



Great Bear

Great Bear Gold Project Impact Statement

Section 21: Conclusions





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Acronyms and Abbreviations

fVC	Valued component under federal jurisdiction
GHG	Greenhouse gas
Great Bear Resources	Great Bear Resources Ltd.
Project	Great Bear Project
pVC	Pathway valued component

21.0 Conclusions

21.1 Impact Statement Findings

Great Bear Resources Ltd. (Great Bear Resources) is proposing to develop the Great Bear Project (Project) in northwestern Ontario. The Project will establish a long-term presence in the Red Lake area, creating positive economic and social benefits for local communities and Indigenous peoples, leading to improvements in the overall quality of people's lives in a manner that is sustainable beyond the life of mine, while being responsible stewards of the environment.

This final Impact Statement has been prepared to meet the regulatory requirements under the *Impact Assessment Act*. The Impact Statement reflects the results of consultation and engagement efforts by Great Bear Resources, particularly over the last 32 months of the Impact Assessment process. Consultation input from local Indigenous Nations has been considered throughout the Impact Statement including during the extensive baseline data collection, alternatives assessment, Project design advancements, assessment of potential Project effects, and proposed mitigation measures to eliminate or reduce adverse effects.

The Impact Statement is required to identify valued components that will serve as the focal points for the Impact Assessment and characterization of changes to the environment. As the federal Impact Assessment process is intended to prevent or mitigate significant adverse effects within federal jurisdiction and significant direct or incidental adverse effects, the selected valued components were characterized as valued components within federal jurisdiction (fVCs), or valued components that provide a pathway through which the Project may affect fVCs, termed pathway valued components (pVCs) for this document. This framework allows for an integration of environmental aspects under both federal and provincial jurisdiction, with other components of interest to better accommodate an ecosystem approach.

Based on the Tailored Impact Statement Guidelines (Appendix A-1) and feedback Great Bear Resources received through consultation and engagement, the pVCs identified for assessment in the Impact Statement were: air quality, sound, vibration, groundwater, surface water flows and levels, water quality, vegetation communities, Wild Rice, Moose, Species at Risk, other wildlife, land and resource use, cultural heritage, archaeology and local and regional economy.

The selected fVCs for this Impact Statement were: fish and fish habitat, migratory birds and Indigenous Peoples (inclusive of: community services and infrastructure; current use of lands and resources for traditional purposes; physical and cultural, heritage, structures, sites or things; community well-being; and health).

Environmental protection, mitigation and management measures have been incorporated into planning, design, construction, operations and ultimate closure of the Project as described in the Impact Statement. The engineering design of the Project incorporates climate change considerations, and Project components and infrastructure are being designed to manage variable weather events. The Impact Statement demonstrates that mitigation and management can be effectively used to avoid significant adverse environment effects under federal jurisdiction.

There is a high level of confidence that the assessment of effects to valued components are not underestimated, as a result of taking a precautionary approach using conservative assumptions. Multiple years of environmental baseline investigation and engineering field investigations have been completed to support the design of the Project, and reduce the level of scientific



uncertainty. Management and follow up programs are proposed to confirm the conservatism of the assessment and detect unintended effects so that appropriate corrective actions can be taken.

21.2 Project Benefits, Impact and Public Interest

21.2.1 Project Benefits

One of the primary benefits of the Project is the positive effects on the economy. Expenditures during all Project phases (construction, operations and decommissioning and closure) will stimulate the economy, creating jobs and income in industries throughout Ontario. Direct, indirect and induced effects of the Project include a total of \$18.9 billion in additional gross domestic product, 113,130 person-years of employment, \$9.2 billion in labour compensation and \$6.3 billion in government revenues. The workforce numbers will peak at over 1,300 people in the last year of the construction phase, and will decrease during the operations phase to approximately 700 workers when only the underground mine is operating. The majority of the workforce is targeted to be local to the area. Great Bear Resources intends to attract and hire from Indigenous partners and local communities before looking regionally and provincially, which may be necessary for some specialty positions.

Great Bear Resources aims for a life of mine approach to meet community expectations, with a goal of benefits extending beyond mining operations. The Project is expected to have a substantial, net positive effect on community and the social environment locally through benefits such as training, work experience and related business experience gained through the Project. These benefits are anticipated to result in skills that are transferable to other economic sectors to further support the regional economy after the mine closes.

This Impact Statement provides information aligned with the Tailored Impact Statement Guidelines, to inform the preparation of an Impact Assessment Report by the Impact Assessment Agency of Canada. The Impact Assessment Report supports the determination by the Minister of Environment and Climate Change that the Project is in the public interest and should be approved. That determination is understood to involve the balancing of aspects such as environmental protection, economic benefits, social well-being and Indigenous rights, to determine an overall public interest. Section 63 of the *Impact Assessment Act* outlines the following factors that must be considered when making a public interest determination:

- Contribution to sustainability
- Presence of significant adverse effects within federal jurisdiction, and adverse direct or incidental effects
- Impact on any Indigenous group and adverse impacts on Indigenous rights
- Extent the effects of the project contribute to, or hinder, the Government of Canada's environmental obligations and climate change commitments.

21.2.2 Contribution to Sustainability

The four sustainability principles defined in Impact Assessment Agency of Canada (2021) are applied through this the Impact Statement, including as follows:

- 1) Interconnectedness of human-ecological systems: valued components were selected based on Indigenous knowledge and stakeholder input, recognizing linkages among environmental, social and economic factors
- 2) Well-being of present and future generations: community-defined well-being elements, including health, housing, employment, safety, cultural continuity and intergenerational knowledge transfer, were incorporated

- 3) Positive effects and reduction of adverse effects: mitigation measures and social benefits are summarized, with recognition of potential regional inequities, and emphasis on maximizing benefits and reducing harm
- 4) Precautionary principle and risk management: conservative assumptions, adaptive management, best available technologies, progressive reclamation, and community engagement are integral to risk mitigation and project design.

The precautionary principle guided the effects assessment, risk mitigation, site rehabilitation, and community consultation, aiming to prevent serious or irreversible environmental harm associated with scientific uncertainty that may remain despite extensive environmental baseline investigations and comprehensive modelling efforts. Great Bear Resources is confident in the assessment of effects as identified in the Impact Statement. Follow-up programs or use of surrogate monitoring information (Section 20) is proposed to confirm the assessment results.

21.2.3 Significant Adverse Effects under Federal Jurisdiction

The selected fVCs for this Impact Statement were: fish and fish habitat, migratory birds and Indigenous Peoples (inclusive of: community services and infrastructure; current use of lands and resources for traditional purposes; physical and cultural, heritage, structures, sites or things; community well-being; and health). Mitigation is proposed for adverse indirect or incidental effects, including related to pVCs that may be present a pathway to significant adverse effects to fVCs. As described in the comprehensive effects assessment completed in a stepwise manner and detailed in Section 8 to Section 14, no significant residual adverse effects under federal jurisdiction have been identified, after application of proposed mitigation measures.

21.2.4 Impact on Indigenous People

The construction, operation, and active closure of the Project will result in positive and negative effects to Indigenous people, including through access restrictions to traditional lands required for the safe operation of the mine, and changes to the quality of experience in the immediate area of the Project. The Project may affect community well-being of the broader region, but adverse effects are expected to be manageable through mitigation and enhancement measures. No significant residual effects are expected to the Indigenous people of Asubpeeschoseewagong Netum Anishinabek, Lac Seul First Nation, Northwestern Ontario Métis Community, Wabauskang First Nation or Indigenous people residing in Red Lake and Ear Falls, Ontario.

21.2.5 Environmental Obligations and Climate Change

The Impact Statement is required to describe likely effects of the Project in the context of Government of Canada environmental obligations and commitments, both legislative and policy-related. The Project has been designed to meet federal and provincial regulatory requirements, which would include, but is not limited to requirements under the *Canadian Navigable Waters Act*, *Canada Wildlife Act*, *Fisheries Act*, *Migratory Birds Convention Act* and *Species at Risk Act*, as applicable, and supporting policies and guidance aligned with biodiversity commitments. Although not known or expected to be present on the Great Bear Property, the Impact Statement considers potential effects on Boreal Caribou habitat and population at a range-level (Section 7.12), as well as potential effects to other Species at Risk. Assessment of potential effects to migratory birds and proposed mitigation measures in consideration of the *Migratory Birds Convention Act* is provided in Section 9.

Under the Convention on Biological Diversity, the Government of Canada has committed to conserving biological diversity, ensuring the sustainable use of biological resources, and promoting the fair and equitable sharing of benefits arising from the use of resources, consistent with the principles of sustainable development. In fulfilling its obligations, Canada must integrate biodiversity considerations into policies, plans and Project-level decisions. Amongst other measures, these obligations also require mitigating biodiversity impacts, supporting ecosystem restoration and species recovery and respecting, and incorporating Indigenous knowledge and practices relevant to sustainable use. Great Bear Resources has promoted these aspects consistent with Canada's environmental obligations related to biological diversity, by minimizing the overall Project footprint, planning for Project closure prior to development. Available Indigenous knowledge has been used to assess potential effects of the Project including to the biophysical environment, and to develop mitigation measures to minimize biodiversity effects.

The Impact Statement includes a comprehensive assessment of potential greenhouse gas (GHG) emissions (Appendix D-3), recognizing the linkage with climate change. The assessment estimates the net emissions and impact on carbon. Although, the Project will result in a net increase in GHG emissions, the change will not have a notable effect on the Canadian and global GHG inventories. Onsite natural gas usage is the largest source of the GHG emissions, and can be substantially reduced if additional grid power becomes available from the provincial utility or another source. Mitigation opportunities will continue to be reviewed over the Project life with an aim to further reducing GHG emissions.

A Net-Zero Plan has been prepared following the requirements of the Strategic Assessment of Climate Change developed by Environment and Climate Change Canada, to demonstrate Great Bear Resources' commitment to climate action and GHG mitigation in alignment with the *Net-Zero Emissions Accountability Act*. The Project Net-Zero Plan presents two credible scenarios to achieve net-zero emissions by 2050, supportive of the federal commitment to achieve net-zero GHG emission by 2050 (Appendix W-1).

Climate change may alter future precipitation and temperature patterns, affecting weather-related hazards and potentially impacting the Project. To address this, a detailed climate change dataset, a climate change risk assessment and a climate roadmap were developed and integrated into Project design and hazard evaluation (Appendix W-3, Appendix W-4 and Appendix W-5, respectively). The climate change risk assessment estimates climate risks and identifies management approaches throughout Project phases, aligning with federal and mining sector guidelines on climate resilience and adaptation. The Project is expected to be resilient to future climate conditions over its planned lifetime.

21.3 Next Steps

Great Bear Resources is dedicated to establishing productive local partnerships that contribute to achieving goals identified in collaboration with the communities to derive benefits from the Project. Ongoing, consultation and engagement is essential to success, and is proposed to continue to occur throughout all phases of the Project.

Great Bear Resources is currently preparing application documents for the required environmental approvals building on the framework presented in this Impact Statement. These applications will provide additional details, and provide further confidence that the proposed mine can meet the necessary regulatory requirements. Consultation and engagement will continue while obtaining these environmental approvals.

Great Bear Resources is looking forward to working with its local partnerships to develop a world-class gold mine in the Red Lake area on completion of the environmental approvals process.

21.4 References

Impact Assessment Agency of Canada. 2021. Guidance: Considering the Extent to which a Project Contributes to Sustainability. Accessed June 3, 2025 from:
<https://www.canada.ca/en/impact-assessment-agency/services/policy-guidance/practitioners-guide-impact-assessment-act/guidance-considering-extent-project-contributes-sustainability.html#toc4>