



# *Asubpeeschoseewagong Netum Anishinabek*

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July 7, 2024

## **BY EMAIL**

Ontario Ministry of the Environment, Conservation and Parks  
Client Services and Permissions Branch  
135 St. Clair Ave. West – 1st Floor  
Toronto, Ontario M4V 1P5

**RE: Great Bear Resources Ltd. Proposal for Environmental Compliance Approval (“ECA”) for Industrial Sewage Treatment Works (“ISW”) serving the Great Bear Advanced Exploration Project – ERO No. 019-8718**

On behalf of Asubpeeschoseewagong Anishinabek (“ANA” or “Grassy Narrows First Nation”), we write in response to Great Bear Resources/Kinross Gold’s proposal for an ECA for ISW for the Great Bear Gold Advanced Exploration Project. Enclosed are preliminary comments in response to this proposal from our legal counsel requesting that the Ministry reject the application.

Grassy Narrows is extremely concerned that Great Bear/Kinross wants permission from Ontario to put more dangerous pollution into our life-giving river. Grassy Narrows has already suffered far too much from the cumulative impacts of industry that has been forced on our lands, waters, and people with terrible consequences. Our people are sick, our fish are unsafe to eat, the animals we rely on are scarce, our medicines are tainted, and our sacred landscape is desecrated. This harm has gone too far, and we cannot bear any more.

Ontario and Great Bear/Kinross tell us that they care about our concerns and that they will keep us safe.

And yet, we just learned that ten months ago Great Bear/Kinross and Ontario secretly agreed on the amount of pollution that Great Bear/Kinross will be allowed to put into the water which flows through the heart of our sacred landscape. We were not notified, we had absolutely no input into this decision, we were not consulted, and we have not given our free, prior, and informed consent. We learned about this only after we found a notice for a general public comment period online and began asking questions of the Ministry. Even though we are in the midst of an ongoing mercury crisis with four of our community members passing in recent weeks, and still grieving, we are commenting as best as we can now. But it appears that the key decision of how much pollution will be allowed to be put into our river has already been made in secret without us.

Our experts tell us that Great Bear/Kinross does not have reliable scientific information to support this ECA application. They are not doing the contaminant studies in the right way, as required by the law, and the studies are not finished. Great Bear/Kinross cannot reliably predict how much pollution will be made by the Project and so they cannot design a reliable way to treat it. They do not know how much pollution will end up in our river. But the limited information we have is enough to know that the risks are serious and not credibly addressed.

Great Bear/Kinross is completely ignoring important pollutants and important risks like the risk from huge piles of contaminated soil and rocks that will be cleared from the site. The rainwater that falls on those piles will get contaminated and then be allowed to flow directly into a creek whose waters flow into our river.

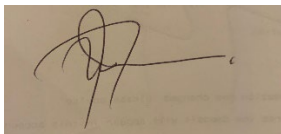
The treatment plant that they have proposed is vague and is not capable of removing key pollutants like sulfate that makes more methylmercury in our river and makes our fish more unsafe to eat.

The limits that Ontario and Great Bear/Kinross are setting for pollutants in the Chukuni River, a tributary of the English River, are not capable of protecting the people who eat the fish who live in the river, because they are not designed to do that. They set no limit for methylmercury in the river water, the most dangerous form of mercury, and allow sulfate levels that are more than 100 times what is naturally found in the English River. These limits do not protect us and do not take into account our unique circumstances, our watershed, our ecosystem, and the cumulative impacts of damming, mercury poison, pulp mill effluent, logging, mining, and proposed nuclear waste.

Approving this application would be reckless and dangerous to Grassy Narrows. It would add to the harm that we already suffer and take us farther from the path of healing and reconciliation. We cannot bear any more pollution.

Grassy Narrows says 'no'.

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A rectangular area containing a handwritten signature in dark ink on a light-colored background. The signature is stylized and appears to be 'J. B. Fobister'.

Joseph B. Fobister  
Lead Negotiator, Grassy Narrows Lands Protection Team

C.C.

Chief Rudy Turtle (rudyturtle@outlook.com)

**Grassy Narrows Lands Protection Team**

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