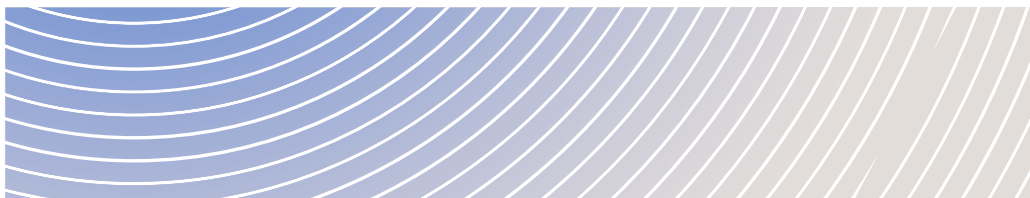


Planning Phase Engagement Report



NOVADOR GOLD MINE PROJECT

February 21, 2025



Impact Assessment
Agency of Canada

Agence d'évaluation
d'impact du Canada

Canada



Table of Contents

1. Introduction	1
1.1 Project context.....	1
1.2 Report content	2
2. Consultation and engagement during the Planning phase	3
3. How input was used	4
3.1 Identifying key issues and proponent response	4
3.2 Inform the decision of whether to require an impact assessment	5
3.3 Inform preparation of the Tailored Impact Statement Guidelines.....	5
3.4 Informing preparation of the Indigenous Engagement and Partnership Plan	6
3.5 Informing preparation of the Public Participation Plan	7
4. Next steps	8
5. Stay informed	9
5.1 Stay informed about the impact assessment of the Novador Gold Mine Project	9
5.2 Stay informed about the Impact Assessment Agency of Canada and other assessments	9



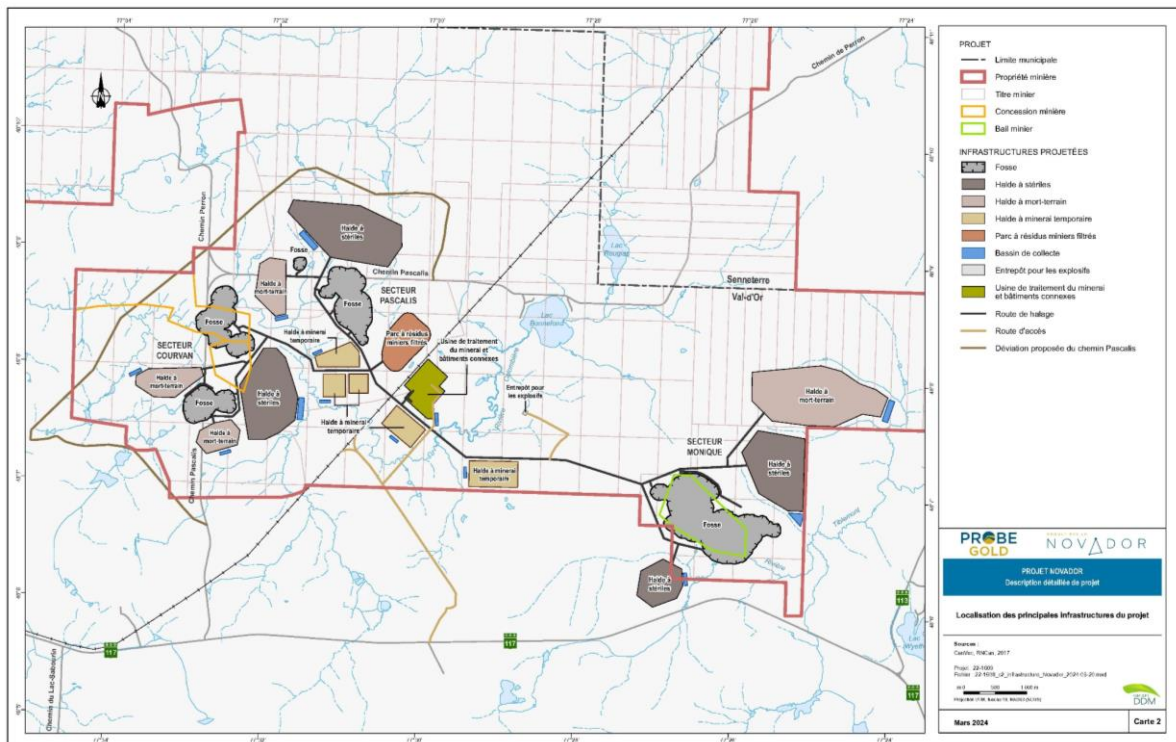
1. Introduction

On August 13, 2024, the Impact Assessment Agency of Canada (IAAC) commenced an impact assessment of the Novador Gold Mine Project proposed by Probe Gold Inc. During the Planning phase, IAAC conducted consultation and engagement activities with Indigenous communities and the public. This report explains how the input provided by Indigenous communities and the public was used by IAAC.

1.1 Project context

Probe Gold Inc. is proposing the construction and operation of a new open-pit and underground gold mine, located about 25 kilometres east of Val-d'Or, in Quebec. As proposed, the Novador Gold Mine Project would have a maximum ore production capacity of 24,000 tonnes per day with an estimated lifespan of 12.5 years. The project would include an ore processing plant, access roads, waste rock and overburden piles, and a tailings storage facility.

Figure 1: Location of main infrastructure at the Novador Gold Mine Project



Source: Probe Gold Inc., 2024



The [Planning phase](#) for the impact assessment process of the project was completed on August 13, 2024. This 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 communities 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



Timeline

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

Source: Impact Assessment Agency of Canada, 2025

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 communities and the public was used to help identify key issues, and inform the process and associated documents.

Information on [next steps](#) in the impact assessment process, as well as how you can [stay informed](#) is also included in this report.



2. Consultation and engagement during the Planning phase

In November 2023, IAAC initiated a comment period on the [Summary of the Initial Project Description](#) and invited comments from Indigenous communities, federal authorities and the public on the Project. As part of this comment period, IAAC held three 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 June 2024, IAAC initiated a second public comment period to seek input on the [Draft Tailored Impact Statement Guidelines](#) and [Draft Public Participation Plan](#). Three virtual information sessions were held to support public participation. In addition, IAAC worked together with Indigenous communities to prepare an [Indigenous Engagement and Partnership Plan](#) for the Project.

In total, IAAC received 40 written comments during the Planning phase from federal authorities (14), Indigenous communities (4), a municipal authority (1), non-governmental organizations (11), and members of the public (10), including those received outside of the formal comment periods. Written comments that were submitted to IAAC during the Planning phase were posted on the [project page on the Canadian Impact Assessment Registry](#) (the Registry) for transparency, subject to exceptions related to privacy, security or confidentiality¹.

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](#).



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 through consultation and engagement activities. The following are examples of key issues identified by the public and Indigenous communities related to effects within federal jurisdiction or adverse impacts on the rights of the Indigenous peoples of Canada recognized and affirmed by section 35 of the *Constitution Act, 1982*:

- effects on fish and fish habitat, including fish species at risk;
- effects on migratory birds, including migratory bird species at risk;
- impacts on the current use of lands and resources for traditional purposes and on the physical and cultural heritage of Indigenous peoples, including the effects the project may have on the habitat of the Woodland caribou, boreal population, and on the watersheds of the Harricana and Nottaway rivers; and
- changes to the health, social and economic conditions of Indigenous peoples.

Following the issues raised by Indigenous communities and the public, IAAC has developed and sent to the proponent a [Summary of Issues](#). On April 4th, 2024, the proponent submitted a [Detailed Project Description](#) (in French only) to address the concerns in the Summary of Issues (Appendix A of the Detailed Project Description). More specifically, the proponent provided details of the project's rationale, and its components and activities (e.g., infrastructure, type of operation, tailings management). The proponent has also indicated they intended to:

- optimize socio-economic benefits for local and Indigenous communities;
- encourage the hiring of local and regional workers, including Indigenous workers, and work with local organizations to meet the project's workforce needs, including those serving Indigenous populations;
- meet with the Indigenous communities taking part in the consultation, specifically to document current and past use of their traditional territory;
- develop an impact and benefit agreement with Indigenous communities; and
- maintain information and consultation activities with involved stakeholders throughout the project's development.

The proponent has also committed to include in its impact assessment:

- a comparative analysis of alternative locations for the ore processing plant, waste rock piles and overburden;
- the results of environmental and social studies carried out as part of the project;

- an analysis of the effects that the project may have and mitigation measures, particularly on surface and groundwater (including the Harricana and Nottaway rivers' watersheds), fish and fish habitat, woodland caribou, archaeology, as well as on land use and the health, social and economic conditions of Indigenous communities; and
- a major technological accident risk analysis and emergency response plan.

3.2 Inform the decision of whether to require an impact assessment

On May 3, 2024, IAAC AAC issued an [Opinion on Whether an Impact Assessment is Required](#) based on the measures outlined in the [Statement on the Interim Administration of the *Impact Assessment Act* Pending Legislative Amendments](#). In issuing this opinion, IAAC took into account the fact that the carrying out of the Project may cause adverse effects within federal jurisdiction or direct or incidental adverse effects, including effects on fish and fish habitat, migratory birds, and impacts on Indigenous peoples (changes to health, social, and economic conditions, physical and cultural heritage, and current use of lands and resources for traditional purposes). IAAC also took into account other factors, including comments received from Indigenous Peoples and the public.

3.3 Inform preparation of the Tailored Impact Statement Guidelines

The [Tailored Impact Statement Guidelines](#) is a document written by the IAAC that describes 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 [Tailored Impact Statement Guidelines for the project](#).

In addition, the following modifications to the guidelines were inspired by comments received during the second comment period on the draft version of the document:

- insertion of a section entitled "Alternatives to the project";
- additional requirements for information on:
 - diversion of the Colombière and Tiblemont rivers;
 - species at risk, including the woodland caribou;
 - birds of prey that have cultural significance and game birds that are important for traditional practices of Indigenous communities;
 - resources of traditional and cultural importance to Indigenous communities (e.g., wild rice, big game such as bear and moose, small game, fur-bearing animals, teas);

- use or territories of traditional and cultural importance to Indigenous communities (e.g., Lake Bonfond, Pascalis Road, watercourses in the Harricana and Nottaway rivers' watersheds);
- employment opportunities for each phase of the project;
- withdrawal of the requirement pertaining to burial sites, as these are unlikely to be present on the project site.

Consideration of Indigenous Knowledge

Indigenous Knowledge contributed to the preparation of the Tailored Impact Statement Guidelines. In particular, Indigenous Knowledge holders identified environmental components that are important to their communities and likely to be affected by the project's effects. For example, they identified places and components of cultural importance (e.g., Harricana watershed and river), plants gathered by members of their communities (e.g., wild rice, berries, teas) and wildlife species of importance to their use or culture (e.g., caribou, lake sturgeon, moose, beaver).

3.4 Informing preparation of the Indigenous Engagement and Partnership Plan

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

During the Planning phase, some Indigenous communities identified values and objectives for Indigenous consultation related to the project, which were summarized in the IEPP. In particular, the Indigenous communities told IAAC that they wanted the following:

- inclusive engagement activities adapted to the needs of each community;
- consideration of comments made verbally or during consultation periods with the same weight as written comments;
- ability to express their preferences regarding the tools or visual aids used during IAAC consultation presentations; and
- ongoing consultation to be held throughout the entire impact assessment process in order to address all concerns raised 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.



Comments provided by Indigenous communities helped refine IAAC's understanding of which communities may be impacted by the project and the potential nature of these impacts. IAAC modified the IEPP to reflect the above comments.

To complement the IEPP, the Lac Simon Anishnabe Nation and Abitibiwinni First Nation have requested tailored consultation plans for their communities, outlining their specific consultation objectives. IAAC will work in collaboration with these Indigenous communities to develop these tailored plans during the Impact Statement phase. These two communities have also asked to be involved in assessing the project's impact on their rights. These assessments may cover health and socio-economic conditions, current use of lands and resources for traditional purposes, cultural and physical heritage, or the exercise of Indigenous or treaty rights, including cumulative impacts on the exercise of rights.

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 to inform preparation of the [Public Participation Plan for the project](#).

Public comments helped IAAC determine the participation preferences of the various stakeholders involved in the impact assessment process. For example, some participants suggested that targeted meetings or face-to-face information sessions be organized during the impact assessment process in order to reach a larger number of people. Public comments also enabled IAAC to identify other organizations with an interest in the project's impact assessment.



4. Next steps

On August 13, 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 3: Impact Statement phase within the impact assessment process



Source: Impact Assessment Agency of Canada, 2025

IAAC will continue to lead consultation and engagement activities with Indigenous communities and the public during the Impact Statement and Impact Assessment phases of the process. As part of future consultation and engagement, Indigenous communities 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 Novador Gold Mine Project

- To find out the latest on the status of the impact assessment of the Novador Gold Mine 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 on the right 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 Novador Gold Mine Project by sending an email to Novador@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 Simply Syndication (RSS) reader, you can subscribe to IAAC's [RSS Feed](#).