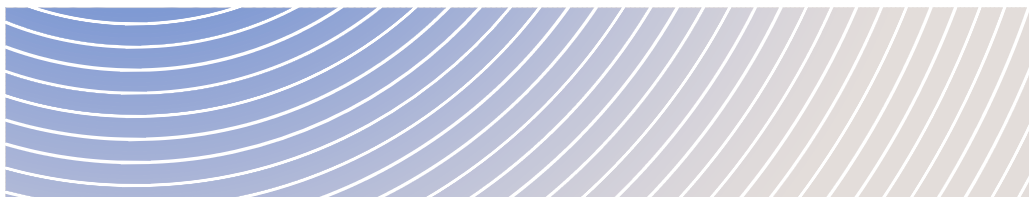




Planning Phase Engagement Report



GREAT BEAR GOLD PROJECT

January 28, 2025

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1. Introduction

On August 1, 2024, the Impact Assessment Agency of Canada (IAAC) commenced an impact assessment of the Great Bear Gold Project (the Project) proposed by the Kinross Gold Corporation (the Proponent). During the Planning phase of the impact assessment process, IAAC led consultation and engagement activities with Indigenous Peoples and the public. This report explains how the input provided by Indigenous Peoples and the public was used by IAAC.

1.1 Project context

Kinross Gold Corporation is proposing the construction, operation, decommissioning and abandonment of a new open-pit and underground gold mine with an on-site metal mill, located 23 kilometres southeast of Red Lake, Ontario. As proposed, the Great Bear Gold Project would include the mining of two open-pits, the construction of a new on-site metal mill, a new tailings management facility, and new mine rock, overburden, and ore stockpiles (Figure 1). The Project would produce up to 60,000 tonnes of ore per day, while the metal mill would process up to 15,000 tonnes of ore per day and would operate for about 20 years.

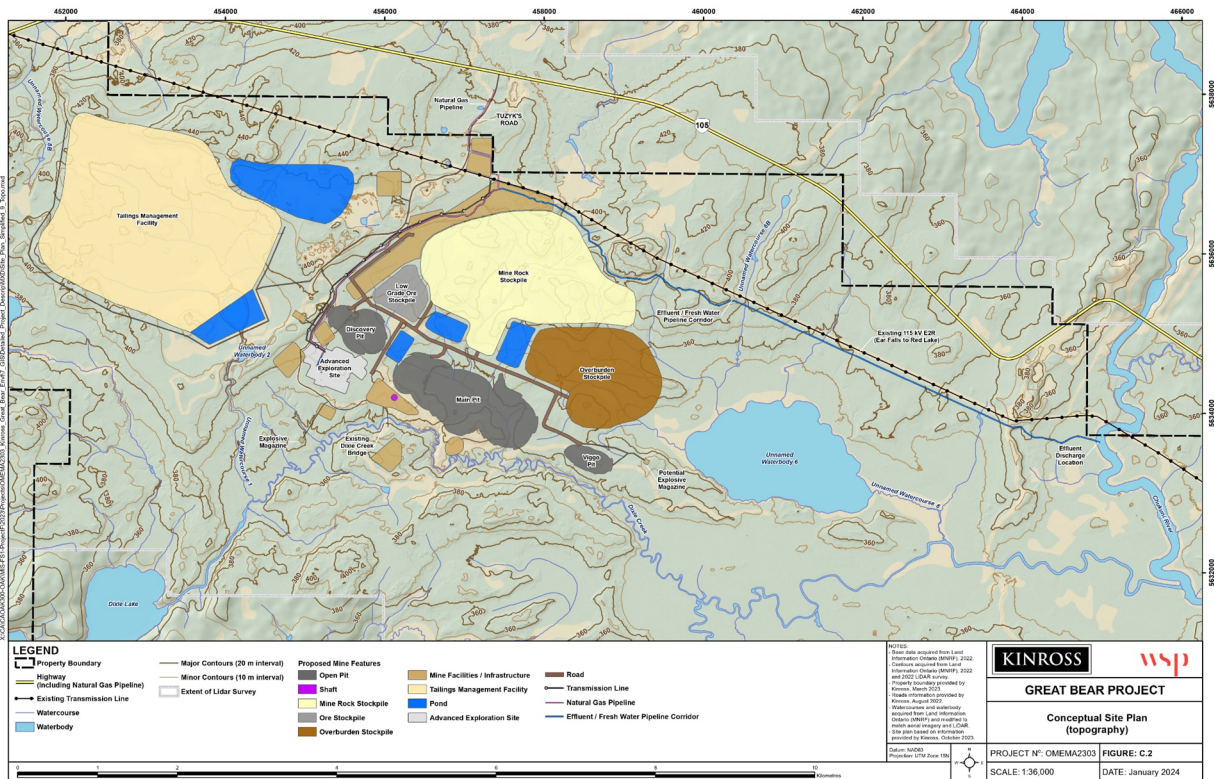


Figure 1: Conceptual drawing of the proposed project
Source: Kinross Gold Corporation, 2024



The [Planning phase](#) for the impact assessment of the Project was completed on August 1, 2024. The Planning phase is the first of five phases of the federal impact assessment process under the [Impact Assessment Act](#) (Figure 2). The Planning phase was used to: identify key issues related to the project; decide whether an impact assessment is required; understand how Indigenous Peoples and the public would like to participate in the impact assessment process; and plan the assessment.

Figure 2: Planning phase within the impact assessment process



Source: Impact Assessment Agency of Canada, 2022

During the Planning phase, IAAC led consultation and engagement activities with Indigenous Peoples and the public. This was done through virtual and in-person meetings and two formal comment periods. In addition, IAAC provided \$56,000.00 in [Participant Funding](#) to support Indigenous and public participation in the Planning phase. Written comments that were submitted to IAAC during the Planning phase were posted on the [project page on the Canadian Impact Assessment Registry](#) (Registry) for transparency, subject to exceptions related to privacy, security or confidentiality¹.

1.2 Report content

This report provides information about comment periods and other consultation and engagement activities conducted by IAAC during the Planning phase. It explains how the input received from Indigenous Peoples and the public was used to help identify key issues and inform the process and associated documents.

¹ For additional information on which comments remain private and how IAAC protects individual privacy, please refer to IAAC's [Submission Policy](#) and [Privacy Notice](#).



In addition, information on [next steps](#) in the impact assessment process, as well as how you can [stay informed](#) on the Project is also included.

IAAC has a unique relationship with Indigenous Peoples involved in the impact assessment process and seeks to work with Indigenous Peoples in a way that: advances reconciliation; respects rights, culture and self-determination; and ensures consideration of Indigenous perspectives, concerns, expertise and knowledge. Such consultation work extends beyond the principles of public engagement.

This report includes some information on Indigenous consultation, including how comments from Indigenous Peoples helped shape the assessment, but does not describe the full range nor depth of consultation activities or outcomes. Rather, IAAC maintains direct communication with Indigenous communities, including in relation to how their comments were considered and addressed.



2. Consultation and engagement during the Planning phase

In August 2023, IAAC initiated a comment period on the [Summary of the Initial Project Description](#) and invited comments from Indigenous communities, federal authorities, provincial ministries, and the public on the Project. As part of this comment period, IAAC held virtual information sessions and used other means of engagement, such as publications on social media and local newspapers, so that Indigenous Peoples and the public could learn about the Project, the impact assessment process, and how to submit comments.

In May 2024, IAAC initiated a second public comment period to seek input on the draft [Tailored Impact Statement Guidelines](#) (the Guidelines) and draft [Public Participation Plan](#). Additional in-person and virtual information sessions were held and the same means of engagement to the first comment period were used to support public participation. In addition, IAAC worked together with Indigenous communities to prepare an [Indigenous Engagement and Partnership Plan](#) for the Project. IAAC continued engaging Indigenous communities and the public after the second comment period ended, and before the [Notice of Commencement](#) was posted on the Registry.

In total, IAAC received 56 written submissions during the Planning phase from Indigenous communities (12), members of the public (16), provincial ministries and municipalities (10), and federal departments and agencies (18), including those received outside of the first and second formal comment periods².

3. How input was used

3.1 Identifying key issues and Proponent response

IAAC identified key issues drawing from comments received from Indigenous communities and the public prior to IAAC's opinion that an impact assessment was warranted for the Project, and through associated consultation and engagement activities. The following are examples of key issues within federal jurisdiction identified by the public and Indigenous communities:

² A total of 17 written submissions were received outside of the first and second comment periods. Comments received verbally during in-person and virtual meetings with Indigenous communities and municipalities are not included in the total.

- adverse changes to fish and fish habitat, specifically for lake whitefish, walleye, lake trout, and lake sturgeon;
- potential effects to fish habitat from changes to surface water and groundwater quality and quantity in Dixie Creek and the Chukuni River watershed around the Project from overprinting, potential watercourse diversions, and the effluent discharge location;
- adverse changes to migratory bird species at risk;
- potential effects on species of importance to Indigenous Peoples including moose and American Pine Marten;
- potential effects to the current use of lands and resources for traditional purposes by Indigenous communities such as hunting, fishing, gathering (e.g. wild rice), spiritual and cultural practices and exercise of Aboriginal and/or treaty rights;
- potential effects on sites or artifacts of archaeological importance to Indigenous Peoples;
- potential impacts on the health and well-being of Indigenous Peoples, including potential impacts to drinking water and country foods, including potential mercury contamination of fish; and
- potential impacts to Indigenous People's social and economic conditions including but not limited to hunting, trapping, fishing, tourism, and access to employment.

Issues raised by Indigenous Peoples and the public helped inform IAAC's development of a [Summary of Issues](#). IAAC provided the [Summary of Issues for the Project](#) to the Proponent and directed it to set out how it intends to address the issues identified within. IAAC also directed the Proponent to provide a [Detailed Project Description](#). On February 23, 2024, the Proponent submitted its [Response to the Summary of Issues](#) and its Detailed Project Description. In the Detailed Project Description and Response to the Summary of Issues, the Proponent indicated that several issues will be assessed in the Proponent's Impact Statement, including the provision of proposed mitigation measures and appropriate monitoring or follow-up program based on the results of the assessment. Some examples provided in the Response to Summary of Issues include:

- monitoring seepage and treating effluent discharge to meet regulatory requirements prior to discharge to the environment;
- no longer considering the diversion of Dixie Creek;
- conducting a human and ecological health risk assessment considering relevant biophysical pathways of exposure and applicable provincial and federal guidelines; and
- fostering an inclusive, accessible environment for all employees and working to reduce barriers to employment for underrepresented groups in the labour force including women.

3.2 Informing the opinion of whether to require an impact assessment

On March 22, 2024, in applying the measures outlined in the [Statement on the Interim Administration of the Impact Assessment Act Pending Legislative Amendments](#), IAAC issued its opinion that an



[impact assessment for the Project was warranted](#). In issuing this opinion, IAAC was of the opinion that the Project may cause adverse effects within federal jurisdiction, including effects on fish and fish habitat, migratory birds, and impacts on Indigenous peoples. Potential effects on Indigenous Peoples include changes to health, social, and economic conditions, as well as impacts on physical and cultural heritage, and current use of lands and resources for traditional purposes, and any structure, site or thing of historical or archaeological significance. IAAC also took into account other factors, including comments received from Indigenous Peoples and the public.

3.3 Informing preparation of the Tailored Impact Statement Guidelines

The [Tailored Impact Statement Guidelines](#) describe the information and studies that a Proponent is required to include in its [Impact Statement](#). Input from Indigenous communities and the public informed IAAC's preparation of the [Tailored Impact Statement Guidelines](#) for the Project. Specifically, these guidelines require the Proponent to assess potential effects of the Project and prevent or mitigate significant adverse effects within federal jurisdiction in the following areas.

Comments provided by Indigenous Peoples helped improve IAAC's understanding of how Indigenous communities may be impacted by the Project and the potential nature of these impacts. IAAC considered all comments received in the development of the Tailored Impact Statement Guidelines and added additional requests for information to the guidance to address issues accordingly.

IAAC heard comments and issues from Indigenous Peoples and the public as noted in Section 3.1, as well as the following:

- contaminants that may flow downstream from the Project and increase existing impacts on health of Indigenous Peoples, specifically methylmercury;
- current use of lands and resources for traditional purposes of Indigenous Peoples, specifically sites of physical and cultural significance, including areas for ceremony, sacred places and archaeological sites;
- Indigenous spiritual and cultural practices, including the cultural importance of water; and
- Indigenous harvesting rights (e.g., species of cultural importance, traditional and medicinal plants).

In addition, the following modifications to the Tailored Impact Statement Guidelines were informed by comments on the draft document received during the second comment period, from Indigenous Peoples, members of the public, federal departments, provincial ministries and municipalities.

Concerns were raised related to contaminants that may flow downstream from the Project and increase existing impacts on health of Indigenous Peoples, specifically methylmercury. These



comments led to additional requirements for the Proponent in the Tailored Impact Statement Guidelines to:

- submit a study plan that examines and includes an analysis for project contributions to methylmercury production in downstream watersheds;
- conduct a Human Health Risk Assessment including existing methylmercury exposure in nearby human receptors;
- identify mitigation to avoid human health effects caused by changes to the quality of country foods from potential changes in mercury methylation rates downstream of the Project;
- use monitoring points to assess surface water quality upstream and downstream of the Project; and
- assess effects on fish and fish habitat, including spawning habitat and methylmercury in fish tissue.

Additional concerns were raised regarding impacts to Indigenous Peoples. These concerns led to additional requirements for the Proponent to:

- explain Indigenous communities' preference to conduct an Indigenous-led assessment and the use of Indigenous Knowledge in the Impact Statement;
- implement ceremonial practices requested or advised by Indigenous communities prior to collecting Indigenous Knowledge and/or conducting baseline studies;
- provide information on heritage structures, sites, and things of significance for Indigenous Peoples, including sacred, ceremonial or culturally important places, plants, animals, objects, beings, or things;
- describe measures that would mitigate effects on physical and cultural heritage and any structure, site or thing that is of historical, archaeological, paleontological or architectural significance related to Indigenous Peoples and supported by technical cultural heritage studies;
- refer to the [Nibi Declaration of Treaty #3](#) to ensure that it understands the significance of water for Indigenous communities while conducting the assessment of potential effects on groundwater and surface water;
- evaluate the significant adverse effects, particularly the discharge of mining effluent into watercourses, on water quality and fish harvested by Indigenous communities;
- provide information on the possibilities of avoidance of certain country food sources or drinking or recreational water sources by the Indigenous Peoples due to the perception of contamination;
- describe changes in terms of accessibility, availability, utilization (quality and use) and stability of country foods (traditional foods), and the potential effects related to these changes on physical and mental health of Indigenous Peoples;
- provide a description of the potential adverse effects on species of importance to Indigenous Peoples and their habitat, including moose, American pine marten, fur-bearing mammals, caribou, wolverine, berries and medicinal plants, lake whitefish, lake trout, walleye, and lake sturgeon habitat; and
- demonstrate measures to avoid and minimize effects to boreal caribou and its critical habitat.



Consideration of Indigenous Knowledge

Indigenous Knowledge provided to IAAC during the Planning phase was instrumental in helping IAAC reach its opinion that an impact assessment was warranted and prepare the Tailored Impact Statement Guidelines. For example, Indigenous Knowledge holders identified potential effects related to cultural important places (e.g., Rice Lake and Chukuni River), places with archaeological potential or artefacts (e.g., east bank of Chukuni River), cultural significance of water (e.g., [Nibi Declaration of Treaty #3](#)), plants (e.g., wild rice), and identified species of importance (e.g., moose, boreal caribou, wolverine, American pine marten, lake whitefish, lake trout, lake sturgeon).

3.4 Informing preparation of the Indigenous Engagement and Partnership Plan

An [Indigenous Engagement and Partnership Plan](#) describes opportunities and methods for meaningful engagement and consultation with potentially affected Indigenous communities throughout an impact assessment process. IAAC worked collaboratively with Indigenous Peoples to prepare the [Indigenous Engagement and Partnership Plan](#) for the project.

During the Planning phase, Indigenous communities identified values and objectives for Indigenous consultation related to the Project, which were summarized in the Indigenous Engagement and Partnership Plan. For example, IAAC was advised that consultation should be ongoing throughout the impact assessment process and must meaningfully address all concerns raised by Indigenous communities. Consultation should also respect existing consultation protocols, such as working with communities' designated representatives, as established by Indigenous communities. With respect to Indigenous Knowledge, Indigenous communities advised that there must be respect for, and adherence to, established processes and protocols developed by communities that govern the sharing and use of this knowledge.

Indigenous communities requested to be provided sufficient time to engage with their members or citizens regarding the Project and provide access to financial support to enable meaningful participation in the impact assessment process. Indigenous communities also advised that they should be provided with opportunities to verify procedural records of consultation throughout the impact assessment process. In addition, IAAC will work collaboratively with the Indigenous communities, who have expressed interest, to develop and implement community-specific consultation plans during the Impact Statement phase.

Certain Indigenous communities are working with the Proponent to contribute to the assessment of the Project's impacts on their respective communities, namely the Anishinaabe-led impact assessment (ALIA), as proposed jointly by Lac Seul First Nation and Wabauskang First Nation. Both communities are working with the Proponent to determine how the ALIA will inform the Impact Statement. IAAC is



committed to validate the Impact Statement with Indigenous communities, including sections that may have been informed by the ALIA.

Comments provided by Indigenous communities helped refine IAAC's understanding of how communities may be impacted by the Project and the potential nature of these impacts. IAAC modified the Indigenous Engagement and Partnership Plan to reflect the above comments, as well as others provided by Indigenous communities during the Planning phase.

3.5 Informing preparation of the Public Participation Plan

A [Public Participation Plan](#) describes the plan for engaging the public throughout an impact assessment process. Comments from the public were used by IAAC to inform its preparation of the [Public Participation Plan](#) for the Project.

Public comments helped IAAC understand how various parties prefer to participate in the impact assessment process. Public comments also helped IAAC identify additional organizations interested in the impact assessment of the Project.

3.6 Other comments received during the Planning phase

Further to the input provided in Section 3.3 above, some Indigenous communities provided comments regarding the implementation of the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP) including free, prior and informed consent (FPIC) in the IA process, and a pause in the Planning phase timeline to allow an opportunity for the community to be involved and provide feedback on the proposed Project.

4. Next steps

On August 1, 2024, IAAC issued the [Notice of Commencement of an Impact Assessment](#) for the Project and provided the Proponent with the final [Tailored Impact Statement Guidelines](#) and [plans](#). At the same time, IAAC issued the [Notice of Transition to the Amended Impact Assessment Act](#) in order to bring the project under the amended *Impact Assessment Act*. The impact assessment of the Project then entered the [Impact Statement phase](#) (Figure 3). During this phase, the Proponent collects information and conducts studies as described in the Tailored Impact Statement Guidelines to prepare an [Impact Statement](#) before submitting it to IAAC.



Figure 2: Impact Statement phase within the impact assessment process



Timeline

- Planning
- Impact Statement
- Impact Assessment
- Decision-making
- Post Decision

Source: Impact Assessment Agency of Canada, 2022

IAAC will continue to lead consultation and engagement activities with Indigenous Peoples and the public during the Impact Statement and Impact Assessment phases of the process. Indigenous communities and members of the public are also encouraged to share their comments with the Proponent to inform the development of the Impact Statement. As part of future consultation and engagement, Indigenous Peoples and the public will be invited to provide their views on the Proponent's Impact Statement as well as on IAAC's Draft [Impact Assessment Report](#) and Draft Potential [Conditions](#).

5. Stay informed

5.1 Stay informed about the impact assessment of the Great Bear Gold Project

- To find out the latest on the status of the impact assessment of the Great Bear Gold Project, including information about future opportunities to provide comments, consult the [project page on the Canadian Impact Assessment Registry](#) or click on the QR Code below that will take you to the Project page on the Registry.



- You can also request to be added to the email distribution list for the Great Bear Gold Project by sending an email to: GreatBear@iaac-aeic.gc.ca.

5.2 Stay informed about the Impact Assessment Agency of Canada and other assessments

- For general information about IAAC and the impact assessment process, including how to get involved, refer to [IAAC's website](#).
- For information about other assessments, including impact assessments of other projects and regional and strategic assessments, refer to the [Canadian Impact Assessment Registry](#). The Canadian Impact Assessment Registry is Canada's national database about federal assessments.
- You can also subscribe to the Canadian [Impact Assessment Registry notification service](#) to receive a personalized email when new content is posted.
- To receive news and alerts issued by IAAC delivered directly to your Really Simple Syndication (RSS) reader, you can subscribe to IAAC's [RSS Feed](#).