

**Enclosure 1: Federal Authority Advice Record for the Impact Assessment**

Please submit the completed form by **May 29, 2026**, via email to [GreatBear@iaac-aeic.gc.ca](mailto:GreatBear@iaac-aeic.gc.ca).

**Department Contact Information**

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| <b>Submission Date</b>                     | May 29, 2026                                                                                                                             |
| <b>Department/Agency</b>                   | Indigenous Services Canada                                                                                                               |
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| <b>Email, Phone</b>                        |                                                                                                                                          |

1. Taking into account the Project Context and Targeted Questions that IAAC has shared, review Batch 3 of the Impact Statement and provide views for IAAC's consideration in the analysis of the project's effects and preparation of the Impact Assessment Report (Table 1) or identify potential outstanding information requirements in the Impact Statement (Table 2). Tables 1 and 2 (attached) provide additional guidance to support your review.
2. As per the Cooperation Plan<sup>1</sup>, consider all the mechanisms in place to manage potential federal effects. If your department is responsible for, or aware of, any relevant federal legislative frameworks, policies, programs, or potential complementary measures<sup>2</sup> that may help manage the project's potential adverse federal effects, please specify and describe applicability to the project and any known limitations to managing effects.
3. Indicate whether your department has identified any power that it will be unable, or may be unable, to exercise to allow the project to proceed, in whole or in part as currently planned, and next steps to resolve any issues.
4. Indicate if any proponent information provided in Batch 3 of the Impact Statement changes the previous guidance provided on permitting. If yes, please provide an overview of the new permitting guidance. Please note that the Detailed Permitting Plan will be updated accordingly.

*Note from ISC: To ensure clarity, please note that whenever we provide comments, including those of the past, our comments are without prejudice to any legal positions that Canada may take regarding this matter or any other matter or proceeding, and are not admissions of fact, law, or liability*

Norah Kielland, Indigenous Services Canada  
**Name of Departmental / Agency  
 Responder**

**Analyst**  
**Title of Responder**

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

<sup>2</sup> Complementary measures are additional authorities of government officials or programs that may be used to mitigate effects that may be beyond the care and control of the proponent. They can be taken into account in decision-making.

**May 29, 2026**

**Date**

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Table 1. Views to Inform the Impact Assessment

Table 1 should be used to provide views for IAAC’s consideration in the analysis of the project’s effects<sup>3</sup> and preparation of the Impact Assessment Report and potential conditions. Expert advisors should consider project context (see Enclosure 2 for more detail on the key issues and targeted questions) and regulatory context and provide risk-proportional, solution-oriented advice even where potential gaps in the Impact Statement are observed.

| Comment ID                                                                                    | Refence to Impact Statement                                                                 | Description of View or Concern Related to an Effect                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Advice to Inform the Impact Assessment                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
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| <i>Please identify comments by organization and comment number.</i><br><br><i>e.g.: HC-01</i> | <i>Identify the specific section of the Impact Statement to which your comment applies.</i> | <i>Provide a brief description of the view or concern for IAAC’s consideration in the analysis of effects, based on available information, such as:</i> <ul style="list-style-type: none"><li><i>a missing pathway of an adverse federal effect that may really increase the overall extent of significance; or</i></li><li><i>sources of uncertainty that, in your department’s view, may weaken potential conclusions.</i></li></ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | <i>Considering project context (see Enclosure 3 for more detail on the key issues and targeted questions) and regulatory context, provide solution-oriented advice for the impact assessment. For example:</i> <ul style="list-style-type: none"><li><i>Characterize residual effects and the level of uncertainty with predictions in the absence of more information from the Proponent, as predicted by your department. Explain the uncertainty. Consider describing the range of possible scenarios.</i></li><li><i>Suggest other mitigation and follow-up measures that may increase certainty in predictions or help manage uncertainty for adverse federal effects, including operational guidance or standards, and well-understood practices.</i></li><li><i>Describe any other federal or provincial legislative frameworks, policies, programs, and potential complementary measures that may provide another means to address adverse federal effects, or considerations related to the public interest factors, including predictable outcomes and whether other tools set conditions on the Proponent.</i></li><li><i>Identify those mitigation measures and project design elements that are necessary to limit the extent of significance of adverse federal effects, and those follow-up program measures that are necessary to address substantial uncertainty with the accuracy of predictions and the effectiveness of mitigation, in relation to key issues that are material to decision-making.</i></li><li><i>Provide advice on risk (likelihood and severity of effects), using applicable frameworks relevant to your mandate, to support IAAC’s risk-based decisions.</i></li><li><i>Provide any additional considerations in relation to the Project’s contributions to sustainability or to Canada’s environmental obligations and climate change commitments.</i></li><li><i>Provide any additional considerations in relation to IAAC’s obligations under section 79 of the Species at Risk Act.</i></li></ul><br><i>In the event of cross-cutting issues or a shared mandate/expertise with another agency or department, please specify the agency/department and contact persons.</i> |
| ISC-01                                                                                        | Appendix A-2;<br>Appendix N-2;<br>Appendix T                                                | ISC is uncertain whether or how issues raised early in the process were addressed by the Proponent. TISG requirements are also not clearly referenced in Proponent documents - for example, Appendix A-2: “Concordance Table for the Impact Statement”, which lists the TISG requirements for the assessment of “effects to human health”, doesn’t mention “Appendix X: Gender Based Analysis Plus”, which is clearly linked to the TISG requirement in section 9.2.<br><br>ISC also noted conflicting statements in the Impact Statement regarding whether there will be follow-up monitoring for Indigenous health VCs, specifically, for the monitoring of water quality and fish tissue for methylmercury. Appendix T and Appendix N-2 state that there will be monitoring, while Section 20 of the IS states that a dedicated follow-up program for water quality is not required, and appears to not mention the quality of country foods (traditional foods) at all. | Details on planned follow-up program measures relating to Indigenous health (e.g. monitoring of water and fish for mercury) are necessary to address substantial uncertainty with the accuracy of predictions and the effectiveness of mitigation, in relation to key issues that are material to decision-making.<br><br>The monitoring programs referenced in the HIA and Section 7 of Appendix T (including human health-based benchmarks) should be provided to the Agency for review during the Impact Assessment.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |
| ISC-02                                                                                        | Summary of the Impact Statement: Section 6.4<br><br>Table 6-46 of the Health Impact         | There is no commitment made in the Impact Statement to update water quality modelling and consider human health impacts, when water quantity models are updated. The Proponent states in the HIA (Appendix N-2) that it is important to include human health-based benchmarks in water and fish monitoring programs, however, these programs are not specifically described or available for review as a part of the Impact Statement.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | Any changes to water modelling may also influence predicted changes to water quality, which could impact human health.<br>MDMER guidelines do not consider potential impacts to human health.<br><br>The Proponent should commit to updating the water quality modelling to reflect any revised water quantity modelling and to explicitly consider potential impacts to human health. Without updated predictions, potential                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            |

<sup>3</sup> “Effects” means adverse effects within federal jurisdiction and direct or incidental adverse effects (as defined in section 2 of the IAA), and considerations related to the public interest factors (as defined in section 63 of the IAA). Advice is also invited in relation to IAAC’s separate obligations under section 79 of the *Species at Risk Act*.

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|        | Assessment (HIA) (Appendix N-2)                                                                         | The Proponent states in Table 6-46 of the HIA (Appendix N-2) that:<br><i>“including human health-based constituents and benchmarks in water and aquatic / fish monitoring programs is important to validate assessment assumptions, provide evidence regarding the effectiveness of mitigation measures, and assist in mitigating community perception issues related to safety, environmental quality and health”.</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | health impacts associated with changes in water quality may only be identified after impacts have already occurred.<br><ul style="list-style-type: none"> <li>The monitoring programs referenced in the HIA and Section 7 of Appendix T (including human health-based benchmarks) should be provided for review during the Impact Assessment.</li> </ul>                                                                                                                                                                                                                                                                                                                                          |
| ISC-03 | Section 11.3 of the Summary of the Impact Statement                                                     | Section 11.3 (Contributions to Knowledge) of the Summary of the Impact Statement states that: <i>“Great Bear Resources has provided funding for: An independent Anishnaabe-led Impact Assessment of the Project”.</i> However, it is not stated in the Impact Statement how the “independent Anishnaabe-led Impact Assessment of the Project” will inform the federal impact assessment process.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | The Proponent should explain how the independent Anishnaabe-led Impact Assessment of the Project will inform the federal impact assessment process.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| ISC-04 | Appendix N-1 Human Health and Ecological Risk Assessment (HHERA)<br><br>Summary of the Impact Statement | <p>The Proponent’s assessment of the predicted incremental risk posed by the mining project is that it is negligible (HQ &lt;0.2). They conclude that the mining project is not anticipated to trigger a change in fish consumption advisories in the area. These outcomes are reassuring, provided projections are accurate. ISC notes that despite the Proponent’s commitment to the use of the precautionary principle in the Summary of the Impact Statement, fish tissue contaminant levels in some water bodies were inferred from existing data rather than baseline measurements.</p> <p>The Great Bear Gold Impact Statement Summary states that: “The use of the precautionary principle is mandated by the Impact Assessment Act. The Impact Statement incorporates the precautionary principle through multi-year baseline investigations and conservative assessment assumptions.”</p> <p>ISC notes that MECP provided the following comments on the Mercury Study Plan to IAAC on July 18, 2025:</p> <p><i>“It is recommended that the proponent add Pakwash Lake to baseline fish tissue collection in conjunction with sediment sampling. Pakwash Lake is directly downstream of the proposed final effluent point location within the Chukuni River, and harbours fish communities which may interact with effluents from the mine. Understanding baseline fish tissue concentrations in this lake is paramount for comparison to future values, and to assess consumption risks.”</i></p> <p>ISC similarly notes that ECCC provided the following comments on the Mercury Study Plan on January 29, 2025:</p> <p><i>“It is recommended that the movement or transfer of methylmercury through the food web be modeled using modelled/predicted mercury and methylmercury concentrations and baseline measurements of methylmercury transfer through the food web, including measurements of mercury and methylmercury in water, lower food web organisms (i.e., invertebrates), and carbon and nitrogen isotopes in lower food web organisms (i.e., invertebrates), and fishes, similar to that carried out in Calder et al. 2016. Thus, measurements of mercury, methylmercury and carbon and nitrogen isotopes in lower food web organisms are required to understand the transfer of methylmercury through fish food webs of the region. The suggested approach will provide a much more robust analysis than simply using a baseline bioconcentration factor from water to fish.”</i></p> | <p>Despite the Proponent’s commitment to the use of the precautionary principle in the Summary of the Impact Statement, fish tissue contaminant levels in some water bodies were inferred from existing data rather than baseline measurements.</p> <p>Given the concern around mercury in water and fish that has been raised by Indigenous communities, federal departments, and the Expert Technical Review Committee, ISC recommends that the Proponent follows the earlier advice of MECP and ECCC, and identifies baseline fish tissue concentrations in waterbodies identified by Indigenous communities, instead of relying on a baseline bioconcentration factor from water to fish.</p> |

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| ISC-05 | Appendix T                 | <p>ISC maintains its February 2026 recommendation to IAAC, that the proponent includes additional country foods in the baseline assessment. Existing literature and monitoring can serve as screening-level inputs without new sampling.</p> <p>The three communities identified as potentially impacted by the project, Grassy Narrows First Nation, Lac Seul First Nation and Wabauskang First Nation, are located within the Boreal Shield/Subarctic ecozone, as defined by FNFNES. Grassy Narrows First Nation participated in the FNFNES, therefore, the proponent may wish to engage directly with the community to request access to community-specific traditional food consumption data. Please note that these data belong to the community and ISC does not have access to them. While Lac Seul First Nation and Wabauskang First Nation did not participate in the FNFNES, ecozone-specific information relevant to these communities can be used from the Ontario FNFNES report.</p> <p>First Nations Food, Nutrition and Environment Study (FNFNES): Results from Ontario (2011/2012). Ottawa: University of Ottawa, 2014.<br/> <a href="https://www.fnfnes.ca/docs/FNFNES_Ontario_Regional_Report_ENGLISH_2019-10-16.pdf">https://www.fnfnes.ca/docs/FNFNES_Ontario_Regional_Report_ENGLISH_2019-10-16.pdf</a><br/> <a href="https://www.fnfnes.ca/docs/CRA/FNFNES_Report_Summary_Oct_20_2021_FINAL.pdf">https://www.fnfnes.ca/docs/CRA/FNFNES_Report_Summary_Oct_20_2021_FINAL.pdf</a></p> | <p>The Mercury Study Plan (Appendix T) looks at human exposure to methylmercury through fish consumption only, and doesn't consider exposure through country foods other than fish (e.g. wild rice [manoomin] or piscivorous birds).</p> <ul style="list-style-type: none"> <li>ISC recommends that the Proponent implements a country foods follow-up monitoring program and adaptive management plans which must: <ul style="list-style-type: none"> <li>Reflect Indigenous knowledge.</li> <li>Specify how exceedances of contaminants in country foods and any associated health risks will be communicated to Indigenous communities, and how this communication will be accessible to all members. It is recommended to share, in a timely manner, the results of all regulatory monitoring with Indigenous communities.</li> </ul> </li> <li>Additionally, ISC recommends the Proponent implement an Indigenous-led follow-up monitoring program, for which Indigenous communities decide which food sources and contaminants to monitor. Whether regulatory monitoring is occurring should not impact in any way the implementation of such an Indigenous monitoring program.</li> </ul>                                                                                                                            |
| ISC-06 | Appendix N-2 (HIA)         | <p>Appendix N-2 (HIA) repeatedly refers to a “list of mitigation and enhancement measures”, however these measures refer to programs or measures that do not yet exist, are not mandated to exist, and have not been shared for review.</p> <p>Appendix N-2 (HIA):<br/> <i>“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. While the specifics of this agreement are confidential, the agreements are assumed to provide economic benefit to on-reserve communities and off reserve band members. A list of mitigation and enhancement measures are presented in Section 6.1.2.4 for multi-media environmental quality, in Section 6.2.1.4 for economics, in Section 6.2.4.4 for food security and in Section 7 for the HIA overall.”</i></p>                                                                                                                                                                                                                                                                                                                                                    | <p>The same mitigation and monitoring measures are referenced multiple times throughout the Health Impact Assessment (Appendix N-2), however none of the environmental monitoring programs referenced have been shared for review.</p> <p>The Proponent should provide the referenced environmental monitoring programs for review by the Agency for the assessment of the Impact Statement and commit to implementing the mitigation and enhancement measures listed in sections 6.1.2.4, 6.2.1.4 and 6.2.4.4 of the Health Impact Assessment in Appendix A-2.</p> <p>Among the commitments listed in sections 6.1.2.4, 6.2.1.4 and 6.2.4.4 of the Health Impact Assessment, the proponent should commit to developing monitoring programs, as described in the HIA document, which:</p> <ul style="list-style-type: none"> <li>include human health-based constituents and benchmarks in water and aquatic / fish monitoring programs to validate assessment assumptions, and provide evidence regarding the effectiveness of mitigation measures.</li> <li>include ongoing sampling and testing of fish quality in species identified by Indigenous communities.</li> <li>commit to a frequency with which monitoring results will be shared, and the method for sharing results with Indigenous communities.</li> </ul> |
| ISC-07 | Appendix T                 | <p>Proof of lab accreditation specific to mercury testing for fish tissue is not provided in the Impact Statement. Page 215 of the HHERA (Appendix N-1) references a “Metals and Mercury Biota Digestion (Micro)” preparation method and the following associated lab: “ALS Environmental – Vancouver”.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | <p>The Proponent should:</p> <ul style="list-style-type: none"> <li>clearly document that analytical laboratories are accredited for the relevant parameters</li> <li>confirm that “ALS Environmental – Vancouver” is accredited for “Metals and Mercury Biota Digestion (Micro)” preparation method”.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           |
| ISC-08 | Appendix N-1<br>Appendix T | <p>The HHERA (Appendix N-1) states in Section 1.4.2.2 (Biomonitoring) that: <i>“Several scientific assessments led by Indigenous communities are currently underway to determine the extent and location of mercury contamination and identify how mercury moves throughout the food chain (MECP 2024).”</i></p> <p>It is not stated whether these assessments be shared with <u>all</u> Indigenous communities involved in the GBG project.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | <p>The Proponent highlights “ongoing” assessments led by Indigenous communities in Section 1.4.2.2 of the HHERA (Appendix N-1), however it is not clear how these assessments are informing the Mercury Study Plan (Appendix T), and whether the results of these assessments will be shared with Indigenous communities.</p> <ul style="list-style-type: none"> <li>The Proponent should clarify how the “ongoing” assessments led by Indigenous communities described in Section 1.4.2.2 of the HHERA (Appendix N-1), are informing the Mercury Study Plan (Appendix T).</li> <li>The Proponent should commit to sharing the results of these assessments with all Indigenous communities involved in the Impact Assessment.</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   |

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| ISC-09 | Community Services and Infrastructure (sections 10.4.2, 11.4.2, 12.4.2)                  | <p>For some communities, the Impact Statement is missing some information regarding community capacity regarding essential services, such as fire, waste, policing, etc. (Section 12). Where details are provided, the analysis provided does not appear to consider how the proposed project will interact with existing capacity challenges faced by communities.</p> <p>This could create uncertainty and potentially weaken the conclusions that there will be no impacts on community services and infrastructure.</p> <p>In the department's experience, communities often face capacity challenges and difficulty attracting and retaining qualified personnel on-reserve due in large part to the higher wages that are typically offered off reserve. This appears to be consistent with the information provided in other areas of the impact statement that notes that key community services, such as day care, shelters, health services, police, and employment support, and housing are either near or over capacity.</p> <p>The proposed project may source employment from people who are currently working in local works and essential community services, which in turn, may affect the operation and maintenance of services on reserve lands.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | To help mitigate this uncertainty, the Proponent could commit to developing monitoring strategies together with affected communities to ensure that source labour does not adversely affect Indigenous communities, and modify hiring strategies accordingly.                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| ISC-10 | Population Growth and Labour Requirements (Section 7.16.7.1, 18.1, 10.8.3.2, 11.9.3.4.6) | <p>The Impact Statement provides inconsistent analysis around the population changes. The Impact Statement notes that the project will attract new people to the region, either returning from other parts of Ontario or working age migrants and suggests low local involvement in the workforce. However, the Impact Statement also concludes that there will be no population changes on reserve, as this is reserved for members.</p> <p>The majority of First Nations members typically live off reserve. The Impact Statement includes information on migration trends, however, it does not contemplate population changes where First Nations may seek to move on reserve to take advantage of the economic opportunities offered by this project. This lack of analysis may create uncertainty around conclusions that the on reserve population will not increase, or that there will be no change in demand for on-reserve programs and services.</p> <p>In general, First Nations members often face long waitlists for on-reserve housing, and may leave communities due to a lack of accommodation or shortage of employment opportunities on reserve. The majority of the members of the communities affected by the proposed project live off reserve. For example, in Lac Seul First Nation, two thirds of members live off reserve.</p> <p>The economic opportunities brought on by this proposal may encourage members to try to move back on reserve. These population changes may not be apparent at the beginning of the project, but may change throughout its lifespan. This would place additional pressures and demands on a wide range of community infrastructure and programs such as</p> <ul style="list-style-type: none"> <li>- housing</li> <li>- education and social services</li> <li>- local works.</li> </ul> | <p>To help address these uncertainties, the Proponent could committing to integrating discussions/information sharing on population changes and community pressures into monitoring and follow-up programs, such as the proposed Social Performance Plan referenced in Section 20. While details on this plan haven't been provided, the Impact Statement indicates that this meant, to among other things, prevent negative pathways, and will be developed in collaboration with affected communities.</p> <p>Information about population demographics with Indigenous communities and municipalities can help to support long-term planning activities for the provision of key services and local infrastructure.</p> |
| ISC-11 | Public Safety and Gender-Based Violence (Sections 10.8.3.1.3,                            | The Impact Statement indicates that there are "no direct interactions" with public safety or gender-based violence that are anticipated on reserve during the construction phase of the project. However, the impact statement also acknowledges that the influx of transient workers may elevate safety concerns and provides a series of mitigation measures to address safety concerns on site.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | <p>To help address the uncertainties surrounding potential safety concerns, mitigation measures could be developed in consultation with Indigenous women and gender diverse people. ISC supports the measures to reduce potential safety risks on site such as:</p> <ul style="list-style-type: none"> <li>- Workplace anti-harassment, anti-bullying, anti-discrimination and anti-violence policies</li> <li>- Culturally appropriate sexual harassment and assault counselling</li> <li>- Workplace policies on the use of drugs and alcohol</li> </ul>                                                                                                                                                                 |

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|        | 11.8.3.1.3, and 12.8.3.1.3)       | <p>First Nations people living on reserve, particularly women and girls, may face safety concerns that extend beyond the site of the proposed project.</p> <p>The analysis of the potential health and safety risks do not seem to account for the capacity considerations for programs and services to address safety and violence. For example, the impact statement noted that emergency services on reserve (such as police and ambulance) are at capacity and/or already facing resourcing challenges. Similarly, emergency shelter and health care services, which are typically accessed off reserve, are also facing capacity challenges.</p> <p>Potential changes in health and safety which are well known to accompany resource extraction camps, as noted in the Final Report on Missing and Murdered Indigenous Women and Girls, which may lead to residual risks where capacity challenges are exacerbated for on reserve communities as well as for on reserve members who access programs and services off reserve.</p>                                                                                                                                                                                                                                                                                                                            | <ul style="list-style-type: none"> <li>- Mandatory cultural awareness training</li> <li>- Workplace codes of conduct</li> <li>- Processes to investigate and resolve complaints</li> </ul> <p>To address potential risks to health and safety off-site, which may occur where Indigenous people face difficulties in accessing programs and services, ISC would recommend implementing monitoring or follow-up programs to track potential changes in this area and support collaborative problem solving with affected communities. For example, this could be integrated into the proposed Social Performance Plan, though the details of this follow-up program have not yet been made public.</p> |
| ISC-12 | Summary of benefits Section 18.1  | <p>The Impact Statement does not provide disaggregated data on estimated employment figures for Indigenous employees, or potential procurement opportunities for Indigenous businesses, which may create uncertainty as to the over all benefits.</p> <p>Without access to disaggregated data on the anticipated economic benefits that are specific to this project (and not the mining industry generally) it is difficult to assess the degree to which Indigenous communities will benefit and/or will not face adverse effects related to barriers to participation.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | <p>From the information provided in the Impact Statement, it was unclear as to whether this information was not provided because it is unavailable or whether it was subject to confidentiality constraints. If the former, the Proponent could committing to working with affected communities to develop a projection of the anticipated number of people who may benefit from the proposed project (either by direct employment or from procurement opportunities), as well as some demographic information on the number of people who meet (or nearly meet) the qualifications for employment.</p>                                                                                               |
| ISC-13 | Economic Opportunity Table 10.8-5 | <p>The Impact Statement includes broad statements about the economic benefits and labour development opportunities that will accrue to affected Indigenous communities, but also notes widespread economic vulnerability and barriers that suggest that access to benefits will be constrained by some.</p> <p>Among some of the barriers to economic opportunities, the Impact Statement notes that educational attainment is lower for the affected communities. For example, 8.6% of men and non binary persons in Lac Suel First Nation and 5% of men and non-binary persons in Asubpeeschoseewagong Netum Anishinabek have an apprenticeship or trades certificate. No women and non-binary persons appear to have a trades certificate, nor do members in Wabauskang First Nation. These qualifications are important as the first wave of jobs available will be in the construction industry. No additional information is provided on how many people have the necessary qualifications or are nearly qualified.</p> <p>As such, there could be some residual uncertainty on the extent to which Indigenous people will be able to benefit from economic opportunities, and the nature of the employment opportunities available (particularly for women, who have historically seen lower participation rates in resource extraction opportunities).</p> | <p>The Impact Statement includes commitments to provide on-the-job training opportunities, additional commitments could be made around ongoing monitoring activities, designed in partnership with Indigenous organizations, to ensure that hiring strategies continue to be effective as the project progresses and more information is available on the Indigenous workforce.</p>                                                                                                                                                                                                                                                                                                                   |

Please insert additional rows as necessary.

Table 2. Identification of Outstanding Information Requirements and Clarifications in Relation to the Requirements of the Tailored Impact Statement Guidelines

Table 2 should be used to identify potential outstanding information requirements in the Impact Statement where information from the proponent is **both** 1) missing or unclear as prescribed by the Tailored Impact Statement Guidelines **and** 2) necessary to formulate advice (Table 1) to IAAC on matters that are likely to be material and relevant to decision-making<sup>4</sup>. Expert advisors should consider project context (see Enclosure 2 for more detail on key issues and targeted questions) and regulatory context and provide risk-proportional, solution-oriented advice.

| Outstanding Information Requirement ID                                                                       | Reference to Impact Statement                                                                                                               | Reference to Tailored Impact Statement Guidelines                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | Description of Outstanding Information Requirement (Context and Rationale)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | Advice to Proponent for Resolving the Outstanding Information Requirements                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
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| <i>Please identify information requirement by organization and comment number.</i><br><br><i>e.g.: HC-02</i> | <i>Identify the specific section of the Impact Statement related to the information requirement</i>                                         | <i>Identify the specific section of the Tailored Impact Statement Guidelines related to the information requirement</i>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | <i>Provide a brief description of the outstanding information requirement in the Impact Statement, including:</i> <ul style="list-style-type: none"><li><i>why the information or studies are required to formulate advice to IAAC on matters that are likely to be material and relevant to decision-making.</i></li></ul> <i>Include, where relevant:</i> <ul style="list-style-type: none"><li><i>how the outstanding information requirement relates to an adverse federal effect or to a public interest factor including outlining the relevant pathway of effect (see Enclosure 3 for more detail on the key effects and targeted questions);</i></li><li><i>identify the level of concern about the outstanding information and implications or consequences for strength of conclusions; and</i></li><li><i>advice to IAAC on risk (likelihood and severity of effects), using applicable frameworks relevant to your mandate.</i></li></ul><br><i>Identify if the outstanding information requirement links to specific advice provided to IAAC in Table 1.</i> | <i>Provide a clear and precise description of the missing information or clarification that would resolve the issue detailed at left.</i><br><i>Also provide, where applicable, other commitments the proponent can make to respond to the issue, such as:</i> <ul style="list-style-type: none"><li><i>offsetting or mitigation to compensate for uncertainty in baseline;</i></li><li><i>follow-up to verify the accuracy of predictions and effectiveness of mitigation;</i></li><li><i>applicable guides, standards and thresholds the proponent intends to meet; and</i></li><li><i>measures the proponent intends to take to comply with other legislative frameworks that provide a means to address effects.</i></li></ul> |
| ISC-14                                                                                                       | Impact Statement Section 20<br>Table 20.3-3<br><br>Summary of the Impact Statement Section 12.2<br><br>HIA (Appendix N-2)<br><br>Appendix T | Section 17.2 (Follow-up program monitoring) of the TISG states that:<br><i>“For the proposed follow-up framework, the Impact Statement must present the preliminary environmental, health, social and economic monitoring program, including, but not limited to the:</i> <ul style="list-style-type: none"><li><i>identification of regulatory instruments that include a monitoring requirement for the VCs;</i></li><li><i>description of the methodology for tracking environmental, health, social, and economic issues;</i></li><li><i>description of the methodology and mechanism for monitoring the effectiveness of mitigation and reclamation;</i></li><li><i>description of the characteristics of monitoring where foreseeable (e.g. location of interventions,</i></li></ul> | Both Appendix N-2 and Appendix T state that the Proponent <u>will</u> have a monitoring program for monitoring mercury in surface water and methylmercury in fish tissue, however, other sections in the Impact Statement state that these follow-up programs are not required. For example, section 12.2 of the Summary of the Impact Statement states that <i>“dedicated follow-up programs were determined to not be needed as surrogate monitoring information is available from other regulatory programs”</i> , and the Tables outlining the follow-up information for water quality in section 20 only reference the requirements of the MDMER and provincial ECA, neither of which reference human health benchmarks. Table 20.2-4 (Follow-up Program for Federal Valued Component: Indigenous) <u>does not</u> mention mercury as a contaminant of interest for monitoring in fish.<br>.                                                                                                                                                                         | The Proponent should update section 20 of the Impact Statement with the required information for the preliminary follow-up programs related to health, as per sections 17.2 and 17.3 of the TISG.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |

<sup>4</sup> Outstanding information requirements must be limited to information or clarifications that are necessary to formulate or substantially strengthen a conclusion related to decision-making, such as the extent to which federal effects are significant, the identification of appropriate mitigation and follow-up measures, and whether the federal effects are justified in the public interest. “Federal effects” means effects within federal jurisdiction and adverse direct or incidental effects (as defined in section 2 of the IAA). Public interest considerations are outlined in section 63 of the IAA. Comments can also be provided in relation to IAAC’s obligations under section 79 of the *Species at Risk Act*.

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|  |  | <p><i>planned protocols, list of measured parameters, analytical methods employed, schedule, data management, human and financial resources required);</i></p> <ul style="list-style-type: none"><li><i>• a description of the indicators to be used to assess progress towards expected outcomes and a rationale for their selection;</i></li><li><i>• an explanation of how any differences in predicted effects versus actual measured effects will be attributed to either uncertainty related to predictions or to effectiveness of the mitigation measures;</i></li><li><i>• identification of the monitoring activities that could pose a risk to the environmental, health, social, and economic conditions and/or VCs and the measures and means planned to protect these conditions;</i></li><li><i>• guidelines for preparing monitoring reports (number, content, frequency, format, duration, geographic extent) that will be sent to the authorities involved; and</i></li><li><i>• plans, including funding options, to involve Indigenous communities and local communities in monitoring and follow-up programs, where appropriate.”</i></li></ul> <p>Section 17.3 (Compliance monitoring) of the TISG states that: <i>“The Impact Statement must present a framework by which it will undertake compliance monitoring for follow-up programs. This should include, but not be limited to:</i></p> <ul style="list-style-type: none"><li><i>• identification of those positions accountable and responsible for monitoring and ensuring compliance;</i></li><li><i>• description of the proponent’s intervention mechanisms in the event of the observation of non- compliance with the legal and environmental</i></li></ul> |  |  |
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|        |                                                                                                 | <p>requirements or with the obligations imposed on contractors by the provisions of their contracts; and</p> <ul style="list-style-type: none"> <li>• quality assurance and quality control measures to be applied to monitoring programs.”</li> </ul>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| ISC-15 | Section 5.14.7 of the Impact Statement (Contact Water Treatment)                                | <p>TISG 8.6.3 “Mitigation and enhancement measures”</p> <p><i>“The Impact Statement must:</i></p> <ul style="list-style-type: none"> <li>- <i>describe the methods for ensuring that the rate of methylation of mercury downstream of the Project does not increase as a result of the Project, taking into account physicochemical parameters, biological parameters, and chemical constituents of surface water that can contribute to the methylation of mercury.”</i></li> </ul>                                                                                                                                                                                                                                                                                                                                                               | <p>The Concordance table in Appendix A-2 links Section 8.6.3 of the TISG to “Section 5.14.7” (Contact Water Treatment) of the Impact Statement.</p> <p>However, Section 5.14.7 of the Impact Statement describes the treatment of contact water but does not mention mercury or methods for ensuring that the rate of methylation of mercury downstream of the Project does not increase as a result of the Project. A monitoring program for methylmercury was <u>not</u> included in the Impact Statement.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | <p>The Proponent should provide a description of the methods for ensuring that the rate of methylation of mercury downstream of the Project does <u>not</u> increase as a result of the Project, as required by section 8.6.3 of the TISG. This description should take into account physicochemical parameters, biological parameters, and chemical constituents of surface water that can contribute to the methylation of mercury.</p>                                                                                                                                                                      |
| ISC-16 | Section 20 of the Impact Statement (Environmental and Social Management, and Follow-up Program) | <p>TISG 17.1 Follow-up program framework</p> <p><i>“• the expected outcome(s) and targets of the follow-up program and information describing how the proponent expects to achieve the expected outcome(s);</i></p> <ul style="list-style-type: none"> <li>• <i>preliminary description of follow-up studies planned, as well as their main characteristics (e.g. list of parameters to be measured, planned implementation timetable);”</i></li> <li>• <i>mechanism to disseminate follow-up results among the concerned interested parties;</i></li> <li>• <i>consideration of accessibility and sharing of data for the general population; and</i></li> <li>• <i>opportunities for the involvement of Indigenous communities, stakeholders, and local and regional Indigenous organizations in the follow-up program design and</i></li> </ul> | <p>The Concordance table in Appendix A-2 links Section 17.1 of the TISG references “Section 20” (Environmental and Social Management, and Follow-up Program) of the Impact Statement. However, Section 20 of the Impact Statement does not include the following required bulleted information for the “Follow-up Program for Federal Valued Component: Indigenous” (Table 20.2-4) – residual effects for these components:</p> <ul style="list-style-type: none"> <li>- traditional terrestrial harvesting activities</li> <li>- quality of experience to traditional habitation, cultural, and spiritual sites and areas in the LSA</li> <li>- traplines</li> </ul> <p>• <i>the expected outcome(s) and targets of the follow-up program and information describing how the proponent expects to achieve the expected outcome(s);</i></p> <p>• <i>preliminary description of follow-up studies planned, as well as their main characteristics (e.g. list of parameters to be measured, planned implementation timetable);</i></p> <p>• <i>mechanism to disseminate follow-up results among the concerned interested parties;</i></p> <p>• <i>consideration of accessibility and sharing of data for the general population; and</i></p> <p>• <i>opportunities for the involvement of Indigenous communities, stakeholders, and local and regional Indigenous organizations in the follow-up program design and implementation and the development of a communication mechanism between these organizations and the proponent.”</i></p> <p>It appears as if the “Social Performance Plan” referenced in Table 20.2-4 and described in section 20.1.3 is intended to address some of the requirements of section 17.1 of the TISG. If so, then the details of this Plan need to be made available for review during the Impact Assessment.</p> | <p>The Proponent should provide the following required information (see bullets in adjacent column) for the following Indigenous Valued Components (VCs):</p> <ul style="list-style-type: none"> <li>- traditional terrestrial harvesting activities</li> <li>- quality of experience to traditional habitation, cultural, and spiritual sites and areas in the LSA</li> <li>- traplines</li> </ul> <p>The Proponent should share the “Social Performance Plan” referenced in Table 20.2-4 and described in section 20.1.3 if it intended to address some of the requirements of section 17.1 of the TISG.</p> |

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|        |                                                                                                 | <i>implementation and the development of a communication mechanism between these organizations and the proponent.”</i>                                                                                                                                                                                                                |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |
| ISC-17 | Section 20 of the Impact Statement (Environmental and Social Management, and Follow-up Program) | <p>TISG 17.1 Follow-up program framework</p> <p><i>“The Impact Statement must present a follow-up program that includes:</i></p> <ul style="list-style-type: none"> <li><i>• identification of VCs that warrant a follow-up program and rationale taking into account the guidance on follow-up programs cited above;”</i></li> </ul> | <p>The Follow-up Program for Federal Valued Component: Indigenous” (Table 20.2-4), includes “Changes in Health”, under which the following components are listed:</p> <p><i>“Residual effects to change in health (Indigenous people) measuring;</i></p> <ul style="list-style-type: none"> <li><i>• Biophysical determinants of health:</i></li> <li><i>• air quality</i></li> <li><i>• multi-media environmental quality</i></li> <li><i>• access and availability of water</i></li> <li><i>• access and availability of traditional foods</i></li> <li><i>• sensory disturbances (noise, light vibration).</i></li> <li><i>• Social determinants of health:</i></li> <li><i>• economics (employment, income education)</i></li> <li><i>• housing</i></li> <li><i>• access to health and social services</i></li> <li><i>• food security</i></li> <li><i>• mental wellness and community cohesion</i></li> <li><i>• actual and perceived public safety (accidents and malfunctions)</i></li> <li><i>• safety of Indigenous women and girls.</i></li> </ul> <p><i>Monitoring of the pVCs (Table 20.3-3) and fVCs (Table 20.2-2 and Table 20.2-3) linked to Indigenous Peoples (Table 20.1-1) and monitoring of the Social Performance Plan developed with community and regional input and / or negotiated agreements.”</i></p> <p>ISC notes that the “quality” of both water and country foods is missing from the federal valued component list above. “Water quality” appears in Table 20.3-3 (Surrogate Follow-up Information for pVCs), however “country foods quality” seems to be missing from these follow-up tables. Table 20.2-2 only mentions “fish health” and there is no mention of the potential for mercury levels in fish to affect the health of people consuming fish.</p> <p>The Impact Statement is relying on the MDMER and “anticipated” provincial permits (ECA) to mitigate the potential health impacts relating to water quality. However, it appears there is no consideration of the potential for mercury levels in fish to impact Indigenous health. ISC also notes that provincial permits are outside of federal jurisdiction.</p> | <p>The Proponent should include the following VCs in the “identification of VCs that warrant a follow-up program” as per section 17.1 of the TISG:</p> <ul style="list-style-type: none"> <li>- Water quality impacts on Indigenous health</li> <li>- Quality of country foods and impacts on Indigenous health</li> </ul> <p>Water quality and the quality of country foods are essential Valued Components, as they influence physical health through direct exposure while also supporting cultural traditions, food security, and overall well-being. Overlooking these factors in the Impact Statement and follow-up programs may lead to a significant underestimation of both the scale and nature of impacts on Indigenous communities.</p> |
| ISC-18 | Appendix N-2: Health Impact Assessment (HIA) for the Great Bear Gold Project (WSP, 2026)        | <p>TISG Section 9.2 “Effects to human health” states that:</p> <ul style="list-style-type: none"> <li><i>• “The Impact Statement must: describe how community and Indigenous Knowledge was used in assessing human health effects;”</i></li> </ul>                                                                                    | <p>The Health Impact Assessment (HIA) for the Great Bear Gold Project (WSP, 2026) presents multiple inputs that can influence First Nations health determinants. It considers the various health-effect pathways, it integrates GBA+ analysis and addresses a broad range of First Nations health determinants that may be influenced by project activities. However, ISC notes the following issues:</p> <ol style="list-style-type: none"> <li>1. The HIA does not clearly demonstrate how First Nations communities were engaged, and to what extent.</li> <li>2. Proponent seems to count on their Environmental Management System (EMS) to ensure health impact monitoring. However, the EMS tracks</li> </ol>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | <p>First Nations communities should have meaningful opportunities and adequate resources to develop, co-develop, select or validate, the following:</p> <ul style="list-style-type: none"> <li>• the HIA methodology</li> <li>• the health determinants potentially affected by the project activities</li> <li>• the mitigation measures</li> <li>• the health monitoring plan and monitoring activities</li> <li>• the First Nations health indicators needed for health impact monitoring</li> </ul>                                                                                                                                                                                                                                             |

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|  |  | <ul style="list-style-type: none"><li><i>“The Impact Statement must: apply GBA Plus across all health effects and document how potential effects or changes to human health conditions could be different for diverse population groups. apply GBA Plus across all health effects and document how potential effects or changes to human health conditions could be different for diverse population groups.”</i></li></ul> | mainly environmental parameters (air quality, water, etc.), and doesn’t include specific First Nations health determinants. | <p>At a minimum, the Proponent should demonstrate how the EMS will be adapted to include First Nation health determinants. The specific First Nations health indicators that will be used to verify whether impacts occur on First Nation health determinants and whether mitigation is effective must also be presented. The best practice would be to give First Nations communities the opportunity and the resources to prepare and implement their own health monitoring plan.</p> <p>Section 9 uses both “mitigation measures” and “monitoring activities” interchangeably. Mitigation measures and monitoring are closely intertwined but are two distinct methodological steps. Mitigation measures are aimed to reduce health impacts while the goal of monitoring is to verify whether impacts occur and whether mitigation measures are effective.</p> |
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