

SUMMARY OF ISSUES – Great Bear Gold Project

This document provides a summary of issues that were submitted to the Impact Assessment Agency of Canada (the Agency) about the Great Bear Gold Project (the Project) during the comment period on the Summary of the Initial Project Description, submitted by Kinross Gold Corporation (the Proponent). The issues highlight information that support decision making by the Agency on whether an impact assessment is required under section 16 of the *Impact Assessment Act* and — if an assessment is required — inform the tailoring of planning phase documents. The Agency understands that there are ongoing baseline studies conducted by the proponent. The information gathered as part of these studies should optimally be provided as part of the response to the Summary of Issues to support the Agency’s decision-making. Original submissions are online, on the Canadian Impact Assessment Registry Internet site for the Project (Reference Number 85832).

The Proponent must provide the Agency with their response to the Summary of Issues that details how they intend to address the issues and the Detailed Project Description. The Detailed Project Description, including the Summary of the Detailed Project Description, must contain the information from the Initial Project Description, including the Summary of the Initial Project Description, with new information integrated throughout the main body of the document as appropriate to respond to the issues raised. This will facilitate understanding by assessment participants, including Indigenous and public groups, federal authorities, provincial ministries and municipalities.

Issues
Water (Surface and Ground)
Potential changes in groundwater quantity in the vicinity of the project area due to dewatering activities associated with the Project. Potential impacts on use of groundwater, and reduction in groundwater flow to the surrounding waterbodies. Need for mitigation and monitoring measures.
Potential changes in surface water quantity and quality in the vicinity of the project area due to overprinting of waterbodies, or changes in runoff or increased erosion and sedimentation due to vegetation clearing.
Potential effects to surface water and groundwater quality due to seepage from the mine rock, tailings, and overburden during operations and other applicable project phases, and corresponding mitigation and monitoring measures.
Potential changes in groundwater and surface water quality from acid rock drainage, metal leaching or cyanide, and corresponding mitigation and monitoring measures.
Need for information on water management facilities and drainage works for all phases of the Project, including how and where seepage and mine contact water will be collected, monitored, and treated as necessary.
Need for information on potential changes to surface water quantity (including the risk of flooding) from potential watercourse diversions (e.g. Dixie Creek), including mitigation and monitoring measures.
Need for further information on the effluent discharge location and the receiving waterbody (i.e. Chukuni River), including baseline studies, the discharge criteria for key parameters of concern, the receiver’s assimilative capacity and potential for downstream impacts.
Impact Assessment Methodology
Need to identify the spatial boundaries and study areas, including local and regional study areas, for evaluation of effects from biophysical pathways of exposure.

Social and Economic Conditions (Non-Indigenous)
Request for information about potential effects on forestry, tourism, and bear management areas around the project area.
Need for further information on employment related to the Project, including: <ul style="list-style-type: none"> • information on how workers will be hired locally, from within Canada, or internationally; • the number of and types of jobs the Project will create (direct, induced) in different project phases; • skills and education levels required for the positions; • anticipated hiring policies and programs; • local employment barriers and availability of childcare for workers; and, • anticipated transportation and lodging requirements for the workforce over the lifespan of the Project.
Need for further information on baseline socio-economic conditions such as income, unemployment, labour participation, poverty, dependency/reliance on industry, housing statistics, property, and land values.
Need for more information on the potential effects to tourism on Pakwash Lake.
Indigenous People's Social and Economic Conditions
Need for information on potential impacts to the social and economic conditions of Indigenous communities, including on hunting, fishing, trapping, and tourism-related industries.
Need for further information in baseline studies regarding social and economic conditions, including employment, pressure on social services, housing and affordability, infrastructure, electricity, education, incoming inequality, and Indigenous-owned and led businesses.
Need for further information how the Project will bring social or economic benefits to the Indigenous communities.
Comments seeking further information on potential impacts to the safety of Indigenous women and girls.
Need for further information on positive or negative economic impacts from the Project on Indigenous communities, including prioritized employment or business opportunities. Requested information on Indigenous hiring strategy, anticipated number and type of jobs, skill requirements for those jobs, barriers for career advancement, investment in training and skills enhancement to support career advancement.
Indigenous and Public Engagement
Comment suggesting the use of additional maps and visuals (e.g., depicting watersheds and traplines where possible) to support the participation of Indigenous communities.
Need for further information on the Proponent's engagement with Indigenous communities and public to date, including any issues raised by Indigenous communities and public, the Proponent's responses to those issues, and plans for future engagement.
Comments suggesting an expansion of the list of identified stakeholders to including tourism-related organizations, and to include a map highlighting these stakeholders and their proximity to the project area.
Comments for more information on how engagement with the public will be inclusive and accessible, and how participation will be monitored throughout the life of the Project.
Need for further engagement with communities (including the Métis Nation of Ontario and Grassy Narrows First Nation) regarding the ongoing baseline and archaeological assessment programs.

Human Health and Well-Being (including of Indigenous People)
<p>Need for further information on potential impacts from the Project on health and well-being of Indigenous peoples, including from potential changes to:</p> <ul style="list-style-type: none"> • drinking or recreational water; • country foods, including potential mercury contamination of fish; • air emissions; • noise; • effects on Indigenous health services; and, • underrepresented Indigenous groups (e.g., women, youth, elders). <p>This would inform a human health risk assessment which would inform the need for mitigation and follow-up. Use Health Canada’s Environmental Assessment Guidance for: Air Quality, Noise, Drinking and Recreational Water, Country Foods and Human Health Risk Assessment¹.</p>
<p>Potential effects to hunting, trapping, fishing, and tourism may impact Indigenous communities’ health, social, and economic conditions.</p>
<p>Comments regarding the consideration of additional social determinants of health for the assessment of health and well-being of Indigenous communities, such as intergenerational trauma, mental well-being, cultural continuity, poverty, unhealthy coping mechanisms, and food security/sovereignty.</p>
<p>Need to collect and provide robust information about Indigenous land use activities (approximate locations, frequency, duration, etc.) and to identify sensitive receptor locations, including the location of drinking water sources and of waterbodies used for recreational purposes.</p>
<p>Comments recommending the consideration and application of Indigenous Knowledge into the Human Health Risk Assessment for the Project.</p>
<p>Comments recommending the consideration and application of a Health Impact Assessment (HIA) framework to evaluate positive and negative health impacts for both biophysical and social health factors.</p>
Indigenous Peoples’ Spiritual, Physical, and Cultural Heritage
<p>Need for further information on the potential effects on built heritage and cultural heritage environment, including planned, ongoing, or completed archaeological assessments, and potential impacts on underwater archaeological resources.</p>
Indigenous People’s Current Use of Lands and Resources for Traditional Purposes and Exercise of Aboriginal and/or Treaty Rights
<p>Need for further information on potential impacts from the Project to current use of lands and resources by Indigenous communities, such as impacts to landscapes, waterbodies, wildlife and country foods (e.g., wild rice), and how impacts to these may affect the cultural practices and rights of Indigenous communities. Provide information on potential mitigation measures for these impacts, where possible.</p>
Species at Risk, Wildlife, and their Habitat
<p>Need for baseline information on wildlife, species at risk and species of importance to Indigenous communities, including identification of habitat, seasonal and annual variations, distribution, and habitat use.</p>

¹https://www.canada.ca/en/sr/srb.html?cdn=canada&st=s&num=10&langs=en&st1rt=1&s5bm3ts21rch=x&q=Guidance+for+Evaluation+Human+Health+Impacts+in+Environmental+Assessment%253A&_charset_=UTF-8&wb-srch-sub=

<p>Potential direct and indirect effects on wildlife and their habitat, species at risk (including their critical habitat), and species of importance to Indigenous communities and their habitat, from sensory disturbance or loss or alteration of habitat due to the Project. Provide mitigation or monitoring measures, as applicable.</p>
<p>Comments about considering and applying Indigenous Knowledge into the baseline information for wildlife, species at risk and species of importance to Indigenous peoples.</p>
<p>Potential direct and indirect effects on Woodland Caribou and its Sydney range, including information on the presence of critical habitat in any areas that could potentially be affected by the Project, using the Amended Recovery Strategy². Provide mitigation or monitoring measures, including any offsetting measures, as applicable.</p> <p>Note: In the Sydney Range, all habitat (disturbed or not) is critical habitat. Acknowledging the low potential for caribou presence in the local project area at present time, additional information could help clarify the scope of potential effects and narrow down the required information and studies.</p> <p>To help inform tailored assessment requirements, (optionally) provide, in the Detailed Project Description:</p> <ul style="list-style-type: none"> • a clear map showing where the Project overlaps the Sydney caribou range; • a description of the potential occurrence of caribou near the project site including, pipelines, transmission lines, and site roads. Summarize available information from provincial data sets about the Sydney range caribou population as well as local Indigenous and community knowledge. If caribou is considered locally absent, provide rationale and your level of certainty; • information on the presence of critical habitat in any areas that could potentially be affected by the Project, using definitions in the Amended Recovery Strategy. Explicitly address whether the biophysical attributes of caribou critical habitat occur within and around the mine site and linear project components, taking into account Appendix H of the Amended Recovery Strategy; • a description, with general rationale, of the potential for effects on caribou, critical habitat, and caribou recovery efforts within the Sydney Range over the short, medium, and long-term including the post-mine closure landscape. Compare to how the area might contribute to recovery efforts in the absence of the Project; and • a description of how the Project would compromise recovery or recovery efforts within the Sydney Range.
<p>Need for more information on the potential effects of the Project on Tricolored bat, Eastern Wood Pewee, Evening Grosbeak, Rusty Blackbird, and Snapping Turtle. Provide mitigation and monitoring measures, as applicable.</p>
<p>To help inform tailored assessment requirements, (optionally) provide, in the Detailed Project Description:</p> <ul style="list-style-type: none"> • currently available information about federally listed species at risk presence and critical habitat for species at risk that may be affected or over printed by the Project, from continued monitoring, engagement and desktop analyses; including validation with local experts; and, • a description about how potential effects to these species and their critical habitat would typically be managed on private and provincial Crown land, if the species or critical habitat is present.

² https://wildlife-species.canada.ca/species-risk-registry/virtual_sara/files/plans/Rs-CaribouBorealeAmdMod-v01-2020Dec-Eng.pdf

Concerns about potential effects on native and rare vegetation from the introduction of invasive or noxious plant species in the project area and access points.
Potential effects on Black Ash, which is widespread, common, but in decline due to an invasive beetle. To help inform tailored assessment requirements, (optionally) provide, in the Detailed Project Description, more specific information including: <ul style="list-style-type: none"> • a description of the extent to which Black Ash may be present and impacted (including a desktop analysis of relevant eco-sites, if warranted); and • a description about how potential effects to Black Ash would typically be managed, including provisions in the Ontario <i>Endangered Species Act</i>.
Need for information on baseline studies, and potential direct and indirect effects on wolverines and their habitat, including seasonal and annual variation, distribution, and habitat use in the project area. Provide mitigation and monitoring measures, as applicable.
Concerns about effects on wildlife from vehicular traffic on roads, including potential changes in wildlife migration patterns, and the corresponding mitigation measures.
Concern regarding adverse effects to the aquatic ecosystem, flora and fauna from the proposed discharge of treated effluent from the Project to the Chukuni River watershed.
Fish and Fish Habitat
Concerns about potential effects on fish and fish habitat during all project phases, including: <ul style="list-style-type: none"> • death or harm to fish; • alteration, disruption, fragmentation or destruction of fish habitat; • changes to noise, vibration, water quality, quantity and flow; and • obstruction of fish passages from in-water works during construction and maintenance of watercourse crossings and culverts, and dams.
Need for baseline studies on fish and fish habitat, including biological indicator species, such as benthic invertebrate species, and further information on the baseline sampling program.
Need for further information on standard and site-specific mitigation and monitoring measures to minimize effects on fish and fish habitat. Need for information on offsetting measures, if applicable.
Concern about potential effects of noise, vibration, blasting and seismic activity on waterbodies and aquatic life.
Need to provide baseline information on seasonal migration patterns of spawning Lake Whitefish.
Wetlands
Potential direct and indirect effects on wetlands during all phases of the Project, including an assessment of wetlands that may be important for fish and fish habitat, migratory birds or species at risk. Provide mitigation and monitoring measures, as applicable.
Migratory Birds
Potential effects on migratory birds and their habitat, including habitat loss, alteration or fragmentation, mortality, and effects due to sensory disturbances during all phases of the Project. Provide mitigation and monitoring measures, as applicable.

<p>To help inform tailored assessment requirements, (optionally) provide, in the Detailed Project Description:</p> <ul style="list-style-type: none"> • a list of migratory birds known to occur, and with the potential to occur, in areas to be affected by the Project, based on available information; • a general estimate of the quantity and quality of migratory bird habitat that would be lost, and the extent to which it is limiting in the broader area; • the capacity of the surrounding habitat to accommodate any displaced migratory birds due to the Project; and, • specific mitigation measures that would avoid mortality and disturbance, including a justification for
<p>Climate Change and Greenhouse Gas Emissions</p>
<p>Need for details regarding the net greenhouse gas emissions estimates for each project phase.</p>
<p>Need for further information on plans for achieving net-zero emissions by 2050, including details on carbon sinks, alternative means of carrying out the project, and use of best available technologies.</p>
<p>Comment requesting an update of future documents such that they align with the Government of Canada's Strategic Assessment on Climate Change³ (Section 4.1) and its technical guide⁴ (Section 2.4).</p>
<p>Atmospheric Environment</p>
<p>Need for further information on baseline air quality assessment, including data on key parameters, sampling methodology, sampling locations, frequency, and duration.</p>
<p>Need for further information on changes to air quality, including dispersion modeling and emissions estimates from fugitive and point source emissions, and fuel combustion.</p>
<p>Need for further information on proposed mitigation measures to manage changes to air quality, including monitoring and adaptive management plans, and best management practices.</p>
<p>Cumulative Effects</p>
<p>Potential cumulative effects on health, social, or economic conditions of Indigenous groups from industrial development surrounding the Project (e.g., forestry, current and historical mineral exploration, and mining activities).</p>
<p>Vulnerable Population Groups (GBA+)</p>
<p>Need to consider Gender-based Analysis Plus (GBA Plus) when collecting baseline information and assessing potential effects on health, social and economic conditions during all phases of the Project, including potential for gender-based violence. Pay particular attention to people who might be employed by the Project, citizens of potentially impacted Indigenous communities, as well as citizens of Red Lake and Ear Falls, given the proximity to employees of the Project.</p>
<p>Navigation and Navigable Waters</p>
<p>Need for more information on the traditional use of waterways for navigation, potential effects on navigable waterways during all phases of the Project, and proposed mitigation and monitoring measures.</p>

³ <https://www.canada.ca/en/services/environment/conservation/assessments/strategic-assessments/climate-change.html>

⁴ <https://www.canada.ca/en/environment-climate-change/corporate/transparency/consultations/draft-technical-guide-strategic-assessment-climate-change.html>

<p>To help inform tailored assessment requirements, (optionally) provide, in the Detailed Project Description:</p> <ul style="list-style-type: none"> • information about all water crossings and works involving navigable waterways, including the stockpiles (overprinting of watercourse), pipelines, transmission lines, replacement of culverts, and dams; • identification of water bodies that are obviously navigable or obviously not navigable (with supporting rationale) and which bodies still require a determination of navigability; and, • identification of project activities that could possibly affect navigation during all project phases.
<p>Accidents and Malfunctions</p>
<p>Need for information on potential effects from accidents and malfunctions and the measures to prepare for, and prevent them, particularly unintentional releases of hazardous materials (e.g., fuel, explosives, cyanide, tailings dam) during all project phases.</p>
<p>Provide information on emergency response plans and procedures to respond to any accidents or malfunctions, including fuel or chemical spills.</p>
<p>Alternative Means</p>
<p>Need for an analysis on alternative means for carrying out the Project that considers alternative methods and locations of tailings storage, and associated effects of alternatives to groundwater and surface water quality.</p>
<p>Effects of the Environment on Project</p>
<p>Need for further information on mitigation measures related to the effects of the environment on the Project, including emergency preparedness and response plans, and how climate change will be incorporated into the design of the Project.</p>