than females in most years, although the NWHU rates appear more variable compared to Ontario (Ontario Agency for Health Protection and Promotion 2023g).

Attachment A of Appendix N-2 provides additional information regarding chronic and communicable disease trends in Sioux Lookout area First Nations and in the NWHU.

13.9.2.2.6 Mental Health and Substance Use

Mental health and substance-related disorders are consistently identified in local health reports as a priority area of concern and a large contributor to health service utilization in the region (SLFNHA 2024b; NWHU and Yusuf 2023; MNP LLP 2020). Slightly over one third of diagnoses for Sioux Lookout area First Nations nursing station visits related to mental health and substance use were substance-related or for addictive disorders (33.5%) (SLFNHA 2024b).

As stated in SLFNHA (2024b): *"Between 2015 to 2020 across the community nursing stations, more women than men visited nursing stations to seek help for substance use / addictive disorders (55.3 females vs. 44.7 males per 1000 visits) and self-harm / suicidal attempts (71.9 females vs. 28.1 males per 1000 visits). However, both men and women had similar numbers of visits for anxiety disorders."*

When examining emergency department visit rates for intentional self-injury for Sioux Lookout area First Nations and regional health units between 2011-2021, rates for Band members both on- and off-Reserve were generally higher than the provincial average and rates for the NWHU (SLFNHA 2024b).

Emergency department visit rates per 1,000 population for mental health and substance use for Sioux Lookout Band Members on- and off-reserve rates were generally higher than the provincial average and rates for the NWHU between 2011-2021 (SLFNHA 2024b).

The Red Lake and Ear Falls 2020 Community Safety and Well-Being (CSWB) Plan further identifies substance use and mental health as top community priorities, noting that hospitalizations due to mental health conditions are higher in Red Lake and Ear Falls than provincial levels (MNP LLP 2020). In particular, youth and young adults in the region are experiencing higher rates of mental health issues (e.g., hospitalizations and emergency departments related to self-injury and / or substance use) than their Ontario counterparts (Mergler et al. 2023; MNP LLP 2020; NWHU and Yusuf 2023; SLFNHA 2018, 2024b).

With respect to self-reported prevalence of anxiety disorders in the NWHU in comparison to the province of Ontario, females were more likely than males to report anxiety in both the NWHU and the province (Ontario Agency for Health Protection and Promotion 2023h).

A report published by the Northern Policy Institute and authored by Parsons (2022) examined the homelessness, addiction, and mental health crisis in northern Ontario. The report uses data from district social services administration boards (DDSABs) in northern Ontario communities and regions. DDSABs are required to conduct detailed enumerations of their homeless populations every two years, in accordance with a new requirement that began in 2018 under the Housing Services Act (Parsons 2022). The report highlights how the rising rates of homelessness and substance use in northern Ontario suggest a growing trend of mental health crises among vulnerable populations (Parsons 2022). In 2021, the District of Kenora region reportedly had 3.1 homeless individuals per 1,000 persons, which was the third highest of the regions included in the study and represent larger homeless populations than some of the most populus cities in Ontario (Parsons 2022). In the District of Kenora, 65% and 75% of homeless individuals in 2021 reported they struggled with mental health and addiction, respectively (Parsons 2022). Given the high percentage of homeless individuals reporting to be struggling with addiction, it is noteworthy that opioid-related emergency department visits and deaths between 2017 and 2021 more than doubled in in the NWHU (Parsons 2022).

Attachment A of Appendix N-2 provides additional information regarding mental health and substance use trends for Indigenous communities in the region and the NWHU.

13.9.2.2.7 Cancer and Mortality

A report titled Kayamowemakak Ahkosiwin Tipacimowin Cancer in Sioux Lookout area First Nations 2006-2022 (SLFNHA 2025), examined cancer trends in Sioux Lookout area First Nations. During most single years between 2006 and 2020, using age-standardized rate measures, the overall cancer incidence (new cases) rates among Sioux Lookout area First Nations, which includes LSFN and WFN, were lower than the rates seen in other public health units (Thunder Bay District Health Unit and NWHU), and Ontario (SLFNHA 2025).

Métis National Council (2022) summarizes current trends in cancer and tobacco-related risk factors for Métis populations in Canada. Research suggests that cancer rates among Métis populations are comparable to, or higher than, those observed among non-Indigenous populations. Mazereeuw et al. (2018) as cited in (Métis National Council 2022), examined cancer incidence and mortality using data from the Canadian Census Health and Environment Cohort (1992–2009). Their analysis found that, when all cancer types and both sexes were considered together, overall cancer incidence among Métis adults was similar to that of non-Indigenous adults. However, statistically significant higher relative risks of cancer were identified for Métis adults for breast, lung, liver, laryngeal, gallbladder, and cervical cancers. In contrast, lower relative risks were observed among Métis people for colorectal cancer among women, as well as for melanoma and leukemia when men and women were considered together. Differences in incidence for other cancer types were not statistically significant (Métis National Council 2022).

A report published by the SLFNHA (Mamow Ahyamowen 2020) examined mortality and chronic health conditions among members of 59 First Nations communities in Northern Ontario. It compared mortality trends to the Ontario population overall and highlights key health challenges and inequities faced by First Nations communities. Although SLFNHA serves 33 First Nation communities in the Sioux Lookout region in Ontario, Canada, including LSFN and WFN, this report was published by the Mamow Ahyamowen (everyone's voices) Partnership, which is an epidemiology partnership of 11 First Nations organizations collectively serving 78 communities across northern Ontario. 59 communities participated in this analysis including ANA and LSFN (Mamow Ahyamowen 2020). It is noted that WFN and NWOMC were not participants in this analysis and as such, the data may not be representative of these communities. Members of Mamow Ahyamowen communities are more likely to die before retirement age (65 years old) than the overall Ontario population, with the average age at death among Mamow Ahyamowen communities being 54 years old compared to 74 years old for Ontario. The most common causes of death among Mamow Ahyamowen community members between 1992 and 2014 included injuries, circulatory, cancer, and diabetes related deaths. Mamow Ahyamowen communities have more deaths due to injuries and diabetes than Ontario overall, whereas circulatory and cancer deaths showed similar rates to Ontario overall. More people in Mamow Ahyamowen communities tend to have diabetes when they die compared to Ontario overall, and women were more likely to have a history of diabetes when they die compared to men (Mamow Ahyamowen 2020).

Cancer incidence rates (all types) show a general downward trend for both males and females in the NWHU between the years of 2010-2014, though there are some year-to-year fluctuations. In comparison, the rates in Ontario for both genders remain relatively steady, with only a slight decline over time. Overall, cancer incidence rates for both males and females were relatively higher than rates in the NWHU for both males and females between 2010-2014 (Ontario Agency for Health Protection and Promotion 2023i).

Attachment A of Appendix N-2 provides additional information regarding cancer and mortality characteristics in the region.

13.9.2.2.8 Food Security

Food security remains a key determinant of health for Indigenous communities in northern Ontario, and food insecurity represents a public health concern in northwestern Ontario. For many First Nations communities, colonization and the imposition of colonial policies have disrupted traditional food knowledge and practices. These interventions have resulted in a shift away from longstanding Indigenous food systems toward reliance on market foods, which are commercially produced, store-bought items that are imported into communities from retailers (SLFNHA 2024a).

The average monthly cost of food in Sioux Lookout area First Nations estimated to be between 37% and 69% higher than the average monthly cost for other municipalities elsewhere in northern Ontario (SLFNHA 2024a). In addition, the NWHU reported food insecurity rates in the Kenora-Rainy River Districts (21%) as being slightly higher than provincial and regional averages (19%) (NWHU 2024).

In 2011, the First Nations Food Nutrition and Environment Study (FNFNES) assessed food security in First Nations communities using the Household Food Security Survey Module and results are summarized in a report titled FNFNES Ontario Regional Report (2011–2012) (Chan et al. 2014). It is noted that LSFN, WFN, NWOMC, and RLEF were not participants in this study; however, ANA participants were included. The highest household food insecurity rate (52%; 34% moderately and 18% severely) was reported among First Nations households located in the Boreal Shield / Subarctic Ecozone 1 (which encompasses northern First Nations including ANA) compared to other Ontario ecozones in the study (Chan et al. 2014). In Ontario (all ecozones), when asked if their household would like to have more traditional food, most adults (73%) said that they would (Chan et al. 2014).

Rates of food insecurity in the NWHU (2018-2020) were higher than provincial averages, with 79.9% of households in the NWHU being food secure compared to 83.3% of households in the province (Ontario Agency for Health Protection and Promotion 2023j).

Attachment A of Appendix N-2 provides additional information regarding food security trends in the region.

13.9.3 Potential Effects

The potential interactions between proposed Project-related activities and Indigenous health are used to identify potential effects (positive and negative), and whether these effects are direct or indirect.

For each Project phase, a detailed overview of the Project's potential interactions (direct and indirect) with Indigenous health is presented in Table 13.9-1. All Project activities were identified as having a potential interaction with Indigenous health. The potential interactions are considered to be applicable to each of the Indigenous communities being assessed (LSFN, WFN, ANA, NWOMC and RLEF).

Table 13.9-1: Potential Interactions Between Project Activities and Indigenous Health

Project Component / Activity	Change in Health (Indigenous Peoples)
Construction Phase	
Site preparation activities	Yes
Establishment and operation of water management and treatment facilities	Yes
Open pit mining	Yes
Underground mining	Yes
Management of rock and unconsolidated materials in stockpiles	Yes
Establishment of onsite fish habitat and compensation measures	Yes
Establishment of onsite aggregate operations	Yes
Construction of the starter embankments for the TMF	Yes
Construction and operation of buildings and infrastructure	Yes
Waste management	Yes
Commissioning of the process plant	Yes
Power supply	Yes
Employment and expenditures	Yes
Operations Phase	
Underground mining	Yes
Mining of the LP Central pit	Yes
Management of rock and unconsolidated materials in stockpiles	Yes
Process plant operation	Yes
Management of desulphurized tailings in the TMF	Yes
Management of concentrate tailings and contact water in the VMF	Yes
Operation of water management and treatment facilities	Yes
Construction of a mine water pond	Yes
Operation and maintenance of buildings and infrastructure	Yes
Waste management	Yes
Power supply	Yes
Progressive reclamation activities	Yes
Employment and expenditures	Yes
Closure Phase	
Active closure	Yes
Passive closure	Yes
Final reclamation	Yes
Employment and expenditures	Yes

Notes:
Yes = Interaction exists
No = No interaction exists
TMF = Tailings Management Facility; VMF = Viggo Management Facility

The assessment of potential effects on Indigenous health relied on two main approaches, HHERA (Appendix N-1) and HIA (Appendix N-2). In order to understand and interpret the potential effects sections below, a brief description of these two methodologies is required. Additional details can be found in the technical appendices (Appendix N-1 and N-2).

For Indigenous health, a single comprehensive assessment was completed that relies on the combined findings of the HHERA (Appendix N-1) and HIA (Appendix N-2) for all participating Indigenous communities (i.e., LSFN, WFN, ANA, NWOMC and RLEF). This subsection includes the assessment and discussion of Indigenous health overall, presenting findings for all five Indigenous communities.

In order to interpret the potential effects sections below, a brief summary of relevant HHERA and HIA methodologies have been provided:

13.9.3.1 HHERA Methodology

For changes to air, multi-media environmental quality and access and availability of traditional foods, the potential effects assessment relies on findings from the HHERA. A brief summary of HHERA inputs, assumptions, methodology and results are provided herein. See Appendix N-1 for additional details. In addition, a Mercury Bioaccumulation Study for Downstream English River to Wabigoon System Waterbodies is included as Appendix T, some data from which was incorporated in the HHERA, as detailed in Appendix N-1.

Project activities may emit chemical parameters into air (through fugitive dust, vehicle exhaust and direct facility emissions) and water (through permitted emissions and runoff). Consequently, human and / or ecological receptors around the Project may be exposed to parameters of potential concern (POPCs) originating from the Project present in environmental media through inhalation, ingestion, incidental ingestion, dermal contact, and ingestion of food items. The HHERA, which consists of a human health risk assessment (HHRA) and an ecological risk assessment (ERA), evaluates cumulative exposure via relevant pathways to determine potential health risks from the Project. The HHERA evaluates exposures and associated risks for baseline (i.e., existing conditions) and for each Project phase (i.e., construction, operations and closure).

The HHERA process involves four fundamental steps, problem formulation, exposure assessment, toxicity assessment, and risk characterization. The results of the HHERA are determined as part of the risk characterization step. This involves qualitatively and / or quantitatively evaluating the potential risks by comparing the results of the exposure assessment with the findings of the toxicity assessment to determine whether there is potential for POPCs to pose adverse human or ecological health effects.

- For human health, risk estimates for non-carcinogenic (i.e., threshold) POPCs are expressed as a hazard quotient (HQ). When considering multiple exposure pathways through cumulative exposure including background exposures, an HQ of less than 1.0 indicates that exposures would not be expected to result in adverse human health effects (Health Canada 2024b).
- For carcinogenic (i.e., non-threshold) POPCs, risk estimates are expressed as incremental lifetime cancer risk (ILCR), and were compared to a target risk value of 1-in-100,000 (i.e., 1.0E-05) (Health Canada 2024b).

- For diesel particulate matter (DPM), in addition to calculating ILCRs, Health Canada (2016) recommends an approach to provide an estimate of additional lung cancer mortality (ALCM) associated with additional DPM emissions related to the Project for chronic exposure. The ALCM values are compared against a benchmark value of 1, representing an incremental cancer risk of 1-in-100,000.
- For ecological health, risk estimates were expressed as HQs and compared to a target risk value of 1.0 because baseline or background exposures were included in the ERA.

The HHERA included both an inhalation and multi-media assessment to evaluate the potential effects to Indigenous health associated with changes to air quality and multi-media environmental quality (i.e., exposure to air, groundwater, surface water, and through the consumption of traditional foods) from Project activities.

The inhalation assessment considered exposure from Project-related air emissions that could occur at the maximum point of impingement (MPOI: a non-static location which represents the highest predicted ground level air concentrations anticipated along the Leased Claims Boundary of the PA) and at PORs within the LSA and RSA through the inhalation of outdoor air. It was conservatively assumed that the Indigenous Resident was present 100% of their time at each long-term (chronic) POR and up to 24 hours of their time at each short-term (acute) POR, which included locations identified as part of Indigenous knowledge. The locations selected to represent potential exposure from Project-related air emissions are detailed in the HHERA inhalation assessment (Appendix N-1). included:

Initial Air Quality PORs: PORs 1-29 were (selected by the air quality discipline; as reported in Appendix D-2), and consist of primarily long-term stay locations (e.g., cottage, cabin, lodge, camp), with the exception of POR1, which is a short-term stay storage area.

Additional PORs: PORs 30-41 were selected in the HHERA to represent additional areas that were either identified in available confidential TKLUS reports or were identified to account for the potential for exposure on water bodies not otherwise identified in TKLUS reports. PORs 30-38 and 40 consist of primarily short-term stay TKLUS locations (e.g., fishing area, gathering area and cultural area) identified through TKLUS reports or chosen to represent exposure on water bodies. POR 39 is an overnight stay location. For completeness and to represent a worse-case area near Red Lake, POR41 was added near Red Lake as a long term stay location within the RSA.

MPOI: a non-static location which represents the highest predicted ground level air concentrations anticipated along the Leased Claims Boundary of the PA. It is noted that human receptors (e.g., Indigenous Resident) in the LSA are not expected to spend an appreciable amount of time at the MPOI and, therefore, the short-term and long-term stay and TLKUS locations represented by PORs more accurately represent potential exposure.

For both assessments, the Indigenous Resident (receptor) was considered representative of Indigenous individuals who are assumed to reside in and / or harvest traditional foods in the LSA or RSA year-round for their entire lifetime; however, the HHERA focused on exposures and risks in the LSA. The multi-media assessment considered two types of Indigenous Residents to capture exposures from varying levels of traditional foods consumption:

- **Indigenous Resident (Heavy Consumer):** The heavy consumer Indigenous resident was based on a receptor that consumes high amounts of traditional foods (i.e., 95th percentile consumption rates).

- **Indigenous Resident (Average Consumer):** The average consumer Indigenous resident was based on a receptor that consumes average amounts of traditional foods (i.e., mean consumption rates) and was considered to represent the general Indigenous population.

For the assessment of non-carcinogens (i.e., threshold) POPCs, the toddler lifestage (the most sensitive life stage due to their exposure rates relative to body weight) and adult lifestage were evaluated; and a woman of childbearing age was also evaluated given the potential presence of developmental toxicants (i.e., mercury). For the assessment of carcinogens (i.e., non-threshold) POPCs, a composite receptor was evaluated which incorporates exposure through all lifestages: infant, toddler, child, teen, and adult (or Elder).

Additional details on the HHERA methodology, including inputs, assumptions and modelling approach are provided in Appendix N-1.

13.9.3.2 HIA Methodology

The assessment of effects (beneficial and adverse) on Indigenous health was also informed by an HIA (Appendix N-2) following established best-practices in the field, including Health Canada's Interim HIA guidance for designated projects (Health Canada 2024a). The HIA (Appendix N-2) included an assessment of potential effects using available evidence (primary and secondary), established indicators, and a combination of quantitative and qualitative approaches, to identify Project effects on Indigenous health. This approach aims to weave together Indigenous knowledge, and other information that has been obtained through engagement with the local Indigenous communities, with publicly available data, information and established impact assessment methods. The HIA relies on a large number of inputs to support the assessment of Project-related effects on Indigenous health. Full details on the methodology of the HIA are provided in Appendix N-2 and are briefly summarized below.

The HIA process follows a prescriptive set of steps that are intended to provide a framework for the assessment of potential beneficial and adverse effects on human health and wellness. These steps include: screening, scoping, assessment (and a baseline health profile), mitigations and enhancements, reporting, monitoring and evaluation. These steps are described in detail in Appendix N-2.

The assessment step involves systematically determining the potential health effects (both beneficial and adverse) from Project activities, including understanding the distribution of those effects across communities and subgroups, and an indication of required mitigation and / or enhancement measures needed based on assessment findings. A combination of quantitative and qualitative assessment methods are used to identify, characterize and assess potential effects both at the individual determinant level and to support an overall assessment for health. Key components of the assessment step, as outlined in the interim HIA guidance (Health Canada 2024a) are:

- Development of a Baseline Health Profile to gain an understanding of existing health conditions and population health status (Attachment A of Appendix N-2).
- Identification of potential effects to predict whether health effects (direct or indirect) may occur as a result of the Project, as well as the extent of these effects. In doing so, it is important to consider which groups are likely to benefit, which groups may be adversely affected, and which groups may be unaffected by the Project (includes GBA Plus).

- Apply an assessment framework to assess Project-related effects. An assessment framework provides a consistent and transparent approach for assessing Project-related effects. Assessment criteria are selected based on the jurisdiction (i.e., Health Canada 2024a), project context and site information, scientific evidence and community feedback.

As a result of the assessment step, the HIA identifies specific mitigation and enhancement measures based on assessment of individual determinants of health but also based on the holistic evaluation of overall health and wellness. Mitigation measures are features of a project intended to eliminate, reduce, control or offset the adverse effects of a project.

The following sections present the results of the assessment of Indigenous health including the HHERA (Appendix N-1) and HIA (Appendix N-2).

13.9.3.3 Construction Phase

The construction phase is expected to occur over a three-year period and will include site preparation, infrastructure development, and mobilization of the construction workforce. Activities during construction include, but are not limited to, open pit and underground mining, management of rock and unconsolidated materials in stockpiles, and construction of buildings and infrastructure. Site preparation activities for the mine site area include clearing, grubbing, bulk earthworks and the establishment of onsite road infrastructure. The potential interactions during construction are explored as contributions to the potential effect of an overall change in Indigenous health.

13.9.3.3.1 Air Quality

As stated in Section 7.2 (Air Quality), air quality during construction may be influenced by changes in particulate, silica, metals, nitrogen dioxide (NO_2), sulphur dioxide (SO_2), carbon monoxide (CO), DPM, volatile organic compounds (VOCs), polycyclic aromatic hydrocarbons (PAHs) and other air parameters due to emissions from the operation of equipment (e.g., generators), material handling, and the use of unpaved surfaces associated with site preparation activities, construction and development of mine infrastructure (including blasting) and operation of the construction camp. Additionally, emissions from the operation of a concrete batch plant, cemented rockfill plant, and paste plant may interact with air quality.

Project interactions with air could result in elevated concentrations of POPCs in outdoor air, which could subsequently be inhaled by Indigenous people. The HHERA evaluated potential human health risks from POPCs from the inhalation of outdoor air as part of the HHERA inhalation assessment. The results of the HHERA inhalation assessment are presented below in Table 13.9-2 and Table 13.9-3, with full details provided in the HHERA (Appendix N-1).

Table 13.9-2: Acute Non-Carcinogenic Risk Estimates (Hazard Quotients) for Indigenous Receptor

POPC	Exposure Period	Receptor Group	Baseline	Project-Alone (2)		Project + Baseline (2)		POR with Max HQ
				Construction / Active Closure (1)	Operations	Construction / Active Closure (1)	Operations	
NO_2 (3)	1-Hour	MPOI (4)	0.06	0.64	0.87	0.70	0.93	N/A
NO_2 (3)	1-Hour	Initial Air Quality POR (5)	0.06	0.56	0.57	0.62	0.63	POR1
NO_2 (3)	1-Hour	Additional POR (6)	0.06	0.63	0.64	0.70	0.70	POR33 - Construction / Active Closure POR39 - Operations
DPM	1-Hour	MPOI (4)	0.046	**2.8**	**2.9**	**2.9**	**2.9**	N/A
DPM	1-Hour	Initial Air Quality POR (5)	0.046	0.46	0.42	0.51	0.47	POR21
DPM	1-Hour	Additional POR (6)	0.046	0.23	0.22	0.28	0.27	POR39

Notes:

1 Air emissions associated with the Project during active closure are assumed to be the same as during construction.

2 Air emissions associated with the Project are assumed to be 0 during post-closure (following Project decommissioning)

3 The CCME CAAQS for NO_2 is based on the maximum average of predicted 98th percentile results from three consecutive years (CCME 2025). The matching statistic was selected as the EPC for NO_2 for the MPOI and each POR for each Project phase. This is consistent with the approach applied by the Air Quality assessment (Appendix D-2).

4 MPOI: a non-static location which represents the highest predicted ground level air concentrations anticipated along the Leased Claims Boundary of the PA. It is noted that human receptors (e.g., Indigenous Resident) in the LSA are not expected to spend an appreciable amount of time at the MPOI and, therefore, the short-term and long-term stay and TLKUS locations represented by PORs more accurately represent potential exposure.

5 Initial Air Quality POR: PORs 1-29 were (selected by the air quality discipline; as reported in Appendix D-2), and consist of primarily long-term stay locations (e.g., cottage, cabin, lodge, camp), with the exception of POR1, which is a short-term stay storage area.

6 Additional POR: PORs 30-41 were selected in the HHERA to represent additional areas that were either identified in available confidential TKLUS reports or were identified to account for the potential for exposure on water bodies not otherwise identified in TKLUS reports. PORs 30-38 and 40 consist of primarily short-term stay TKLUS locations (e.g., fishing area, gathering area and cultural area) identified through TKLUS reports or chosen to represent exposure on water bodies. POR 39 is an overnight stay location. For completeness and to represent a worse-case area near Red Lake, POR41 was added near Red Lake as a long term stay location within the RSA.

CAAQS = Canadian Ambient Air Quality Standards; CCME = Canadian Council of Ministers of the Environment; DPM= diesel particulate matter; MPOI= maximum point of impingement; N/A = not applicable; NO_2= nitrogen dioxide; POPC= parameter of potential concern; POR= point of reception.

Gray shade and bold = HQ is above risk target of 1.

Table 13.9-3: Chronic Carcinogenic Risk Estimates (Incremental Lifetime Cancer Risks and ALCM) for Indigenous Receptor

POPC	Exposure Period	Receptor Group	Construction / Active Closure[2]	Operations	Total ILCR[1,3]	POR with Maximum ILCR	Total ALCM[4]
DPM	Annual	Initial Air Quality POR [5]	1.2E-06	4.3E-06	5.5E-06	POR4	0.08 to 0.80
DPM	Annual	Additional POR [6]	1.7E-06	4.9E-06	6.6E-06	POR39	0.09 to 0.95
Acceptable ILCR or ALCM			<1.0E-05			N/A	1

Notes:

1 Incremental lifetime cancer risk is based on a lifespan of 80 years.

2 Air emissions associated with the Project during active closure are assumed to be the same as during construction.

3 Air emissions associated with the Project are assumed to be 0 during post-closure (following Project decommissioning).

4 Total ALCM is the sum of the ALCM for the construction, operations and closure phases that were assumed to emit DPM.

5 Initial Air Quality POR: PORs 1-29 were (selected by the air quality discipline; as reported in Appendix D-2), and consist of primarily long-term stay locations (e.g., cottage, cabin, lodge, camp), with the exception of POR1, which is a short-term stay storage area.

6 Additional POR: PORs 30-41 were selected in the HHERA to represent additional areas that were either identified in available confidential TKLUS reports or were identified to account for the potential for exposure on water bodies not otherwise identified in TKLUS reports. PORs 30-38 and 40 consist of primarily short-term stay TKLUS locations (e.g., fishing area, gathering area and cultural area) identified through TKLUS reports or chosen to represent exposure on water bodies. POR 39 is an overnight stay location. For completeness and to represent a worse-case area near Red Lake, POR41 was added near Red Lake as a long term stay location within the RSA.

ALCM = additional lung cancer mortality; DPM = diesel particulate matter; ILCR= incremental lifetime cancer risk; N/A = Not applicable; POPC = parameter of potential concern; POR= point of reception

Gray shade and bold = ILCR is above risk threshold of 1 in 100,000 (1.0E-05) or ALCM is above the target risk threshold of 1 in 100,000 (i.e., 1).

As shown in Table 13.9-2 above, the HHERA inhalation assessment reported HQs above the target HQ of 1 for DPM only at the MPOI during the construction phase for Project Alone and Project+Baseline. As shown in Table 13.9-2 and Table 13.9-3 above, HQs for short-term NO_2 exposure were below the target HQ of 1 and estimated ILCRs and ALCMs for chronic DPM exposure were below the target ILCR of 1.0E-05 (i.e., 1 in 100,000) and target ALCM of 1. As such, potential risks associated with short-term NO_2 and chronic DPM exposure in air were negligible.

The MPOI is a theoretical point that is a non-static location, where maximum air concentrations are predicted outside of the Project property boundaries, in close proximity to the PA. As the MPOI is a conservative assumption that varies and is typically used for the human health worst-case scenario, individuals are not likely to be exposed to concentrations that relate to exposures above the risk target (i.e., HQ above 1). The HHERA inhalation assessment reported that although HQs above the target HQ of 1 were identified at the MPOI, the frequency of these instances was low during construction / active closure (i.e., 0.13% at the MPOI), which equates to less than 24 hours (i.e., 1 day) of HQs above the target in a year.

With respect to DPM, the majority of the toxicological evidence is related to respiratory and cardiovascular health effects. Health Canada (2016) has reviewed results from controlled human exposure studies to establish the critical effect point of departure (POD) for short-term exposures to DPM and observed increases in airway resistance in mildly asthmatic individuals and respiratory inflammation in healthy individuals exposed to 100 micrograms per cubic metre ($\mu g/m^3$) DPM based on short-term exposure (Mudway et al. 2004; Behndig et al. 2006, 2011; Riedl et al. 2012; Stenfors et al. 2004; as cited in Health Canada 2016). This concentration was selected as the critical effect and POD. The maximum predicted 1-hour concentration of DPM for Project+Baseline (i.e., construction / active closure) was 28.3 $\mu g/m^3$, which was below the POD of 100 $\mu g/m^3$. Therefore, potential risks to the Indigenous Resident from Project-related DPM exposure during construction were considered to be low, given that the predicted concentrations were below the POD of 100 $\mu g/m^3$, the predicted frequency of DPM concentrations above targets was low (less than 1 day / year), conservative assumptions were used in the air quality assessment, the assumption that all particulate matter less than 2.5 microns in diameter ($PM_{2.5}$) vehicle combustion was related to DPM is conservative, and people are not expected to be at the MPOI for extended periods that would constitute risk.

Overall, Project activities are not anticipated to pose risks to the Indigenous Resident from exposure to POPCs in air during construction. These findings are applicable to the local Indigenous communities, including LSFN, WFN, ANA, NWOMC and RLEF. Given the HHERA process considers conservative assumptions related to the amount of time people are assumed to be present outdoors (i.e., 100% of their time), adverse health effects to Indigenous people are not expected from acute or chronic exposure to Project-related changes in air quality (i.e., NO_2 and DPM levels) during construction.

While Indigenous health is not expected to be directly affected by Project interactions with air quality during construction, it is important to acknowledge that Indigenous views on wellness are holistic and include complex connections to the environment and all living things. It is possible that perception issues related to air quality may indirectly change or limit the amount of time spent outdoors by Indigenous communities, including for traditional land practices. The effect of changes in traditional land use on Indigenous health is assessed via multi-media environmental quality and access and availability of traditional foods.

Mitigation measures and monitoring plans are expected to be protective of Indigenous health during construction. For example, as discussed in Section 7.2 (Air Quality), Great Bear Resources plans to actively manage emissions from the Project. While the HHERA did not identify adverse effects to Indigenous people's health from Project activities via the inhalation of outdoor air, these measures are expected to continue mitigating potential effects from exposure during construction. Given the HHERA is based on predicted data, additional measures were proposed to monitor air quality parameters in order to validate assumptions, if needed. Data sharing agreements with local Indigenous communities, and support of Indigenous environmental monitoring programs were also identified. Mitigation and enhancement measures for health are presented in Section 13.9.4. Additional details, including specific mitigations for air quality are presented in Section 7 of Appendix N-2.

Overall, direct effects on Indigenous health from changes to air quality as a result of Project activities during construction are not anticipated; however, mitigation and enhancement measures presented in Section 13.9.4 are required to validate assumptions and promote Indigenous participation in environmental monitoring and data sovereignty.

13.9.3.3.2 Multi-media Environmental Quality

As stated in Section 7.2 (Air Quality), Project interactions which could potentially effect soil, surface water and traditional foods as a result of deposition from airborne emissions include emissions from the operation of equipment, material handling, and the use of unpaved surfaces, construction and development of mine infrastructure and operation of the construction camp. Additionally, operation of a concrete batch plant, cemented rockfill plant, and paste plant are anticipated to interact with soil, surface water and traditional foods as a result of deposition from airborne emissions during construction.

As stated in Section 7.7 (Water Quality), Project interactions which could potentially effect surface water and traditional foods quality during construction include erosion and sedimentation effects to local water features, fugitive dust emissions and subsequent deposition on surface water features, changes to existing catchment areas and associated catchment loading to surface water features, and blasting residue impacting runoff and dewatering water quality.

Project interactions with soil and / or surface water could result in elevated concentrations of POPCs in these media which can result in direct contact by Indigenous people (e.g., incidental ingestion, ingestion, dermal contact and / or inhalation of soil particulates), and / or can be taken up by plants and animals, and subsequently ingested by Indigenous people. The HHERA (Appendix N-1) evaluated potential human health risks from direct contact with soil (incidental ingestion, dermal contact, inhalation of soil particulates), surface water (ingestion of drinking water, incidental ingestion, dermal contact), and ingestion of traditional foods which were assumed to have taken up POPCs from soil and / or surface water as part of the multi-media assessment. The results of the human health multi-media assessment are presented in Table 13.9-4, Table 13.9-5, Table 13.9-6 and Table 13.9-7 below, with full details provided in the HHERA (Appendix N-1).

Table 13.9-4: Maximum Non-Carcinogenic Risk Estimates (Hazard Quotients) for Indigenous Receptor (Average Consumer, Toddler)

POPC	Baseline	Project + Baseline				Project Alone			
		Construction	Operations	Closure	Post Closure	Construction	Operations	Closure	Post Closure
Inorganic Arsenic	**3.4**	**3.4**	**3.4**	**3.3**	**3.3**	0.0084	0.012	0.013	0.0083
Inorganic Mercury (1)	0.30	0.30	0.32	0.32	0.30	0.0012	0.020	0.020	0.0022
Methylmercury (1)	**1.9**	**1.9**	**1.9**	**1.9**	**1.9**	0.0063	0.049	0.052	0.013
Selenium	0.11	0.11	0.11	0.11	0.12	0.0037	0.0058	0.0088	0.024

Notes:

1 Inorganic mercury and methylmercury risk estimates were calculated as the sum of HQs for fish and surface water pathways (estimated from the Mercury Bioaccumulation Study for Downstream English River to Wabigoon System Waterbodies report [Appendix T]) and HQs for other assessed exposure pathways (estimated from the HHERA multi-media assessment [Appendix N-1]).

For Baseline and Project + Baseline, HQ values > 1.0 are shaded and **bolded**.

For Project Alone, HQ values > 0.2 are shaded and **bolded**.

HHERA = Human Health and Ecological Risk Assessment; HQ = hazard quotient; POPC = parameter of potential concern.

Table 13.9-5: Maximum Non-Carcinogenic Risk Estimates (Hazard Quotients) for Indigenous Receptor (Heavy Consumer, Toddler)

POPC	Baseline	Project + Baseline				Project Alone			
		Construction	Operations	Closure	Post Closure	Construction	Operations	Closure	Post Closure
Inorganic Arsenic	**4.6**	**4.6**	**4.5**	**4.4**	**4.3**	0.018	0.020	0.020	0.010
Inorganic Mercury (1)	1.0	1.0	**1.1**	**1.1**	1.0	0.0032	0.073	0.074	0.0062
Methylmercury (1)	**6.8**	**6.8**	**6.9**	**6.9**	**6.8**	0.019	0.18	0.18	0.041
Selenium	0.44	0.45	0.45	0.47	0.47	0.014	0.021	0.035	0.085

Notes:

1 Inorganic mercury and methylmercury risk estimates were calculated as the sum of HQs for fish and surface water pathways (estimated from the Mercury Bioaccumulation Study for Downstream English River to Wabigoon System Waterbodies report [Appendix T) and HQs for other assessed exposure pathways (estimated from the HHERA multi-media assessment [Appendix N-1]).

For Baseline and Project + Baseline, HQ values > 1.0 are shaded and **bolded**.

For Project Alone, HQ values > 0.2 are shaded and **bolded**.

HHERA = Human Health and Ecological Risk Assessment; HQ = hazard quotient; POPC = parameter of potential concern.

Table 13.9-6: Non-Carcinogenic Risk Estimates (Hazard Quotients) for the Adult Female Indigenous Receptor (Average and Heavy Consumer)

Receptor	POPC	Baseline	Project + Baseline				Project Alone			
			Construction	Operations	Closure	Post Closure	Construction	Operations	Closure	Post Closure
Indigenous Resident (Average Consumer)	Inorganic Mercury (1)	0.21	0.21	0.21	0.21	0.21	0.00088	0.016	0.016	0.0015
	Methylmercury (1)	0.97	0.97	1.0	1.0	0.97	0.0047	0.027	0.028	0.0091
Indigenous Resident (Heavy Consumer)	Inorganic Mercury (1)	0.56	0.57	0.60	0.60	0.56	0.0020	0.040	0.040	0.0041
	Methylmercury (1)	**3.5**	**3.6**	**3.7**	**3.6**	**3.5**	0.013	0.10	0.10	0.032

Notes:

1 Inorganic mercury and methylmercury risk estimates were calculated as the sum of HQs for fish and surface water pathways (estimated from the Mercury Bioaccumulation Study for Downstream English River to Wabigoon System Waterbodies report [Appendix T) and HQs for other assessed exposure pathways (estimated from the HHERA multi-media assessment [Appendix N-1]).

For Baseline and Project + Baseline, HQ values > 1.0 are shaded and **bolded**.

For Project Alone, HQ values > 0.2 are shaded and **bolded**.

HHERA = Human Health and Ecological Risk Assessment; HQ = hazard quotient; POPC = parameter of potential concern.

Table 13.9-7: Carcinogenic Risk Estimates (Incremental Lifetime Cancer Risks) for Indigenous Receptor (Average Consumer and Heavy Consumer, Lifetime Composite)

Receptor	POPC	Construction	Operations	Closure	Post Closure	Total ILCR
Indigenous Resident (Average Consumer)	Inorganic Arsenic	1.8E-08	1.5E-07	1.8E-08	1.2E-07	3.1E-07
Indigenous Resident (Heavy Consumer)		4.2E-08	3.3E-07	3.5E-08	2.1E-07	6.8E-07

Notes:

ILCR values > 10E-05 are shaded and **bolded**.

ILCR = incremental lifetime cancer risks; POPC = parameter of potential concern.

As presented in Table 13.9-4 and Table 13.9-5, the human health multi-media assessment identified non-carcinogenic risks (i.e., HQs above the target HQ of 1.0) from exposure to inorganic arsenic for both the average and heavy consumer Indigenous resident (toddler) for baseline and when accounting for Project+Baseline for the construction phase.
When accounting for Project-Alone contributions, HQs were below the target HQ of 0.2 for construction and are considered negligible. This indicated that Project+Baseline HQs above the target HQ of 1 are associated with the background conditions (i.e., baseline) rather than the Project, and the Project is not expected to increase arsenic-related human health risks for the average consumer or heavy consumer Indigenous resident living, working, and recreating in the LSA and RSA during construction. For the Indigenous resident, the maximum HQs were observed for the toddler life stage (most sensitive life stage for non-carcinogenic exposure to arsenic) and surface water exposure (i.e., ingestion as drinking water, incidental ingestion, dermal contact) was the primary exposure pathway. Surface water exposure accounted for approximately 83% of the arsenic HQs for the average consumer toddler Indigenous resident, and approximately 62% of the arsenic HQs for the heavy consumer toddler Indigenous resident. Surface water exposure represents a conservative assumption in the HHERA as surface water in the RSA and LSA was assumed to be the only source of drinking water for Indigenous resident receptors.

Arsenic was additionally assessed as a carcinogen as presented in Table 13.9-7.
The calculated ILCR values for the lifetime composite Indigenous resident receptor were below the target ILCR of 1.0E-05 (i.e., 1-in-100,000) for both the average and heavy consumer Indigenous resident for the construction phase, and for the total ILCR for an 80-year lifetime. As such, unacceptable carcinogenic risks are not expected from the Project.

For the assessment of mercury, a Mercury Bioaccumulation Study for Downstream English River to Wabigoon System Waterbodies (Appendix T) was conducted to evaluate potential risks to human health associated with fish and surface water consumption, based on predicted changes in fish tissue mercury and methylmercury concentrations resulting from treated effluent discharge from the Project. For both Indigenous resident receptors (average and heavy consumer), baseline HQ values for inorganic mercury and / or methylmercury often were greater than the target HQ of 1, indicating potential health risks under existing conditions, which is reflected in the existing local fish consumption advisories from the Ontario Ministry of Environment, Conservation and Parks. However, Project-related contributions were calculated to be negligible, with Project-related HQ values below the target HQ of 0.2. It should be noted that the Mercury Bioaccumulation Study for Downstream English River to Wabigoon System Waterbodies report (Appendix T) focused only on exposure pathways of ingestion of fish and surface water. Therefore, the HHERA multi-media assessment of mercury focused on exposures from other media, and the HHERA multi-media HQs were combined with the HQs calculated in the Mercury Bioaccumulation Study for Downstream English River to Wabigoon System Waterbodies to estimate total mercury related HQs from the sources of exposure related to the Project site.

For inorganic mercury, as presented in Table 13.9-4, for the average consumer Indigenous resident (toddler), baseline and Project+Baseline HQs were below the applicable target HQ of 1 for these assessment cases, and Project-Alone HQs were below the applicable target HQ of 0.2. Therefore, Project-related risks are considered to be negligible for the average consumer from exposure to inorganic mercury.

For the heavy consumer (toddler), as presented in Table 13.9-5, predicted maximum HQs were equal to the target HQ of 1 for baseline and Project+Baseline and below the target HQ of 0.2 when accounting for Project-Alone contributions and considered negligible for construction.

The maximum HQs were observed for the toddler lifestage (most sensitive lifestage for non-carcinogenic exposure to inorganic mercury) and the primary exposure pathway contributing to the HQs was ingestion of fish, accounting for approximately 96% of HQs for the heavy consumer toddler Indigenous resident. For inorganic mercury, a female adult (of child-bearing age) was also evaluated to represent sensitive populations for exposure to developmental toxicants. As presented in Table 13.9-6, for the adult female baseline and Project+Baseline HQs were below the target HQ of 1, and Project-Alone HQ values were below the target HQ of 0.2. As such, the Project is not expected to increase inorganic mercury-related health risks for the average consumer or heavy consumer Indigenous Resident living, working, and recreating in the LSA and RSA during construction.

As presented in Table 13.9-4 and Table 13.9-5, the human health multi-media assessment identified non-carcinogenic risks (i.e., HQs above the target HQ of 1.0) from exposure to methylmercury for both the average and heavy consumer Indigenous resident (toddler) for baseline and when accounting for Project+Baseline for the construction phase. When accounting for Project-Alone contributions, HQs were below the target HQ of 0.2 for construction and are considered negligible. This indicated that Project+Baseline HQs above the target HQ of 1 are associated with the background conditions (i.e., baseline) rather than the Project. For methylmercury, a female adult (of child-bearing age) was also evaluated to represent sensitive populations for exposure to developmental toxicants. As presented in Table 13.9-6, the baseline and Project+Baseline HQ for the adult female life stage was above the target HQ of 1 for the heavy consumer but lower than for the toddler heavy consumer (Table 13.9-4, Table 13.9-5). The baseline and Project+Baseline HQs for the average consumer were below 1.0. When accounting for Project-Alone contributions, maximum methylmercury HQ values for the adult female were below the target HQ of 0.2 for both heavy and average consumers. Therefore, Project-Alone HQs are considered negligible. Exposure to methylmercury via dietary consumption pathways, specifically fish ingestion, was the primary (i.e., greater than 95%) exposure pathway contributing to HQs. The Project is not expected to increase methylmercury-related human health risks for the average consumer or heavy consumer Indigenous Resident living, working, and recreating in the LSA and RSA during construction.

No risks were identified for selenium for the average or heavy consumer Indigenous resident based on HQs for baseline and Project+Baseline which were below the target HQ of 1.0 or Project-Alone, which were below the target HQ of 0.2. Therefore, the Project is not expected to increase selenium-related human health risks for the average consumer or heavy consumer Indigenous Resident living, working, and recreating in the LSA and RSA during construction.

Overall, multi-media environmental quality is influenced by a number of interrelated factors that both directly and indirectly affect downstream environmental conditions. The available evidence from upstream pVCs and HHERA results indicated that for the multi-media POPCs, health risks from Project activities are not anticipated during construction. While baseline (i.e., existing conditions) risks were identified for some POPCs, incremental risks from Project activities are negligible. These findings are applicable to the local Indigenous communities, including LSFN, WFN, ANA, NWOMC and RLEF.

While physical health is not expected to be directly affected by Project interactions with multi-media environmental quality during construction, it is important to acknowledge that Indigenous people in the region view health as a holistic balance including complex and connections to the environment and all living things. Potential effects to health associated with multi-media environmental quality should be interpreted in the context of the interconnectedness of physical, mental, emotional and spiritual health.

It is possible that perception issues related to environmental quality may change or limit the consumption of traditional foods by local Indigenous communities during construction. Traditional food diets contain high levels of essential nutrients (Batal et al. 2021b; McCartan et al. 2020). Evidence suggests that traditional food diets promote greater cardiovascular health, have protective action against some cancers, autoimmune and thyroid diseases, support maintenance of bone and immune health and can decrease incidence of diabetes, obesity and other diet-related diseases (Batal et al 2021a; FNHA n.d.; Kuhnlein et al., 2001; Marushka et al. 2021). Traditional food practices are also beneficial to health via opportunities for physical activity (Samson and Pretty 2006). Additionally, traditional food systems contribute to the cultural identity, social cohesion, and nutritional wellness of Indigenous communities, all of which are intricately tied to each other and to their overall Indigenous health and community wellness (Earle 2011a). While not quantifiable in the same manner as food quality and nutrition, traditional food collection and consumption also plays an important role in spiritual and cultural wellness (Batal et al. 2021a; Samson and Pretty 2006).

Mitigation measures and monitoring plans are expected to be protective of Indigenous health during construction. For example, as discussed in the CULRTP assessments (Sections 10 to 14), Great Bear Resources supports Indigenous-led monitoring and is currently funding a community-based Chukuni Watershed Aquatic Monitoring Program. Another program that will be provided to employees and their families is the Annual Fitness and Mental Health Benefit fund ($500 per annum) which will provide funding that can be used for purchasing equipment needed for harvesting (hunting, fishing, foraging) traditional foods. In addition, given the HHERA is based on predicted data, environmental quality (air, water, fish) monitoring programs are proposed in order to validate assumptions. Data sharing agreements with local Indigenous communities, and support of Indigenous environmental monitoring programs were also identified. Mitigation and enhancement measures for health are presented in Section 13.9.4. Additional details, including specific mitigations for multi-media environmental quality are presented in Section 7 of Appendix N-2.

Overall, direct effects on Indigenous health from changes to multi-media environmental quality as a result of Project activities during construction are not anticipated; however, mitigations and enhancements presented in Section 13.9.4 are required to minimize potential indirect effects related to perception of environmental quality to avoid disruption to traditional food practices.

13.9.3.3.3 Access and Availability of Water

Changes to access and availability of water as a result of Project activities is impacted by both groundwater and surface water quantity. It is noted that water quality was also considered in the HIA, through the assessment of changes to multi-media environmental quality.

As discussed in Section 7.5 (Groundwater), Project interactions which could potentially effect groundwater quantity (i.e., flows and levels) during construction include dewatering activities associated with excavations, mine development and construction of water management facilities. Excavations below the groundwater table will result in the underground facilities acting as local sinks for groundwater.

Further, management of contact water will result in changes in surface water catchment areas, and the development of facilities and stockpiling activities will have an effect on infiltration rates to groundwater. These activities are expected to result in a reduction in groundwater quantity and groundwater contributions to some surface watercourses and waterbodies within or adjacent to the PA during construction.

As discussed in Section 7.6 (Surface Water Flows and Levels), in addition to a reduction in groundwater contributions to surface water as described above, Project interactions which could potentially affect surface water flows and levels during construction include collection and treatment of Project contact water resulting in changes to surface water runoff quantities and patterns materially contributing to local water features within the LSA, primarily on and near the PA. Additionally, diversion of non-contact water for the establishment of fish habitat compensation measures and starter embankments for the TMF will interact with the watershed areas contributing flows to surface waterbodies and watercourses within the LSA. Reductions in flow are expected in waterbodies throughout the LSA and RSA during construction; however, these reductions are not expected to be observable. As discussed in Section 7.6 (Surface Water Flows and Levels), during construction, there will be permanent alteration to a number of very small unnamed waterbodies and watercourses within the PA. The effects to fish and fish habitat resulting from these permanent changes are proposed to be mitigated (Section 8 [Fish and Fish Habitat] and Appendix L-2).

Access and availability of water is influenced by a number of interrelated factors that both directly and indirectly affect upstream environmental and cultural conditions. Access and availability of water is inextricably linked to Indigenous traditions, culture and identify (McGregor 2008; Martinez-Cruz 2024). Changes to access and availability of water allows for cultural continuation and supports a sense of cultural identity, which can fortify community cohesion and improve individual mental health and wellbeing (NCCIH 2016). Perceived reduction or change in experience to access of water can result in avoidance of the use of waters. This may influence Indigenous health and wellness through changes to cultural ceremonies, traditions and identity linked to water. The link between access and availability of water, mental health, and community cohesion is further discussed through the assessment of mental wellness and personal behaviours.

The Project will result in changes to access and availability of water within the PA, LSA and RSA. There is no confirmed use of water within the PA by the local Indigenous communities, and changes to access and availability of water in the RSA and LSA are either not observable, or are being mitigated. However, the connection that Indigenous people have with water may result in indirect effects on Indigenous health and wellness for some individuals; no measurable deviation from baseline population-level health resulting from Project activities is anticipated following implementation of mitigation measures. These findings are applicable to the local Indigenous communities, including LSFN, WFN, ANA, NWOMC and RLEF. Mitigations, as described in Section 7.5 and Section 7.6 (Groundwater and Surface Water Flows and Levels), are proposed, and will minimize changes to access and availability of water. Data sharing agreements with local Indigenous communities, and support of Indigenous environmental monitoring programs were identified as mitigation measures required to minimize perception issues surrounding Indigenous use of lands and waters. Mitigation and enhancement measures for health are presented in Section 13.9.4. Additional details, including specific mitigations for access and availability of water are presented in Section 7 of Appendix N-2.

It is noted that changes to groundwater and surface water quantity (i.e., flows and levels) can result in changes to aquatic habitats, which can impact both aquatic life species themselves and humans who rely on these species as traditional foods. These topics are assessed through access and availability of traditional foods and food security.

13.9.3.3.4 Access and Availability of Traditional Foods

Dust and vibration related to Project construction have the potential to affect wildlife, fish, and vegetation, and subsequently, the availability of traditional foods, affecting Indigenous people's health and wellness.

In terms of traditional foods availability, potential effects and interactions during construction identified within the linked biophysical pVCs and fVCs (Air Quality, Sound, Vibration, Water Quality, Vegetation Communities, Wild Rice, Moose, Other Wildlife, SAR, Fish and Fish Habitat and Migratory Birds) may influence a change in availability of traditional foods by altering ecosystems that support traditional harvesting activities. Specifically, water levels and flows within waterbodies in the PA may be altered by mine activities or related infrastructure and nearby waterbodies and waterways will receive treated effluent discharged from the Project. For wildlife, modeling indicates only marginal disturbance and habitat loss within the PA, with no expected population-level effects on any species, including moose and boreal caribou. For migratory birds, vegetation removal and ground-disturbing site preparation activities may alter habitat abundance, connectivity, and quality, while noise, dust, and water drawdown may further affect birds within the PA and immediately surrounding areas. For vegetation, site preparation and associated changes in groundwater conditions will lead to localized direct and indirect impacts on vegetation communities, which may also influence Indigenous availability of traditional food resources. For fish, site preparation will directly affect fish habitat and fish communities. Changes to upstream ecological conditions in the PA, and immediately surrounding areas, may lead to changes in availability of traditional foods which in turn, may affect Indigenous health (Earle 2011a). It has been well-established that traditional food systems, land-based practices, and community cohesion have the potential to influence Indigenous health and wellness.

Fish, wildlife, and plants species utilized for traditional food consumption by Indigenous communities in the region were identified through both confidential reports and publicly available resources (Chan et al. 2014; ANA 2024). According to these sources, commonly reported foods for traditional food consumption in the region include but are not limited to moose, birds including waterfowl (goose, ducks), fish (walleye, lake whitefish, northern pike), berries, and traditional plants. A more fulsome list of traditional food species commonly consumed by each Indigenous community is detailed in the HIA (Section 4.4 of Appendix N-2).

Many Indigenous communities understand that fish, wildlife, plants, and water are interconnected and interdependent, such that changes to one component of the environment may affect the health, availability, and use of traditional foods as part of a broader, living system. Therefore, changes in air and water quality could have the potential to indirectly affect Indigenous health via changes in availability of traditional foods. The HHERA (Appendix N-1) considered this potential effect through the evaluation of potential health risks to fish, wildlife, and plants due to POPC emissions associated with Project activities. The results of the HHERA ecological multi-media assessment demonstrated that air and / or water quality changes associated with Project activities were not expected to result in unacceptable risks to plants, mammals and birds, or aquatic communities, suggesting that the availability of traditional foods is not expected to be impacted.

In terms of traditional foods access, for some communities, traplines and harvesting may occur within the PA (for LSFN and RLEF) and LSA; therefore, construction-related disturbance could reduce access to traditional foods for those Indigenous communities who harvest within the PA (LSFN and RLEF). Access to harvesting areas is maintained within the LSA.

These changes to access may affect Indigenous health (Earle 2011a), which is inherently linked to traditional food systems, land-based practices, and community cohesion.

Perceptions of contamination, whether from the Project or historical developments, can lead to avoidance of traditional land use practices, further disrupting access of traditional foods, even without any identified health risk from the Project (Waasegiizhig Nanaandawe'iyewigamig 2020). For example, in the Great Bear Project Community Health Survey, a few self-identified Indigenous respondents from Red Lake or Ear Falls indicated that they believe the Project may affect their fishing and foraging activities in areas near the Project (Attachment A of Appendix N-2). It is noted however, that according to the FNFNES, time constraints, absence of a hunter in the household, and lack of equipment and / or transportation were the top reported barriers to accessing traditional foods among First Nations households in Ontario (Chan et al. 2014). Overall, changes in access to traditional foods may influence health through disruptions in diet, cultural practices, community cohesion, and overall wellness during the construction phase (Batal et al. 2021b; Earle 2011a, 2011b; Salerno et al. 2021; Simpson et al. 2009). Perception of contamination, and participation in land-based practices as it relates to cultural continuity is further discussed in the assessment of mental wellness and personal behaviours.

Access and availability of traditional foods is influenced by a multitude of interrelated factors that both directly and indirectly affect upstream environmental, social, cultural and economic conditions. For Indigenous communities, Project related construction activities that lead to wildlife habitat alteration, vegetation removal, and sensory disturbance may limit access for Indigenous community members who previously harvested within the PA (LSFN and RLEF). Pre-existing sociocultural barriers to access of traditional foods, such as on-going effects of colonization, cost, time constraints, lack of traditional knowledge and skills (Chan et al. 2014), and perception of contamination (Waasegiizhig Nanaandawe'iyewigamig 2020) may be further influenced by Project development. Changes to wildlife distribution, plant harvesting areas and migratory bird habitat, and potential indirect changes to fish and aquatic systems may disrupt availability of traditional foods. These disruptions to availability of traditional foods may have implications for nutrition (Batal et al. 2021a, 2021b; Earle 2011a), physical activity (Earle 2011a), cultural continuity, and mental health (Batal et al. 2021a; Earle 2011a, 2011b; Salerno et al. 2021; Simpson et al. 2009). For example, studies have noted that disruptions to accessing the land and cultural practices can lead to mental stress for community members and reduced dietary and physical activity benefits (Salerno et al. 2021; Shandro et al. 2017).

Mitigation measures and monitoring plans are expected to be protective of Indigenous health during construction (e.g., the Wild Rice Enhancement Project; the conducting of moose surveys; and the Fish Habitat Offset and Compensation Plan). While upstream pVCs and fVCs did not identify adverse effects to Indigenous people's health from Project activities per se, the measures proposed for upstream pVCs and fVCs are expected to continue mitigating potential effects from disruptions to access and availability of traditional foods during construction. In addition, data sharing agreements with local Indigenous communities, support of Indigenous environmental monitoring programs, and support for Indigenous-led education and training for land-based activities were also identified. Mitigation and enhancement measures for health are presented in Section **13.9.4**. Additional details, including specific mitigations for access and availability of traditional foods are presented in Section 7 of Appendix N-2.

As described above, access to harvesting areas is maintained within the LSA, but temporary disturbances during construction could change the availability of resources. Therefore, as described in the CULRTP assessments (Sections 10 to 14), the Project is expected to temporarily disrupt access (LSFN and RLEF only), availability, and / or experience for at least one type of land-based practice (hunting and trapping or plant gathering) for each Indigenous community after the application of mitigation measures. As such, available information indicates that changes in access and availability of traditional foods (e.g., changes in harvesting patterns due to land disturbance and perception issues and ecosystem alteration) will likely occur as a result of Project activities during construction, and that this change may affect Indigenous health and wellness for some individuals (Earle 2011a, 2011b; Simpson et al. 2009; Waasegiizhig Nanaandawe'iyewigamig 2020); however, no measurable deviation from baseline population-level health resulting from Project activities is anticipated following implementation of mitigation measures. These findings are applicable to the local Indigenous communities, including LSFN, WFN, ANA, NWOMC and RLEF.

Changes in access and availability of traditional foods are also linked to social determinants of health such as economics (employment, income and education), food security, and mental wellness and personal behaviours.

13.9.3.3.5 Sensory Disturbances: Sound, Vibration and Light

The primary noise emissions from the Project are expected to originate from equipment and infrastructure such as stationary equipment and mobile equipment fleet operating at different areas of the mine, and ventilation systems. During the construction phase noise will be primarily sourced from the power generator, haulage routes with high truck traffic and primary drills. Vibration will be generated related to blasting activities.

Potential effects and interactions during construction identified within upstream Section 7.3 (Sound), Section 7.4 (Vibration) and Appendix G (Light) may influence a change in sensory disturbance, that lead to annoyance (Health Canada 2024c) or disrupt sense of place (Salerno et al. 2021). Noise modelling was carried out to predict the potential changes to baseline sound levels at 29 selected sound PORs, as outlined in the Section 7.3 (Sound). Predicted sound levels were compared to provincial and federal guidelines. In addition, the Project-related change in the sound environment and the related increase in the percentage of percent highly annoyed (%HA) were evaluated. Predicted sound levels at all of the identified PORs were predicted to be below the federal and provincial criteria after the application of mitigation measures as described in Section 7.3 (Sound). In addition, the change in %HA meets Health Canada limit of 6.5% (Health Canada 2023e) which means that changes to sound levels are not expected to trigger noise complaints from PORs, and effects associated with a higher %HA (i.e., annoyance) are not expected.

A mechanism will be established for the Project for receiving and responding to noise complaints in a timely manner during construction, operations and closure phases. A framework for a follow-up noise monitoring program for the Project is provided in Section 20 (Environmental Management and Follow-Up Program). Monitoring will be required as a condition of provincial approval(s).

Similarly, vibration from blasting was predicted to remain within Health Canada's air overpressure guidelines at all 29 PORs, after implementation of mitigations (e.g., blast management plan) described in Appendix E-3 and in the Section 7.4 (Vibration).

Although potential changes for underwater ground vibration and water overpressure were identified, changes to upstream conditions (i.e., fish and fish habitat) will be managed such that no residual effects to fish and fish habitat were identified.

Project-related artificial lighting during construction is required for safety and effective working. Light trespass was not predicted to be above the recommended thresholds (i.e., Commission Internationale d'Éclairage Lighting Zones) at any assessed PORs (Appendix G). Generally, the difference between existing and predicted skyglow was comparable to the seasonal variability seen between baseline measurement. The predictive light assessment (Appendix G) indicated that nuisance effects are not expected and should be manageable through use of responsible outdoor lighting practices.

Overall, with Project design and the application of mitigation measures identified in the Impact Statement, potential effects to Indigenous health and wellness from changes in sound, vibration, and light such as annoyance (Health Canada 2024c), disruptions to sense of place (Salerno et al. 2021), or sleep disturbance (WHO 2009; Candolin 2024; Cao et al. 2023; Chepesiuk 2009), are not anticipated. These findings are applicable to the local Indigenous communities, including LSFN, WFN, ANA, NWOMC and RLEF.

It is noted however, that mining activities may result in sensory disturbance (noise, visual and dust) which could impact sense of place and quality of experience during harvesting activities in the LSA, and immediately adjacent to the PA.

13.9.3.3.6 Economics (Employment, Income and Education)

Project activities during construction are anticipated to result in a temporary population increase of 1,000 workers during construction and 1,300 during peak construction. The Project will create temporary employment and contracting opportunities, providing increases in labour income and valuable work experience for members participating in the workforce. As described in the CWB assessments (Sections 10 to 14), these opportunities may enhance individual and household financial stability and contribute to the local and regional economy through increased consumer spending. Economic modelling for the Project, as described in Section 18 (Summary of Benefits), has estimated that annual direct, indirect and induced effects generated during the assessment period include on average $570 million per year, 3,430 persons employed in an average year, labour compensation averaging $280 million per year, and $190 million per year in government revenues on average.

During construction, economics can be influenced by factors such as cost of living and traditional economy. As stated in the CWB assessments (Sections 10 to 14), Indigenous people in the region already face elevated costs for food, fuel, and housing due to limited supply chains and regional market conditions. The Project is expected to impact the cost of living in the area, including in Red Lake and Ear Falls, contributing to existing pressures during peak construction or hiring periods. Project-related activity may temporarily increase demand for certain goods and services during construction in these communities, which is expected to result in localized affordability pressures for residents, particularly those on fixed or lower incomes. For LSFN, WFN and ANA, as reported in the CWB assessments, no measurable change in the cost of goods and services is anticipated on-reserve. However, construction activities, may also raise concerns about environmental disturbance near traditional harvesting areas, which could affect confidence in local traditional food and medicine sources. This may in turn change community reliance on market-based goods and services over time and affect household expenditures and perceived cost of living.

For local Indigenous communities, reduced confidence or access to traditional harvesting areas could also influence their participation in land-based livelihoods, affecting their participation in traditional economy. Due to the complexities associated with Indigenous people's health and changes to the environment and landscapes, potential effects associated with cost of living and / or traditional economy are also discussed in relation to access and availability of traditional foods and food security.

The demand for labour is expected to create more job opportunities, which can also influence access to health and social services in the region during construction. As presented in the CWB assessments (Sections 10 to 14), Project workforce accommodations are expected to be off-reserve, therefore, Project workers and relocated families in Red Lake and Ear Falls are anticipated to increase the demand for childcare, mental health support and education, which already face staff shortages and capacity constraints. Services may not be able to fully absorb the additional demand associated with population growth or increased service needs during construction; this is further discussed as part of access to health and social services. Education services may also be affected by the arrival of new families, as the Red Lake and Ear Falls school systems already face challenges with recruiting and retaining teachers due to limited housing and service infrastructure. Further, transportation barriers remain a challenge for Indigenous students traveling from more remote locations. For ANA, WFN and LSFN, no direct effects to service systems on-reserve are expected, but there is a potential for indirect strain on regional service systems, particularly for members who travel to other regional centres for services. Members who access these services may face longer wait times, reduced availability and delayed access due to the increased demand of regional services. This is a particular concern for elders and caregivers who face transportation, mobility, or financial barriers. This could result in deepened inequities in access and availability for populations already experiencing systemic barriers. Increased earnings during construction may also improve household stability and financial security for some families (and lessen strain on local services within the communities), but rotational work schedules and long periods of separation can strain relationships and caregiving capacity. Uneven income distribution and limited childcare options may also deepen existing stressors, heighten household / emotional stress and increase responsibilities for caregivers. Differences in income within households can create added strains and imbalances, affecting family dynamics.

As reported in the CWB assessments (Sections 10 to 14), Project construction is also expected to generate employment and training opportunities, improving income stability for some residents and their families. Broad regional benefits through employment and labour income are expected during construction. However, unequal access to jobs due to barriers such as childcare, transportation, or qualifications may reinforce existing inequities. Wage inequality between project workers and other residents could also contribute to uneven distribution of benefits and localized economic polarization. In general, the demand for labour is expected to increase local and regional employment levels and labour income, and the demand for goods and services are expected to create opportunities for local and regional businesses to participate through procurement and contracting, further generating employment opportunities.

Employment and income play a large role in shaping health outcomes, as financial stability determines an individual's ability to access the resources necessary for maintaining a healthy lifestyle (Darin-Mattson et al. 2017). Income is one of the most significant determinants of overall health and wellness, and financial insecurity contributes to increased rates of chronic disease, mental illness, and overall poorer health outcomes (CPHA n.d.).

Research further indicates that higher income levels and greater educational attainment are strongly associated with better health outcomes, highlighting the importance of supporting education initiatives with resource development (PHAC 2018). This is especially significant because conditions such as arthritis, asthma, diabetes, and obesity occur at higher rates among First Nations and Métis adults compared to non-Indigenous adults (PHAC 2018). Employment also plays an important role in supporting self-esteem and self-worth, which can in turn enhance mental health and reduce the prevalence of addictions (NCCIH 2020).

Low self-rated mental health is more frequently reported among individuals with lower incomes, lower education attainment, and those working in unskilled occupations (PHAC 2018). Income and employment also are also linked to access to health care, but especially social services. Many social assistance programs, including mental health supports, are outside of or only partially covered by Canadian universal health care. Affordability can be one of the most significant barriers for accessing adequate mental health services, as not being able to afford to pay was one of the most frequently reported reasons for having unmet or partially met mental health needs (Statistics Canada 2019). It is also noted that while higher income can influence individual personal behaviours such as substance use or increased domestic violence (Ruddell and Ray 2018), education such as financial literacy can help support better health outcomes.

Overall, the economic opportunities (including employment, income and education) resulting from Project activities have the potential to support a range of health benefits through increased income to support individuals and their families, improvements in mental health through stable employment and wages, and disposable income that can be used for cultural practices and recreation and leisure. Regionally, the economic influx will help support local and regional businesses, and provides education, training and mentorship opportunities for Indigenous youth and adults. While the findings above are applicable to the local Indigenous communities, including LSFN, WFN, ANA, NWOMC and RLEF, it is noted that at the time of producing this report, ANA had not responded to requests for interviews; it is unknown if their community members will be seeking economic opportunities with the Project. Therefore, it is unknown if their community members will benefit from the Project even though they may be affected by certain economic indicators such as cost of living, traditional economy or access to regional health and social services. While increased income is one of the top determinants of health, it can also influence personal behaviours such as substance use, gambling and domestic violence. Existing economic conditions vary among the communities which can further influence existing barriers and vulnerabilities associated with employment, income and education. For individuals not employed in mining or a comparable high-paying industry, the higher cost of living can pose a considerable challenge.

While economic changes due to the Project is expected to result in a net positive benefit to Indigenous health overall, the implementation of carefully designed mitigations are key to mitigating harmful effects and enhancing the economic benefits of the Project. Mitigation and enhancement measures for health are presented in Section 13.9.4. Additional details, including specific mitigations for economics are presented in Section 7 of Appendix N-2. Great Bear Resources has indicated that commercial project agreements are in progress with LSFN, WFN and NWOMC to minimize adverse social impacts and maximize economic opportunities for Indigenous communities. While the specifics of these agreements are confidential, the agreements are assumed to provide economic benefit to on-reserve communities and off reserve band members.

To support economic development, Great Bear Resources plans to support community-driven economic development by partnering with local and Indigenous communities and prioritizing local hiring and procurement, as described in Section 18 (Summary of Benefits).. Great Bear Resources has also committed to inclusive and culturally appropriate employment practices (e.g., equity-based hiring, Indigenous procurement policies, partnerships with Indigenous organizations, financial literacy support, etc.).

Overall, available information indicates that changes in economics will likely occur as a result of Project activities during construction. While a net positive effect is expected as a result of economic changes (e.g., economic opportunities and income stability), some adverse effects (e.g., cost of living, boom-bust cycle, uneven income distribution, personal behaviours) may affect Indigenous health and wellness for some individuals.

However, no measurable deviation from baseline population-level health resulting from Project activities is anticipated. While these findings are applicable to the local Indigenous communities, individual community benefits will depend on several factors including their ability and willingness to participate in economic opportunities (e.g., employment, Project agreements, local businesses) noting the pre-existing barriers that may impede participation in employment and other opportunities. Mitigation and enhancement measures for health are presented in Section 13.9.4.

13.9.3.3.7 Housing

The construction phase of the Project is anticipated to result in a temporary population increase of 1,000 workers during construction and 1,300 during peak construction. As stated in the CSIN and CWB assessments (Sections 10 to 14), the influx of non-local workforce associated with the Project during construction is expected to result in short-term population growth which may impact demand for housing and temporary accommodations. The Project on-site camp is designed to accommodate approximately 1,000 people on a temporary basis during construction. If on-site accommodations are not available at the time when workers are needed, particularly during early construction activities, or if non-local workers relocate with their families who will not be accommodated on-site, there may be short-term demand for off-site housing or other temporary accommodations (i.e., hotels, motels, lodges). The Project will aim to source workers locally where possible and minimize the need for off-site accommodations through the on-site work camp.

The CSIN and CWB assessments (Sections 10 to 14) concluded that no changes to housing during construction are anticipated on-reserve for LSFN, WFN and ANA due to distance from the Project, and because on-reserve housing is reserved for members of the Indigenous communities only. Population changes and housing pressures are anticipated to be limited to regional hubs in Kenora District including Red Lake and Ear Falls. During construction, the increased Project-related workforce may intensify existing regional housing availability and affordability pressures, and may increase demand for certain goods and services contributing to localized affordability pressures, particularly for renters, low- to moderate-income households, and individuals already experiencing housing precarity. This may exacerbate socio-economic divides by reinforcing existing barriers to secure and affordable housing for certain groups, including Indigenous people, women and youth. Contrarily, for those individuals employed by the Project, and their families, improved income stability is expected which may improve housing opportunities. However, unequal access to jobs due to barriers such as childcare, transportation, or qualifications may reinforce existing inequities.

Housing is influenced by a number of interrelated factors that both directly and indirectly affect upstream social and economic conditions. Access to housing of adequate condition is linked to better mental health outcomes, as it supports decreased stress, better sleep and nutrition and improved personal safety (CMHA 2014). The available evidence from upstream pVCs (Local and Regional Economy) and fVCs (Indigenous Peoples – CSIN and CWB assessments) indicated that no Project effects to population growth, housing availability and affordability, or cost of living are anticipated for LSFN, WFN or ANA communities on-reserve. The Project is anticipated to result in population growth in the region associated with the Project workforce which could intensify existing housing concerns for RLEF and the NWOMC. As such, mitigation measures were identified as part of the CSIN and CWB assessments (Section 10 to 14) to minimize potential increased need for housing.

These mitigations, including the on-site camp accommodations, community financial support for housing, local hiring objectives, and education and training to support local hiring, are expected to help limit the extent of Project-related housing challenges. Mitigation and enhancement measures for health are presented in Section 13.9.4. Additional details, including specific mitigations for housing are presented in Section 7 of Appendix N-2.

Overall, no changes to housing are expected on-reserve, and given this upstream finding, a change in Indigenous health and wellness for LSFN, WFN and ANA is also not expected. While mitigation measures are expected to limit the extent of Project-related housing pressures in Kenora District including Red Lake and Ear Falls, given the existing precarity of the housing scenario, changes to housing may result from the Project with potential adverse effects to Indigenous health and wellness for some individuals; no measurable deviation from baseline population-level health resulting from Project activities is anticipated. These findings are applicable to NWOMC members living in Red Lake and Ear Falls and RLEF.

13.9.3.3.8 Access of Health and Social Services

Construction activities are anticipated to result in a temporary population influx of 1,000 workers to the region. As described in the CWB assessments (Sections 10 to 14), during construction, the Project workforce and any relocated families are expected to rely on community-based health, social and education services for non-emergency and specialized care. These systems already face staff shortages and capacity constraints, which may be compounded by population changes during construction. Local service providers have indicated that certain health and social programs such as elder care, home support, and community transportation, are already operating near or at capacity, particularly for vulnerable or aging members. Added demand for childcare, mental health support, and education could contribute to longer wait times and reduced access, particularly for Indigenous residents who may already face barriers to culturally appropriate or geographically accessible care. This includes Elders and caregivers who may face transportation, mobility, or financial barriers.

The Project is not expected to directly interact with service delivery systems on-reserve for LSFN, WFN and ANA due to the distance between the communities and the planned off-reserve Project workforce accommodations; however, regional service access may be affected, particularly for Indigenous individuals and families who travel off-reserve to access these services. As reported in the CWB assessments (Sections 10 to 14), while a variety of social services operate within LSFN, certain services are often still lacking in-community, such as emergency women’s shelters, or maternity and birthing services. For WFN, hospital services are not located within the community, and the closest major hospital (Red Lake Margaret Cochenour Memorial Hospital) is located approximately 108 km away.

Similarly, the closest centre offering specialized health, mental health, and social services for ANA is in the City of Kenora, although it is noted that the Mercury Care Home and Wellness Centre is currently being developed for ANA members. There are services dedicated to Métis that provide culturally specific mental health services and are tailored to Métis citizens, but access to these regional services within the RSA remains limited and may not be able to fully absorb additional demand associated with population growth needs during construction. In addition, education services may also be affected by the arrival of new families as increased enrollment may outpace available classroom space, staff capacity, or specialized programming, including supports for students with special needs or culturally relevant curriculum. Overall, the change in temporary or permanent population from the Project in the region during the construction phase, may contribute to a higher demand for these already limited health and social services.

Access to good quality health care allows individuals to prevent and treat disease and preserve or improve their health (Gulliford et al. 2002; WHO 2024). For people with chronic conditions, including mental health challenges, long waits for medical care can lower quality of life, delay effective treatment, and in some cases increase mortality risks (Ali et al. 2025). As described in the CWB assessments (Sections 10 to 14), while the change in access to health and social services may not affect on-reserve service delivery systems in LSFN, WFN and ANA, members of these communities currently access specialized care in the region. In addition, geographic remoteness of reserves is a major challenge for accessing adequate health and social care services (PDAC 2022) and creates a barrier for timely treatment. While equipped with some services, Red Lake and Ear Falls do not have the same level of service provision as larger population centres. For instance, in Red Lake there are currently no withdrawal management, residential addictions treatment facilities, or mental health centres providing psychiatric or psychological services, requiring members to travel to Kenora or Thunder Bay for these services (MNP LLP 2020). Also, while Red Lake has two shelters, only one is specifically for women experiencing domestic and sexual violence. Conditions are more challenging in Ear Falls, where residents must travel to Red Lake to access most social services. These challenges would affect RLEF and NWOMC members living in Red Lake and Ear Falls who rely on these services.

Geographic isolation combined with limited healthcare infrastructure can worsen existing health issues (Manifold 2024), particularly given that Indigenous populations in northern Ontario experience higher rates of chronic conditions such as diabetes and heart disease (Manifold 2024). This reiterates the need for adequate and appropriate health and social services, and the importance of access to these services. This is also reflected in the Great Bear Community Health Survey results for the Project (Attachment A of Appendix N-2), where about 83% of people in Red Lake and Ear Falls and nearby areas said that access to services is very important to their community.

Appropriate services and programs are particularly important for Indigenous women and girls during industrial development as there have been well documented evidence of negative outcomes, such as domestic violence, for this population. Health care-related services often fail to provide the support needed for victims of physical and sexual abuse or violence (National Inquiry into Missing and Murdered Indigenous Women and Girls 2019). Project interactions and their resulting potential health effects for Indigenous women and girls are further discussed in the assessment of safety of Indigenous women and girls.

Further, access to health care is not equally or universally available to Indigenous people across Canada (NCCIH 2019). While Project activities during construction can improve household financial security that can be put towards transportation to access specialized care, better insurance coverage for health and social supports, or access to childcare options, equitable health care for Indigenous people remains an issue nationally. Differences in funding, racism or discrimination when accessing care, and culturally unsafe care are challenges Indigenous people continue to face. Further, mental health disparities for Indigenous people are rooted in historical factors such as colonialism and adverse intergenerational impacts (Statistics Canada 2024a). As described in the CWB assessments (Sections 10 to 14), the added demand for health and social services during construction may deepen inequities in access and availability for populations already experiencing systemic barriers. With respect to the influx of workers into the area during construction, the potential for this population increase to put additional pressure on regional services depends in part on Project design and camp accommodations. Health service leaders have reported that worker accommodation arrangements can directly affect local health services (Oke and Wilson 2024).

Oke and Wilson (2024) found that projects with well-managed work camps, access to high-quality on-site medical clinics, or a workforce drawn from the local population or that is permanently settled in the community, were generally much less disruptive to regional health services. Without well-managed camps, their research identified that extractive industry projects can result in increased demand on emergency departments, primary care services, and healthcare staffing as the main sources of pressure on local health systems. These findings highlight the importance of effective camp management and the provision of on-site health services to reduce potential impacts on regional healthcare capacity.

During construction, regional changes to access to health and social services due to Project activities may result in adverse effects to Indigenous health for some individuals; however, no measurable deviation from baseline population-level health resulting from Project activities is anticipated following implementation of mitigation measures. These findings are applicable to the local Indigenous communities, including regional effects for LSFN, WFN, ANA, and local effects to NWOMC and RLEF. Proactive planning and mitigation measures can help workers obtain appropriate levels of care in-camp to avoid straining regional systems and provide Indigenous community members the appropriate financial supports to access additional health and social services they may need. Mitigation measures and monitoring plans related to access to health and social services are expected to be protective of Indigenous health during construction. As discussed in Section 18 (Summary of Benefits), Great Bear Resources plans to develop local partnerships aligned with community-identified priorities to provide benefits to communities from the Project. Recent support from Great Bear Resources included funding for health care equipment, facility upgrades, recruitment efforts, and social service initiatives, including a $200,000 contribution to local health care. To further support Indigenous health and wellness, Great Bear Resources has committed to implementing other measures such as Telus telehealth or similar services for employees and immediate family members, medical management and response to track on-site medical responses and referrals for off-site health services, and develop an employee benefits program that includes medical, mental and dental services for employees and their families. This is in addition to an established Employee Assistance Program (EAP) that will be available to employees and their families to alleviate pressures on local health-supportive services (e.g., mental health, addiction counselling and prescriptions). This is expected to improve timely access to care and help minimize pressure on regional health and social services resulting from Project activities during construction.

Overall, available information indicates that changes in access to health and social services will likely occur as a result of Project activities during construction. Potential adverse effects for some individuals (e.g., strain on service delivery and inequitable care) may affect Indigenous health and wellness. Mitigation and enhancement measures for health are presented in Section 13.9.4. Additional details, including specific mitigations for access to health and social services are presented in Section 7 of Appendix N-2.

13.9.3.3.9 Food Security

Food security during the construction phase could be indirectly influenced by changes in multi-media environmental quality, access and availability of traditional foods, and economics.

As discussed in the assessment of multi-media environmental quality, the available evidence from upstream pVCs (Air Quality, Water Quality) and the HHERA (Appendix N-1) results indicated that health risks from Project activities are not anticipated during construction since incremental risks from Project were below the target HQ of 0.2 for all Project phases and considered negligible in comparison to baseline risks.

While physical health is not expected to be directly affected by Project interactions with multi-media environmental quality during construction, it is important to acknowledge that Indigenous people in the region view health as a holistic balance including complex connections to the environment and all living things. Potential effects to health associated with multi-media environmental quality (as an input to food security) should be interpreted in the context of the interconnectedness of physical, mental, emotional and spiritual health. Despite the HHERA findings predicting negligible risks from Project activities, perception issues related to environmental quality may indirectly change or limit the consumption of traditional foods by local Indigenous communities during construction. Self-imposed limitations on traditional food consumption may impact food security associated with both a decreased diet supplementation with traditional foods and costs associated with increased reliance on market foods.

As described in the CWB assessments (Sections 10 to 14) and discussed in the assessment of access and availability of traditional foods, Indigenous people who previously accessed the PA and who access the LSA immediately adjacent to the PA for harvesting may experience changes in access and availability of hunted and trapped species, and impacts to quality of experience due to sensory disturbance during construction. Changes to access to land-based food and medicines, including reduced participation in traditional economy, may deepen existing food insecurity, limit cultural continuity, and contribute to adverse health outcomes, particularly where store-bought food is expensive or nutritionally inadequate.

As described in the CWB assessments (Sections 10 to 14), the increased workforce-related population may increase demand for certain goods and services during construction, contributing to localized affordability pressures for residents, particularly those on fixed or lower incomes. These affordability and income changes can reduce economic resources and contribute to sustained or worsening food security. However, for those individuals employed by the Project, and their families, improved income stability is expected which may improve food security. Unequal access to jobs, however, due to barriers such as childcare, transportation, or qualifications, may reinforce existing inequities.

Collectively, food security is influenced by a multitude of interrelated factors that both directly and indirectly affect upstream environmental, social, cultural and economic conditions.

Food security, which is often closely tied to an individual's socio-economic status, plays a crucial role in health because when people have sufficient financial resources, they can access a diverse range of nutritious foods, which can support better diet quality and reduce chronic disease risk (Ziso et al. 2022). Indigenous communities across Canada currently experience higher than average levels of food insecurity than the non-Indigenous population (Batal et al. 2021b; Tarasuk et al. 2019). Food security represents a public health concern in northwestern Ontario, with food insecurity in the Kenora-Rainy River Districts reported to be higher than provincial and regional averages (NWHU 2024). Given that the most prominent cause of food insecurity is poverty, the importance of distribution of additional economic supports in alleviating this disparity is critical. The available evidence from pVCs and fVCs suggests that food security could be positively affected by the Project via economic supports (income, employment, benefit agreements) that allow Indigenous families to have access to healthier and more diverse foods. However, food security may also be adversely impacted through perception issues and / or changes in access and availability (i.e., alterations to ecosystems, sensory disturbances in gathering/hunting areas) of some wildlife, fish and / or plants that may change or limit the consumption of traditional foods by local Indigenous communities and potentially exacerbate existing food insecurity concerns in the region.

Simultaneously, increased population during construction which may impact affordability due to increased demand for certain goods and services may add further stress for food insecure individuals. Access to traditional foods is an important strategy for addressing food security (Skinner et al. 2013; Banerji et al. 2023; SLFNHA 2019b), as traditional foods can be an affordable and high nutritional value source of food, alternative to high cost, low nutritional value market foods. Reduced use of traditional foods can increase reliance on market foods which can impact food security based on affordability and quality of the market foods attainable to an individual or household. Market foods in Northern Ontario are higher in cost than those in the rest of Ontario, and significantly more so in remote regions of northern Ontario in comparison to urban centres (SLFNHA 2024a; NWHU 2024). These high costs can result in reduced access to market foods in general, and / or reduced access to high nutritional value market foods (i.e., fresh produce) which are often more costly than foods with poorer nutritional value (i.e., processed foods).

Overall, for those Indigenous people employed by the Project and their families, Project activities are anticipated to improve food security through increased income allowing for access to adequate amounts of, and higher nutritional quality, foods. For Indigenous households not employed by the Project, Project activities that interact with cost of living may add additional strain to food security for some individuals; however, no measurable deviation from baseline population-level health resulting from Project activities is anticipated. These findings are applicable to the local Indigenous communities, including LSFN, WFN, ANA, NWOMC and RLEF. Mitigations will be required to minimize potentially adverse effects related to perception to avoid disruption to traditional food practices and traditional economy (e.g., funding for Indigenous-led education and training for land-based activities), minimize effects to cost of living and maximum economic benefits (e.g., local hiring policies). While economic changes due to the Project may result in an overall benefit to Indigenous health, the implementation of carefully designed mitigations are key to mitigating adverse effects and enhancing the benefits of the Project. Great Bear Resources has indicated that commercial project agreements are in progress with LSFN, WFN and NWOMC to minimize adverse social effects and maximize economic opportunities for Indigenous communities. Mitigation and enhancement measures for health are presented in Section 13.9.4. Additional details, including specific mitigations for food security are presented in Section 7 of Appendix N-2.

13.9.3.3.10 Mental Wellness and Personal Behaviours

Mental wellness and personal behaviours during the construction phase is influenced by a multitude of interrelated factors that both directly and indirectly affect upstream environmental, social, cultural and economic conditions. Collectively, these conditions have the potential to affect Indigenous health at the individual and community level.

The available evidence suggests that Project activities may have a beneficial effect of mental wellness via economic support (e.g., income, employment and agreements) during construction. As discussed previously, economic opportunities can improve food security (Myrette and Riva 2021), and in some cases, reduce barriers (via economic benefit) to participation in traditional harvesting practices, by providing means of purchasing hunting, fishing and harvesting equipment (Chan et al. 2014). Economic development, coupled with environmental stewardship and self-determination, is a key determinant of Indigenous health (Loppie and Wein 2022). Therefore, providing opportunities for training, education, and employment for local Indigenous communities is an important way to enhance and support Indigenous health via mental wellness and personal behaviours.

Indigenous health via changes in mental wellness and personal behaviours, may also be indirectly influenced by Project activities during construction through potential changes to traditional food systems (Batal et al. 2021b), environmental dispossession and solastalgia (e.g., the feeling of loss and grief tied to sense of place.) (Ninomiya et al. 2023; Salerno et al. 2021; Tobias and Richmond 2014), family dynamics and relationships (Parker et al. 2018; Myrette and Riva 2021) and potential changes to access to health and social services (Parker et al. 2018; Wheatley 2024).

Some communities in the region (i.e., in the Sioux Lookout area) are experiencing pre-existing mental health and substance use challenges, with higher hospitalization rates for mental health and substance use compared to other local communities in northern Ontario (NWHU and Yusuf 2023; SLFNHA 2024b). In a confidential report prepared for NWOMC, while community members expressed that the Project may bring positive economic benefits (which can lead to beneficial influences on mental health outcomes), there was concern about an influx of workers and issues related to drugs and alcohol. While these issues are complex and may be attributed to a myriad of personal and social factors, research has shown that without effective mitigation strategies in place, resource development more broadly can affect mental wellness and personal behaviours through various pathways of effect, including those related to family dynamics (Parker et al. 2018) and substance use challenges (Aalhus et al. 2018; Gibson et al. 2017).

Notably, research has shown that positive mental health outcomes are strongly linked to active community participation and effective collaboration throughout project development and implementation (Salerno et al. 2021). Positive mental health outcomes can result from the creation of jobs themselves or secondary economic effects when there is investment into local community development, education and training, as well as culturally appropriate and community-specific mitigation measures (Salerno et al. 2021). In confidential reports, LSFN, WFN, and NWOMC expressed the desire for local hiring initiatives. Additionally, WFN and LSFN community members suggested that a method of building trust was to support economic prosperity outside of the mine.

A common theme that has emerged within publicly available reports, confidential reports, and various community engagement activities was the desire for investment in education and training for youth and children.

Existing mental health outcomes across Indigenous communities within the LSA are disproportionately affecting youth and young adults, including in the NWHU as a whole in Sioux Lookout area First Nations, which includes LSFN and WFN, in ANA, and in RLEF (NWHU and Yusuf 2023; SLFNHA 2024b; SLFNHA 2018; MNP LLP 2020; Mergler et al. 2019, 2023). Preserving culture through various mediums (e.g., language and knowledge transmission; supporting participation in land-based activities and learning) has been shown to have protective effects on mental health (Carrier et al. 2022; Lines et al. 2019; NCCIH 2016; Task Group on Mental Wellness 2021). Therefore, mitigation and enhancement measures that include mental health protective factors such as education and training initiatives that involve targeting youth, are important considerations for the Project.

As indicated in the sections above, Project activities during construction have the potential to cause changes to mental wellness and personal behaviours (via changes in employment and economics, family wellness, land-based practices, intergenerational trauma, substance use); although, these effects are highly subject to individual variability. As family, community, and relationships with each other are foundational to Indigenous health (Métis National Council 2025; SLFNHA 2016), Project-related changes to mental wellness and personal behaviours during construction may therefore result in a mix of both beneficial and adverse effects to Indigenous health.

Mitigation measures and monitoring plans are expected to be protective of Indigenous health during construction. The implementation of carefully designed mitigation and enhancement measures are key to mitigating potential adverse effects and maximizing the benefits of the Project, such as an inclusive and local hiring strategy, prioritizing Indigenous hiring, education and training, employee benefits programs, supporting Indigenous procurement and business opportunities, and operation of a dry camp.

The likelihood of beneficial effects on mental wellness and personal behaviours outcomes is largely based on the planning, design and implementation of mitigation measures that improve the upstream conditions (environmental, social, economic, cultural) that influence Indigenous health and wellness. In general, beneficial mental health effects from major projects are associated with meaningful engagement and effective partnerships (Salerno et al. 2021). Given Indigenous communities generally within the RSA (e.g., Sioux Lookout area First Nations) may be currently experiencing higher rates of mental health challenges and substance use challenges than their Ontario counterparts, supporting initiatives that aim to mitigate potential Project effects and support mental health resiliency and healing outside of the mine, should be considered to support alleviating this disparity. Therefore, funding for Indigenous-led education and training for land-based activities and support of Indigenous environmental monitoring programs were also identified. Mitigation and enhancement measures for health are presented in Section 13.9.4. Additional details, including specific mitigations for mental wellness and personal behaviours are presented in Section 7 of Appendix N-2.

Overall, both beneficial (e.g., via economic development and increased material resources due to employment) and adverse (e.g., via environmental dispossession, negative health behaviours) changes to mental wellness and personal behaviours may affect Indigenous health and wellness for some individuals during construction, with potential effects being highly subject to individual variability. However, no measurable deviation from baseline population-level health resulting from Project activities is anticipated. These findings are applicable to the local Indigenous communities, including LSFN, WFN, ANA, NWOMC and RLEF. Mitigations and enhancements presented in Section 13.9.4 are required to minimize adverse effects.

13.9.3.3.11 Actual and Perceived Public Safety (Accidents and Malfunctions)

The risk for accidents and malfunctions to occur is introduced due to the development of the Project; however, the nature of events that may occur will differ between construction and operations, being lower during construction.

The potential types of accidents and malfunctions that are most applicable to human health are those that would result in a spill, such as those related to dam, ditch, or pipeline failure. The residual risk rankings for the potential accident types that were assessed in Section 16 (Effects of Potential Malfunctions and Accidents), including those related to a spill, ranged from very low to low. Given that the likelihood of the scenarios had a rare (1/1,000 to 1/10,000 events per year) or unlikely (1/100 to 1/1,000 events per year) likelihood of occurrence, interactions between the Project and Indigenous health via changes to actual public safety are not anticipated at this time. This is assuming that the development and effective implementation of contingency planning and mitigation measures listed in Section 16 (Effects of Potential Malfunctions and Accidents) are carried out.

In terms of perception, perceived public safety due to accidents and malfunctions, including emotional and social stress, is influenced by a multitude of interrelated factors. The available evidence, including community feedback and primary and grey literature sources (Ninomiya et al. 2023; Salerno et al. 2021; Shandro et al. 2017), suggests that perceived changes in safety, even in the absence of direct incidents, may affect community health and wellness.

This is largely due to the introduction of a potential risk of spill-related accidents or malfunctions as a result of Project development, even if the actual risk of such events is negligible.

Should an accident or malfunction occur, Indigenous health and wellness could be impacted both directly and indirectly at varying magnitudes for varying durations, depending on the nature of the event. Indirect interactions with Indigenous health and wellness may occur because the development and construction of the Project introduces the possibility (via new infrastructure) of anthropogenic accidents and malfunctions occurring in the vicinity of the Project relative to existing conditions. As such, indirect or perceived changes to public safety due to accidents and malfunctions could occur and may influence community health and wellness. These indirect or perceived influences relate primarily to concerns over environmental contamination and potential perceived disruptions in traditional land and resource use, which may in turn influence Indigenous health via changes in actual and perceived safety (accidents and malfunctions) including emotional and social stress factors.

It is acknowledged that there is inherent uncertainty associated with the potential effects of accident and malfunctions scenarios, making it difficult to fully characterize the potential health effects associated with the Project. Broader social and cultural factors, such as historical mistrust and pre-existing emotional and social stress factors associated with industrial development, may continue to influence and in some cases exacerbate, overall health effects for Indigenous communities.

Mitigation measures and monitoring plans are expected to be protective of Indigenous health during construction. As discussed in Section 16 (Effects of Potential Malfunctions and Accidents), an emergency response plan for the Project will be implemented and will include the communication of plans as may be required for each type of accident and malfunction. Great Bear Resources has also developed a Community Grievance Procedure specific to the Great Bear Gold Project site.

With the design and application of contingency planning and mitigation measures, the resulting effects on Indigenous health via changes in actual and perceived safety, including emotional and social stress factors, are expected to be negligible for LSFN, WFN, NWOMC, and RLEF. Potential effects on Indigenous health (i.e., emotional and social stress) due to changes in the perception of safety during construction may occur for some individuals within the ANA community; largely due to historical mistrust and pre-existing emotional and social stress associated with industrial development. However, no measurable deviation from baseline population-level health resulting from Project activities is anticipated. While upstream technical inputs did not identify adverse effects to Indigenous people's health from Project activities per se, the measures proposed for upstream technical disciplines are expected to continue mitigating potential effects from changes to actual and perceived public safety during construction. In addition, environmental data sharing agreements with local Indigenous communities, support of Indigenous environmental monitoring programs, and public safety communications were also identified as health measures to minimize adverse effects due to changes in perceived safety. Mitigation and enhancement measures for health are presented in Section 13.9.4. Additional details, including specific mitigations for perceived safety due to accidents and malfunctions are presented in Section 7 of Appendix N-2.

Overall, the potential for effects on Indigenous health during construction due to changes in actual and perceived public safety, including emotional and social stress, is largely dependent on Great Bear Resources' continued engagement and transparency with the local Indigenous communities and the efficacy of Project design, mitigation measures and emergency response planning.

13.9.3.3.12 Safety of Indigenous Women and Girls

Construction phase activities are anticipated to result in a temporary population increase of 1,000 workers during construction and 1,300 during peak construction. As stated in the CWB assessments (Sections 10 to 14), no direct interactions with public safety or gender-based violence are anticipated on-reserve for LSFN, WFN, ANA during construction. However, the Project will bring a temporary influx of non-local workers into the region, including in Red Lake and Ear Falls, which may elevate broader safety concerns, particularly among Indigenous women, girls, and 2SLGBTQQIA+ people. These concerns reflect ongoing systemic safety risks and the national crisis of Missing and Murdered Indigenous Women and Girls. The influx of new and transient workers may affect safety and the perception of safety, particularly for Indigenous women, girls, and 2SLGBTQQIA+ individuals.

Human trafficking and sexual exploitation risks were raised by local service providers, consistent with regional trends documented in the Final Report on Missing and Murdered Indigenous Women and Girls (National Inquiry into Missing and Murdered Indigenous Women and Girls 2019). These concerns may not always be captured through quantitative data but are central to the lived experience and perceived safety in the community. The NCCIH (2020) reports that impacts such as domestic violence and sexual abuse *"differentially affect the health of Indigenous girls and women, a population already experiencing high rates of domestic abuse, sexually transmitted diseases and pregnancies."* For individuals and groups who already experience disproportionate vulnerability to gender-based violence, increased presence of non-local and transient workers may contribute to heightened fear or unease within the community. This may also intersect with broader historical and systemic factors that contribute to lower levels of trust in public safety systems among some Indigenous and vulnerable populations.

Even in the absence of actual incidents, perceived increases in risk can have adverse effects on mental wellness, personal security, and overall community cohesion.

For Indigenous health, there can be both direct and indirect effects on health and wellness in instances where the safety of Indigenous women, girls, and 2SLGBTQQIA+ individuals is compromised, whether in the community or in the workplace. There are direct impacts including the possibility of injury (through sexual assault and violence), death and / or mental health effects (National Inquiry into Missing and Murdered Indigenous Women and Girls 2019). In addition, *"the systems and institutions that Indigenous people reach out to for health care-related support often fail to provide the support needed and, in doing so, often deepen these health concerns"* (National Inquiry into Missing and Murdered Indigenous Women and Girls 2019). These incidents do not only affect the individual, but also their families and broader communities.

A study of Indigenous women employed in natural resource industries in Canada found that *"sexual harassment and misconduct is common in field operations"* and that *"there was a huge difference between what would be tolerated by management in corporate offices and on mine sites"*, specifically referring to incidents of both physical and verbal sexual harassment (Baruah and Biskupski-Mujanovic 2023). Study respondents suggested that development and enforcement of strict sexual harassment policies at mine camps and pre-arrival training for employees about what constitutes harassment and abuse is important (Baruah and Biskupski-Mujanovic 2023). Mitigating such incidents from occurring is the foundation of the calls to action that are listed in the Final Report on Missing and Murdered Indigenous Women and Girls. Five calls to action were specifically directed at extractive and development industries.

In addition, IAAC commissioned a study in response to the National Inquiry (i.e., MMIWG) and provided further recommendations to mitigate adverse effects to Indigenous women, girls and 2SLGBTQQIA+ individuals (IAAC and Narratives Inc. n.d.). Collectively, these sources have informed the mitigations listed below in Section 13.9.4.

Overall, safety of Indigenous women and girls is influenced by a number of interrelated factors that both directly and indirectly affect upstream social and cultural conditions. Safety of Indigenous women and girls is directly linked to health as both violations of physical safety (e.g., through violence, harassment) and perceptions of safety can influence both physical and mental health and wellness. The available evidence from upstream social conditions (i.e., public safety and gender-based violence) and primary and grey literature, including the National Inquiry into MMIWG, indicated that health effects from Project activities (namely the influx of workers) are possible during construction, especially if incidents occur at camp and / or in community that compromise the safety of Indigenous women and girls. While baseline information highlighted that the issues surrounding the national crisis of MMIWG are not specific to a single region or project, they have the potential to be exacerbated with development in remote northern areas.

Mitigation measures and monitoring plans are expected to minimize risks to the safety of Indigenous women and girls during construction; however, they cannot completely eliminate the possibility of incidents occurring. Mitigation and enhancement measures for health are presented in Section 13.9.4. Additional details, including specific mitigation for safety of Indigenous women and girls are presented in Section 7 of Appendix N-2.

Mitigations include site security (e.g., separate and locked accommodations for women at camp), mandatory cultural awareness training for employees, tracking incidents in the workplace and protective grievance processes for workers, among others. It is noted that Kinross' Code of Business Conduct and Ethics (Kinross 2025) states that harassment will not be tolerated and Kinross will take disciplinary action against anyone found to be in violation. In community, mitigations include in collaboration with Indigenous communities and local law enforcement to discuss safety considerations regarding the influx of additional workforce into the area. Collectively, these mitigations are expected to help minimize the likelihood of incidents occurring at camp and in community. It is acknowledged that should incidents occur, the physical and mental health consequences for the affected individual(s), and their families, is substantial.

Overall, effects on Indigenous health from changes to safety of Indigenous women and girls as a result of Project activities during construction are possible if incidents were to occur. However, no measurable deviation from baseline population-level health resulting from Project activities is anticipated following implementation of mitigation measures. These findings are applicable to the local Indigenous communities, including LSFN, WFN, ANA, NWOMC and RLEF. Mitigations and enhancements presented in Section 13.9.4 are required to address potential effects by minimizing risks to safety of Indigenous women and girls both at camp and in community.

13.9.3.4 Operations Phase

The operations phase is anticipated to occur over a 26-year period. Several direct, indirect or perceived interactions may continue to influence Indigenous health identified during construction are expected to continue during operations. These relate primarily to confidence in land and resource use, access to traditional territories, Project workforce and ongoing reliance on regional services.

The source of the Project interactions during operations are associated with the operation of the mine and related infrastructure (e.g., generators), processing of ore and management of rock and tailings, and operation of a concrete batch plant, cemented rockfill plant, and paste plant. The potential interactions during operations are explored as contributions to the potential effect of an overall change in Indigenous health.

13.9.3.4.1 Air Quality

Potential changes to air quality are expected to continue during operations. NO_2 and DPM were also identified as POPCs during the operations phase and carried forward into the HHERA inhalation assessment (Appendix N-1). The results of the HHERA inhalation assessment for the operations phase are presented below, with full details in the HHERA (Appendix N-1). The results of the HHERA inhalation assessment are presented in Table 13.9-2 and Table 13.9-3 in the discussion of construction in Section 13.9.3.1 above, with full details provided in the HHERA (Appendix N-1).

As shown in Table 13.9-3, the HHERA inhalation assessment reported HQs above the target HQ of 1 for DPM only at the MPOI during the operations phase for Project Alone and Project+Baseline. Potential risks associated with short-term NO_2 exposure or chronic DPM exposure in air were negligible.

The MPOI represents a worst-case scenario; therefore, individuals are not likely to be exposed to concentrations that would result in HQs above the target HQ of 1 and result in potential risks to human health.

The HHERA inhalation assessment reported that although HQs above the target HQ of 1 were identified at the MPOI, the frequency of these instances was low during operations (i.e., 0.15% at the MPOI), which equates to less than 24 hours (1 day) of HQs above the target in a year.

The findings for DPM during operations are similar to construction. Adverse risks to health for the Indigenous Resident based on short-term exposure are not expected as the maximum predicted 1-hour concentration of DPM for Project+Baseline (i.e., during operations) was 28.6 µg/m^3, which was below the critical effect and POD of 100 µg/m^3 for which the majority of DPM toxicological studies have observed increases in airway resistance (Mudway et al. 2004; Behndig et al. 2006, 2011; Riedl et al. 2012; Stenfors et al. 2004; as cited in Health Canada 2016). Potential risks to the Indigenous Resident from Project-related DPM exposure during operations were considered to be low given the predicted concentrations are below the POD of 100 µg/m^3, the predicted frequency of DPM concentrations above targets are low (less than 1 day / year), conservative assumptions were used in the air quality assessment, the assumption that all $PM_{2.5}$ vehicle combustion was related to DPM is conservative, and people are not expected to be at the MPOI for extended periods that would constitute risk.

As such, Project activities are not anticipated to pose risks to the Indigenous Resident from exposure to POPCs in air during operations. These findings are applicable to the local Indigenous communities, including LSFN, WFN, ANA, NWOMC and RLEF. While physical health is not expected to be directly affected by Project interaction with air quality during operations, perception issues related to air quality may affect the amount of time spent outdoors by Indigenous communities during the 26-period of operations, including traditional land use practices. Mitigation measures and monitoring plans are expected to be protective of Indigenous health during operations. Mitigation and enhancement measures for health are presented in Section 13.9.4. Additional details, including specific mitigations for air quality are presented in Section 7 of Appendix N-2.

Overall, direct effects on Indigenous health from changes to air quality as a result of Project activities during operations are not anticipated; however, mitigations and enhancements presented in Section 13.9.4 are required to validate assumptions and promote Indigenous participation in environmental monitoring and data sovereignty.

13.9.3.4.2 Multi-media Environmental Quality

As stated in Section 7.2 (Air Quality), Project interactions which could potentially effect soil, surface water and traditional foods as a result of deposition from airborne emissions are the same as those expected for construction. As stated in Section 7.7 (Water Quality), Project interactions which could potentially affect surface water quality during operations include discharge of treated Project contact water, fugitive groundwater seepage, treatment and discharge of domestic sewage, and fugitive dust emissions and subsequent deposition on surface water features.

The results of the HHERA multi-media assessment for the operations phase are presented in Table 13.9-4, Table 13.9-5, Table 13.9-6 and Table 13.9-7 in Section 13.9.3.1 above, with full results provided in the HHERA (Appendix N-1). The results of the human health multi-media assessment for the operations phase resulted in the same conclusions described for construction, with HQs for operations calculated as essentially equal to or below HQs calculated for construction.

As presented in Table 13.9-4 and Table 13.9-5, non-carcinogenic risks (i.e., HQs above target HQ 1.0) were identified from exposure to inorganic arsenic for both the average and heavy consumer Indigenous resident (toddler) for baseline and Project+Baseline for operations, with surface water exposure as the primary contributing pathway (approximately 83% of the HQs for average consumer toddler Indigenous resident; approximately 62% of the HQs for heavy consumer toddler Indigenous resident [same as construction]). However, when accounting for Project-Alone contributions, HQs were below the target HQ of 0.2 for operations and considered negligible. This indicated that Project+Baseline HQs above the target HQ of 1 are associated with the background conditions (i.e., baseline) rather than the Project, and the Project is not expected to increase arsenic-related human health risks for the average consumer or heavy consumer Indigenous resident living, working, and recreating in the LSA and RSA during construction. Carcinogenic effects from inorganic arsenic, as presented in Table 13.9-7, are the same as described for the construction phase wherein the calculated ILCR values for the composite receptor was below the target ILCR of 1.0E-05 (i.e., 1-in-100,000) for both the average and heavy consumer Indigenous resident for the operations phase and for the total 80-year lifetime composite. As such, unacceptable carcinogenic risks are not expected from the Project.

In the HHERA, multi-media assessment HQs for mercury (inorganic and methylmercury) were combined with the HQs calculated in the Mercury Bioaccumulation Study for Downstream English River to Wabigoon System Waterbodies (Appendix T) to estimate total mercury related HQs from the sources of exposure related to the Project site. These total HQs are presented in Table 13.9-4, Table 13.9-5 and Table 13.9-6. For inorganic mercury, as presented in Table 13.9-4, for the average consumer Indigenous resident (toddler) baseline and Project+Baseline HQs were below the applicable target HQ of 1 for these assessment cases, and Project-Alone HQs were below the applicable target HQ of 0.2. As such, risks for the average consumer were considered to be negligible during operations. For the heavy consumer Indigenous resident (toddler), as presented in Table 13.9-5, the HQ was above the target HQ of 1 for Project+Baseline for operations, driven by the ingestion of fish exposure pathway (accounting for approximately 96% of HQs; same as construction).

However, when accounting for Project-Alone contributions, the HQ was below the target HQ of 0.2 for the heavy consumer for operations and considered negligible. As presented in Table 13.9-6, for the average and heavy consumer adult female baseline and Project+Baseline HQs were below or equal to the target HQ of 1, and Project-Alone HQ values were below the target HQs of 0.2 and considered negligible. The female adult was evaluated to represent sensitive populations for exposure to developmental toxicants. As such, the Project is not expected to increase inorganic mercury-related health risks for the average consumer or heavy consumer Indigenous Resident living, working, and recreating in the LSA and RSA during construction.

As presented in Table 13.9-4 and Table 13.9-5, non-carcinogenic risks (i.e., HQs above target HQ of 1.0) were identified from exposure to methylmercury for the average and heavy consumer Indigenous resident (toddler) for baseline and Project+Baseline for operations, with dietary consumption pathways, specifically fish ingestion as the primary exposure pathway contributing to HQs (i.e., >95%; same as construction). However, when accounting for Project-Alone contributions, HQs were below the target HQ of 0.2 for operations and considered negligible. As presented in Table 13.9-6, baseline and Project+Baseline HQs for the adult female life stage were below or equal to the target HQ of 1 for the average consumer and above the target HQ of 1 for the heavy consumer, but lower than HQs for the toddler (Table 13.9-4, Table 13.9-5).

When accounting for Project-Alone contributions, methylmercury HQ values for the adult female were below the target HQ of 0.2. This indicated that Project+Baseline HQs above the target HQ of 1 are associated with the background conditions (i.e., baseline) rather than the Project, and the Project is not expected to increase methylmercury-related human health risks for the average consumer or heavy consumer Indigenous resident living, working, and recreating in the LSA and RSA during construction.

No risks were identified for selenium for the average or heavy consumer Indigenous resident based on HQs for baseline, Project+Baseline or Project-Alone for operations. Therefore, the Project is not expected to increase selenium-related human health risks for the average consumer or heavy consumer Indigenous Resident living, working, and recreating in the LSA and RSA during construction.

Consistent with the construction phase, for the multi-media POPCs, baseline (i.e., existing) conditions are driving risk for human health. The incremental Project risks for each phase are below the target HQ of 0.2 applicable for Project-Alone contributions, representing a negligible change from baseline risks. For carcinogenic effects of inorganic arsenic, ILCR values are below the target threshold of 1.0E-05 (i.e., 1-in-100,000). As such, Project activities are not anticipated to pose risks to the Indigenous Resident during operations. These findings are applicable to the local Indigenous communities, including LSFN, WFN, ANA, NWOMC and RLEF.

While physical health is not expected to be directly affected by Project interactions with multi-media environmental quality during operations, it is important to acknowledge that Indigenous people in the region view health as a holistic balance. It is possible that perception issues related to environmental quality may change or limit the consumption of traditional foods by local Indigenous communities during operations. Mitigation measures and monitoring plans are expected to be protective of Indigenous health during operations. Mitigation and enhancement measures for health are presented in Section 13.9.4. Additional details, including specific mitigations for multi-media environmental quality are presented in Section 7 of Appendix N-2.

As such, direct effects on Indigenous health from changes to multi-media environmental quality as a result of Project activities during operations are not anticipated; however, mitigations and enhancements presented in Section 13.9.4 are required to minimize potential indirect effects related to perception of environmental quality to avoid disruption to traditional food practices.

13.9.3.4.3 Access and Availability of Water

As stated in Section 7.5 (Groundwater), Project interactions which could potentially effect groundwater quantity are the same as those expected for construction. A reduction in groundwater levels from mine dewatering will reduce groundwater contributions to surface water, which will be reflected in some surface watercourses and waterbodies within or adjacent to the PA during operations.

As stated in Section 7.6 (Surface Water Flows and Levels), Project interactions which could potentially effect surface water flows and levels are the same as those expected for construction, with the additional activity water takings from the Chukuni River during operations. Reductions in flow in watercourses will continue and increase during the operations phase but will continue to not be observable. The temporary reduction in flow is expected to cause a small change in water level in a portion of Dixie Creek; however, the reduction in average annual water level may by less than 5 centimetres [cm]) which is unlikely to be identifiable from natural variation.

Changes are considered temporary and reversible as flows and water levels are restored after closure. Observable changes in surface water levels are not expected for other waterbodies or watercourses with the exception of the unnamed waterbodies and watercourses within the PA which will be permanently altered during construction.

On-going changes to access and availability of water during long-term operations may continue to reinforce community concerns regarding perceived environmental change. This can result in avoidance of the use of local waters potentially leading to indirect effects on Indigenous health and wellness for some individuals through interruption of cultural ceremonies, traditions and identity linked to water. Potential adverse effects related to community cohesion, cultural continuity, mental health, intergenerational knowledge transfer, land-based healing, and ceremonial activities noted in construction are expected to continue in operations, particularly where the landscape remains altered or access to waters are perceived as reduced. However, no measurable deviation from baseline population-level health resulting from Project activities is anticipated following implementation of mitigation measures. These findings are applicable to the local Indigenous communities, including LSFN, WFN, ANA, NWOMC and RLEF.
The complex interaction between environmental quality, perception and possible avoidance is further discussed in relation to multi-media environmental quality and food security. Mitigations and enhancements presented in Section 7.5 and Section 7.6 (Groundwater and Surface Water Flows and Levels, respectively) are proposed and will minimize changes to access and availability of water. Data sharing agreements with local Indigenous communities, and support of Indigenous environmental monitoring programs were identified as mitigation measures required to minimize perception issues surrounding Indigenous use of lands and waters. Mitigation and enhancement measures for health are presented in Section 13.9.4. Additional details, including specific mitigations for access and availability of water are presented in Section 7 of Appendix N-2.

13.9.3.4.4 Access and Availability of Traditional Foods

During operations, similar interactions as the construction phase will continue, and potential effects to health via changes to access and availability of traditional foods for Indigenous people may occur. Project-related activities during operations may continue to disrupt access and / or availability of traditional foods, including changes in harvesting patterns due to land disturbance, perception issues and other barriers, as well as ecosystem alteration.

During the operations phase, access to areas within the PA will be restricted for safety and security reasons, however, access to land and resource areas within the LSA will remain unrestricted during Project operations. Therefore, changes to access of traditional foods for those Indigenous communities who harvest within the PA (LSFN and RLEF) may occur. Anticipated potential effects from Project activities also include direct and indirect changes to availability of plants and wildlife, respectively, as well as diminished quality of experience due to sensory disturbance in the LSA, immediately adjacent to the PA. Therefore, effects to Indigenous health identified for the construction phase due to changes to access and / or availability of traditional foods, may continue throughout the mine life.

In addition, operational activities could affect fish, wildlife, and plants due to potential changes in air and water quality and in turn, indirectly affect Indigenous health. The HHERA considered this potential effect pathway to assess potential effects on fish, wildlife, and plants due to POPC emissions associated with Project activities (Appendix N-1).

The results of the HHERA (Appendix N-1) demonstrated that air and / or water quality changes associated with Project activities are not expected to result in unacceptable risks to plants, mammals and birds, or aquatic communities, suggesting that the availability of traditional foods is not expected to be impacted.

Mitigation measures and monitoring plans for the operations phase are expected to be protective of Indigenous health during operations. Mitigation and enhancement measures for health are presented in Section 13.9.4. Additional details, including specific mitigations for access and availability of traditional foods are presented in Section 7 of Appendix N-2.

As described in the CULRTP assessments (Sections 10 to 14), long-term operational activity may reinforce community concerns regarding environmental change and cultural continuity, particularly where the landscape remains altered or access to important cultural areas is perceived as reduced and may continue to influence overall health for Indigenous people.

Overall, available information indicates that changes in access and availability of traditional foods (e.g., changes in harvesting patterns and ecosystem alteration) will likely occur as a result of Project activities during operations, and this change may affect Indigenous health and wellness for some individuals (Earle 2011a, 2011b; Simpson et al. 2009; Waasegiizhig Nanaandawe'iyewigamig 2020);however, no measurable deviation from baseline population-level health resulting from Project activities is anticipated following implementation of mitigation measures. These findings are applicable to the local Indigenous communities, including LSFN, WFN, ANA, NWOMC and RLEF. Changes in access and availability of traditional foods are also linked to other health indicators including economics (employment, income and education), food security, and mental wellness and personal behaviours.

13.9.3.4.5 Sensory Disturbances: Sound, Vibration and Light

During the peak production and underground production operations modelling periods, sound levels predicted under the worst-case hour scenario (LAeq-1hr [A-weighted equivalent sound level], dBA) meet the provincial and federal guidelines at all PORs in the LSA and RSA, during daytime and evening / nighttime periods. In addition, the change in %HA is predicted to meet the Health Canada guideline (2023e) of 6.5% for the operations phase, which means that changes to sound levels are not expected to trigger noise complaints from PORs. Blasting operations are within applicable guidelines and there is no change to vibration at the PORs. Therefore, effects to Indigenous health during the operations phase due to due to sound (e.g., annoyance) and vibration are not anticipated. For light, the difference between existing and predicted skyglow during operations was comparable to the seasonal variability seen between baseline measurement.

Therefore, potential effects to Indigenous health due to light (e.g., sleep disturbance) are not anticipated. These findings are applicable to the local Indigenous communities, including LSFN, WFN, ANA, NWOMC and RLEF.

Mining-related activities may result in sensory disturbance during the operations phase (noise, visual and dust) which could impact sense of place and quality of experience during harvesting activities in the LSA, and immediately adjacent to the PA.

Mitigation measures and monitoring plans are expected to be protective of Indigenous health during operations, such as noise control measures, the blast management plan, and light control measures and best practices. In addition, a mechanism will be established for receiving and responding to noise complaints in a timely manner during all Project phases.

13.9.3.4.6 Economics (Employment, Income and Education)

During operations, Project-related employment and contracting opportunities will continue to provide increased income to individuals working for the Project and their families. Peak employment is anticipated to reach approximately 1,100 workers during operations when both the open pit and underground mines are active; however, the workforce is expected to decrease to approximately 700 workers during the underground mining-only operations (after approximately year 9).

Although no population growth or direct workforce is anticipated on-reserve for LSFN, WFN and ANA, Project operations are expected to affect the local and regional economy (including RLEF and NWOMC) through temporary job creation and increased regional spending during operations. As described in the CWB assessments (Sections 10 to 14), this is also anticipated to increase labour income, provide valuable work experience for Indigenous members participating in the workforce, and strengthen income stability. The workforce is expected to stabilize during operations; thus, most potential interactions identified during construction are likely to persist or evolve over time.

Income is a key determinant of health, and higher earnings during operations can reduce financial stress, enhance self-esteem, and support improved mental health, including a reduced prevalence of addictions (NCCIH 2020). Increased income may also alleviate community-level poverty and enable participation in cultural and traditional practices, which promote healthier lifestyles and reduce the risk of obesity-related conditions such as diabetes and cardiovascular disease (NCCIH 2020). However, income is not the sole economic influence on health. Income, education, and occupational skill levels are closely linked, and individuals with lower socio-economic status consistently experience higher rates of chronic conditions, including arthritis, asthma, diabetes, and obesity (PHAC 2018). Therefore, initiatives that support education and skills development during operations is key to increased employment opportunities, higher income over the long-term and better health. Increased consumer spending during operations can raise demand for goods and services, supporting improved health and social services and in turn, better health outcomes (NCCIH 2020). However, for some individuals, higher incomes may exacerbate substance use issues, potentially increasing risks of domestic violence, family disruption, and safety concerns for Indigenous women and girls (NCCIH 2020). Further, due to the expected demand for certain goods and services during operations, a temporary increase in the cost of living for communities that already face elevated costs for food, fuel and housing can contribute to localized affordability pressures.

During operations, potential effects to Indigenous health due to changes in economics (employment, income, education) from the Project are expected to be positive overall as steady employment and contracting opportunities could support income stability, local business activity and workforce skill development. However, higher income could also lead to negative health behaviours (e.g., substance use) for some individuals, and sustained operations may reinforce community concerns about affordability, service capacity, and long-term population change, as described in the CWB assessments (Sections 10 to 14). Further, for individuals not employed in mining or a comparable high-paying industry, the higher cost of living can pose a considerable challenge. While the findings above are applicable to the local Indigenous communities, including LSFN, WFN, ANA, NWOMC and RLEF, it is noted that at the time of producing this report, it is unknown if ANA members will be seeking economic opportunities with the Project.

The implementation of carefully designed mitigations and enhancements are key to mitigating adverse effects and enhancing the economic benefits of the Project. Mitigation and

enhancement measures for health are presented in Section 13.9.4. Additional details, including specific mitigations for economics are presented in Section 7 of Appendix N-2. Great Bear Resources has indicated that commercial Project agreements are in progress with LSFN, WFN and NWOMC, which will continue to provide economic benefits to communities throughout operations. Great Bear Resources has also committed to support economic development and the ability for Indigenous people to gain economic benefit from the Project. One key commitment that will influence the operations phase is the effort to increase the labour force and business capacity by supporting training and hiring of Indigenous people, particularly in the operations phase (Section 18). This and other commitments, including supporting equitable benefits (employment, training, income equality) for Indigenous women, retirement planning and support, an employee benefits program, and Indigenous-led education and training for land-based practices, have the potential to improve conditions related to Indigenous health.

Overall, available information indicates that changes in economics will likely occur as a result of Project activities during operations. While a net positive effect is expected as a result of economic changes (e.g., economic opportunities and income stability), some adverse effects (e.g., cost of living, boom-bust cycle, uneven income distribution, personal behaviours) may continue to affect Indigenous health and wellness for some individuals. However, no measurable deviation from baseline population-level health resulting from Project activities is anticipated following implementation of mitigation measures. Mitigations and enhancement measures for health are presented in Section 13.9.4.

13.9.3.4.7 Housing

The Project is expected to result in sustained population growth in the Red Lake and Ear Falls area due to a long-term workforce presence during operations. Peak employment is anticipated during operations (when LP Central pit and underground mines are active simultaneously) is 1,100 workers, which is less than peak construction employment. When only underground mining is underway, the workforce is expected to decrease to approximately 700 workers.

During operations, the on-site camp reduces to a capacity of 300 intended to house a portion of the workforce on a rotational basis. Operational staff are expected to be accommodated while on-shift. As the on-camp site is not intended to house workers while off rotation, some workers may acquire permanent off-site residences to use while off rotation. Some mine personnel will have fixed hours weekly rather than rotational shift work and will not be accommodated by the on-site camp, therefore these personnel will reside off-site permanently. Accommodations for occasional short-term contractors are expected to be met by the on-site camp.

Non-local workforce related housing pressures expected during construction will continue in operations, with the demand for permanent housing being dependent on the proportion of the operations workforce that is sourced from the local population compared to non-local hires. No change to on-reserve housing for LSFN, WFN or ANA is anticipated during operations. The influx of workforce related population in Kenora, including Red Lake and Ear Falls, may result in increased demand for permanent housing and rental accommodations which can add additional strain to existing housing availability and affordability concerns. Given the existing limitations, even modest additional demand for housing and accommodations could intensify existing challenges.

As stated in the CWB assessments (Sections 10 to 14), affordability concerns related to increase demand for goods and services resultant from Project-related population growth noted in construction are anticipated to continue through operations. These affordability changes can reduce economic resources available for securing suitable housing.

However, employment and income stability throughout operations may improve housing opportunities for individuals employed by the Project, and their families.

Mitigation measures were identified as part of the CSIN and CWB assessments (Section 10 to 14) to minimize potential increased need for housing during operations, as well as to minimize disruption to cost of living. These mitigations are expected to limit the extent of housing and cost of living challenges. Mitigation and enhancement measures for health are presented in Section 13.9.4. Additional details, including specific mitigations for housing are presented in Section 7 of Appendix N-2.

Overall, during operations no changes to housing are expected on-reserve, and given this upstream finding, a change in Indigenous health and wellness for LSFN, WFN and ANA is also not expected. Given the existing precarity of the housing scenario in Kenora district including Red Lake and Ear Falls, while mitigation measures are expected to minimize effects, changes to housing may result from the Project with potential adverse effects to Indigenous health for some individuals; no measurable deviation from baseline population-level health resulting from Project activities is anticipated. These findings are applicable to NWOMC members living in Red Lake and Ear Falls and RLEF.

13.9.3.4.8 Access to Health and Social Services

The operations phase will result in sustained workforce presence in the region, potentially contributing to ongoing regional service demands. Peak employment is anticipated to reach approximately 1,100 workers during operations when both the open pit and underground mines are active; however, the workforce is expected to decrease to approximately 700 workers during underground mining operations.

While no population growth or direct workforce is expected on-reserve for LSFN, WFN and ANA, potential effects to regional health and social services are anticipated. The extended duration of activities during operations means that potential effects related to access to services identified during construction may persist or evolve over time during operations. As such, there may be both direct and indirect effects to Indigenous people's health for individuals that rely on regional health and social services, due to ongoing Project activity in the region. Existing barriers associated with timely access to health and social services within the region due to geographic location, capacity and staff constraints, and lack of childcare options to attend medical appointments, are expected to continue with the additional workforce during operations. These challenges can directly influence Indigenous people's health outcomes particularly in emergency medical or crisis (mental health) situations.

For Indigenous people living off-reserve in Red Lake and Ear Falls, or for Métis living within these communities, potential effects to Indigenous health related to access to services during operations is expected to continue even as the Project workforce stabilizes. While a portion of the workforce will reside in on-site accommodations, other workers and their families may relocate to nearby communities, placing ongoing pressure on existing service systems. Community members living on-reserve who travel to Red Lake and Ear Falls to access municipal, provincial, and non-profit health, social and emergency services may continue to be exposed to the potential regional service pressures. With respect to on-site camp accommodations, strong management strategies and the adequate provision of on-site medical services is critical to reduce the impact on regional healthcare services (Oke and Wilson 2024).

Both the CWB and CSIN assessments (Sections 10 to 14) acknowledge that steady employment and contracting opportunities during operations could support income stability and local business activity (including health and social services), community stability, encourage workforce retention and support incremental improvements in municipal revenues and location service delivery capacity over time. It is noted however, that despite some improvements, participation barriers may continue to limit equitable access for some residents.

During operations, potential effects to Indigenous health due to changes in access to health and social services is expected to be similar to construction and experienced primarily through access to regional services rather than direct changes within on-reserve communities. While there may be limited beneficial effects from Project-related changes that can improve service delivery over time (e.g., employment and employee benefits), adverse effects associated with regional constraints on the service delivery system or reinforcing systemic barriers related to access to services are expected due to added demand on services from the Project workforce. Therefore, community health will be shaped more by long-term adjustments in economic, social, and demographic conditions across Red Lake and Ear Falls and surrounding areas.
These findings are applicable to the local Indigenous communities, including LSFN, WFN, ANA, NWOMC and RLEF. Great Bear Resources has committed to establish several initiatives that are expected to have several key social benefits, including supporting local initiatives that can contribute to better health outcomes for Indigenous people. Mitigation measures and monitoring plans are expected to be protective of Indigenous health during operations. These include medical management and response to track on-site medical responses and referrals for off-site health services, and an employee benefits program that includes coverage for health care including medical, mental and dental services for employees and their families. Mitigation and enhancement measures for health are presented in Section 13.9.4. Additional details, including specific mitigations for access to health and social services are presented in Section 7 of Appendix N-2.

Overall, available information indicates that changes in access to health and social services will likely occur as a result of Project activities during operations. While beneficial effects (e.g., employment and employee benefits) may occur for some individuals, potential adverse effects on the regional service system due to Project activities (e.g., further strain on capacity / service delivery and inequitable care) may affect Indigenous health and wellness; however, no measurable deviation from baseline population-level health resulting from Project activities is anticipated following implementation of mitigation measures. Mitigations and enhancement measures for health are presented in Section 13.9.4.

13.9.3.4.9 Food Security

Given that Indigenous people in the region view health as a holistic balance including complex and connections to the environment and all living things, potential effects to health associated with multi-media environmental quality and access and availability of traditional foods (as an input to food security) should be interpreted in the context of the interconnectedness of physical, mental, emotional and spiritual health. While HHERA (Appendix N-1) results indicate that incremental risks from Project were below the target HQ of 0.2 for all Project phases and considered negligible in comparison to baseline risks and physical health is not expected to be directly affected by Project interactions during operations, perception issues related to environmental quality may indirectly change or limit the consumption of traditional foods by local Indigenous communities during operations.

Further, Indigenous people who previously accessed the PA and access the LSA immediately adjacent to the PA for traditional harvesting practices may experience changes in access and availability of hunting and trapped species and effects to quality of experience due to ongoing sensory disturbances related to Project activities; therefore, temporary or longer-term avoidance of certain areas may occur. Self-imposed limitations on traditional food consumption based on perception may impact food security associated with both a decreased diet supplementation with traditional foods and costs associated with increased reliance on market foods.

As stated in the CWB assessments (Sections 10 to 14), affordability concerns related to increase demand for goods and services resultant from Project-related population growth noted in construction are anticipated to continue through operations. Changes to traditional economy (i.e., reduced income from traditional economy and increased reliance on higher cost market goods) related to perceived changes to the environment are also expected to continue through operations. These affordability changes can reduce economic resources and strain food security particularly those on fixed or lower incomes. However, Project-related income and economic opportunities for Indigenous individuals and their families may improve food security. Unequal access to jobs, however, due to barriers such as childcare, transportation, or qualifications, may reinforce existing inequities during operations, continued from construction.

Overall, during operations it is expected that for those Indigenous people employed by the Project, Project activities are anticipated to improve food security through increased income allowing for access to adequate amounts of, and higher nutritional quality, foods. For Indigenous households not employed by the Project, Project activities may add additional strain to food security based on potential reduced participation in traditional food practices and traditional economy, and increased affordability pressure from rising costs of goods and services; however, no measurable deviation from baseline population-level health resulting from Project activities is anticipated. These findings are applicable to the local Indigenous communities, including LSFN, WFN, ANA, NWOMC and RLEF. Mitigations will be required to minimize potentially adverse effects related to perception to avoid disruption to traditional food practices and traditional economy, minimize effects to cost of living and maximum economic benefits. Mitigation and enhancement measures for health are presented in Section 13.9.4. Additional details, including specific mitigations for food security are presented in Section 7 of Appendix N-2.

13.9.3.4.10 Mental Wellness and Personal Behaviours

During operations, similar interactions as the construction phase are expected, and potential effects to Indigenous health via changes to mental wellness and personal behaviours may continue. Although no population growth or direct workforce is anticipated on-reserve for LSFN, WFN, and ANA, Project operations and the continuation of Project activities means that several pathways (both beneficial and adverse) identified during construction may persist or evolve over time, as the workforce is expected to stabilize during operations. It is expected that the mine workers will be working seven working days of 12-hour shifts, followed by seven days off, with a goal that the majority of workers will be from local communities. As a result, potential beneficial effects to mental wellness associated with economic benefit from the Project may continue for some individuals. These relate primarily to economic opportunities such as increased income, education, training and skills, which can improve food security (Myrette and Riva 2021), access to services (e.g., via employment and employee benefits for those employed by the Project), and in some cases, potentially reduce barriers to participation in traditional harvesting practices (e.g., via increased material resources) (Chan et al. 2014).

Income is a key determinant of mental health (PHAC 2018; CAMH n.d.; PHAC 2024), and higher earnings during operations can reduce financial stress, enhance self-esteem, and support improved mental health, including a reduced prevalence of addictions (NCCIH 2020).

As described in the CWB assessments (Sections 10 to 14), stable employment and contracting opportunities could support income security and skill development for Indigenous people, assuming local hiring remains prominent and Indigenous people are employed throughout operations; though barriers to participation may continue to limit equitable access. Great Bear Resources has indicated that commercial project agreements are in progress with LSFN, WFN and NWOMC to minimize adverse social impacts and maximize economic opportunities for Indigenous communities. While the specifics of these agreements are confidential, the agreements are assumed to provide economic benefit to on-reserve communities and off-reserve band members. Similar to construction, beneficial pathways of effect to health that relate primarily to economic development, temporary job creation and increased spending within the region, which may in turn, have secondary economic effects for the local communities, may continue during operations (Salerno et al. 2021).

Simultaneously, as described in the CWB assessments (Sections 10 to 14), long-term operations may reinforce community concerns about environmental change and cultural continuity, particularly where access to traditional or ceremonial areas is perceived as reduced. As a result, adverse effects due to changes in mental wellness and personal behaviours may also continue. These relate primarily to participation in traditional activities (including disruption of traditional food systems) environmental dispossession (Ninomiya et al. 2023) and solastalgia (i.e., the feeling of loss and grief tied to sense of place) (Salerno et al. 2021), confidence in land and resource use, housing availability, cost of living, and access to health and social services (for those not employed by the Project) (Myette and Riva 2021). In addition, higher income associated with steady employment during operations may deepen the current mental health and substance use issues within the community (SLFNHA 2024b), as problematic substance use can be related to resource development, through increased stress, access to disposable income, time away from traditional, community, and social practices (Aalhus et al. 2018; Myette and Riva 2021).

As described in the CWB assessments (Sections 10 to 14), family routines and caregiving roles may gradually adapt to rotational work patterns, but these adjustments could influence social cohesion, as daily habits, time on the land, and participation in community activities evolve.

In the broader region, social cohesion may also shift as new families and workers relocate to nearby communities, potentially altering local demographics and social networks that Indigenous communities interact with.

Mitigation measures and monitoring plans are expected to be protective of Indigenous health during operations. The implementation of carefully designed mitigations and enhancements, such as education and training, prioritizing Indigenous hiring, community partnerships, and operation of a dry camp, are key to mitigating potentially adverse effects and maximizing the benefits of the Project. In addition, funding for Indigenous-led education and training for land-based activities and support of Indigenous environmental monitoring programs will support mental health resiliency through land-based learning (Carrier et al. 2022; Lines et al. 2019; NCCIH 2016; Task Group on Mental Wellness 2021). A list of mitigation and enhancement measures for health are presented in Section 13.9.4. Additional details, including specific mitigations for mental wellness and personal behaviours are presented in Section 7 of Appendix N-2.

Overall, both potential beneficial changes (e.g., via economic development and increased material resources due to steady employment) and adverse changes (e.g., via environmental dispossession, negative health behaviours) to mental wellness and personal behaviours continue to affect Indigenous health and wellness for some individuals during operations, with potential effects being highly subject to individual variability. However, no measurable deviation from baseline population-level health resulting from Project activities is anticipated following implementation of mitigation measures. These findings are applicable to the local Indigenous communities, including LSFN, WFN, ANA, NWOMC and RLEF. Mitigations and enhancements presented in Section 13.9.4 are required to minimize adverse effects.

13.9.3.4.11 Actual and Perceived Public Safety (Accidents and Malfunctions)

While the risk of accidents and malfunctions during the operations phase is limited and was assessed as very low to low (see Section 16), several indirect or perceived influences on public safety, including emotional and social stress, that were identified during construction may continue to affect health and wellness for some individuals within Indigenous communities during operations. Long-term operational activity occurring without accidents and malfunctions may alleviate some perception issues over time.

The risk of certain accident types will be introduced as mining and operational activities commence, such as the risk of TMF slope failure and pipeline failure. Project design and performance monitoring are key to safeguarding the Project against the risk of an accident or malfunction. The potential for credible accidents and malfunctions, their potential consequences, and detailed descriptions of contingency planning and mitigation strategies applicable are described in Section 16 (Effects of Potential Accidents and Malfunctions) and are expected to be protective of Indigenous health during operations.

Overall, with the design and operational safeguards, and with the application of contingency planning and mitigation measures, resulting effects on Indigenous health via changes in actual and perceived safety due to accidents and malfunctions are expected to be negligible for LSFN, WFN, NWOMC, and RLEF. Potential effects on Indigenous health, namely emotional and social stress, due to changes in the perception of safety during operations may occur for some individuals within the ANA community; largely due to historical mistrust and pre-existing emotional and social stress associated with industrial development.

However, no measurable deviation from baseline population-level health resulting from Project activities is anticipated. Environmental data sharing agreements with local Indigenous communities, support of Indigenous environmental monitoring programs, and public safety communications were also identified as measures to minimize adverse effects due to changes in perceived safety. A list of mitigation and enhancement measures for health are presented in Section 13.9.4. Additional details, including specific mitigations for perceived safety due to accidents and malfunctions are presented in Section 7 of Appendix N-2.

13.9.3.4.12 Safety of Indigenous Women and Girls

The operations phase will result in sustained workforce presence in the region. Peak employment is anticipated to reach approximately 1,100 workers during operations when both the open pit and underground mines are active; however, the workforce is expected to decrease to approximately 700 workers during underground mining operations (approximately after year 9).

As stated in the CWB assessments (Sections 10 to 14), no direct interactions with public safety or gender-based violence are anticipated on-reserve in LSFN, WFN, and ANA during operations. However, the Project will sustain a temporary influx of non-local workers into the region, including in Red Lake and Ear Falls, which may continue to elevate broader safety concerns among Indigenous women, girls, and 2SLGBTQQIA+ people. Even in the absence of actual incidents during operations, perceived increases in risk can continue to have adverse effects on mental wellness, personal security, and overall community cohesion.

During operations, there can be direct and indirect effects on health in instances where the safety of Indigenous women, girls, and 2SLGBTQQIA+ individuals is compromised, whether in the community or in the workplace. Should incidents occur, they do not only affect the individual, but also their families and broader communities. The available evidence shows that health effects from Project activities (continued presence of workforce) are possible during operations, especially if incidents (e.g., violence, sexual harassment) occur at camp and / or in community that compromise the safety of Indigenous women and girls.

Mitigation measures and monitoring plans are expected to continue to minimize risks to the safety of Indigenous women and girls during operations; however, they cannot completely eliminate the possibility of incidents occurring. The mitigations identified for construction, are expected to be continued throughout the operational life of the mine, including measures to protect Indigenous women at camp and Indigenous woman and girls in community. However, it continues to be acknowledged that should incidents occur, the physical and mental health consequences for the affected individual(s), and their families, is substantial.

Overall, effects on Indigenous health from changes to safety of Indigenous women and girls as a result of Project activities during operations are possible if incidents were to occur. However, no measurable deviation from baseline population-level health resulting from Project activities is anticipated following implementation of mitigation measures. These findings are applicable to the local Indigenous communities (i.e., LSFN, WFN, ANA, NWOMC and RLEF). Mitigation and enhancement measures for health are presented in Section 13.9.4. Additional details, including specific mitigations for the safety of Indigenous women and girls are presented in Section 7 of Appendix N-2. These mitigations are required to address potential effects by minimizing risks to the safety of Indigenous women and girls both at camp and in community.

13.9.3.5 Closure Phase

The active closure phase is expected to occur over approximately three years following the end of operations. Similar mining and construction equipment are utilized during this period, but on a much smaller scale. Following the active closure period, there will be a passive closure period which includes occasional maintenance, limited use of mining and construction equipment, and a short final close-out and reclamation period where water treatment infrastructure will be removed. The potential interactions during closure are explored as contributions to the potential effect of an overall change in Indigenous health.

13.9.3.5.1 Air Quality

As discussed in Section 7.2 (Air Quality), air quality during closure may be influenced by emissions from the operation of equipment, material handling, and the use of unpaved surfaces associated with demolition and removal activities. The passive and final closure periods during the closure phase consist predominantly of monitoring activities, with occasional maintenance and limited equipment use, and accordingly, was not specifically assessed for effects to air quality.

As active closure uses similar mining and construction equipment but on a much smaller scale, the potential for air quality effects is adequately captured by the construction and operations phase assessments, and therefore was not quantitatively assessed, as detailed in Section 7.2 (Air Quality). Similarly, the HHERA inhalation assessment (Appendix N-1) evaluated the active closure phase as part of the assessment of construction effects; therefore, risk results (i.e., HQs, ILCRs and ALCMs) for the active closure phase were considered the same as the construction phase. Notable sources of air parameter emissions were not expected after active closure. Given that potential adverse effects on Indigenous health were not expected during construction and operations, changes to air quality during active closure, passive closure, close-out, or post-closure, are also not expected. These findings are applicable to the local Indigenous communities, including LSFN, WFN, ANA, NWOMC and RLEF. It is also noted that when Project activities have ceased, perception issues related to air quality will diminish.

13.9.3.5.2 Multi-media Environmental Quality

As stated in Section 7.2 (Air Quality), Project interactions which could potentially effect soil, surface water and traditional foods as a result of deposition from airborne emissions are the same as those expected for construction, with interactions during closure associated with demolition and removal activities. As stated in Section 7.7 (Water Quality), Project interactions which could potentially effect surface water and subsequently traditional food quality during closure include discharges from contact water, fugitive groundwater seepage to surface water features, erosion and sedimentation from reclamation activities, and dust deposition on local water features.

The results of the HHERA multi-media assessment for the operations phase are presented in Table 13.9-4, Table 13.9-5, Table 13.9-6 and Table 13.9-7 in Section 13.9.3.1, with full results provided in the HHERA (Appendix N-1). The results of the human health multi-media assessment for closure and post-closure resulted in the same conclusions described previously for construction and operations. For the POPCs (inorganic arsenic, inorganic mercury, methylmercury, inorganic selenium), baseline (i.e., existing conditions) drive risk for human health. The incremental Project risks for each phase are below the target HQ of 0.2 applicable for Project-Alone contributions, representing a negligible change from baseline HQs. The ILCRs values are below the target ILCR of 1E-05 (i.e., 1-in-100,000) for carcinogenic effects of inorganic arsenic.

This indicated that Project+Baseline HQs above the target HQ of 1 are associated with the background conditions (i.e., baseline) rather than the Project, and the Project is not expected to increase human health risks for the average consumer or heavy consumer Indigenous resident living, working, and recreating in the LSA and RSA during construction from exposure to inorganic arsenic, inorganic mercury, methylmercury, inorganic selenium during closure or post closure. Collectively, these HHERA findings are applicable to the local Indigenous communities, including LSFN, WFN, ANA, NWOMC and RLEF.

The *Mining Act* requires that a Closure Plan be certified to the Mine Rehabilitation Code, prior to disturbance associated with the mining project. The overall intent of the Closure Plan is to restore the Project to a naturalized condition. As described in the CWB assessments (Sections 10 to 14), confidence in land and water quality will remain a key determinant of recovery, influencing whether members resume harvesting and other traditional practices in reclaimed areas. Over the long term, reclamation and revegetation activities may gradually restore access to traditional lands and support cultural revitalization if trust in environmental outcomes is rebuilt. In this manner, concerns related to perception of environmental quality may diminish overtime.

13.9.3.5.3 Access and Availability of Water

As stated in Section 7.5 (Groundwater), groundwater levels will recover during the closure phase through passive and active filling of mine workings. After closure, groundwater will stabilize to levels similar to baseline.

As stated in Section 7.6 (Surface Water Levels and Flows), after closure the pre-development watershed areas will generally be restored although the changes to local topography will result in some localized reductions and increases. These changes will not be discernible from natural, seasonal water level fluctuations.

Interactions with the health of Indigenous people during closure are similar to those identified during construction and operations. As described in the CWB assessments (Sections 10 to 14), confidence in land and water quality will remain a key determinant of recovery, influencing whether members resume harvesting and other traditional practices in reclaimed areas. Under post-closure conditions, groundwater levels will be restored to levels similar to baseline and the pre-development watershed areas will generally be restored, with the exception of the permanent alterations to some waterbodies and watercourses within the PA. Over the long term, reclamation activities may gradually restore access to traditional lands and support cultural revitalization if trust in environmental outcomes is rebuilt. Mitigations and enhancements during the closure phase will minimize changes to access and availability of water and perception issues surrounding Indigenous use of lands and waters. These findings are applicable to the local Indigenous communities, including LSFN, WFN, ANA, NWOMC and RLEF.

13.9.3.5.4 Access and Availability of Traditional Foods

Interactions similar to those identified during the construction and operation phases will continue during closure activities for the Project community members in the PA, LSA, and RSA. Potential interactions with the Project that result in pathways to potential effects on access and availability of traditional foods will continue to have the potential to affect Indigenous health for some individuals.

The *Mining Act* requires that a Closure Plan be certified to the Mine Rehabilitation Code, prior to disturbance associated with the mining project. The overall intent of the Closure Plan is to restore the Project to a naturalized condition. In such a condition, the Project footprint would eventually provide wildlife habitat, and the potential for typical open space pursuits.

The re-establishment of vegetation communities during closure would allow wildlife to return to the PA and surrounding area. With the closure of the PA and subsequent site rehabilitation supporting the return of wildlife, there is the potential for the PA to be used again for harvesting for food and medicinal purposes. Restoration of harvesting opportunities also contributes to cultural continuity and land-based practices that underpin mental, emotional, and spiritual wellness for Indigenous communities.

As described in the CWB assessments (Sections 10 to 14), confidence in land and water quality will remain a key determinant of recovery, influencing whether members resume harvesting and other traditional practices in reclaimed areas. Over the long term, reclamation and revegetation activities may gradually restore access to traditional lands and support cultural revitalization if trust in environmental outcomes is rebuilt. These findings are applicable to the local Indigenous communities, including LSFN, WFN, ANA, NWOMC and RLEF.

13.9.3.5.5 Sensory Disturbances: Sound, Vibration and Light

Noise emissions are considerably less during the closure phase. After the active closure period, there will be limited equipment or materials movement, and sound, vibration and light levels are expected to revert to the near baseline conditions.

During the closure phase (active closure period), sound levels predicted under the worst-case hour scenario (LAeq-1hr, dBA) meet the provincial and federal guidelines at all modeled PORs, during daytime and evening / nighttime periods. The change in %HA is predicted to meet the Health Canada guideline of 6.5% for the closure phase, which means that changes to sound levels are not expected to trigger noise complaints from PORs. Therefore, effects to Indigenous health due to sound (e.g., annoyance) and vibration are not anticipated. Light emissions during the closure phase are anticipated to vary according to construction equipment requirements and are expected to be lower than those during the operations phase. Therefore, potential effects to Indigenous health due to light (e.g., sleep disturbance) are also not anticipated. These findings are applicable to the local Indigenous communities, including LSFN, WFN, ANA, NWOMC and RLEF.

13.9.3.5.6 Economics (Employment, Income and Education)

The closure phase will continue employment and contracting but at a substantial reduction from the operations phase. Project activities during the closure phase are expected to result in temporary and short-term population changes. As described in the CWB assessments (Sections 10 to 14), employment levels and labour income will decrease to pre-Project levels during the closure phase, after the active closure period.

While the Project workforce is not expected to reside on-reserve, local effects may be observed for members employed by the Project. Direct Project influence within Red Lake and Ear Falls that were expected during construction and operations, are anticipated to lessen as the workforce in this area declines during closure. As discussed in the CWB assessments (Sections 10 to 14), as employment opportunities decrease, some workers are expected to leave the region, reducing pressure on housing and easing affordability constraints within larger communities such as Red Lake and Ear Falls. Lower population and business activity may also reduce demand for goods and services in Red Lake and Ear Falls. While this may modestly ease cost-of-living pressures, it may also affect small or Indigenous-owned businesses that expanded during operations, contributing to localized economic decline or volatility.
Direct interactions with closure activities are expected to be limited for LSFN, WFN and ANA, and no change in cost of goods and services is expected on-reserve for these communities.

With the expected changes in the local and regional economies during closure, potential benefits that were observed from having higher incomes and employment opportunities during construction and operations may return to baseline during the closure phase. Further, households that relied on Project-related income may also face financial stress and income instability during this transition, and limited alternative employment or training options may widen existing inequalities. As noted in the CWB assessments (Sections 10 to 14), these pressures can influence family dynamics and contribute to emotional strain, particularly for those with high care responsibilities or limited financial buffers. This may result in an eventual return to baseline conditions for Indigenous health, unless alternate employment is found or financial literacy training and support has enabled a more secure financial future.

Overall, effects to Indigenous health from changes in economics (employment, income and education) during closure will be largely dependent on the pre-closure transition planning (e.g., re-skilling, and financial literacy and planning) that occurred throughout operations. The loss of a large regional employer is known to have complex societal effects, typically attributed to boom-bust cycles of resource development. However, as effects to health are shaped more by long-term changes in the economic and social conditions within the region, mitigations can reduce barriers to new opportunities after the Project ends. Mitigation and enhancement measures associated with the closure phase are designed to ease the transition to other employment opportunities in advance of mine closure.

Great Bear Resources proposes to address local priorities so that communities can benefit from the Project, including after the mine closes. With respect to economics, Great Bear Resources plans to support local initiatives that includes working with local suppliers to develop capacity and provide training opportunities, which may extend the benefits of the Project beyond the life of the mine. These initiatives are expected to have ongoing positive effects on the health of Indigenous people during and after closure.

13.9.3.5.7 Housing

As discussed in the CSIN and CWB assessments (Sections 10 to 14), closure activities will include the removal of the on-site work camp. As such, short-term contractors may rely on the limited hotel and motel capacity in the region during closure, adding pressure to existing availability concerns. For the portions of the closure workforce with long-term assignments, housing pressures expected during construction and operations will continue. As the workforce declines through the closure phase, the reduced population will lighten the pressure for housing and rental demand; however, this could result in adverse effects to vacancy rates, and property values. No changes to on-reserve housing for LSFN, WFN or ANA is anticipated during any Project phase.

As stated in the CSIN an CWB assessments (Sections 10 to 14), population reduction as the workforce leaves the region can improve affordability of goods and services but can result in negative effects to small or Indigenous-owned businesses that expanded during operations. Households that relied on Project-related income may face financial stress during this transition, and limited alternative employment or training options may widen existing inequalities, particularly for those with high care responsibilities or limited financial resiliency. Mitigations related to community financial support and social plans for closure will be required to minimize changes to housing resultant from income instability at Project closure.

Overall, no changes to housing are expected on-reserve, and given this upstream finding, a change in Indigenous health and wellness for LSFN, WFN and ANA is also not expected. During closure, regional social and economic conditions will undergo a period of transition.

While mitigation plans for closure will limit the extent of changes to housing, given the existing precarity of the housing scenario in Kenora district including Red Lake and Ear Falls, continued changes to housing during closure may result from the Project with potential adverse effects to Indigenous health and wellness for some individuals. However, no measurable deviation from baseline population-level health resulting from Project activities is anticipated. These findings are applicable to NWOMC members living in Red Lake and Ear Falls and RLEF.

13.9.3.5.8 Access of Health and Social Services

The closure phase will result in a substantial reduction in the Project workforce. The withdrawal of a major employer in the region will introduce a period of social and economic adjustment. As employment opportunities decrease, some workers are expected to leave the region, reducing pressure on the health and social services. Less pressure on services can lead to lower wait times, increased capacity, additional assets available for mobile crisis response, and additional childcare options to attend treatment or counselling. This can lead to improved health outcomes for Indigenous people in the region; however, with the loss of economic opportunity from the Project, realized benefits may also diminish ultimately leading to a return to baseline conditions for access to health and social services.

The removal of steady employment and income for some Indigenous people and their families can result in added challenges during closure. In some cases, mine closure has been shown to coincide with higher reporting of stress, anxiety, depression and alcoholism (Shandro et al. 2011). Households that relied on Project-related income may face financial stress during the closure transition. Therefore, some individuals may seek health and social support services during this transition time, but likely to a lesser extent than the pressures of construction and operations workforces.

Overall, closure-phase Project interactions with Indigenous health related to access to health and social services are expected to be limited and generally improve capacity pressures relative to earlier phases. Since Indigenous health is a complex issue shaped more by long-term changes in the economic and social conditions in the region, and historical injustices associated with colonialism, pre-existing barriers to accessing quality, timely, and culturally appropriate care is expected to remain. Effects to Indigenous health from changes to access to health and social services will depend largely on the pre-closure transition planning (e.g., re-skilling, economic diversification supports, and similar). Mitigation measures and monitoring plans are expected to be protective of Indigenous health during closure.

Great Bear Resources proposes to address local priorities so that communities can benefit from the Project, including after the mine closes. With respect to health and social services, Great Bear Resources plans to support local initiatives that includes funding local and regional health and social services. These initiatives are expected to have ongoing beneficial effects on the health of Indigenous people during and after closure.

13.9.3.5.9 Food Security

The HHERA results indicate that health risks from Project activities are not anticipated during any Project phase given that incremental risks from Project were considered negligible in comparison to baseline risks, and physical health is not expected to be directly affected by Project interactions during closure. Perception issues expected during construction and operations related to environmental quality may continue during closure, but would be expected to diminish over time. Interactions similar to those identified during the construction and operation phases will continue in closure relation to access and availability of traditional foods.

Changes to or avoidance of traditional food consumption based on perception during the closure phase may impact food security associated with both a decreased diet supplementation with traditional foods, and costs associated with increased reliance on market foods. With the re-establishment of vegetation communities during closure, wildlife are expected return to the PA and surrounding area. This leads to the possibility of a return of use of the PA for harvesting for food and medicinal purposes.

As the availability and reliability of traditional food resources may improve, food security may improve for some individuals. Restoration of harvesting opportunities also contributes to cultural continuity and land-based practices that support mental, emotional, and spiritual wellness for Indigenous communities.

As stated in the CWB assessments (Sections 10 to 14), population reduction as the Project workforce leaves the region can improve affordability of goods and services potentially improving food security for some individuals. However, households that relied on Project-related income may face financial stress during this transition, and limited alternative employment or training options may widen existing inequalities, particularly for those with high care responsibilities or limited financial resiliency. This income instability can result in decreased food security. Through closure activities there is expected improved access to lands and resource areas which can support traditional food consumption, with opportunities for increased income supplementation through traditional economy, thus improving food security. These findings are applicable to the local Indigenous communities, including LSFN, WFN, ANA, NWOMC and RLEF.

The *Mining Act* requires that a Closure Plan be certified to the Mine Rehabilitation Code, prior to disturbance associated with the mining project. The overall intent of the Closure Plan is to restore the Project to a naturalized condition. As described in the CWB assessments (Sections 10 to 14), confidence in land and water quality will remain a key determinant of recovery, influencing whether members resume harvesting and other traditional practices in reclaimed areas. Over the long term, reclamation and revegetation activities may support restoration of traditional practices if trust in environmental outcomes is rebuilt. Mitigations related to restoration of the Project to a naturalized condition, building and maintaining trust in environmental outcomes via Indigenous environmental monitoring, will maximize the potential for food security improvements associated with traditional food consumption. Mitigations such as a social plan for mine closure will act to minimize adverse effects from income instability at Project closure, and project agreements to maximize economic opportunities for Indigenous communities beyond the life of the Project will ease the transition through and beyond post-closure.

13.9.3.5.10 Mental Wellness and Personal Behaviours

As described in the CWB assessments (Sections 10 to 14), the demobilization of the workforce and the end of Project-related employment could lead to temporary financial stress and loss of income stability for households during closure. This may contribute to emotional stress, particularly for caregivers or single-parent households, and could increase short-term inequalities within the community, and potentially worsen mental health outcomes. However, with transferrable skills development, and adequate education and training, including on financial literacy, income from Project-related economic benefits may continue to be realized during and after closure.

The CWB assessments (Section 10 to 14) reported that, at the same time, the conclusion of operations may reduce workforce-related safety concerns (e.g., harassment, substance use, or trafficking) and allow for gradual improvement in social stability and community cohesion. Confidence in land and water quality will remain a key determinant of recovery, influencing whether members resume harvesting and other traditional practices in reclaimed areas.

Over the long term, reclamation and revegetation activities may gradually restore access to lands and support cultural revitalization if trust in environmental outcomes is rebuilt.

This restoration and possible of improvement of access and availability of traditional lands and resources can lead to improvements to community cohesion and mental health for Indigenous people particularly given their connection to the environment, and the importance of traditional practices. In addition, the closure phase may alleviate any emotional or social stress factor that arose as a result of the construction and operation of the Project.

The CWB assessments (Sections 10 to 14) also stated that changes to community cohesion during closure will depend on the continuity of engagement and transparency from Great Bear Resources. Reduced communication or lack of clarity around long-term commitments could erode trust and reinforce perceptions of external dependency. Conversely, visible follow-through on training, diversification, legacy infrastructure programs, and continued community involvement, could strengthen relationships and enhance confidence in post-project transition.

Overall, both potential beneficial (e.g., via economic development and increased material resources due to steady employment) and adverse (e.g., via environmental dispossession, negative health behaviours) changes to mental wellness and personal behaviours may continue to affect Indigenous health and wellness for some individuals during closure. However, mental wellness and personal behaviours effects are highly subject to individual variability. Mitigation and enhancement measures associated with the closure phase are designed to ease the transition to other employment opportunities in advance of mine closure.

Great Bear Resources proposes to address local priorities so that communities can benefit from the Project, including after the mine closes. With respect to economics, Great Bear Resources plans to support local initiatives that includes working with local suppliers to develop capacity and provide training opportunities, which may extend the benefits of the Project beyond the life of the mine. These initiatives are expected to have ongoing beneficial effects on the health and mental wellness of Indigenous people during and after closure.

13.9.3.5.11 Actual and Perceived Public Safety (Accidents and Malfunctions)

The risks of certain credible scenarios identified for the construction and operations phases will continue into the closure phase, such as the risk of TMF slope failure and ditch failure. While the risk of certain accident types will be unique to the closure phase, such as the potential for pit lake overtopping, the risk of the assessed potential credible scenarios is expected to remain limited (very low or low).

The conclusion of operations may reduce safety concerns related to accidents and malfunctions, allow for gradual improvement in social stability, and as a result may improve safety perceptions and alleviate emotional and social stress; thereby diminishing potential effects on Indigenous health. As described in the CWB assessments (Sections 10 to 14), confidence in land and water quality will remain a key determinant of recovery, influencing whether Indigenous community members continue or reduce experiences of emotional or social stress. Mitigations such as environmental data sharing agreements and public safety communications will also act to minimize potential adverse effects from changes in perceptions of safety by supporting consistent communication and planning throughout closure.

13.9.3.5.12 Safety of Indigenous Women and Girls

The closure phase will result in a substantial reduction in the Project workforce. As described in the CWB assessments (Sections 10 to 14), employment levels will decrease to pre-Project levels during the closure phase, after the active closure period.

The conclusion of operations may reduce workforce-related safety concerns (e.g., violence, harassment, trafficking), particularly for Indigenous women, girls and 2SLGBTQQIA+ individuals, and allow for gradual improvement in social stability and community health and safety. The improvement in both safety and perception of safety could improve the health and wellbeing of Indigenous women and girls in the region. However, it is important to note that the issues surrounding MMIWG are national in scale, existed before the Project, and will likely continue after the project. It is expected that mitigation measures are continued throughout active closure to continue to minimize risks to the safety of Indigenous women and girls.

13.9.4 Mitigation and Enhancement

Mitigation measures for Indigenous health consider both direct and indirect effects, and includes Project design measures, workforce policies, community partnerships, Indigenous engagement, regionally targeted supports as well as monitoring and adaptive management plans. The goal of these measures is to reduce the scale / severity, duration, and likelihood of adverse residual effects on Indigenous health, including changes to the biophysical and social determinants of health for both Indigenous and non-Indigenous communities.

For Indigenous health, mitigation approaches reflect a combination of:

- Physical design measures (e.g., worker accommodations, site security and on-site medical facilities)
- Program and policy measures (e.g., hiring policies, workforce training, cultural awareness programming, employee supports and benefits, incident tracking and grievance reporting)
- Monitoring and adaptive management plans (including but not limited to, environmental quality monitoring inclusive of health parameters, and on-site medical and off-site referral monitoring)
- Community and service supports (e.g., partnerships with Indigenous service providers, coordination with local agencies, funding to expand health-focused community services and programs).

Table 13.9-8 outlines mitigation measures thematically, aligning with Project interactions and the biophysical and social determinants of health. These mitigation measures are anticipated to apply across all Project phases unless otherwise specified. Mitigation measures presented in Table 13.9-8 are not presented in any particular order (e.g., priority), rather they are listed alphabetically. For a description of which mitigations were relevant to each determinant of health, and a rationale for its inclusion and impact on the assessment, please see the HIA (Appendix N-12).

While the measures identified below are the key ones identified and developed for Indigenous health, many other measures identified in the CSIN, CULRTP and CWB assessments, as well as measures identified throughout the Impact Statement in the upstream pVC and fVC sections, are directly or indirectly relevant to Indigenous health, and the upstream conditions that influence health. Appended Table 13.1-1 includes mitigation measures applicable to the management of effects on pVCs and fVCs that are linked to Indigenous health. It includes relevant plans, policies, and measures from predictive reporting on linked pVCs and fVCs. These will be applied for effects management.

Table 13.9-8: Project Design, Mitigation, and Enhancement Measures for Indigenous Health

Potential Effect	Project Design, Mitigation and Enhancement Measures
Change in Health	Air Quality Monitoring: Air quality monitoring for the Project will include constituents and related health-based benchmarks (e.g., NO_2 and DPM [as PM2.5]) until assumptions are validated, to trigger action, if needed.
	Camp Operations and Services (health care): Provide emergency response and basic health services to the on-site workforce. On-site medical facilities and staff will be in place to address health services for emergencies, injuries, and other routine needs. Medical personnel will be trained on supports that are available through Employee Assistance Program (EAP), Telus telehealth (or similar service / provider), and local / regional providers to foster connected health care on and off-site. Information about these services and supports (available to employees and their immediate families), will be posted in a visible location at the medical facilities and accommodations. (1)
	Camp Operations and Services (site security): Site security will be maintained and consistent with other Ontario mining operations. Access will be limited to Great Bear Resources' workers and contractors, and approved visitors. Security guardhouses will be positioned where appropriate Cameras, routine patrols and other methods will be utilized to monitor and ensure site security. Workers will be housed in separate accommodations by gender with locked access (e.g., keys) for each room and a separate mining dry / change rooms. Ongoing monitoring will occur throughout the mine life and policies will be updated as required. (1)
	Camp Operations and Services (telehealth): Create access to Telus telehealth or similar provider for employees (and immediate family members) throughout the life of the Project, helping to alleviate pressures on local services. (1)
	Community Financial Support (Access to Services): Great Bear Resources will work collaboratively to fund programming through the Friendship Centre and community partners, including programming and supports to promote physical and mental health outcomes for Indigenous adults and youth. (1)
	Community Financial Support (Access to Services): Support local communities regarding access to social services and health care services in the region, including mental health and addiction services, and implement an adaptive management approach (as part of the Social Performance Plan) to address additional pressures resulting from the influx of workers and their families. (1)
	Community Financial Support (Change in Housing and Accommodations): Great Bear Resources will work collaboratively to support culturally appropriate housing initiatives led by Indigenous and municipal partners. This will include development of a housing strategy and plans for ongoing monitoring of housing capacity issues, and an adaptive management approach (as part of the Social Performance Plan) to address additional pressures imposed from the influx of workers and their families. (1,2)
	Social Closure Plan: Support consistent communication and planning throughout closure with emphasis on legacy, continuity, and shared decision-making. Develop a community transition plan in consultation with local Indigenous communities and groups so that decisions are made with integrity, based on cultural, spiritual and Indigenous well-being in mind.

Potential Effect	Project Design, Mitigation and Enhancement Measures
	The plan will include collaborative planning, implement job-matching, retraining programs, financial literacy workshops, and economic diversification supports in anticipation of closure. (1)
	Community Safety Enhancement: Work in collaboration with Indigenous communities and local law enforcement to discuss safety considerations regarding the influx of additional workforce into the area, including the possibility of increases in violent crime and / or sexual harassment in local communities.
	Education and Training (Project): Deliver mandatory Cultural Awareness training for employees and contractors (including supervisors and managers) on safety, harassment awareness and prevention, and MMIWG2S+ and human trafficking awareness training. (1)
	Education and Training (Project): Provide budgeting and financial literacy tools available to all employees through the EAP, including a combination of organized workshops during working hours and optional individual supports that employees and their families can access on their own time. (1)
	Education and Training (Region): Inclusive and Local Hiring Strategy (hiring policies): Partner with Indigenous training and employment organizations to support culturally appropriate recruitment and retention of Indigenous candidates, to support employment of Indigenous workers, provide training, priority hiring and work towards continuous improvement including training and employment opportunities for Indigenous women. (1)
	Employee Benefits Program: Benefits program will include coverage for health care, prescription drugs, dental and access to in-person and online mental health services for employees and their families.
	Environmental Data Sharing Agreements: GBR will share environmental monitoring data (air, water, fish) with Indigenous communities that request it on an annual basis and provide opportunities (including funds) to conduct their own reviews.
	Environmental Management Committee: Great Bear Resources will work with the environmental management committee(s) and interested Indigenous members throughout the duration of the Project (all phases), to facilitate ongoing communications, sharing and integration of Indigenous knowledge and environmental information, and share and evaluate Project approvals, adaptive management and monitoring plans, and address emerging issues and interests identified by Indigenous Nations. (1)
	Environmental Monitoring: Environmental monitoring programs for surface water and aquatics will include constituents and related health-based benchmarks as considered in the health assessment (such as arsenic, mercury, methylmercury and selenium). Aquatics sampling programs will also include ongoing sampling and testing of fish quality in species identified for human consumption (i.e., walleye / pickerel, lake whitefish, northern pike, trout) as captured.
	Exploration of a Community Health and Well-being Survey: Consider options for Indigenous-led survey and data collection on project related metrics and health indicators, funded by GBR. This program could be further developed as part of the Social Performance Plan.

Potential Effect	Project Design, Mitigation and Enhancement Measures
	Indigenous Environmental Monitoring Programs: GBR is committed to involving Indigenous communities in environmental monitoring activities throughout all phases of the Project, including opportunities for participation in the collection and sharing of environmental monitoring information and results.
	Indigenous Procurement (Local Procurement Policy): Help strengthen Indigenous participation in business opportunities by developing Project procurement policies that support Indigenous economic development and reconciliation.
	Medical Management and Response: Track on-site medical responses needed for employees (anonymously) and referrals for off-site health services. GBR will continue to work with local health care service providers if capacity issues should arise in relation to an influx of employee referrals.
	Project / Benefit Agreements: Economic benefits to Indigenous communities, based on collaborative engagement with local Indigenous communities.
	Public Safety Communications: Involve and consult with Indigenous communities in the development of communications approaches that will identify how important information will get disseminated, including as part of emergency response plans.
	Retirement Planning and Support: Offer a retirement pension plan, Registered Retirement Savings Plan matching or equivalent, to employees to help support longer term financial stability.
	Support for Indigenous-led Education and Training for Land-Based Activities: Support for Indigenous-led education and training for land-based activities (hunting, gathering, plant harvesting) in the region and promote skills and knowledge transmission among Indigenous communities, including Indigenous youth.
	Training and Tracking Incidents of Harassment and Violence in the Workplace: Provide mandatory training on the code of conduct and ethics, with a specific focus on unlawful discrimination, harassment, and workplace violence for all employees and contractors, including supervisors and managers. This training will include clear and specific examples of sexual and gender-based harassment and assault (verbal, physical) and outline steps for action if the perpetrator is a mine worker, supervisor or manager. These policies will also include incident tracking and review, a monitoring plan for policy effectiveness, and an adaptive management process.
	Workplace Incident Reporting (at Camp): Implement the Code of Conduct policy which provides clarity that employees reporting incidents will be protected against wrongful termination or other negative actions.

Notes:

1 Measure may also appear in CULRTP and CWB sub-sections within the Indigenous Peoples Sections 10 to 14.

2 The change in housing is expected to be regional and will not change on-reserve systems. Mitigation is relevant for off-reserve housing in the region, including Red Lake and Ear Falls.

DPM = diesel particulate matter; EAP = Employee Assistance Program; fVC = federal valued component; GBR = Great Bear Resources; HIA = Health Impact Assessment; MMIWG = Murdered Indigenous Women and Girls; MMIWG2S+ = Missing and Murdered Indigenous Women, Girls, Two-Spirit, Transgender, and Gender-Diverse+ peoples; NO_2 = nitrogen dioxide; $PM_{2.5}$ = particulate matter less than 2.5 micrometres; pVC = pathway valued component.

The HIA assumes that all mitigations and follow-up programs from the identified linked pVCs and fVCs, including those throughout the Indigenous Peoples Sections, are in place as planned.

13.9.5 GBA Plus Considerations

In accordance with Health Canada (2024a) guidance, the health assessment takes an equity approach to assessing potential effects by examining the potential distribution of effects across different sub-populations within the Indigenous communities.

The methodology for the GBA Plus approach used in the HIA and the assessment of Indigenous health is outlined in Section 2.4.3.3 of the HIA (Appendix N-2) and is summarized below.

Established best practices in HIA inherently includes consideration of ways that effects from projects, policies, or programmes may be experienced differently among diverse subgroups of the population. The assessment applied a GBA Plus approach by purposefully evaluating how potential health and wellness effects may be influenced by different identity factors and how these factors intersect with local context and lived experience. Where sufficient data were available to do so, the assessment quantitatively evaluated effects to unique subgroups (e.g., consideration of women and children in quantitative risk estimates). Where data were unavailable or insufficient for disaggregation, the HIA qualitatively discussed the potential for effects to be influenced by different identity factors such as gender, age and Indigenous identity.

Therefore, GBA Plus is embedded throughout the HIA (Appendix N-2) since evaluation of the distribution of effects across a community is standard HIA practice. In addition, GBA Plus considerations have been provided in the: discussions related to approach and methodology, baseline health profile, assessment of determinants of health, mitigation and enhancement measures, and the limitations and uncertainty.

The HIA applied a GBA Plus lens that treats Indigenous identity as a central identity factor, and the other factors described herein are discussed within this context. It is recognized that Indigenous identity intersects with the other GBA Plus subgroups that are discussed herein, and this concept is considered throughout the HIA (Appendix N-2). While Indigenous identity is considered broadly for the purposes of the GBA Plus analysis, it is recognized that Indigenous people are not a homogenous group and that First Nations and Métis communities have diverse identities, needs, and lived experiences, which are discussed throughout the HIA as appropriate (Appendix N-2).

Several GBA Plus identity factors were selected based on established best practices, a review of consultation and engagement records, public health data presented in the Baseline Health Profile (Attachment A of Appendix N-2), as well as the demographic and socio-economic information documented in the Socio-Economic Baseline Study (Appendix O-1). It is acknowledged that several additional identity factors, such as religion, ethnicity, geography, race, sexual orientation, and others, are also relevant within a GBA Plus framework. However, within the context of this Project and for the purposes of this assessment, Table 13.9-9 represent the primary subpopulations of analytical focus for the assessment of Indigenous health.

Table 13.9-9: Key GBA Plus Identity Factors Selected for the Assessment of Health

Identity Factor	Description and Subgroups
Gender [1]	**Description:** *"Gender refers to an individual's personal and social identity as a man, woman or non-binary person (a person who is not exclusively a man or a woman). Gender includes the following concepts: (i) gender identity, which refers to the gender that a person feels internally and individually; and (ii) gender expression, which refers to the way a person presents their gender, regardless of their gender identity, through body language, aesthetic choices or accessories (e.g., clothes, hairstyle and makeup), which may have traditionally been associated with a specific gender. A person's gender may differ from their sex at birth […]. A person's gender may change over time. Some people may not identify with a specific gender,"* (Statistics Canada 2022). • **Men+:** Individuals whose gender identity aligns with or is associated with masculine roles and social positioning, including cisgender, transgender, and gender-diverse people. • **Women+:** Individuals whose gender identity aligns with or is associated with feminine roles and social positioning, including cisgender, transgender, and gender-diverse people.
Age	**Description:** Age is a key demographic variable used to identify population groups (e.g., children, working-age adults, older adults / Elders) and is derived using the person's date of birth and the reference date (Statistics Canada 2022). • **Youth (children and infants):** Individuals in early developmental stages (individuals under 18 years of age) • **Young adults:** Individuals in transitional life stages typically associated with workforce entry, increased mobility, and evolving socio-economic determinants (individuals 15-29 years of age). • **Older adults and Elders:** Older adults and community-recognized Elders with increased susceptibility to health effects due to age-related physiological changes and cumulative lifetime exposures (individuals 65+ years of age).
Physical Ability	**Description:** The *Accessible Canada Act* defines disability as *"any impairment, including a physical, mental, intellectual, cognitive, learning, communication or sensory impairment — or a functional limitation — whether permanent, temporary or episodic in nature, or evident or not, that, in interaction with a barrier, hinders a person's full and equal participation in society"* (Department of Justice 2022). This identity factor focuses on physical abilities such as those that influence strength, endurance, flexibility, balance, and coordination. • **Individuals with disabilities:** Persons with pre-existing mobility, sensory, cognitive, or functional limitations. • **Individuals with chronic health conditions:** Persons with pre-existing health conditions (e.g., cardiovascular, metabolic, or respiratory diseases).
Socio-economic Status	**Description:** Socio-economic status refers to an individual's level of income, wealth, education, and social standing, and is commonly used to describe a person's or group's economic and social position within society (PHAC 2018). • **Low-income individuals and households:** Populations with constrained material and financial resources where food security and housing needs may be difficult to meet. • **Individuals with low educational attainment or limited labour-market participation:** Populations with lower levels of education (e.g., without a high school diploma) and / or insufficient skill development.

Identity Factor	Description and Subgroups
Mental Ability	**Description:** The Accessible Canada Act defines disability as *"any impairment, including a physical, mental, intellectual, cognitive, learning, communication or sensory impairment — or a functional limitation — whether permanent, temporary or episodic in nature, or evident or not, that, in interaction with a barrier, hinders a person's full and equal participation in society"* (Department of Justice 2022). This identity factor focuses on physical, cognitive, psychomotor, and sensory abilities. • **Individuals with pre-existing mental health conditions:** Persons with diagnosed or self-reported mental health challenges (e.g., anxiety, depression) • **Individuals with concurrent substance use (e.g., alcohol, drugs) and mental health challenges:** Populations experiencing co-occurring mental health and substance use disorders.

Notes:

GBA Plus = Gender-based Analysis Plus (sometimes referred to as GBA+)

1 The categories of men+ and women+ were used for analytical simplicity and were adopted from categories used in the census by Statistics Canada (2022a). These categories include cisgender and transgender persons, and non-binary persons are denoted by the + symbol.

A GBA Plus analysis was completed for each determinant of health in the HIA (Appendix N-2). Each identity factor was reviewed to determine whether potential effects, should they occur, were expected to be even or disproportionate to assess how Project-related changes to determinants of health may affect different population subgroups. This assessment drew on available demographic data, baseline health indicators, and evidence from primary and grey literature.

It is important to note that while this section identifies subgroups that have the potential to experience effects uniquely from changes to biophysical and social determinants of health, the analysis should be considered in the context of the potential effects assessment findings. For example, while the GBA Plus analysis for air quality identifies that individuals with pre-existing lung or heart conditions (such as asthma and Chronic Obstructive Pulmonary Disease) are at the highest risk of potential effects related to poor air quality, the results from the HHERA indicate that Project activities are not anticipated to pose risks to the Indigenous communities from exposure to POPCs in air. The analysis below identifies populations that could be disproportionately affected and also discusses the potential health effects, or lack thereof, as identified in the assessment.

13.9.5.1 Gender (Indigenous Women+)

Several of the biophysical and social determinants of health identified gender (Women+) as an important equity consideration in the HIA, and a key identity factor as part of the GBA Plus analysis. For example:

- In Indigenous culture, women are often considered to have a unique relationship to water and additional responsibilities for the care of water (McGregor 2008; Awume et al. 2020; Assembly of First Nations 2023). Given that permanent changes to some waterbodies will occur, the connection that Indigenous people, and specifically Indigenous women, have with water may result in indirect effects on Indigenous health and wellness for some individuals.

- Gender-specific differences in economics are expected to disproportionately affect Indigenous women and girls, and 2SLGBTQQIA+ individuals due to limited job or education / training opportunities, inadequate childcare options to pursue employment, or already face mental health challenges to pursue higher education or employment.
- With respect to housing as a determinant of health, research indicates that domestic violence is a leading cause of housing instability for women and children in Canadian municipalities (Fustic et al. 2019). Existing housing concerns in the region included the limited availability and limited access to transitional and emergency shelter services outside of major centres such as the City of Kenora, with few facilities available in smaller municipalities such as Red Lake. In an interview with the Executive Director of the Kenora Sexual Assault Centre, women experiencing domestic violence were identified as being particularly at risk of housing insecurity (Wesley 2025).
- Gender-specific differences in access to health and social services are expected to disproportionately affect Indigenous women as there are existing gaps in certain women-specific services including women's shelters or birthing centres. In addition, women often play caregiving roles and cannot always obtain childcare in order to attend appointments. Further, evidence indicates that health-care services often fail to provide the support needed for Indigenous women and girls who are victims of physical and sexual abuse or violence (National Inquiry into Missing and Murdered Indigenous Women and Girls 2019).
- NWHU data indicates that women (particularly youth and young adults) either match or outnumber male rates across mental illness and substance-related indicators (NWHU and Yusuf 2023). Research also typically shows higher rates of mood and anxiety disorders in women (CAMH n.d.).

13.9.5.2 Age (Indigenous youth, older adults and Elders)

Several of the biophysical and social determinants of health identified age (youth, older adults, Elders) as an important equity consideration in the HIA, and a key identity factor as part of the GBA Plus analysis. For example:

- For multi-media environmental quality, exposure or sensitivity to parameters in the environment may vary by life stage based on the parameter. For methylmercury and selenium, Health Canada recommends TRVs based on age (Health Canada 2025). Appropriate, age-specific TRVs were applied in the HHERA multi-media assessment.
- Youth (children and infants) and the elderly are more vulnerable to potential effects due to noise (e.g., sleep disturbance and speech comprehension) (WHO 2009). However, Health Canada (2023) guidelines for sound and vibration applicable to the Project are protective of vulnerable groups including children to account for such sensitivities.
- As income is an important determinant of health, non-working age individuals (youth, Elders) are less likely to experience financial opportunities via employment, business, or training / education opportunities. Older adults and Elders may also be disproportionately impacted through changes in cost of living and access to health services. Similarly for housing, there is a lack of independent or assisted living options and long-term care availability in the region which contributes to vulnerability among seniors. The 2016 Census for Red Lake shows that the demand for senior housing is projected to grow by 57% between 2016 and 2025 (Statistics Canada 2017).

Seniors (i.e., older adults) were identified as being particularly at risk of housing insecurity in Kenora district (Wesley 2025), which would include anyone seeking seniors services in regional hubs.

- Age is also a consideration when it comes to accessing services, where youth and young adults specifically can struggle with mental health and need health and social service supports, particularly within the NWHU, as shown by notably higher rates of mental health challenges for individuals aged 10 to 24 from 2012 to 2021 compared to Ontario (NWHU and Yusuf 2023).

13.9.5.3 Physical Ability (Indigenous individuals with disabilities or chronic conditions)

Several of the biophysical and social determinants of health identified physical ability (individuals with disabilities and/or chronic health conditions) as an important equity consideration in the HIA, and a key identify factor part of the GBA Plus analysis. For example:

- Evidence suggests that individuals with physical health conditions (e.g., disabilities) may have unique challenges accessing employment, income and education given their health may prevent or limit the ability to pursue work or education / training (Employment and Social Development Canada 2022).
- For housing, individuals with disabilities were identified as being particularly at risk of housing insecurity in Kenora district (Wesley 2025).
- Evidence suggests that individuals with pre-existing health conditions requiring ongoing care may have unique challenges accessing health and social services given their health may prevent or limit the ability to make or attend appointments, or travel to get care. The additional demand from Project-related population growth in the region may contribute to longer wait times and reduced access to health services. A lack of access to healthcare for Indigenous populations has shown to lead to poor health outcomes, including lower life expectancies, higher rates of chronic diseases, later- stage diagnoses, increased mental health challenges, higher infant mortality, and greater risks from preventable conditions like obesity (PHAC 2018; CMA 2026).
- In relation to food security, based on the findings of the 2021 Canadian Income Survey, individuals with disabilities were found to be more likely to be food insecure than those individuals without disabilities (Statistics Canada 2024b).
- Individuals with physical disabilities may face barriers to accessing traditional foods. Finally, people with chronic physical health conditions (e.g., chronic pain) are much more likely to also experience mood disorders; although this relationship is bidirectional (i.e., people with a mood disorder are often at higher risk of developing a long-term medical condition) (CAMH n.d.).

13.9.5.4 Socio-economic status (low-income Indigenous individuals and households)

Several of the biophysical and social determinants of health identified socio-economic status (low-income individuals and households) as an important equity consideration in the HIA, and a key identity factor as part of the GBA Plus analysis. For example:

- Low-income individuals and households may be experiencing pre-existing barriers to access of traditional foods due to financial constraints, reduced harvesting capacity, limited access to equipment and transportation, and / or greater reliance on market-based foods (Shafiee et al. 2022; Chan et al. 2014).
- Low or fixed-income individuals and households (e.g., single parents) may also be more affected by Project-related increases in cost of living which can create local affordability pressures for housing or goods and services. Shift work employees who cannot access part-time opportunities for higher education may be limited to pursuing better employment opportunities. The Canadian Public Health Association reports that financial insecurity contributes to increased rates of chronic disease, mental illness, and overall poorer health outcomes (CPHA n.d).
- House insecurity particularly affects low-income households and seniors who pay 30% or more of their income in accommodations (MNP LLP 2020). As of 2023, the average Red Lake resident is spending 53% of their yearly income on housing (Statistics Canada 2023). Red Lake residents also have a higher portion of households in subsidized housing, 20.2% versus 11.7% nationally (Statistics Canada 2023).
- Poverty has been identified in literature as the driving factor for food insecurity (Banerji et al. 2023). Households received social assistance and households below the poverty line are more likely to be food insecure (Banerji et al. 2023, Domingo et al. 2020).
- Canadians in the lowest income group are more likely than those in the highest income group to report poor to fair mental health (CAMH n.d.; PHAC 2018). Similarly, unemployment is associated with higher risk of mental health challenges; although, this relationship is bidirectional (i.e., mental health can also reduce a person's ability to maintain a job) (PHAC 2024).
- Finally, low-income individuals and households may be at higher risk of experiencing safety issues such as domestic violence, and lower-income individuals may be less willing to report issues in the workplace.

13.9.5.5 Mental Ability (Indigenous individuals with mental health conditions)

Several of the social determinants of health identified mental ability (Individuals with pre-existing mental health conditions and / or Individuals with concurrent substance use and mental health challenges) as an important equity consideration in the HIA, and a key identity factor as part of the GBA Plus analysis. For example:

- Research shows that financial security is impacted by risk factors such as mental health (MNP LLP 2020). Underlying issues such as mental health status is expected to have an impact on economics, as mental health conditions may prevent individuals from finding or keeping employment or pursuing higher education, which can reduce financial stresses, enhance self-esteem, or promote healthier lifestyles (NCCIH 2020).
- Mental health status may result in disproportionate barriers to housing. The OPP and shelter staff both reported that mental health and substance use are drivers of homelessness and emergency housing use. The 2021 KDSB Homeless Enumeration Report indicated that 64.7% of respondents cited mental health, and 76.5% cited substance use, as contributing factors to their housing loss (Kenora District Services Board 2021).

- With respect to accessing services, Project-related population growth in the region may create a strain on regional services that are already at or near capacity. Added demand may contribute to longer wait times and reduced access, particularly for individuals who have pre-existing mental health conditions and require ongoing and regular mental health support. These challenges can directly influence Indigenous people's health outcomes particularly in emergency medical or crisis (mental health) situations.
- Intergenerational trauma has been reported in literature to contribute to food insecurity (Banerji et al. 2023). The National First Nations Regional Health Survey, reported that adults who attended or those with a parent or a grandparent who attended a residential school had a higher proportions of severe food insecurity than those who did not (16.4%, 16.2% respectively verses 6.9%) (Banerji et al. 2023).
- Individuals living with a mental illness are about twice as likely to also struggle with a substance use disorder compared with the broader population. In the same way, people with substance use disorders are up to three times more likely to have a mental illness. More than 15% of individuals with a substance use disorder also have a co-occurring mental health condition (CAMH n.d.).
- Finally, individuals with pre-existing mental health conditions may already be experiencing elevated baseline levels of stress and as such, may be more sensitive to changes (e.g., emotional and social stress) from changes to actual and perceived public safety due to accidents and malfunctions (Wong et al. 2024).

Also important to GBA Plus is the concept of intersectionality. Intersectionality is widely recognized as an analytical approach that describes how *"groups of people are not homogeneous, as they have multiple, and diverse intersecting factors that impact how they understand, […] shape their perspectives, ideologies, and experiences,"* (Women and Gender Equality Canada 2022). Intersectionality is key to GBA Plus as it recognizes that there are multiple factors that could influence how an individual or community could experience an effect, which individually may not put them at a disadvantage but combined can lead to higher vulnerability.

In addition to analysis of individual identity factors for each determinant of health, analysis of intersectionality was completed, as detailed in the HIA (Appendix N-2):

- Intersectional effects may occur for individuals who identify with, or are experiencing, a combination of any (or all) of the identified subgroups (i.e., gender, age, physical ability, socio-economic status, mental ability). It is also acknowledged that Indigenous identity intersects with all of the other GBA Plus identity factors discussed. For example, in terms of access to health and social services, a low-income woman with pre-existing health conditions may experience more barriers (e.g., lack of childcare or money for transportation to attend medical appointments that have increasingly higher wait times) compared to either of those groups individually. Indigenous people also continue to face culturally unsafe care, or racism and discrimination when accessing care, which are rooted in historical factors such as colonialism (Statistics Canada 2024a).

- In addition, intersectional effects were also considered across the health determinants. For example, individuals who identify as women+, are within the youth or older adults age group, and are living in low-income households may experience overlapping effects related to housing, food security, access to health and social services, and economic conditions, where barriers or constraints in one determinant can interact with challenges in another. Similarly, youth with pre-existing chronic health conditions, disabilities, and / or mental health conditions may experience intersecting effects related to housing, food security, access to health and social services, and mental wellness and personal behaviours. These interactions highlight how combinations of gender, age, socio-economic status, physical ability, and mental ability can influence how individuals experience the determinants of health differently.

Additional details on intersectionality considerations for each health determinant are provided in the HIA (Appendix N-2). The results of the GBA Plus analysis were considered in the development of mitigation and enhancement measures for health, as detailed in the HIA (Appendix N-2).

13.9.6 Residual Effects after Mitigation

After implementation of mitigation and enhancement measures, assessment and characterization of potential residual effects on Indigenous health are assessed using the methodology outlined in Section 6. Further details on residual effect criteria ratings that are specific to Indigenous health are defined in Section 6 and in Section 13.3.3.

The appended Table 13.1-1 summarizes the results of the assessment for the linked pVC and fVC components. Detailed description on the methods, existing conditions, mitigation measures, and residual effects can be found in their respective sections.

Based on the assessment of these linked pVCs and fVCs, the effects to be considered as part of the assessment of residual effects on Indigenous health include:

- Air Quality
- Sound
- Vibration
- Groundwater
- Surface Water Flows and Levels
- Water Quality
- Vegetation Communities
- Moose
- Other Wildlife
- Species at Risk
- Migratory Birds
- Local and Regional Economy

There are other linked pVCs and fVCs, listed in Table 13.1-1 and Section 13.1, where no change is expected after mitigation measures have been applied.

This includes Fish and Fish Habitat and Wild Rice. This means that predicted changes to their existing conditions due to Project activities will be fully mitigated or offset over the Project life cycle. Therefore, those linked effects are not considered in the residual effects assessment for Indigenous health.

13.9.6.1 Characterization of Residual Effects After Mitigation

The changes after mitigation and residual effects for linked pVCs and fVCs, and for the other assessments for the Indigenous Peoples fVC (e.g., CSIN, CULRTP and CWB) are discussed here based on their relevance to and influence on potential residual effects for Indigenous health. The findings from these assessments provided a foundation for identifying whether the change in upstream environmental, social, cultural and economic conditions was sufficient to influence downstream effects on Indigenous health. Overall, based on the findings of the linked pVCs and fVCs, residual effects were identified for CULRTP and CWB for the local Indigenous communities (LSFN, WFN, ANA, NWOMC and RLEF), and residual effects were identified for CSIN for NWOMC and RLEF. Building on this, the HIA assessed potential changes in biophysical and social determinants of health from Project activities to come to an overall understanding of the Project's effect on Indigenous health.

The potential effects assessment for health was conducted using Project information, technical modelling results, existing conditions data, primary and grey literature, government and agency resources, Indigenous knowledge and community-specific information. The key results regarding whether a specific determinant of health contributed to an overall change in Indigenous health, based on the potential effects assessment, are summarized in Table 13.9-10. Whether a determinant had the potential to contribute to a change in health, was based on the scale of effect (details provided in the HIA; Appendix N-2). The rating for scale of effect included four categories:

- **Negligible:** there is limited to no effect on Indigenous health expected as a result of Project activities for this determinant following implementation of mitigation measures.
- **Minor:** the effect on Indigenous health is expected to be minor; with no measurable deviation from baseline population-level health resulting from Project activities for this determinant following implementation of mitigation measures.
- **Moderate:** the effect on Indigenous health is expected to be moderate following implementation of mitigation measures; measurable deviation from baseline population-level health is possible due to Project activities for this determinant. If the effect is adverse, some support may be required to maintain baseline (current conditions).
- **Major:** the effect on Indigenous health is expected to be major following implementation of mitigation measures; measurable deviation from baseline population-level health is probable due to Project activities for this determinant, with a high degree of support required to mitigate adverse effects in order to maintain baseline levels and / or baseline levels are no longer attainable.

In Table 13.9-10, where a rating of negligible was identified for a determinant, that determinant was not expected to contribute to an overall change in health. Where a rating of minor was identified for a determinant, that determinant was expected to contribute to an overall change in health. Taking a conservative approach, where a rating of minor (i.e., a yes in the table below) was identified for any of the determinants of health, an assumption of potential residual effects for health overall was identified for that community.

None of the determinants were characterized as moderate or major based on the findings of the HIA; for additional detail on residual effects approach in the HIA see Section 8.2 of Appendix N-2.

A summary of which determinants of health were predicted to contribute to an overall change in health, thereby indicating potential residual effects, is provided in Table 13.9-10. While the table below presents a high-level summary, the determination of whether residual effects exist or not for each Indigenous community was based on the collective evidence presented and the assessment completed in the HHERA (Appendix N-1) and HIA (Appendix N-2).

Based on the assessment findings, residual effects are identified for each Indigenous community based on an overall change in health (fVC Indigenous Peoples). An assessment of the significance of residual effects (change in health) for each Indigenous community is presented in Section 13.9.7.

Table 13.9-10: Identification of Residual Effects for Health (NWOMC)

Determinant of Health	Potential Effect Contributing to a Change in Health (after mitigation)? Yes / No [1,2]
	NWOMC
Air Quality	No
Multi-media Environmental Quality	No
Access and Availability of Water[7]	Yes
Access and Availability of Traditional Foods[7]	Yes
Sensory Disturbances (Sound, Vibration and Light)	No
Economics (Employment, Income and Education) [3]	Yes
Housing	Yes [4]
Access to Health and Social Services	Yes [5]
Food Security	Yes
Mental Wellness and Personal Behaviours	Yes
Actual and Perceived Public Safety	No
Safety of Indigenous Women and Girls	Yes
Residual Effect (Change in Health) Remaining after Mitigation? [6]	**Yes**

Notes:

1 Yes = the determinant contributes to an overall change in health for Indigenous Peoples (including perception issues and individual behaviours), with a rating of Minor: the effect on Indigenous health is expected to be minor; with no measurable deviation from baseline population-level health resulting from Project activities for this determinant following implementation of mitigation measures.

2 No = the determinant does not contribute to an overall change in health for Indigenous Peoples, with a rating of Negligible: there is limited to no effect on Indigenous health expected as a result of Project activities for this determinant following implementation of mitigation measures.

3 An overall net positive effect associated with economic changes is expected; however, cost of living (regional) and personal behaviour choices from higher incomes (for some individuals) are reflected here to maintain conservatism.

4 The change in housing is expected to be regional and will not change on-reserve systems; however, direct effects related to changes to housing is expected for Red Lake and Ear Falls (including NWOMC population living in these communities).
5 The change in access to health and social services is expected to be regional and will not change on-reserve systems; however, direct effects related to changes to access to services is expected for Red Lake and Ear Falls (including NWOMC population living in these communities), which will influence LSFN, WFN and ANA members who access services in Red Lake and Ear Falls. This finding aligns with the assessment of Community Well-Being.
6 Residual effects are assessed for adverse effects only and take into account implementation of the upstream pVC and fVC mitigations as well as health mitigations identified in Section 7.
7 The assessment of health does not only consider access to lands and resources, it focuses on a perceptions and personal behaviours indirectly influencing health.

NWOMC = Northwestern Ontario Métis Community

13.9.7 Significance of Residual Effects

After implementation of mitigation and enhancement measures, an assessment and characterization of potential residual effects on Indigenous health is completed (Table 13.9-11) using the methodology outlined in Section 6 and detailed in Section 2.4.3 of Appendix N-2).

Changes to Indigenous health are directly and indirectly linked to Project activities, through a complex series of changes to upstream environmental, social, cultural and economic conditions, and through behavioural changes related to perceived risks and effects. While Project-related effects on Indigenous health at the population-level were not identified, effects on health and wellness for some individuals was identified via actual and perceived changes to access and availability of water and traditional foods, cost of living, housing, access to health and social services, food security, mental wellness and safety. Pre-existing systemic limitations may persist, particularly for Indigenous residents and vulnerable groups. However, a change to population-level health, resulting in measurable deviation from baseline, is not anticipated. Given the current barriers being experienced by Indigenous communities in the region, monitoring of population health and wellness over time in the context of Project activities, will support ongoing collaborative efforts between Great Bear Resources, and local and regional partners and help inform adaptive management measures, where applicable.

Table 13.9-11: Characterization of Adverse Residual Effects for Indigenous Health

Attribute	Category [(1)]	Rationale
	NWOMC	
Ecological or Social Context	Level I	Criteria may or may not be sensitive, and can support the predicted change with typical mitigation measures
Magnitude (Health)	Level I	Measurable Project-related changes in environmental exposures and / or social determinants of health are unlikely to result in a material adverse change in population-level health status of local Indigenous people.
Geographic Extent	Level II	Effect extends beyond the LSA but within the RSA.
Duration	Level II	Effect occurs over the medium term: more than three years but less than 32 years.

Attribute	Category [1]	Rationale
	NWOMC	
Frequency	Level II	Effect occurs intermittently or regularly.
Reversibility	Level II	Effect is partially reversible during the Project phases.
Timing	Level I	Effects do not occur during a sensitive period, or related effects are fully mitigated.

Notes:

1 Residual effects are identified for each community based on an overall change in health (fVC Indigenous Peoples).

NWOMC = Northwestern Ontario Métis Community; pVC = pathway valued component; RSA = Regional Study Area; RLEF = Indigenous people living in the Red Lake and Ear Falls area; WFN = Wabauskang First Nation.

As shown in the table above, there is one or more attributes at Level I for each community, and therefore the residual effect to health is not significant for any of the local Indigenous communities (LSFN, WFN, ANA, NWOMC and RLEF).

13.9.8 Confidence

The prediction confidence assignment reflects the information available through Project-specific TKLUS reports, publicly available data, understanding of the effectiveness of applicable mitigation measures, and outcomes of other pVCs and fVCs. Reliance on well-established methodologies, conservative modelling assumptions, calculated health risks, published peer-reviewed information, and community-specific data and Indigenous knowledge, all contributed to a higher level of confidence in the overall assessment of health. Conversely, limitations in the Indigenous knowledge (not provided by all communities) and baseline data for Indigenous health, limitations on the applicability of published information, and inherent limitations associated with predictive modelling contributed to a moderate level of confidence in the overall assessment of health.

The assessment is supported by both the findings of the HHERA and the HIA, which were informed by substantial primary and secondary information and robust analysis. However, as noted above, there are some instances where the information collected had limitations or lacked detail. Therefore, the overall confidence in residual effect and significance predictions for a change in health (fVC Indigenous Peoples) for LSFN, WFN, ANA, NWOMC and RLEF is considered to be moderate.

These limitations and uncertainties associated with the assessment of health overall, including those associated with the upstream inputs (pVCs and fVCs), collectively informed the confidence rating. The confidence rating also informed the development of mitigation and enhancement measures (Section 13.9.4), including monitoring for validation of assessment assumptions and other adaptive management frameworks, where applicable.

As additional information continues to be shared through Great Bear Resources' ongoing consultation with local Indigenous communities over the Project life, relevant information will be incorporated into Project planning as practical.

13.10 Impact on the Exercise or Practice of Rights

An assessment of potential impacts on Rights is a complex undertaking with considerable potential for variation as each will be unique, tailored to the particular Indigenous rights-holding community, specific project, specific area or location, and timing. For this reason, a methodology to assess the impacts on Rights from Great Bear Resources Project activities has been informed by the TISG (Section 12.4), IAAC's *Assessment of Potential Impacts on the Rights of Indigenous Peoples* guidance document, and ongoing consultation with the Indigenous communities.

The TISG states the Impact Statement must:

- identify and describe the Treaty and Aboriginal rights of Indigenous Peoples potentially affected by the Project, including historic, regional, and community context, the geographic extent of traditional territory, the purpose and importance of the rights to the rights-bearing communities (e.g., the practices, customs, beliefs, worldviews, and livelihoods), and information on how rights have already been affected;
- document the Project's potential impacts on the exercise or practice of the rights of Indigenous Peoples or the rights arising from treaties overlapping the PA, as expressed by potentially impacted Indigenous Peoples;
- consider the severity of the impacts on the exercise of rights; and
- document the views of the potentially affected Indigenous Peoples and collaboratively find mutually agreeable solutions for concerns raised about impacts on the exercise of their rights.

In the guidance for assessment of potential impacts on the exercise or practice of Rights of Indigenous Peoples IAAC states "*if an Indigenous community is interested in doing so, they should lead the assessment of impacts on their rights as they are best placed to understand how their rights and relationship with the landscape may be impacted by the Project*". In the absence of this interest, the baseline conditions as outlined in the TISG and a discussion of the assessment of the impact to the exercise and practice of Rights.

This assessment is not intended to limit or define Indigenous or Treaty Rights in any way, nor to bound the territories within which they exercise those rights. Instead, it reflects the Proponent's perspective, on how the Project may affect those rights based on information obtained through Indigenous engagement and review of publicly available information sources. The text is aligned with the TISG for the Project.

Information regarding MNO and NWOMC rights and history is provided as advised by MNO and NWOMC. Some matters are particularly subject to differing interpretations, and the MNO and NWOMC source is highlighted in those instances.

13.10.1 Aboriginal, Treaty and Métis Rights

Indigenous Peoples in Canada hold two constitutionally protected rights:

- Aboriginal Rights: Rooted in pre-contact customs and traditions, including land use, hunting, fishing, trapping, and harvesting.
- Treaty Rights: Established through agreements with the Crown, affirming rights to self-government, land access, and traditional practices. Treaty 3, which spans the RSA, protects these rights under Section 35 of the *Constitution Act*, 1982.

While Indigenous Nation, Aboriginal and Treaty Rights are inherent land-based rights tied to specific traditional territories, the Métis are a distinct Indigenous Peoples with rights asserted based on historical Métis communities identified in the *R. v. Powley* Supreme Court case.

This case determined that the test for establishing Métis rights is distinct from the test for establishing Indigenous Nation and Inuit Rights in Canada, and focuses on the rights established as a continuation of historic Métis communities prior to effective control. The 2019 *Métis Government Recognition and Self-Government Agreement* (the Self-Government Agreement) identifies that Métis assertions to Aboriginal rights includes the right to self-government, though not inherently tied to a specific land base. For the Métis Nation of Ontario (MNO), rights asserted through the Self-Government Agreement in Ontario include those related to harvesting, citizenship, and internal governance. These rights, if, and to the extent, established, are protected under Section 35 of the *Constitution Act, 1982.*

The Métis have a unique culture, language and history with ancestry evolved from the initial relations between European men and Indigenous women+ brought together during the early fur trade. While the initial offspring of these relations were individuals who simply possessed mixed European and Indigenous ancestry, continued intermarriage resulted in a new and distinct people – the Métis Nation (The Métis Nation of Ontario 2024).

Métis settlements emerged as a result of the fur trade, along waterways and watersheds, interconnected by the semi-nomadic life of the Métis, the fur trade, seasonal rounds, extensive kinship and a shared collective history. The historic community of NWOMC experienced complicated policies and handling of Métis claims during the formation of Canada, due to their unique geographic location and its relation to the fur trade. Historically, Canada did not negotiate treaties with Métis communities, but rather issued scrips (which could be money scrips or land scrips). MNO advises that scrips were only partially paid out to the historic community of NWOMC, as only those living within what was then known as Keewatin (outside of Canada's boundaries at the time) were eligible (The Métis Nation of Ontario 2024).

MNO advises that through the Métis Adhesion in 1875, promises were outlined for a distinct Métis community, recognizing that this historic Métis community collectively adhered to Treaty 3, as a distinct Métis group, and thereby became entitled to the same benefits and rights as Indigenous Nations who signed it in 1873. MNO advises that this adhesion includes historic Métis families that were living in Rainy Lake and Rainy River and its surrounding area in 1875, which formed part of what's defined as the larger historic community of NWOMC, as they "*were extensively connected through kinship, including marriages, godparenting, and witnessing relationships*" throughout the area (The Métis Nation of Ontario 2024).

Métis have continued to collectively assert their identity and treaty rights through a number of trade-based cases, historic uprisings and battles, attempts to participate in the numbered treaties (including Treaty 3 and Treaty 9), and other fights for establishment. Despite these efforts, MNO advises that the promises made within the 1875 Métis Adhesion have not been honoured by the Crown (The Métis Nation of Ontario 2024). In 2017, the NWOMC signed an agreement with Canada to begin negotiations around a shared solution to these historic grievances, though this has been a divisive factor for some Indigenous Nations within Treaty 3 (The Métis Nation of Ontario 2022).

13.10.1.1 Historic, Regional and Community Context

The NWOMC emerged during the late 18th and 19th centuries during the fur trade era as families of Indigenous Nation and European ancestry developed distinct communities along the fur-trade routes that connected the Great Lakes to the western interior. The convergence of Anishinaabeg, Cree, and European (primarily French and Scottish) cultures gave rise to a new, self-identifying people who shared common language, culture, and economic systems grounded in mobility and trade. Early settlements developed around Lac La Pluie (Fort Frances), Rat Portage, (Kenora), and Eagle Lake (Dryden), where Métis families acted as trappers, interpreters, voyageurs, and provisioners for fur-trade posts operated by the Hudson's Bay Company and the North West Company (The Métis Nation of Ontario 2020).

Through these networks, the NWOMC maintained extensive land-use patterns that linked waterways, portage routes, and resource harvesting areas across what is now Northwestern Ontario and Southeastern Manitoba. The community developed shared customs, governance systems, and distinct social and cultural norms which are all recognized today as integral to Métis identity (Miner 2022). Métis communities in Northwestern Ontario continued to rely on hunting, fishing, trapping, and gathering as core economic and cultural activities, while also adapting to regional and cultural changes brought about by industrial resource development, railway construction, and settlement expansion. Many Métis families continued to occupy traditional lands around the RSA maintaining social and economic relationships (The Métis Nation of Ontario 2020).

13.10.1.2 Previous Impacts to Exercise or Practice of Rights

The NWOMC's Section 35 harvesting rights have been recognized by the Government of Ontario through negotiated harvesting agreements signed with the MNO. The NWOMC also indicate their Section 35 harvesting rights have been encumbered by legislation and other restrictions in the past. The NWOMC indicated that this has negatively affected their well-being by limiting their ability to fully exercise their Section 35 harvesting rights in accordance with and by their preferred means.

13.10.1.3 Purpose and Importance of Rights for Northwestern Ontario Métis Community

Being on the land and having the ability to harvest are inherent parts of Métis identity and way of life. For the Métis Community to preserve and exercise their Section 35 rights, culture, and way of life, the lands and waters of harvesting areas must remain healthy and accessible. NWOMC have identified the following valued components and potential Project-related effects:

- Hunting and Trapping Wildlife with keystone species include, but are not limited to moose, partridge and grouse, caribou, and deer.
    - Change to and in population of species, wildlife habitat, wildlife and habitat distribution, and wildlife migration;
    - Changes in access to preferred places; Change in perceived confidence;
    - Change in ability to harvest and trap;
    - Change in quality of harvested and trapped species;
    - Change in consumption of hunted and trapped game.
- Fishing with keystone species include, but are not limited to pickerel / walleye, trout, northern pike / jackfish, perch, crappie, and whitefish.

    - Change to and in population of species, habitat, fish and habitat distribution, fish migration;
    - Changes in access to preferred places;
    - Change in perceived confidence;
    - Change in ability to fish;
    - Change in quality of fished species;
    - Change in consumption of fish.
- Gathering Plants & Natural Material with keystone species include but are not limited to blueberries and mushrooms.
    - Change to and in population of species, habitat, distribution;
    - Changes in access to preferred places;
    - Change in perceived confidence;
    - Change in ability to gather;
    - Change in quality of species;
    - Change in consumption of gathered plants and natural materials.
- Water, Watersheds, Rivers, and Streams with key waterways include, but are not limited to the English River system.
    - Change to and in water quality, flows of water bodies, and watercourses;
    - Change in access to preferred places for fishing, hunting, trapping, and overnighting and travel;
    - Change in perceived confidence.
- Climate Change with keystone areas and species include but are not limited to areas of Métis use and occupation principally harvesting areas and cultural activities.
    - Change in air, noise, and light quality;
    - Change in carbon emissions;
    - Change in flows of water bodies and watercourses;
    - Change in wildlife, fish, plant, and natural materials habitat;
    - Change in wildlife, fish, and plants and natural materials quality and populations.
- Cultural Heritage areas of use and occupation with key areas include, but are not limited to Pakwash Lake, Ear Falls Area, Jones Road Area, Longlegged Lake / Sydney Lake Area, Oak Lake / West English River Area, South Lac Seul Area, and Wenasaga Road.
    - Change in access to and use of, preservation of and ability to manage, and privacy.
- Travel with key areas include, but are not limited to Highway 105, Long Legged Road, Jones Road, Wenasaga Road, and Highway 658
    - Change in historic and contemporary travel-ways and travel methods;
    - Modified or alternative routes requiring additional time or expense;

- Safety concerns;
- Disruption to connection to land.

- Land Use Patterns
  - Change to and in travel between and to different sites;
  - Change to and in practicing of seasonal rounds;
  - Change to and in the scheduling of resource use.
- Knowledge Transmission
  - Change to and in the intergenerational transfer of stories, teachings, values, and knowledge such as hunting, fishing, trapping, gathering and seasonal patterns of land use.
  - Change to and in the sufficiency and quality of land and natural resources to facilitate teachings and knowledge transfer.
- Sense of Place
  - Safety concerns;
  - Freedom to return to places;
  - Loss of enjoyment of peaceful or quiet enjoyment of an area disruption to connection to the land and waters.
- Governance
  - Change to and in the right of self-government, governance, decision-making authorities, bodies, laws, policies, protocols, and norms.
- Management and Stewardship
  - Change in ability to carry out and monitor mitigation and accommodation measures.
  - Change in the customs, practices, and traditions related to stewardship;
  - Ongoing initiatives;
  - Alienation from parts of the traditional territory.

In their assessment NWOMC also noted other elements of their community that may be affected: changes to employment, healthcare services, increases in the cost of living and substance abuse; and access to educational and training opportunities.

13.10.2 Project-related Assessment Impact on Rights

Through the impact assessment process presented (Section 13.3), criteria are identified and the existing conditions described followed by the description of Project interactions and potential effects over the Project phases; construction, operation and closure. Mitigation measures based on design, policy, best industry practice, regulatory requirements, and consultation are identified and the residual effects are acknowledged. Through a pre-defined set of attributes, the significance of these residual effects are assessed.

Based on the NWOMC TKLUS, which was presented to Great Bear Resources at a meeting on October 15, 2025 (section 13.4 and 13.10.1.3), key issues incorporated into the exercise or practice of rights impact assessment include:

- Hunting and Trapping Wildlife
- Fishing
- Gathering Plants & Natural Material
- Water, Watersheds, Rivers, and Streams
- Climate Change
- Cultural Heritage areas of use and occupation
- Travel
- Land Use Patterns
- Knowledge Transmission
- Sense of Place
- Governance
- Management and Stewardship

Great Bear Resources has based this assessment of impact on the exercise or practice of rights asserted by NWOMC. MNO and NWOMC have not specified in the NWOMC TKLUS report presented to Great Bear Resources the time of effective European control in the area of the historic community of NWOMC. Nor did the NWOMC TKLUS report specify that MNO and NWOMC asserted rights were integral to their community prior to the time of effective European control.

Using the information collected to characterize existing conditions with respect to the exercise and practice of Rights, likely potential effects on criteria relevant to the assessment of impact on Rights were identified. Where a potential effect was identified mitigation measures to reduce, avoid, and minimize negative potential effects, and enhance positive potential effects were considered and the resulting residual effect characterized.

Project-related changes that may affect the exercise or practice of NWOMC rights builds on the impact assessment by considering the predicted residual effects (i.e., effects remaining after mitigation measures are applied). For the NWOMC this includes:

- Change in the region’s municipal, provincial and non-profit service delivery capacity (Section 13.5.6.2)
- Change in availability, access to, and quality of experience related to traditional terrestrial wildlife harvesting (hunting and trapping section 13.6.6.1.1)
- Change in availability, access to, and quality of experience related to traditional plant harvesting (food and medicinal purposes) (Section 13.6.6.1.2)
- Change in availability, access to, and quality of experience related to traditional habitation, cultural, and spiritual sites and areas (Section 13.6.6.1.3)

- Change in access to or quality of experience with sites or areas of Indigenous heritage importance, including archaeological, historical, or architectural sites (Section 13.7.6)
- Change in sacred, ceremonial, spiritual and cultural values (including language, stories and traditions) associated with sites or areas of Indigenous heritage importance, including archaeological, historical, or architectural sites (Section 13.7.6).
- Change in community well-being (Section 13.8.6).
- Change in health (Section 13.9)

It is important to note that no critical moose habitat types are expected to be eliminated in the PA, and there are no residual effects on either moose and other wildlife or species at risk assessment. In addition, NWOMC have identified fishing as a current use in the LSA and RSA as well as their right to fish and gather aquatic resources, however, no residual effects (i.e., effects remaining after mitigation) on fishing are predicted as a result of Project-related activities

Based on the information provided by NWOMC, the change in the region's municipal, provincial and non-profit service delivery is not included in the exercise or practice of rights assessment and for this reason is not carried forward.

The remaining residual effects after mitigation are assessed as being not significant through the assessment process (refer to section 13.3 regarding the method to determine significance), however, a change in the existing conditions is acknowledged due to the Project that may affect the NWOMC's rights. The residual effects after mitigation are carried into the assessment on the impact to exercise or practice rights.

To assess the potential impact to rights of Indigenous Peoples as recognized and affirmed in Section 35 of the Constitution Act, 1982, IAAC provides guidance (IAAC 2025) on a methodology. IAAC acknowledges that an assessment of impacts on rights is complex with considerable potential for variation and the methodology presented in the guidance document is intended to be flexible and adaptable, based on context.

Residual effects characteristics as they relate to ecological and social context, geographic extent, duration, frequency and reversibility have been determined in the preceding sections and are forwarded for consideration with respect to impact on the exercise or practice of rights. For the Great Bear Resources Project, criteria have been developed to determine the level (i.e., magnitude) of adverse impact to exercise of rights at the population (i.e., community) level with an associated ranking of low, moderate and high for impact on the exercise or practice of rights. This is summarized in Table 13.10-1.

IAAC guidance includes consideration of cumulative effects as part of the impact to rights. Cumulative impacts on the exercise or practice of rights (if applicable) are assessed in Section 15.

Table 13.10-1: Summary of Impact on Exercise or Practice of Rights – Description of Severity Levels

Severity Level	Description of level
Low	• Cultural well-being - Negligible to small Project-related change on the community's ability to continue customs, traditions and practices integral to the community's culture • Impact inequity - The effects would be temporary and would allow intergenerational transfer of knowledge and exercise of rights to continue into the future. Potential benefits resulting from the project would flow between all segments of the community. • Health - The Project is not likely to cause environmental effects, including on traditional foods (including species of cultural importance to traditional diets), that would result in a population-level change in health. • Collaborative Management and Governance - there is a high level of cooperation between Great Bear Resources and Indigenous community; or agreements between the Indigenous community and Great Bear Resources are, or will be, in place; or Great Bear Resources undertakes repeated outreach efforts, but the community remains unresponsive. This also includes participation in the proposed mitigation measures of establishing Community Liaison and Environmental Management Committees and environmental monitors from the community.
Moderate	• Cultural well-being - Measurable Project-related change that will result in a material adverse change in the community's ability to continue customs, traditions and practices integral to the community's culture. • Impact inequity - Transfer of knowledge between generations may be interrupted for a moderate period of time by the project. Effects may be reversed within one generation. Some benefits may accrue to sub-groups. • Health - The Project may cause environmental effects on traditional foods (including species of cultural importance to traditional diets), possibly resulting in a population-level change in health. • Collaborative Management and Governance - Indigenous community has expressed concern about effects of the project. The community has stated that some effects remain after mitigation and / or accommodation.
High	• Cultural well-being - Measurable Project-related chang that will result in a substantive adverse change in the community's ability to continue customs, traditions and practices integral to the community's culture. • Impact Inequity - Sub-groups of the population will be disproportionately impacted by the project and experience little to no benefit. Intergenerational transfer of knowledge would be interrupted for an extended time period and may not be reversed either in whole or part. • Health - The Project will cause extensive environmental effects on traditional foods (including species of cultural importance to traditional diets), resulting in a population-level change in health. • Collaborative Management and Governance - The project would likely prevent or restrict use of areas of title. The project may cause interference in traditional land management and governance regime.

Information provided by NWOMC outline areas that members harvest (hunt and trap) terrestrial wildlife in the LSA and RSA, which NWOMC views as an exercise of their harvesting rights as affirmed under Section 35 of the *Constitution Act*, 1982. (S.C. 1986, c. 8). As described in Section 13.6, Current Use of Lands and Resources for Traditional Purposes, availability of terrestrial wildlife harvesting areas in the PA will be restricted as a result of access restriction due to safety regulations, however, access to the LSA and RSA will remain unrestricted. There is also the potential for negative effects on the availability of hunted and trapped species in the LSA and areas immediately adjacent to the PA due to sensory disturbances (e.g., sound, dust, light, vibration). NWOMC note the importance of intergenerational knowledge sharing activities associated with traditional terrestrial harvesting activities, including hunting and trapping. and that changes to availability and quality of experience may affect knowledge sharing activities. However, it is anticipated that following the implementation of mitigation measures that Project related changes are not sufficient to alter intergenerational knowledge transfer.

Project-related changes to access and availability are fully reversible during project phases, and predicted to occur intermittently over the medium term and only in areas immediately adjacent to the PA. As a consequence, these changes may increase the effort necessary but will not reduce NWOMC's ability to exercise their asserted Rights with respect to terrestrial wildlife harvesting, including hunting and trapping.

Traditional harvesting of plants for NWOMC includes for food sources, medicines, and cultural materials. NWOMC advises that this traditional of plants for food, medicine and natural resources is also an exercise of NWOMC Rights as affirmed under Section 35 of the *Constitution Act*, 1982. No current use of the PA for traditional harvesting of plants or natural resources was identified by NWOMC; however, it was identified as a current use within the LSA and RSA.
No Project-related effects on the availability of traditional plant harvesting are expected; however, a change in the quality of the experience associated with this exercise of this Right within the LSA is possible. As discussed in Section 13.7, Indigenous Physical and Cultural Heritage and Structures, Sites or Things of Significance, NWOMC identifies these activities as an important context for intergenerational knowledge sharing, and they note member concerns about potential Project-related sensory disturbances (dust, sound, light, vibration). NWOMC indicates that members can and may relocate their gathering activities in relation to the Project. However, this suggest that the level of effort necessary may increase but it will not reduce the ability of NWOMC to practice traditional plant harvesting activities.

NWOMC have areas related to traditional habitation, cultural, and spiritual sites within the LSA, as discussed in Section 13.7, Indigenous Physical and Cultural Heritage and Structures, Sites or Things of Significance. The areas identified are overnight stays including traditional campsite habitation sites approximately 3 to 5 km from the boundary of the PA, but have not identified traditional habitation, cultural, or spiritual sites or areas in the PA. Access and availability of traditional habitation NWOMC sites will not be directly or indirectly affected, as they are well outside of the PA. However, it is anticipated that NWOMC visiting traditional habitation sites in the LSA may still be indirectly affected by changes in the quality of experience due to potential sensory disturbances and change to viewscapes. The residual effect to experience at this NWOMC temporary habitation site is expected to occur intermittently over the medium term and will recover during Project phases.

No residual effects involving changes in sacred, ceremonial, spiritual, and cultural values associated with archaeological sites or cultural heritage landscapes of Indigenous heritage importance are anticipated for NWOMC.

For NWOMC, access to shared and exclusive resources and cultural landscapes is essential to their identity; a major determinant of physical, mental and spiritual health, and community cohesion (Statistics Canada 2023d). Some NWOMC members who access the LSA for harvesting, including for culturally significant plant species may experience changes in the quality of harvesting activities due to sensory disturbances (sound, dust, visual changes) across all Project phases adjacent to the PA. While mitigation measures focus on culturally appropriate reclamation, engagement, and monitoring, temporary or longer-term avoidance of certain areas may occur, particularly where harvesting quality or cultural experience is diminished. These changes may contribute to reduced opportunities for intergenerational knowledge transfer, cultural continuity, and land-based wellness practices that are important to community well-being. These changes are also linked to changes to access to terrestrial wildlife harvesting / trapping and harvesting of plants, as well as access and availability of traditional habitation sites. As such, the residual effect to opportunities for intergenerational knowledge transfer, cultural continuity, and
land-based wellness practices are expected to occur intermittently over the medium term and is expected to recover during all Project phases.

13.10.3 Overall Impact to Exercise or Practice of Rights of NWOMC

It is anticipated that residual effects linked to the exercise of Rights are limited to the LSA and associated with sensory disturbance in areas immediately adjacent to the PA. No critical habitat for traditional use has been identified in the PA nor are negative effects on access in the LSA expected. Project related effects on areas of preferred use are also not expected.

Negative residual effects associated with sensory disturbance do not extend beyond the medium term, are not expected within areas of preferred or exclusive use and are expected to recover during Project phases. Sub-groups are resilient enough to sustain effects and maintain exercise of rights. Further, downstream residual effects associated with avoidance of traditional foods due to perception issues may affect some individuals; however, measurable Project-related changes in environmental exposures and / or social determinants of health are unlikely to result in an adverse change in population-level health status of local Indigenous people.

The impact on the exercise or practice of Aboriginal and Treaty Rights for NWOMC at the population-level is considered to be low severity and that the proposed mitigation measures allow for the exercise of Rights to continue in the same or similar manner.

Attached Table 13.1-1: Summary of Linked pVC and fVC Key Mitigation and Changes After Mitigation

Table 13.1-1: Summary of Linked pVC and fVC Key Mitigation and Changes after Mitigation

Federal Valued Components (fVCs)		
Key Mitigation measures	**Adverse Residual Effects Predicted after Mitigation**	**Change considered for Indigenous Peoples**
Fish and Fish Habitat (Section 8.0)		
In collaboration with Indigenous communities, development and implement of Fish Habitat Offset and Compensation plan, including habitat diversion plans, and fish relocation from affected watercourses.	With the implementation of proposed mitigation and measures in the Fish Habitat Offset and Compensation Plan (FHOCP): • There are no residual effects on fish habitat predicted • Adverse residual effects to fish communities, including those of Indigenous community concern, are not predicted • There are no predicted residual effects to fish health as the changes to water quality will be effectively mitigated by the implementation of the integrated water management and treatment system as contact water released to the environment will meet the WQG PAL.	Change after mitigation linked to: • none
Migratory Birds (Section 9.0)		
Great Bear Resources will implement progressive rehabilitation during operations and closure to replace (where feasible) lost migratory bird habitat Buffers will also be implemented around sensitive habitats. The upland areas around wetlands (e.g., Unnamed Waterbody 6) should be protected for 120 m from the wetland. The 120 m buffer is season-dependent and should be greater than 250 m during the nesting season (April to July for waterbirds	With the implementation of mitigation measures and expected offset via restoration during closure, the residual effect on migratory birds from changes related to the Project are primarily be constrained to the PA but could extend into the LSA: • Change in the abundance of habitat is not significant • Change to connectivity and quality of habitat is not significant • Change to migratory birds density and population is not significant • Change in the risk of mortality for migratory birds is not significant • Change to the abundance of habitat of migratory bird SAR is not significant.	Change after mitigation linked to: • current use of lands and resources for traditional purposes • health

Attached Table 13.1-1: Summary of Linked pVC and fVC Key Mitigation and Changes After Mitigation (continued)

Pathway Valued Components (pVCs)		
Key Mitigation measures	**Changes after Mitigation Predicted**	**Adverse Change after Mitigation with Pathways to Indigenous Peoples**
Air Quality (Section 7.2)		
Mitigation measures include the implementation of a dust management plan, a blasting plan to control emissions of particulate matter and nitrogen oxides, an ambient air quality monitoring plan, and limiting vehicle speeds on-site will provide for active management of emissions from the Project.	The modelled cumulative concentrations for all criteria for all averaging periods are below the respective Ambient Air Quality Criteria during the construction phase, operations phase and closure phase at the extent of the leased claims boundary and at all points of reception in the LSA.	Change after mitigation linked to: • current use of lands and resources for traditional purposes • health
Sound (Section 7.3)		
Mitigation measures include various design features aimed at reducing sound levels, use of enclosures and exhausts for diesel and natural gas generators, use of suitable mufflers on all motorized equipment, regular maintenance of equipment, and the development of a noise management plan.	Sound levels at all of the identified PORs are predicted to be below the federal and provincial criteria after application of mitigation measures. The change in percent highly annoyed meets the Health Canada limit of 6.5%, which means that changes to sound levels are not expected to trigger noise complaints from PORs.	Change after mitigation linked to: • current use of lands and resources for traditional purposes • health
Vibration (Section 7.4)		
Mitigation will include the development and implementation of a blast management plan to guide blasting activities while minimizing vibration levels.	The predicted change to air overpressure and peak particle vibration are well below the provincial limits for all PORs and Fisheries and Oceans Canada (DFO) requirements related to vibration for protection of fish will be met.	Change after mitigation linked to: • current use of lands and resources for traditional purposes • health
Visual Environment (Appendix O-3)		
None required with planned design and operations measures	A viewshed analysis (Appendix O-3) was conducted to determine the most pronounced visual aesthetics impact on the surrounding area. This assessment included the proposed stockpiles (mine rock stockpile, low grade ore and overburden stockpiles), tailings management facility dams and headframe designs, all based on anticipated maximum heights and extents to maintain a conservative approach. The analysis concluded that visibility of Project facilities will be very restricted, even at their largest scale, typically limited to distant views during later operational stages.	Change after mitigation linked to: • current use of lands and resources for traditional purposes • health

Pathway Valued Components (pVCs)		
Key Mitigation measures	**Changes after Mitigation Predicted**	**Adverse Change after Mitigation with Pathways to Indigenous Peoples**
Groundwater (Section 7.5)		
Mitigation measures include limiting the area of disturbance and operating an integrated water management system during construction, operation, and active closure to collect and control contact water, which will be reused in processing to reduce freshwater demand. Water treatment ponds will be lined or placed where seepage can be contained, and grouting will seal exploration drillholes and major fractures to limit underground inflows. A sheetpile or grout wall will also be installed to maintain open pit stability and reduce dewatering effects on Dixie Creek. During closure, the LP Central pit, VMF, and underground workings will be actively filled with redirected site runoff and water from the Chukuni River to accelerate groundwater recovery to baseline conditions.	After implementation of the proposed mitigation measures, there is a reduction of groundwater flows and levels during the construction and operations phases that is mitigated during closure. After the filling of the underground, LP Central pit and Viggo management facility (VMF) with water, groundwater flows and levels will recover to near baseline conditions.	Change after mitigation linked to: • current use of lands and resources for traditional purposes • health
Surface Water Flows and Levels (Section 7.6)		
Mitigation measures will include collecting contact water across the Project, treatment of contact water and effluent prior to release, the development and implementation of a dust management plan to minimize dust emissions	There is a reduction of surface water flows and levels within the PA and parts of the LSA after implementation of the proposed mitigation measures, during the construction and operations and closure phases that is partially mitigated by closure-related activities. Some local hydrology changes are permanent, resulting from landscape changes from development. Estimated changes to flow and water level in the Chukuni River and further downstream are not observable during any Project phase.	Change after mitigation linked to: • current use of lands and resources for traditional purposes • health

Pathway Valued Components (pVCs)		
Key Mitigation measures	**Changes after Mitigation Predicted**	**Adverse Change after Mitigation with Pathways to Indigenous Peoples**
Water Quality (Section 7.7)		
None required with planned design and operation measures	Observable changes in water quality from baseline conditions are constrained to the LSA during all Project phases. In the operations phase, predicted concentrations for all modelled parameters are well below the identified water quality guidelines for protection of aquatic life (WQG PAL), or equivalent to baseline conditions where baseline concentrations are greater than these guidelines (arsenic and phosphorus), with the exception for cobalt concentrations at a node in Unnamed Watercourse 1. During the closure phase (and post-closure), all modelled parameters are predicted to be less than WQG PAL, or equivalent to baseline conditions where baseline concentrations are greater than WQG PAL (arsenic and phosphorus).	Change after mitigation linked to: • current use of lands and resources for traditional purposes • health
Vegetation Communities (Section 7.8)		
Proposed design and mitigation measures, include minimizing the Project footprint, targeted management of invasive species and restoration and revegetation where feasible during operations and closure	With the implementation of the proposed design and mitigation measures, direct changes to vegetation communities after mitigation are expected to be localized to the PA. Indirect effects are expected to be confined to the PA and its immediate surroundings. Restoration and revegetation efforts during closure are anticipated to support the recovery of vegetation communities, with long-term positive outcomes for ecosystem function and diversity, although re-establishment is a long-term process.	Change after mitigation linked to: • current use of lands and resources for traditional purposes • health
Wild Rice (Manoomin) (Section 7.9)		
Great Bear Resources Project has funded a study by Northern Bioscience and Harris Ecological Consulting, upon the request of LSFN and WFN. The purpose of this study is to help address the loss of historic wild rice (Manoomin) production on Wabauskang Lake. Potential effects on wild rice are anticipated because of an overprint at Unnamed Waterbody 1 by Project infrastructure. The enhancement study is anticipated to offset potential effects on wild rice as a result of the Project. The wild rice enhancement location, on WFN reserve, has been recommended by the WFN and supported by LSFN.	The zone of changes to Wild Rice is predicted to be within Unnamed Waterbody 1, with mitigation proposed through an offset as part of the Wild Enhancement Project at the WFN reserve.	Change after mitigation linked to: • none

Pathway Valued Components (pVCs)		
Key Mitigation measures	**Changes after Mitigation Predicted**	**Adverse Change after Mitigation with Pathways to Indigenous Peoples**
The study will develop potential enhancement options for implementation in 2026. In addition to habitat restoration, the project will incorporate education and knowledge-sharing on sustainable harvesting practices, supporting long-term stewardship by community members. This collaborative initiative could support broader wild rice revitalization projects in the future and could be shared with other Indigenous communities in the local area if there is interest, advancing the understanding, and recovery of this culturally and ecologically important plant. Together, these efforts will support a more holistic understanding of Wild Rice habitats, cultural values, and their continued importance to the region.		
Moose (Section 7.10)		
None required with planned Project design and operations.	The removal of the PA results in a fractional change to habitat abundance and connectivity. No critical habitat types are eliminated at the regional scale, and overall habitat diversity and connectivity are maintained within the RSA. With the implementation of the proposed design and mitigation measures, changes to the abundance of Moose habitat are not expected after closure. There will be a change in the risk of mortality as wildlife - vehicle collisions are possible when roads and vehicular traffic are present. This will be limited after the active closure period and removed post-closure. Indirect effects to Moose during the construction, operations and closure phases, may extend into the LSA but cease after closure activities end.	Change after mitigation linked to: • current use of lands and resources for traditional purposes • health

Pathway Valued Components (pVCs)		
Key Mitigation measures	**Changes after Mitigation Predicted**	**Adverse Change after Mitigation with Pathways to Indigenous Peoples**
Other Wildlife (Section 7.11)		
None required with planned Project design and operations.	Habitat for other wildlife will be reduced within the PA from vegetation removal required for Project development, but habitat losses are low at a regional scale. The closure phase will directly increase functional other wildlife habitat which will continue to increase post-closure. There will be a change in the risk of mortality due to wildlife - vehicle collisions, which are possible when roads and vehicular traffic are present. This will be limited after the active closure period and removed post-closure. Indirect effects to other wildlife during the construction, operations and closure phases, may extend into the LSA but cease after closure activities end.	Change after mitigation linked to: • current use of lands and resources for traditional purposes • health
Species at Risk (SAR) (Section 7.12)		
None required with planned Project design and operations.	Direct habitat losses will occur within the PA during construction, but no critical SAR habitats will be eliminated, and overall habitat diversity will be maintained within the RSA. Therefore, there are no effects on the relative abundance of habitat after mitigation. There will be a change in the risk of mortality due to wildlife - vehicle collisions, which are possible when roads and vehicular traffic are present. This will be limited after the active closure period and removed post-closure. Indirect effects to SAR during the construction, operations and closure phases, may extend into the LSA but cease after closure activities end.	Change after mitigation linked to: • current use of lands and resources for traditional purposes • health
Land and Resource Use (Section 7.13)		
None required with planned Project design and operations.	Public access to the PA will be prohibited from the onset of the construction phase until following active closure so that construction, operations and closure activities can be carried out safely. In addition, sensory disturbance may potentially cause wildlife and recreational users to avoid the immediate area.	Change after mitigation linked to: • none

Pathway Valued Components (pVCs)		
Key Mitigation measures	**Changes after Mitigation Predicted**	**Adverse Change after Mitigation with Pathways to Indigenous Peoples**
Cultural Heritage (Section 7.14)		
A Cultural Heritage Impact Assessment (CHIA) will be prepared for identified CHVI locations (e.g., CHR3) prior to construction. The conservation guidance from CHIA mitigates potential effects to be implemented early in the Project construction	The zone of changes to Wild Rice is predicted to be within Unnamed Waterbody 1, with mitigation proposed through and offset as part of the Wild Enhancement Project at the at the WFN reserve. Note: Indigenous physical and cultural heritage differs from the pVCs of archaeology and cultural heritage as it encompasses both tangible heritage, such as physical places of heritage value, and intangible heritage, such as the customs, practices and teachings that convey cultural knowledge of heritage value.	Change after mitigation linked to: • none For Indigenous interests change after mitigation linked to: • current use of land and resources for traditional purposes • physical and cultural heritage sites, structures or things
Archaeology (Section 7.15)		
Completion of archaeological assessments in accordance with the Ontario Heritage Act and MCM standards and guidelines by licensed archaeologist with Indigenous participation. Identified resources with Cultural Heritage Value or Interest (CHVI) will have mitigation measures developed and implemented (avoidance, protection in place, or excavation / documentation). A Chance Find Procedure in place for unanticipated discoveries during construction, ensuring immediate work stoppage, notification of authorities and Indigenous communities, and appropriate mitigation as required.	With the proposed design and mitigation measures, no changes to the terrestrial archaeological sites or areas of marine archaeological potential are expected.	Change after mitigation linked to: • none
Local and Regional Economy (Section 7.16)		
None required with planned Project design and operations	The Project will have a net positive effect on the local and regional economy through employment and labour income, opportunities and income for local and regional businesses, and increased revenues to local and regional municipalities. The zone of changes is dominantly within the RSA. The remainder of the potential direct, indirect and induced economic effects are expected to occur in the rest of Ontario and Canada.	Change after mitigation linked to: • none

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