

Enclosure 1: Federal Authority Advice Record – Great Bear Gold Project Impact Statement Batch 1 and 2

Please submit the completed form by **February 2, 2026**, via email to GreatBear@iaac-aeic.gc.ca.

Department Contact Information

Submission Date	February 2, 2026
Department/Agency	Indigenous Services Canada
Lead Contact, Title, Work Unit	Norah Kielland, Policy Analyst, Environment Directorate
Email, Phone	Norah.kielland@sac-isc.gc.ca
Alternate Contact, Title, Work Unit	
Email, Phone	SAC.EvaluationImpacts-ImpactsAssessment.ISC@sac-isc.gc.ca

1. Taking into account the Project Context and Targeted Questions that IAAC has shared, review Batch 2 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 Plan¹, 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 measures² that may help manage the project's potential adverse federal effects, please specify and describe applicability to the project and any known limitations to managing effects.
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 2 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.

Norah Kielland, Indigenous Services Canada

Name of Departmental / Agency Responder

Analyst

Title of Responder

February 2, 2025

Date

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

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

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 effects³ 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	Reference to Impact Statement	Description of View or Concern Related to an Effect	Advice to Inform the Impact Assessment
<i>Please identify comments by organization and comment number.</i> e.g.: HC-01	<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> <i>a missing pathway of an adverse federal effect that may really increase the overall extent of significance; or</i> <i>sources of uncertainty that, in your department’s view, may weaken potential conclusions.</i>	<i>Considering project context (see Enclosure 2 for more detail on the key issues and targeted questions) and regulatory context, provide solution-oriented advice for the impact assessment. For example:</i> <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> <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> <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> <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> <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> <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> <i>Provide any additional considerations in relation to IAAC’s obligations under section 79 of the Species at Risk Act.</i> <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	All	It is ISC’s understanding that the chapters discussing the project’s effects on Indigenous people (as per the TISG) will follow in batch 3. However, there are a number of areas in batch 2 that are dependent on information forthcoming in batch 3. Until information is provided in full, ISC cannot complete a comprehensive review. As such, ISC’s is providing comments on the available information, which may need to be revisited depending on what information is provided in “GBG Submission 3”. Considerations to support the information requests: - The TISG requirements - Section 6.1 references an “Anishnaabe-led impact assessment process”, but does not state how it will inform the GBG Impact Statement or the development of follow-up plans and program 7.11.1.2 “Pathway Linkages from other Wildlife” states that linkages are reflected in the assessment of the current use of lands and resources for traditional purposes and health will be released in sections not included in this batch - ISC supports the expanded predictive modelling area for the Mercury Study Plan, to evaluate whether the additions of sulphate, iron and other parameters which could stimulate methyl mercury in regulated effluent, may result in effects to water quality or aquatic life downstream of the	For a complete analysis, ISC will require the following information in batch 3 to supplement the issues identified in batch 2: The assessment of Indigenous health impacts in “GBG Submission 3”, including the following information required by the TISG: - Changes in potential contaminant levels in harvested species and their prey, with a focus on traditional foods harvested by Indigenous Peoples, such as methylmercury levels in fish; - A description of how the project-related contaminants (e.g. arsenic, mercury, cadmium, lead, chromium) that can potentially end up in the water, air, or soil, may be taken up in country foods (i.e. foods that are trapped, fished, hunted, harvested or grown for subsistence, cultural or medicinal purposes); - The validation of model assumptions (e.g. the rate of country food consumption); - A detailed HHRA of mercury exposure via consumption of country foods, especially fish, ensuring that existing methylmercury exposure in nearby human receptors are factored into the HHRA, particularly when assessing impacts on Grassy Narrows First Nation community members in the HHRA. Information in “GBG Submission 3” how the Anishnaabe-led impact assessment process will inform the Impact Statement and the project’s follow-up plans and programs. Information in “GBG Submission 3” on the analysis of changes for the Lac Seul First Nation, Wabauskang First Nation, Asubpeeschoseewagong Netum Anishinabek, and Northwestern Ontario Métis Community. The inclusion of monitoring practices as part of the Mercury Study Plan (Appendix T), expected in “Submission 3”, to validate the proponent’s modelling predictions, including cumulative effects on downstream waterbodies and fish. - As Grassy Narrows have already endured severe mercury contamination of their fish supply in the past, the assessment must carefully evaluate whether project-related releases of sulphate and mercury could further

³ “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*.

		project, including up to 125 km downstream (encompassing the community of ANA). ISC also supports the proponent's commitment to monitor and report on changes in monthly and annual sulphate, mercury, and methylmercury stream and river loadings or exports (in g or kg of sulphate, mercury, and methylmercury) as hydrologic discharge or flow may change due to the project. This is particularly important for the Chukuni River, which is planned to have both water withdrawals and effluent discharges.	exacerbate existing contamination in the English-Wabigoon River system, posing additional risks to Indigenous health, livelihoods, and Aboriginal and/or Treaty rights.
ISC-02	7.6 Analysis of Changes to Surface Water Flows and Levels	Section 7.6 is missing key information on Indigenous communities. In particular, Figure 7.6-2, Figure 7.6-3 (Map), and the Section analysis (pages 7-129 to 7-151) do not references any sources of community water treatment plans and potential impacts to operations.	ISC recommends that Figure 7.6-2 is amended to identify First Nation communities, and that Figure 7.6-3 identify Asubpeeschoseewagong Netum Anishinabek (Grassy Narrows First Nation). In addition, Section 7.6 Analysis of Changes to Surface Water Flows and Levels (pages 7-129 to 7-151) should include an analysis of potential effects to the First Nations' potable water supply in quantity, cumulative effects, and possible impacts on the operations of community water treatment plants (existing and proposed). It is critical that the proponent discuss directly with Asubpeeschoseewagong Netum Anishinabek the project's potential impacts to water treatment plant(s)'s operations, concerning water flows and levels, and mitigation measures.
ISC-03	7.7 Analysis of Changes to Water Quality	7.7 Analysis of Changes to Water Quality makes no reference to First Nations potable water sources, nor discusses potential water quality impacts and cumulative effects. Section 7.7.8.1 Summary of Changes After Mitigation states the Manitou Falls Generating Station Dam and the confluence of the Chukuni-English River and Wabigoon River are located downstream of the node PAK-OUT, changes to water quality of those locations are also not predicted.	ISC recommends that Section 7.7 Analysis of Changes to Water Quality (pages 7-160 to 7-219) should include an analysis of First Nations' water quality supply located downstream of the proposed mine; how the communal water systems may be impacted (operations), and cumulative effects of past mining operations and industrial disasters to their traditional area, including peoples' health. It is critical that the proponent discuss directly with Asubpeeschoseewagong Netum Anishinabek the project's potential impacts to water treatment plant(s)' operations, concerning water quality, and mitigation measures.
ISC-04	7.9 Analysis to Changes to Wild Rice	The analysis described the destruction of wild rice within the project area, and potential impacts to wild rice areas within the local study area (10 km areas from the project area). The proponent is funding a wild rice study with Lac Seul First Nation and Wabuskang First Nations. Table 7.9-4 states that effluent discharge water may cause adverse effects to receiving waters and that proposed mitigation will include monitoring and testing effluent discharge in accordance with legislation and site specific permits and have water quality protection measures are in place. The analysis does not go far enough to address wild rice stands that are further downstream and does not address harvesting activities from the people of Asubpeeschoseewagong Netum Anishinabek, nor address actual or perceived impacts that may affect this cultural activity and important food source A Wild Rice Enhancement Project led by Lac Seul First Nation and Wabuskang First Nations, however, this traditional harvesting territory will may not align with the other communities who are downstream of the project and may be affected (like Asubpeeschoseewagong Netum Anishinabek) As such, these communities may not benefit from the identified rice enhancement measures.	ISC recommends that the mitigation measures section in Table 7.9-4 clarify the legislated limits regarding effluent discharge and whether discharges will result in changes to country foods, such as wild rice, within acceptable limits. Further, mitigation measures should consider worst case scenarios (i.e. spills) on impacts to Wild rice, and address community concerns. These mitigation measures should be complemented by communities awareness and trust building strategies in the testing/monitoring protocols in order to address perceptions of contamination on country foods consumption and traditional harvesting practices

		Asubpeeschoseewagong Netum Anishinabek has been seriously impacted by other industrial activities and have valid concerns over utilizing naturally occurring food resources in their traditional territory. The project will be perceived as a cumulative impact on their traditional rights and access to traditional foods.	
ISC-05	7.10 Analysis of Changes to Moose	7.10.4 Existing Conditions state that moose is one of the two primary species harvested by Lac Seul First Nation, and does not recognize that moose is also a harvested species by individuals from by Wabuskang First Nation, and Asubpeeschoseewagong Netum Anishinabek. Table 7.10-5 proposed mitigation measure states that the proponent will conduct regular moose surveys to monitor changes in density and distribution over time.	ISC recommends that the proposed monitoring measures are broad enough to detect possible hunting pressures and changes in moose populations of interest to each of the potentially affected First Nations. Further, co-monitoring measures could be development to support First Nations participation and management in moose populations.
ISC-06	Section 7.13.4.4.5 Analysis of Energy	The potential effects of the project's energy requirements on remote First Nations communities are not sufficiently examined, which often face difficulties in accessing reliable power. In particular, section 5.12 Power Supply identified a regional 115 kV transmission line (Hydro One Networks) that crossed the northern boundary of the property. Great Bear Resources recognized that the line does not have sufficient capacity to support all of Project operations (50 MW), and will supplement power supply need from a combination of grid power from the Hydro One Networks E2R transmission line which crosses the Property and power generated from natural gas drawn from the nearby Enbridge Gas pipeline. However, section 7.13.4.4.5 Energy, does not describe the potential impacts to First Nation communities that may be affected by the additional load on the existing 115 kV transmission line, which is connected to the Wataynikaneyap Power Transmission Line that recently grid connected the communities of Pikangikum, Sandy Lake, North Spirit Lake, Deer Lake and Keewaywin First Nations.	The added pressure of Great Bear Gold Mine on the transmission line that does not currently have capacity to support its operation could lead to blackouts/brownouts in First Nations communities. The proponent seems to acknowledge the possibility of blackouts as the proposal notes the use of temporary diesel-powered generators for emergency purposes (section 5.12). It is critical that the proponent discuss together with Wataynikaneyap Power LP and Hydro One the additional power supply needs of Great Bear Resources and clearly outline the potential impacts to the Wataynikaneyap Transmission Line and First Nations communities that are grid connected via this transmission line. As well, for Great Bear Resources to clearly demonstrate and discuss proposed mitigation measures that would be undertaken to reduce the impacts to First Nation communities.
ISC-07	7.14 Analysis of Changes to Cultural Heritage	7.14 Analysis of Changes to Cultural Heritage has provided a limited definition of Culture and identified one impact to wild rice. Indigenous culture also includes Intangible Cultural Heritage (Living Culture) that is a non-physical expressions of culture, traditions, and knowledge passed down through generations. This includes oral traditions, languages, performing arts (music, dance), social practices, rituals, traditional craftsmanship skills, beliefs, and knowledge, and physical landscapes.	The proponent should be consulting with Indigenous communities to clarify what their perspectives are on cultural heritage, including storytelling, ancient and current traditions, languages, family ties, craftsmanship, clothing, tools, inter-tribal relationships, culturally significant landscapes, areas of exclusion, etc. This section can also address Indigenous perspectives related to colonization, treaty-making experiences, and resource and mineral extraction.
ISC-08	Section 7.14.2 Cultural Heritage Evaluation	Harvesting areas for fish are not considered in the analysis of changes to cultural heritage. the proponent cites a reference document in section 7.14.2.1.1 that is not relevant to the project: The "Technical Guidance for Assessing Physical and Cultural Heritage or any Structure, Site or Thing (Government of Canada 2015)" which the proponent cites in section 7.14.2.1.1 is not relevant to a project being assessed under the IAA, and the Government of Canada explicitly states that the document	ISC recommends that harvesting areas for fish are considered in the analysis of changes to cultural heritage in section 7.14. Section 7.13.7 states that input from Indigenous communities "informed the identification of those interactions that are likely to result in a pathway to a potential impact due to a measurable change to land and resource use", however, it appears that only "manoomin (Wild Rice)" is identified as an integral part of an identified cultural heritage landscape (CHL) in section 7.14. It appears that fishing in the Chukuni river is not considered as a CHL, despite the ongoing subsistence harvesting activities of Indigenous communities. The GBG Impact Statement (s.7.13.5.1) states that: "Tailings management operations will result in seepage that will be treated and released into the Chukuni River, <u>which may affect land and resource use activities.</u>" As the Chukuni River will receive effluent from the project, it could be perceived as "contaminated", which could lead to avoidance of harvesting areas and changes from a cultural heritage perspective.

		is retained only for transitional assessments under the former CEAA 2012. References: - Section 8.3 of the GBG Submission 2 states: “These spatial boundaries include watercourses and waterbodies that were noted to be of Indigenous community concern including: Gullrock Lake, Two Island Lake, Pakwash Lake, Chukuni River, Waterbody 6 and Dixie Lake.” - GBG Submission 2, section 7.13.5.1 states: “Establishment and operation of water management and treatment facilities: Construction activities and discharge of treated water in the Chukuni can affect navigation”, and during the 26-year operations phase: “Management of desulphurized tailings in the TMF: Tailings management operations will result in seepage that will be treated and released into the Chukuni River, which may affect land and resource use activities.” - Appendix P-2 (Cultural Heritage Evaluation Report) states that: “...lakes and their surrounding watercourses and ecosystems have supported generations of traditional subsistence activities, including hunting, fishing, trapping, and the harvesting of manoomin.”	The proponent acknowledges that wildlife in the region is already exposed to methylmercury at levels above the most stringent guidelines in the existing baseline condition, and the ongoing concern in Indigenous communities around mercury in country foods. Given the predicted project-related changes to the Chukuni River described in section 7.13 (as the receiving body for effluent, and the potential for both “navigation” and “land and resource use activities” to be affected), and given the importance of fishing to the Indigenous communities identified in the assessment, it appears that harvesting areas for fish should be considered in the analysis of changes to cultural heritage in section 7.14.
ISC-09	Section 7.13.4.4.1 Aggregate Resources	Given the aggregate operations and proposed aggregate use described in this section, emissions, from past, present, and reasonably foreseeable future aggregate operations in the Project Area should be considered in the cumulative effects assessment for the Project. The GBG Submission 2 (section 7.13.4.4.1 Aggregate Resources) states that there are “17 active aggregate operations, which are not part of the Project, located within the LSA. Of these, six are located within the PA. The locations of the active aggregate operations in the LSA, as well as their distance to the PA, are listed in Table 7.13-7 and shown in Figure 7.13-10.”	ISC updates it’s comment from the December 3, 2025 submission (Comment #4 – Aggregate Operations): ISC recommends that the proponent ensure that effects, including emissions, from past, present, and reasonably foreseeable future aggregate operations in the Project Area are considered in the cumulative effects assessment for the Project (section 15), in order to show the predicted cumulative impacts on the environment for Indigenous land and resource users, given the fishing, hunting and harvesting sites identified within the Project Area.
ISC-10	7.15 Analysis of Changes to Archaeology	Table 7.15-2: Mitigation Measure for Changes to Archaeology notes that the proponent will work with Lac Seul and Wabauskang First Nations to avoid the destruction of archaeological sites. In the event of a conflict, the proponent will proceed with a controlled excavation/preservation of all materials for future study “may” be considered in discussion with the First Nations.	In the event that any archaeological artifacts (e.g. bones , stone tools, wood tools, pottery) are found during any construction activity, the proponent should stop the activity, and advise First Nations of the findings. Context specific mitigation measures must be identified and carried out in cooperation with interested First Nations. Monitoring and chance find plans should be developed in alignment with First Nations’ guidance and in agreement with the communities.
ISC-11	Section 8.6 Mitigation and Enhancement Section 7.10.5.2 Operations Phase Section 8.2.2 Spatial and Temporal Boundaries	The proponent states their commitment to consulting with Indigenous communities on monitoring programs (to be further described in section 20 of the Impact Statement). However, despite elevated methylmercury levels in the region, there is no commitment expressed in Submission 2 for an Indigenous-led follow-up monitoring program for methylmercury in fish tissue, or for fish consumption surveys in Indigenous communities. References: Section 8.6 (Mitigation and Enhancement) states that: “Monitoring programs will be implemented to verify the accuracy of the	ISC recommends that section 20 of the Impact Statement describes an Indigenous-led follow-up monitoring program for methylmercury in fish tissue in species consumed by Indigenous communities. - As wildlife in the region is already exposed to methylmercury at levels above the most stringent guidelines in the existing baseline condition, and given the ongoing concern in Indigenous communities around mercury in country foods, This monitoring should start as soon as construction commences and continue through to the post-closure phase. If monitoring shows that methylmercury concentrations are increasing over time relative to pre-construction concentrations, the proponent should update the human and ecological health risk assessment accordingly and implement modified and/or additional mitigation measures based on monitoring results. ISC recommends that fish consumption surveys are conducted using community-validated methodologies.

		predicted effects and assess the effectiveness of the implemented mitigation measures and may be further optimized in response to monitoring data. Proposed follow-up monitoring described in Section 20 and will be refined during the permitting phase to incorporate conditions of approvals and permits.” Section 8.2.2 of the GBG Submission 2 states: “In recognition of the concerns expressed by Indigenous people a Mercury Study Plan was developed to monitor total mercury and methylmercury from a more extensive area that extends along the downstream flow pathway through the English River system (Appendix T). Potential changes to human health including consideration of mercury are assessed in Appendix N.” Section 7.10.5.2 states: “In regard to methylmercury, the form of mercury most readily taken up by aquatic organisms and biomagnified through the food chain, with the highest concentrations in top predators (e.g., Northern Pike and Walleye) and fish-eating birds and mammals, wildlife in the region is already exposed to methylmercury at levels above the most stringent guidelines in the existing baseline condition. The elevated levels are related to natural and historical sources. The incremental contribution to existing mercury and methylmercury concentration in water, sediment and biota by the Project is predicted to be negligible and not measurable with current analytical methods (Appendix K-3 and Appendix N-1).” “Consultation on the monitoring programs is expected to continue through all phases of the Project. Great Bear Resources will continue to look for opportunities for Indigenous communities to participate in the monitoring programs to support long term meaningful engagement and education.”	• ISC supports the proponent’s continued engagement with Indigenous communities to participate in monitoring programs in order to verify the accuracy of the predicted effects and assess the effectiveness of the implemented mitigation measures. ISC looks forward to receiving Appendix T (Mercury Study Plan), Appendix N (HHRA), and Section 20 of the IS (follow-up monitoring) for review and comment.
ISC-12	Section 16.5 Identification of Malfunctions and Accidents	The potential for the erosion of slope along proposed reconstructed watercourse(s) is not considered in the “accidents and malfunctions” section (section 16) of the Impact Statement. Given that the failure of constructed watercourses can result in significant environmental damage, as happened in 2023 at another gold mine in Ontario: https://iaac-aeic.gc.ca/050/evaluations/document/161235, and may result in resulting in impacts to groundwater, surface water, or country, such failures should be explicitly listed as one of the accidents requiring notification of Indigenous communities, in accordance with the proponent plans and policies. References: GBG Submission 2 (16-4) states that Indigenous Nations have: “concerns about the potential for toxic runoff, sedimentation, tailings leakage, and accidental spills that could affect lakes, rivers and groundwater systems that in turn could affect traditional foods.” GBG Submission 2 (section 16.5 Identification of Malfunctions and Accidents) states that: “Specific and important malfunctions and	The potential failure of reconstructed watercourses should be described in section 16 of the Impact Statement and included in Appendix U-2 (Draft accidents and malfunctions plan). • The proponent should commit to immediately notifying Indigenous groups when erosion of slope along proposed reconstructed watercourses could impact groundwater, surface water, or country foods.

		accidents that could have a material environmental effect, and that have a reasonable probability of occurring during the life of the Project were considered.”	
ISC-13	Sections 18.1 and 18.2 Analysis of the economic and social benefits	The proposal notes a number of high-level benefits that could accrue to Indigenous communities. However, without access to Batch 3, which will contain detailed information on the affected communities, it is not yet possible to assess these statements and determine the likelihood that economic opportunities will translate to an overall benefit. For example, section 18.1 notes mineral extraction tends to have higher representation of Indigenous people in the workforce and tends to offer higher wages. However, these statements are based on broader statistical analysis, rather than impacts on specific communities. It is not clear how many Indigenous workers the proponent anticipates will be employed, the nature of the jobs that they will fill, the number of procurement opportunities available to Indigenous businesses, etc. Similarly, section 18.2 notes a that the proposal will ‘strengthen’ Indigenous communities and have a ‘substantial net positive effect’. Analyses on cultural impacts and social benefits for the affected Indigenous communities have not yet been provided. The proposal includes some analyse of the uncertainties associated with attaining these benefits (section 18.5), but the information available is focused on the environmental mitigation measures and broader economic impacts, rather than the anticipated benefits for Indigenous communities.	While additional information related to the anticipated benefits and associated uncertainties is likely forthcoming in Batch 3 of the Impact Statement, ISC’s preliminary review has identified a number of areas that would benefit from additional analysis. In particular, the ability to realize the benefits of mineral exploration is dependants on a number of factors and requires close consultation and engagement from Indigenous communities. While the proposal notes that the proponent will develop strategies to support the Indigenous workers and businesses, without data that estimating that number of workers/businesses involved, it is difficult to asses the net economic benefits for communities. Here, the Economic Impact Estimator tool, which was developed with the support of ISC, provides model and criteria that could be considered in a robust economic analysis. The proposal notes also substantial social benefits but does not include any analysis of factors are unique to Indigenous communities. For example, the National Inquiry on Missing and Murdered Indigenous Women and Girls highlighted that resource extraction activities have the potential to exacerbate gender-based violence. These types of considerations are missing from section 18.5 The proponent should develop and implement a monitoring and follow up program to address and respond to uncertainties in projected social and economic benefits. The development and implementation of these programs should include affected Indigenous communities and can include a variety of quantitative and qualitative metrics to evaluation that which is most meaningful to the affected communities.
ISC-14	Appendix A-2 Concordance Table for IAAC Submission 1 and 2 to the Tailored Impact Statement Guidelines	Information related to Indigenous consumption of country foods are not yet available. ISC acknowledges the Proponent’s high-level information provided across various sections of Batch 02 (e.g., Sections 8.3 and 9.3) regarding species that are culturally important and consumed as country foods. However, ISC notes that this information is insufficient to meet the requirements of the Tailored Impact Statement Guidelines (TISG). Specifically, the TISG require the Proponent to: <i>“describe the access to, and consumption of, country foods (traditional foods) by Indigenous Peoples as a health-related behaviour, including what species are used, quantities, frequency, harvesting locations and how the data were collected (e.g. site-specific consumption surveys, First Nations Food, Nutrition & Environment Study), and if applicable what country foods are currently being avoided because of perceived contamination;”</i> Additionally, there is no corresponding section of the Impact Statement addressing this requirement, as reflected in the Concordance table (Appendix A-2). ISC Therefore expects this information to be provided in Batch 03.	As required by the Tailored Impact Statement Guidelines (TISG), information related to Indigenous consumption of country foods is not included in the various sections of Batch 02, and as there is currently no corresponding section of the Impact Statement addressing this requirement in the Concordance Table (Appendix A-2), ISC reiterates its comments provided on February 7, 2025, regarding the methylmercury study plan and the Impact Statement phase work plan. ISC recommends that the following information be incorporated into the Great Bear Gold Project Impact Statement, to be provided in Batch 03: • Confirmation whether country food consumption by Indigenous communities potentially affected by the project has been or will be evaluated; and • Clarity on if a baseline study of country foods will be included in the Impact Statement and where this information will be incorporated, and if not, provide rationale for the omission. <u>ISC recommends:</u> 1. Engaging with Indigenous communities to conduct Dietary and Food Security Surveys to ascertain consumption patterns for populations that harvest from impacted sites and incorporate the findings in the Impact Statement. 2. Assessing the project-related impacts to <u>all country foods frequently consumed or consumed in large quantities</u> by Indigenous communities, including fish, for all project phases to capture the cumulative effects and incorporate the findings in the Impact Statement. The information gathered should be used to inform a country foods follow-up monitoring program and adaptive management plans which must: 1. Include Indigenous objectives, indicators, thresholds, and responses, including both technical and Indigenous observational (non-technical) parameters. 2. Specify how food safety results 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.

			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.

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-making⁴. 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
Please identify information requirement by organization and comment number. e.g.: HC-02	Identify the specific section of the Impact Statement related to the information requirement	Identify the specific section of the Tailored Impact Statement Guidelines related to the information requirement	Provide a brief description of the outstanding information requirement in the Impact Statement, including: - 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. Include, where relevant: - 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 2 for more detail on the key effects and targeted questions); - identify the level of concern about the outstanding information and implications or consequences for strength of conclusions; and - advice to IAAC on risk (likelihood and severity of effects), using applicable frameworks relevant to your mandate. Identify if the outstanding information requirement links to specific advice provided to IAAC in Table 1.	Provide a clear and precise description of the missing information or clarification that would resolve the issue detailed at left. Also provide, where applicable, other commitments the proponent can make to respond to the issue, such as: - offsetting or mitigation to compensate for uncertainty in baseline; - follow-up to verify the accuracy of predictions and effectiveness of mitigation; - applicable guides, standards and thresholds the proponent intends to meet; and - measures the proponent intends to take to comply with other legislative frameworks that provide a means to address effects.
ISC- 01	Section 16	Section 13: Effects of Potential Accidents or Malfunctions	Section 13.2 of the TISG (Effects of Potential Accidents or Malfunctions, Mitigation Measures) states that the Impact Statement must describe: “modelling for any contaminants spilled, or released indirectly into water or air; - potential environmental, health, social, and economic effects, including effects to Indigenous peoples. With respect to human health specifically, consideration should be given to potential pathways of effects associated with groundwater and surface water, air, country foods, and other relevant media, including short-term and long-term risks to human health; - relative locations of sensitive receptors (e.g. humans, fish and/or wildlife and their habitat, waterways, private drinking water wells); - timing related to sensitive receptors (e.g. migration and nesting periods of migratory birds, spawning periods for fish, hunting season, tourist season); and - critical infrastructure, such as local drinking water treatment plants or facilities that can treat water sources affected by the Project, as well as the ability and capacity of the drinking water treatment plants or facilities to treat water sources affected by accidental releases from the Project during all project phases;”	ISC recommends that Section 16 of the GBG Submission 2 (“Effects of Potential Accidents or Malfunctions”) is updated to fulfil the requirements of section 13 of the TISG.

⁴ 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*.

			ISC notes that Section 16 of the GBG Submission 2 (“Effects of Potential Accidents or Malfunctions”) does not appear to meet the criteria established in section 13.2 of the TISG. For example, it does not appear to describe “modelling for any contaminants spilled, or released indirectly into water or air” – it also does not appear to describe potential “effects to Indigenous peoples” beyond relaying concerns communicated to the proponent in consultation sessions. This reviewer was unable to locate a description of the “relative locations of sensitive receptors” and “critical infrastructure”, including local drinking water “as well as the ability and capacity of the drinking water treatment plants or facilities to treat water sources affected by accidental releases from the Project during all project phases”, as required in the TISG.	
ISC- 02	Sections 16.8.2 and 16.18.2	Section 13: Effects of Potential Accidents or Malfunctions	The GBG Submission 2 (section 16.8.2 Contingency Planning and Mitigation) states that the emergency response plan will be developed. Section 16.8.2 (Contingency Planning and Mitigation) “The emergency response plan will include appropriate notifications to government, Indigenous communities, local communities, as well actions for remediation and / or emergency repairs.” Section 16.18.2 states: “Companies contracted to transport hazardous materials for the Project will be required to have an emergency response plan or equivalent for the materials being carried, and a protocol for managing spills in the unlikely event of a vehicular accident resulting in a spill. In the event of a hazardous materials spill from a vehicular accident, the Project team will support the transport company as needed with the implementation of their recovery plan.” Section 16.22 states: “Great Bear Resources will develop an emergency response plan for the accidents and malfunctions.”	ISC recommends that the proponent ensures that reporting requirements identified in corporate policies related to accidents and malfunctions (such as the “emergency response plan”) include notifying Indigenous communities of all accidents and malfunctions in a timely manner. ISC also recommends that the proponent ensure that their “emergency response plan” includes any contractor “emergency plans”, including those relating to the transport of hazardous materials for the Project.

Please insert additional rows as necessary.