



December 18, 2024

**Sent by email**

Aaron MacDonell  
Director, Environmental Services  
Kinross Gold Corporation  
25 York Street, Suite 15<sup>th</sup> Floor  
Toronto Ontario M5J 2V5  
Aaron.MacDonell@Kinross.com

**SUBJECT: Next Steps in the Impact Statement Phase for the Great Bear Gold Project**

Dear Aaron MacDonell,

I am writing to advise you of improvements to our processes in light of the recent amendments to the *Impact Assessment Act* (the IAA)<sup>1</sup> and the measures announced in *Building Canada's Clean Future* and the accompanying Cabinet Directive on Regulatory and Permitting Efficiency for Clean Growth Projects<sup>2</sup>. These measures will streamline the ongoing assessment and any permitting requirements for the Great Bear Gold Project (the Project).

The Impact Assessment Agency of Canada (IAAC), will:

- focus its technical review of the Impact Statement by placing emphasis on key issues relevant to decision-making, specifically federal effects and positive benefits as set out in the amended IAA;
- support early technical discussions on the key issues relevant for decision-making, as listed in the Enclosure, to ensure that the assessment process is as efficient and effective as possible, and in consideration of the amended IAA;
- leverage provincial legislative frameworks and tools to address key federal issues; and,

.../2

---

<sup>1</sup> Amended *Impact Assessment Act*: <https://laws.justice.gc.ca/eng/acts/I-2.75/index.html>

<sup>2</sup> Cabinet Directive: <https://www.canada.ca/en/privy-council/services/clean-growth-getting-major-projects-done/cabinet-directive.html>

- support and coordinate future permitting requirements for the Project.

### Maximizing collaboration

As set out in the Cooperation Plan<sup>3</sup>, aspects of the Project are also subject to various class environmental assessments pursuant to Ontario's *Environmental Assessment Act*, and/or to various provincial permitting and approval requirements that include an assessment of environmental effects. IAAC wants to explore opportunities with you to maximize collaboration with the Province of Ontario and to take full advantage of other means to address effects in federal jurisdiction, to enhance regulatory efficiency and support the principle of “one project, one assessment”.

### Key issues relevant for decision-making

We look forward to receiving the Impact Statement (IS) for the Project. IAAC will ensure that the process going forward will be effective, efficient and cooperative. IAAC will conduct a technical review of the Impact Statement taking into consideration the requirements of the Tailored Impact Statement Guidelines<sup>4</sup> as well as the amended IAA. To ensure that the technical review and consultation on the Impact Statement are as efficient as possible, IAAC is providing a list of key issues (Enclosure 1) for the Project so that specific focus and attention is given to the issues that IAAC views as being material to decision-making under the amended IAA. IAAC further offers to hold technical meetings with federal and provincial experts to ensure that technical matters can be discussed in a timely manner and to ensure an efficient review of the final Impact Statement when it is received.

When IAAC is satisfied that you have provided it with all the required information and studies, IAAC will post a notice of that determination on the Canadian Impact Assessment Registry in accordance with subsection 19(4) of the IAA.

### Coordinating permitting

To further increase efficiency and timeliness, we encourage you to consider working concurrently on complementary federal regulatory processes that may be required for the Project. IAAC is available to liaise with federal authorities to support the coordination of these processes. Additional information can be found

.../3

---

<sup>3</sup> <https://www.ceaa-acee.gc.ca/050/evaluations/document/158179>

<sup>4</sup> <https://www.ceaa-acee.gc.ca/050/evaluations/document/158375>

on IAAC's website at: <https://www.canada.ca/en/impact-assessment-agency/services/policy-guidance/practitioners-guide-impact-assessment-act/coordination-federal-authorizations-impact-assessment-process.html>.

If you have any questions, please do not hesitate to contact me by phone at 647-616-2471 or by email at Greatbear@iaac-aeic.gc.ca.

Sincerely,

Natalie Boyd  
Project Manager, Ontario Region

Enclosure: Great Bear Gold Project – Key issues relevant for decision-making under the *Impact Assessment Act*

c.c.: Luke Crosby, Kinross Gold Corporation  
Sheila Daniel, WSP

## **Enclosure 1 – Great Bear Gold Project – Key issues relevant for decision-making under the *Impact Assessment Act***

In order to ensure that the technical review and consultation on the Impact Statement is as efficient as possible, IAAC is providing a list of key issues for the Project to ensure that specific focus and attention is given to the issues that IAAC views as being material to decision-making under the amended IAA.

With respect to **fish and fish habitat**, given the context of the project as set out in the Tailored Impact Statement Guidelines, IAAC's review will focus specific attention on the following:

- adverse changes to fish and fish habitat, specifically for lake whitefish, walleye, lake trout, and lake sturgeon;
- changes to water flows and fish habitat in Dixie Creek and the Chukuni River watershed around the Project, and the development of feasible offsetting to inform more detailed federal permitting;
- the geographic extent of contaminants in the Chukuni River watershed and downstream watersheds, as a result of planned or unplanned effluent discharge, taking into account cyanide use and any contaminants generated by acid rock drainage or metal(loid) leaching, with consideration of how the mine closure plan and provincial permitting may address effects;
- specifically, ensuring adequate site management of sulphates and other contaminants (e.g., mercury, copper, iron ions) that have the potential to contribute to methylmercury production and bioaccumulation downstream;
- ensuring the site water management plan is adequately designed for future climate scenarios such that mitigation remains effective.

With respect to **migratory birds**, given the context of the project as set out in the Tailored Impact Statement Guidelines, IAAC's review will focus specific attention on the following:

- adverse changes to migratory bird species at risk (bank swallow, eastern whip-poor-will, barn swallow, Canada warbler, eastern wood-pewee, common nighthawk, olive-sided flycatcher, evening grosbeak, yellow rail, red-necked phalarope, and lesser yellowlegs);
- consideration of any non-standard mitigation needs and provincial legislative frameworks that can address effects.

With respect to the potential **impacts on Indigenous Peoples**, the requirements set out in the Tailored Impact Statement Guidelines on current use of lands and resources for traditional purposes, physical and cultural heritage of Indigenous Peoples, as well as health, social and economic conditions should be assessed by the proponent in collaboration with the Indigenous communities identified in

the Indigenous Engagement and Partnership Plan for the Project. Extra attention will be paid to the analysis of project contributions to methylmercury production downstream, including cumulative effects from development in other watersheds, and to Indigenous peoples' ability to harvest wild rice. IAAC will continue to meaningfully engage and consult with Indigenous Peoples through the assessment process, specifically on the potential adverse impact of designated projects on Aboriginal and Treaty rights as recognized and affirmed in section 35 of the *Constitution Act, 1982*.

Finally, in the event that there are significant adverse effects within federal jurisdiction on the matters listed above, IAAC will also consider the **positive contributions of the Project**. This can include information made available in the Impact Statement such as positive effects on local and regional economic conditions, including access to training and employment for the local work force, economic development, and business opportunities.