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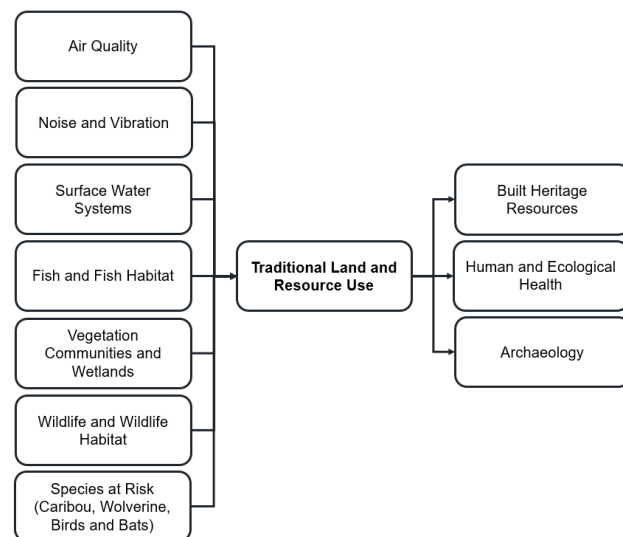
6.21 Traditional Land and Resource Use

Indigenous traditional land and resource use includes activities related to the harvesting of resources, such as hunting, fishing, trapping, gathering plants, and areas where teaching or transfer of knowledge regarding cultural practices occur, ceremonial sites, travel routes or sacred sites. It includes a distinct collection of established knowledge built up and held by a group of people through generations. Traditional Land and Resource Use (TLRU) is a component of Traditional or Indigenous Knowledge (TK) that is cumulative, dynamic and builds upon the historic experiences of a people and adapts to social, economic, and environmental changes. Aboriginal and Treaty rights, which include the right to practice traditional activities such as hunting, trapping, fishing, and plant gathering are protected under Section 35 of the *Constitution Act* (1982) and Indigenous communities exercise those rights throughout the region.

TLRU was selected as a valued component (VC) for assessment to evaluate how the Project may interact with traditional activities, sites and resources identified by Indigenous communities which may affect the exercise on Aboriginal and Treaty rights.

In the absence of mitigation, the assessment of potential changes to traditional land and resource use is directly linked to other VCs and is informed by the following sections:

- **Air Quality (Section 6.2):** the assessment of potential effects in air quality includes changes in air emissions during the construction and operation of the Project which may affect the use of land and resource by Indigenous people.
- **Noise and Vibration (Section 6.3):** the assessment of potential effects in noise and vibration includes the change in sound levels during the construction and operation of the Project, which could affect the experience of being on-the-land during TLRU activities, and indirectly affect the success of TLRU activities due to sensory disturbance of wildlife.



- **Surface Water Systems (Section 6.6 to Section 6.9):** the assessment of potential effects in surface water systems includes the potential change in water quality in Project waterbodies during the construction and operation of the Project which could directly affect access to and use of TLRU areas, and wildlife species harvested by Indigenous people.
- **Fish and Fish Habitat (Section 6.10):** the assessment of potential effects in fish and fish habitat includes the potential change to the quantity and quality of aquatic resources during the construction and operation of the Project and may affect aquatic resources that are harvested by Indigenous people.
- **Vegetation Communities and Wetlands (Section 6.11):** the assessment of potential effects in air quality includes the potential change to the quantity and quality of existing plant communities during the construction and operation of the Project, which may affect traditional plant harvesting activities.
- **Wildlife and Wildlife Habitat (Section 6.12):** the assessment of potential effects in wildlife and wildlife habitat includes the potential change to the quantity and quality of terrestrial wildlife resources

(including large mammals) during the construction and operation of the Project which may affect traditional wildlife harvesting activities.

- **Species at Risk (Section 6.13, Section 6.14 and Section 6.16):** the assessment of potential effects in species at risk includes the potential change to the habitat of species at risk (including Caribou, Wolverine, and birds including Bald Eagle) during the construction and operation of the Project which may affect opportunities to interact with these species during TLRU activities.

In addition, the assessment of potential changes to traditional land and resource use is also directly linked to other VCs, and informs the analysis of the following sections:

- **Archaeology (Section 6.22):** the assessment of potential effects in archaeology is informed by the availability, access and experience associated with traditional habitation, cultural and spiritual sites/areas during the construction of the Project.
- **Built Heritage Resources and Cultural Landscapes (Section 6.23):** the assessment of potential effects in built heritage resources is informed by the availability, access and experience associated with traditional habitation, cultural and spiritual sites/areas during the construction of the Project.
- **Human and Ecological Health (Section 6.24):** the assessment of potential risks in human and ecological health is informed by the availability and access associated with traditional harvesting of wildlife, aquatic resources and plants during the construction and operation of the Project.

The assessment of the potential changes in TLRU from the Project are compared to provincial and federal relevant criteria (Section 6.21.1.4) and existing conditions (Section 6.21.2). The assessment is informed by the socio-economic supporting documentation, including the Baseline Socio-economic Report (Appendix Q-1), the Socio-economic Baseline Study Reports provided by Cat Lake First Nation, Lac Seul First Nation, and Slate Falls Nation, and non-confidential TK/TLRU information for Cat Lake First Nation, Lac Seul First Nation, Slate Falls Nation, the Northwestern Ontario Métis Community, Mishkeegogamang Ojibway Nation, Wabauskang First Nation, and relevant information related to land use planning for Pikangikum First Nation.

6.21.1 Assessment Approach

The approach to the assessment of potential changes to TLRU includes a description of the relevant regulatory and policy setting, a description of the input obtained through consultation specific to this VC, the identification of criteria and indicators along with the associated rationale, a description of the spatial and temporal boundaries used for this VC along with a description of the attributes used to determine the significance of any residual, adverse effects. The assessment of potential effects is supported by a description of the existing conditions for the VC (Section 6.21.2), the identification and description of applicable pathways of potential effects on the VC (Section 6.21.3) and a description of applicable mitigation measures for the VC (Section 6.21.4). An outline of the analytical methodology conducted for the assessment and the key assumptions and/or conservative approach is found in Section 6.21.5. With the application of mitigation measures to the potential effects on the VC, the residual effects are then characterized in Section 6.21.6 and the significance of the residual effects is determined in Section 6.21.7

6.21.1.1 Regulatory and Policy Setting

The effects assessment for TLRU has been prepared in accordance with the requirements of the federal Environmental Impact Statement (EIS) Guidelines (Appendix B-1) and the provincial approved Amended Terms of Reference (ToR; Appendix B-3). Concordance tables, indicating where EIS Guidelines and ToR requirements have been addressed, are provided in Appendix B-2 and B-5, respectively.

Section 7.3.4 of the EIS Guidelines include the requirements of *CEAA 2012* to evaluate the effects of the changes to the environment on Indigenous peoples including on the current use of lands and resources for traditional purposes and, more specifically, the effects on Indigenous uses or activities including hunting, fishing, trapping, and cultural practices.

Section 6 of the EIS Guidelines requires that potential adverse effects on Aboriginal and Treaty rights be identified together with appropriate mitigation measures.

Aboriginal and Treaty Rights and Traditional Land and Resource Use

Treaties are agreements made between the Government of Canada and Indigenous groups that define ongoing rights and obligations for each party. Aboriginal and Treaty rights (or Indigenous rights) are recognized and affirmed in Section 35 of the *Constitution Act, 1982* (CIRNAC 2024).

The Project is located within the area of Treaty 9, one of the Numbered Treaties, which were signed between 1871 and 1921. The First Nations engaged with for this Project are located in three treaty areas which are:

- Treaty 3 – originally signed in October 1873 and covers areas in Ontario west of Thunder Bay and north of Sioux Lookout and extends into Manitoba. LSFN, ONS, and WFN are within Treaty 3.
- Treaty 5 – originally signed in September 1875 and spans southern Manitoba and extends into Saskatchewan and northwestern Ontario. PFN is within Treaty 5.
- Treaty 9 – originally signed in 1905 – 1906 and includes the James Bay and Hudson Bay watersheds in Ontario. CLFN, SFN, and MON are within Treaty 9.

In Canada, there are two primary sources of unique rights held by Indigenous peoples. Treaty rights reflect those express commitments made by the Crown in a treaty, and Aboriginal rights that arise from the principle that when Europeans arrived in North America, Aboriginal peoples were already here, living in communities on the land, and participating in distinctive cultures as they had done for centuries. Aboriginal rights for Métis arise from the post-contact but pre-sovereignty period. Aboriginal rights typically refer to the exercise of hunting, fishing, harvesting and other traditional practices undertaken by Indigenous communities.

Information about how the ability to exercise Aboriginal and Treaty rights may be affected by a project is gathered from Indigenous communities through traditional knowledge and land use studies which reflect the past and current use of lands and resources for traditional purposes including hunting, trapping, fishing, plant gathering, the use of trails, travel routes, habitation sites, and cultural and spiritual sites, and associated practices. The criteria used in environmental assessments to evaluate the effect of a project on Aboriginal and Treaty rights is the degree to which a project may affect the ability of an Indigenous group to undertake activities or practices on which the exercise of Aboriginal and Treaty rights depend. For the Project, this is done through the assessment of effects on the current use of lands and resources for traditional purposes, or, in other words, the effects on TLRU.

6.21.1.2 Influence of Consultation with Indigenous communities, Government and the Public

Consultation has been ongoing for several years, prior to and throughout the environmental assessment process, and will continue with Indigenous communities, government agencies and the public through the life of the Project. Section 2 provides more detail on the consultation process. The Record of Consultation (Appendix D) includes detailed comments received, and responses provided, during the development of the final EIS/EA.

Feedback received through consultation has been addressed through direct responses (in writing and follow up meetings) and incorporated in the final EIS/EA, as appropriate. The key comments that that influenced the assessment for TLRU between the draft and final EIS/EA is provided below:

Incorporation of Traditional Knowledge and Traditional Land Use Information

Cat Lake First Nation (CLFN), Lac Seul First Nation (LSFN), the Northwestern Ontario Métis Community (NWOMC), and the Impact Assessment Agency of Canada (IAAC) requested that the assessment of potential effects of the Project be informed by TK/TLRU information be disaggregated by Indigenous community. During the EA process, Indigenous communities have collected and shared TK/TLRU information, and non-confidential information has been incorporated into the final EIS/EA. This information sharing is appreciated and important for Project planning. Additional opportunities for TK/TLRU information sharing will occur throughout all phases of the Project.

A list of the information sources is included in Section 6.21.2. The information was used to inform or validate baseline studies, validate the selection of VCs, assessment criteria and indicators, supplement the information used to understand the existing conditions of various valued components, consider alternatives for various project components, support the assessment of potential effects on VCs, identify mitigation measures and areas for follow up monitoring. Non-confidential information has been included in the description of the existing environment (Section 3) and the description of existing conditions in each VC (Section 6) and used to support the assessment of alternatives (Section 4) and the assessment of potential effects on biophysical VCs (Section 6.2 to Section 6.16), and human environment VCs (Section 6.18 to Section 6.24). Non-confidential TK/TLRU information has been disaggregated by Indigenous community, where possible. Feedback received from Indigenous communities during engagement activities for the EA, and in particular, the review of the draft EIS/EA has informed the final EIS/EA. Examples of how TK has been included in the final EIS/EA are shown in Table 6.21-1. Further details on the engagement activities are included in Section 2.

Comments on the Project that have been included in the TK/TLRU studies are provided in the following tables, along with a response of how these comments are addressed in the final EIS/EA:

- Cat Lake First Nation (Table 6.21-2);
- Lac Seul First Nation (Table 6.21-3);
- Mishkeegogamang Ojibway Nation (Table 6.21-4);
- Northwestern Ontario Métis Community (Table 6.21-5);
- Slate Falls Nation (Table 6.21-6); and
- Wabauskang First Nation (Table 6.21-7).

Selection of Points of Reception based on TLRU Activities

IAAC requested that the locations of Indigenous TLRU activities (including country foods harvesting and drinking water sources) within the project development area and related study areas be included on a map and used to determine the selection of receptors for the human and ecological health risk assessment. Section 6.2 includes Figure 6.21-2, which includes the points of reception (POR) based on representative Indigenous points of interest identified through traditional land and resource use studies and engagement, and recreational cabin, lodge and camp sites identified through a review of the Ministry of Natural Resources (MNR) Land Information Ontario geographic datasets. The receptor locations were chosen as the closest areas to the Project where people could spend considerable time, therefore representing the conservative case. It was also conservatively assumed that people spending time at these locations are Indigenous people who also conduct traditional activities including harvesting, fishing and gathering within the local study area and regional study areas. This is also further considered in the Human and Ecological Health Risk Assessment (Section 6.24).

Potential Effects on Traditional Harvesting Activities due to Sensory Disturbances and Displacement

NWOMC noted that sensory disturbance has the potential to result in increased avoidance behaviors of the Project area by Métis harvesters. Further, NWOMC identified the concern regarding whether the development of Project could result in displacement of traditional harvesters from the area. The assessment of potential effects on TLRU includes several indicators to assess potential change in traditional harvesting of wildlife, aquatic resource and plants. The indicators include: the quality of the experience associated with sensory disturbances such as altered viewsapes and changes in sound levels; and the quality of access to land where traditional harvesting activities occur. These indicators have been included in Section 6.21.1.4. Mitigation measures for potential effects on traditional harvesting are described in Section 6.21.4.

Traditional Plant Harvesting Areas

Mishkeegogamang Ojibway Nation (MON) noted that vegetation and wetlands assessment should be used to identify areas where the species used for plant harvesting sites by Indigenous communities are found. Section 6.11.6 includes a detailed assessment of the vegetation communities for the Project, based on updated Forest Resource Inventory data. This is used to identify areas where plant harvesting sites may be located, based on the information provided by TK/TLRU information. As a mitigation measure, opportunities will be provided, prior to construction for Indigenous communities, where there is interest to harvest vegetation and aquatic resources within the PDA, and access outside the mine site will be maintained supporting all TLRU activities during all phases of the Project.

Management of Access to TLRU Activities

IAAC requested clarification on the areas that will remain accessible and how access to TLRU activities would be managed within the PDA during the active phases of the Project. Further, IAAC requested that the assessment of effects on human health, and the associated mitigation and follow-up programs take into account permitted land use. There will be no change in access to TLRU areas with the exception of directly within the mine site footprint for safety purposes. Under existing conditions, the proposed mine site area is an active exploration site with significant infrastructure and heavy equipment and has certain activity restrictions in place for safety, which will be similar for the Project. The existing portage at the exploration site between Springpole Lake and Birch Lake, while used infrequently, is maintained in good condition by FMG, and an alternate portage has been identified and will be maintained by FMG from construction to post closure at which point the existing portage will be re-established. Further, while a controlled access gatehouse/checkpoint and signage are proposed to control unauthorized use of the 18km mine access road

leading to the mine site, an access management strategy will be developed with local Indigenous communities and MNR to provide access for TLRU activity along this newly accessible area. The entrance to the mine site towards the end of the mine access road will be gated by FMG for safety and security purposes. The access management strategy has been included as a mitigation measure in Section 6.21.4 to address Indigenous concerns regarding public access to TLRU areas. The plan is anticipated to provide for appropriate signage to advise the public of the road's intended use, safety communication protocol for traditional land users, a gatehouse/checkpoint towards the end of the Wenasaga Road to ensure unauthorized use does not occur, and potential inspection schedule. The plan will be in place during construction, operations and active closure phases of the Project. Finally, the transmission line corridor portion of the project footprint will be allowed to naturally regrow following construction to an extent that limits accessibility and therefore new access along the transmission line is not anticipated.

Indigenous Participation in Environmental Monitoring

Indigenous communities requested participation in an environmental monitoring program for the Project. Environment Committee(s) will be established between FMG and interested Indigenous communities to facilitate communication, ongoing meaningful engagement, participation in monitoring and data reviews, adaptive management and provide opportunities to share TK during all phases of the Project. The opportunity to establish an Environment Committee(s) has been included as a mitigation measure as described in Section 6.21.4.

Aboriginal and Treaty Rights

The following includes comments about potential effects on the ability to exercise Aboriginal and Treaty rights received during consultation with Indigenous communities together with relevant information from Indigenous knowledge and land use reports and planning documents prepared by the communities. The comments raised do not take in to account the conclusions of the various VC effects assessment or the application of mitigation measures. The identification of potential environmental effects and the characterization of residual effects on TLRU integrated information presented in the project-specific TK studies, relevant secondary sources and comments provided during consultation. The mitigation measures discussed throughout the assessment and presented in Section 6.21.4 support addressing effects on traditional land and resource use and apply to the exercise of Aboriginal and Treaty rights described below.

CLFN reported specific habitation and resource use areas in the Local Study Area (LSA) that are used for hunting, trapping, processing meats, and fishing. CLFN noted potential impacts on fish and fishing areas and preferred hunting and trapping areas and noted the concern for Moose leaving the area around the Project which could displace their member harvesting activities.

In its Indigenous Knowledge report, CLFN described that fishing rights and preferred fishing areas support member's diets and the continued sharing of cultural information. The ability to harvest freely anywhere within their territory is essential to their rights and practices. Community members reported that the influx of tourist camps at, or adjacent to, members' preferred harvesting and habitation areas, have led to the continued displacement of CLFN rights and practices.

CLFN commented that the Project could constrain CLFN Treaty rights practice in the Regional Study Area (RSA) and the effect could potentially affect multiple generations, impacting the ability to continue resource harvesting, travelling across and using the land, and transmitting cultural knowledge between generations.

CLFN also raised the concern for existing long-term, multi-source, and large-scale adverse impacts on CLFN territory. These include regional changes in the environment, and specific changes including environmental degradation and contamination due to past and ongoing commercial fishing operations and tourist camps,

and past and ongoing mining operations and developments. Study participants said these impacts have affected their traditional activities and rights and that the Project could add to affects on the use of lands, and the practice of culture and Treaty rights and well-being.

LSFN commented regarding impacts on the ability to hunt and trap on traditional territory and raised concerns about mercury and loss of resources and harvesting rights.

In its Indigenous Knowledge report, LSFN noted the Project could alter the landscape and deter younger members in their practice of hunting and trapping rights. They noted harvesting rights include gathering of plants and medicines.

As CLFN did, LSFN commented that existing impacts in their traditional territory have affected their ability to practice their traditional activities and rights over much of their territory. They raised concern for potential additional effects to LSFN lands, the use of lands, the practice of Treaty rights, and well-being.

SFN commented that they exercise their Aboriginal and Treaty rights throughout their territory which encompasses most of the Cat River watershed. They raised concern for how the Project may affect their exercise of Aboriginal, Treaty and inherent rights of hunting, fishing, and gathering.

The MON land use and traditional knowledge study completed for the Project undertook to determine where the Project may have potential impacts to MON rights and interests. They raised concern for potential downstream effects and areas of use identified along the southern portion of the transmission line route assessed in the draft EIS/EA.

In their land use plan, PFN noted their customary land uses include traditional pursuits protected by Treaty and Aboriginal rights, (including but not limited to trapping, hunting, fishing) and other historical livelihood activities.

NWOMC have Aboriginal rights protected the *Constitution Act, 1982* and they note that those rights are linked to their traditional territory and are not dependent on a specific land use. The NWOMC traditional knowledge report demonstrated that NWOMC citizens use the RSA for the exercise of their rights and the practice of their traditional Métis way of life including participating in activities such as hunting, fishing, and gathering. NWOMC stated that any potential impact on their ability to access and practice their traditional activities may infringe on their Aboriginal rights.

The above comments and concerns are captured and addressed via the evaluation of potential effects of TLRU.

6.21.1.3 Spatial and Temporal Boundaries

The Project Development Area (PDA) is defined as the footprint of the Project including the mine site area, mine site access road and the transmission line corridor, as well as a buffer in order to allow for flexibility for design optimizations. The buffer includes approximately 250 metres (m) around the mine site area. The buffer for the transmission line is included within the 40 m wide corridor and within the 30 m wide corridor for the mine access road. Where the mine access road and transmission line are aligned together, the buffer is included within a 60 m wide corridor.

The spatial boundaries used for the assessment of TLRU are shown in Figure 6.21-2 and defined as follows:

- **Local Study Area (LSA):** the LSA for Indigenous TLRU is based on the combined LSAs for the surface water systems (Sections 6.6, 6.7, 6.8 and 6.9) and wildlife and wildlife habitat (Section 6.12). The LSA for surface water systems is appropriate for activities such as fishing and navigation as these occur in the Birch Lake watershed waterbodies. The wildlife and wildlife habitat LSA is suitable for land use activities

such as hunting, trapping, plant gathering and the habitation and the use of cultural and spiritual areas as it encompasses the vegetation LSA that is appropriate for forestry as well as the broader area for wildlife.

- **Regional Study Area (RSA):** the Indigenous TLRU RSA use is also based on the RSAs for surface water systems (Sections 6.6, 6.7, 6.8 and 6.9) and wildlife and wildlife habitat (Section 6.12) for similar reasons as the LSA.

The temporal boundaries for the assessment of TLRU are defined as:

- **Construction Phase:** Years -3 to -1, representing the construction period for the Project.
- **Operations Phase:** Years 1 to 10, with the first year potentially representing a partial year as the Project transitions from construction into operations. Mining of the ore from the open pit will end in Year 10, at which time the pit will begin refilling with water; and
- **Decommissioning and Closure Phase:**
 - Active Closure: Years 11 and 15, when final decommissioning and the majority of active reclamation activities are carried out; and
 - Post-Closure: Years 16+, corresponding to the post-closure monitoring period and when the filled open pit basin will be reconnected to Springpole Lake.

Effects on the VC are assessed for each Project phase (i.e., construction, operations and closure).

6.21.1.4 Criteria and Indicators

In undertaking the assessment of TLRU effects, the following criteria were used:

- Change in availability, access to and experience related to traditional terrestrial wildlife harvesting (hunting and trapping);
- Change in availability, access to and experience related to traditional aquatic wildlife harvesting (fishing);
- Change in availability, access to and experience related to traditional terrestrial plant (food and medicine) harvesting; and,
- Change in availability, access to and experience related to traditional habitation, cultural, and spiritual sites/areas.

The available Indigenous knowledge and land use studies identified valued components or themes that are directly linked to the indicators used to describe potential effects to TLRU. Those linkages are shown in Table 6.21-8.

The specific criteria, measurable indicators and the rationale for the selection of criteria are described in Table 6.21-9.

6.21.1.5 Description of Residual Effect Attributes

The residual effects for TLRU are characterized in terms of the following attributes:

- Magnitude;
- Geographic Extent;
- Duration;

- Frequency;
- Reversibility; and
- Timing.

These attributes along with the rankings are further described in Table 6.21-10.

In addition, the residual effects for TLRU are characterized according to the ecological and/or social context within which the VC is found. This is a qualitative measure of the sensitivity and/or resilience of the VC to potential change. The following ranking is applicable:

- **Level I:** The VC may or may not be sensitive but is capable of supporting the predicted change with typical mitigation measures.
- **Level II:** The VC is sensitive and requires special measures to support the predicted change.
- **Level III:** The VC is sensitive and unable to support the predicted change even with special measures.

As noted in Section 6.1, a residual effect is defined as significant if both of the following criteria are satisfied:

- A Level II or III rating is attained for all of the attributes involving magnitude, extent, duration, frequency, reversibility and timing; and
- A Level II or III rating is attained for ecological and/or social context.

Conversely, if a Level I rating is achieved for any of the attributes involving magnitude, extent, duration, frequency, reversibility or timing; or, if a Level I rating is achieved for the ecological and/or social context, then the residual effect is considered to be not significant.

In the event there is a significant adverse effect, the likelihood of occurrence is further described.

6.21.2 Existing Conditions

A description of the baseline conditions is presented below to characterize the existing conditions for TLRU and is based on several years of study across the biophysical, cultural heritage and archaeological aspects in the region around the Project. This information is supplemented by the TK/TLRU studies completed by the communities. Together, these information sources provide a strong foundational understanding of TLRU information for this stage of project planning. The existing conditions are used to support the assessment of potential effects from the Project on TLRU and will support long-term monitoring for the Project with interested proximate Indigenous communities.

FMG has supported the development of TLRU studies throughout the EA process and will continue to support TLRU throughout all stages of the Project. TLRU information has been gathered and shared by the following communities for the EA process:

- Cat Lake First Nation (CLFN);
- Lac Seul First Nation (LSFN);
- Mishkeegogamang Ojibway Nation (MON);
- Northwestern Ontario Métis Community (NWOMC);
- Ojibway Nation of Saugeen (ONS);
- Pikangikum First Nation (PFN);
- Slate Falls Nation (SFN); and

- Wabauskang First Nation (WFN).

More specifically, the following studies have been considered in the TLRU assessment:

- Cat Lake First Nation Indigenous Knowledge and Use Study: Kita-Ki-Nan Indigenous-led Assessment of the Springpole Project (CLFN 2024a);
- Cat Lake First Nation Socio-economic Baseline Study for the Proposed Springpole Gold Mine Project (CLFN 2024b);
- Lac Seul First Nation Indigenous Knowledge and Use Study: Kita-Ki-Nan Indigenous-led Assessment of the Springpole Project (LSFN 2024a);
- Lac Seul First Nation Socio-economic Baseline Study for the Proposed Springpole Gold Mine Project (LSFN 2024b).
- Traditional Land Use and Occupancy and Traditional Ecological Knowledge Study Report for the Springpole Gold Project (MON 2023);
- Traditional Knowledge and Land Use Study for the First Mining Gold (FMG) Springpole Mine Project. Completed by Know History Inc. Historical Services (MNO 2021);
- Springpole TKLUS Follow-up Report for NWOMC Completed by Know History Inc. (NWOMC 2024);
- Health, Socio-economic, Indigenous Knowledge and Land Use Baseline Study (SFN 2024); and
- Wabauskang Traditional Knowledge and Use in the area of Springpole Gold Access Corridor Project (ArrowBlade 2014).

Additional information sources that have been used to inform the TLRU assessment include:

- **Community Knowledge:** received through engagement activities such as meetings, oral input, and written input, as described in Section 6.21.1.2.
- **Publicly Available Secondary Literature Sources:** relevant documents such as land use plans and forest management plans, which contain traditional knowledge and traditional land use information for the area around the Project from these Indigenous communities, include:
 - Cat Lake – Slate Falls Community Based Land Use Plan: “Niigaan Bimaadiziwin” – A Future Life (CLFN/SFN 2011).
 - Keeping the Land: A Land Use Strategy for the Whitefeather Forest and Adjacent Areas (PFN 2006)
 - Trout Lake 2021-2031 Forest Management Plan. Supplementary Document C: Wabauskang First Nation (Domtar 2021).

A concordance table showing how the Project addressed the planning considerations for the Cat Lake – Slate Falls Community Based Land Use Plan is found in Table 6.21-11, and for the Land Use Strategy for the Whitefeather Forest and Adjacent Areas is found in Table 6.21-12.

- **Other Relevant Information Sources:**
 - Species at Risk Stewardship Fund Project, a Partnership between Cat Lake / Slate Falls and the Ministry of Natural Resources and Forestry (CLFN, SFN, MNRF n.d);
 - Cultural Heritage Research Report: Built Heritage and Cultural Heritage Landscapes (WSP 2021);



- Springpole Gold Project EIS/EA: Indigenous Traditional Land and Resource Use. Interim Report V.4. Prepared for First Mining Gold Corporation. Vancouver, B.C (Northwinds 2020); and,
- Slate Falls: Through Memory and Material (Kunicky 2021).

In addition, information from biophysical and socio-economic baseline studies was used to understand and inform the potential for TLRU activities in the area. FMG will continue to support studies and address comments related to TLRU activities identified by Indigenous communities during all phases of the Project.

This section provides an overview of the Indigenous communities and values, as shared through the community studies shared with FMG to set the context for the discussion of TLRU. Following the community overview sections, the TLRU activities are further discussed according to the following key aspects of traditional land use:

- The teaching of Anishinaabe Law;
- Traditional harvesting of wildlife species, including hunting and trapping;
- Traditional harvesting of aquatic resources, including fishing;
- Traditional harvesting of plants; and,
- The habitation, and use of cultural and spiritual sites.

6.21.2.1 Community Overviews

6.21.2.2 Cat Lake First Nation

Cat Lake First Nation is an Anishinaabe community which traditionally speaks Anishinaabemowin. The reserve is located on Cat Lake 50 kilometres northeast of the Project and is accessible by air and winter road. CLFN is within Treaty 9 territory and its reserve totals 1,771 hectares. The total population was 870 with 653 members living on reserve in February 2024 (CLFN 2024a, CLFN 2024b).

CLFN cited regional studies on health conditions that say Indigenous communities in northwestern Ontario have much higher rates of oral health issues in children and youth than the Ontario average, and in adults higher rates than the Ontario average for admissions to hospitals for respiratory disease, chronic diseases, diabetes and infectious and parasitic disease. Almost one quarter of people over 20 years of age have diabetes.

Regionally, mental health referrals for youth increased by 18 times between 2008 and 2017 and youth suicide rates were significantly higher than the Ontario average. The experience of residential schools is considered a driver of mental health challenges in CLFN, and the intergenerational trauma has affected mental wellness and individual resilience extending beyond individuals to families and the community. Youth have been affected by COVID-19 and prolonged isolation and absence from classrooms have had long-term impacts on their mental health.

The use of opioids has changed CLFN rapidly and substance abuse has had a major impact on the social and mental health of the community. As a result, youth and adults are engaging in fewer activities, not participating in the labour force, fewer youth are graduating high school, and fewer members are pursuing additional training or educational opportunities. Affected members are challenged in finding employment and are less likely to participate in traditional activities. Mental health is affected, including high rates of depression and increased rates of suicide. In CLFN, the medical staff lack the capacity to address all of the community needs. This was exacerbated by the loss of the Cat Lake nursing station by fire in March 2024.

CLFN has identified 941 TLRU values in general areas across the RSA as outlined in their Indigenous Knowledge and Use Study. The more generalized Project footprint as used in the CLFN report, includes the physical footprint of the mine, the mine access road, and the transmission line corridor plus a distance of 250 metres around all three components. Values identified were categorized as environmental, habitation, subsistence, and transportation types. The reported values are a combination of values collected for the Indigenous Knowledge and Land Use Study and ones previously collected by CLFN. Of the values collected in the Indigenous Knowledge and Use Study, 25 appear to be within about 250 metres of the generalized Project footprint, 63 are within about 5 kilometres of the Project, and 133 are within 25 kilometres of the Project. Of the previously collected values, 65 are within about 250 metres of the generalized Project footprint, 191 are within about 5 kilometres of the Project, and 808 are within about 25 kilometres of the Project. These values were based on CLFN use between 1964 and 2023 (CLFN 2024a).

The values within approximately 250 metres of the Project (Figure 6.21-3) include:

- Cultural values: seasonal processing sites for hunted game such as moose, muskrat, and beaver; place names; and other use areas.
- Environmental values: loon nesting sites.
- Habitation values: seasonal camping sites for moose and other game harvesting.
- Subsistence values: water collection sites; harvesting and kill sites for moose and fish.
- Transportation values: mooring sites for boats; river trails to camping and hunting areas; and seasonal trails used by skidoos.

The values within about 5 kilometres of the Project include:

- Cultural values: place names of sites such as islands, waterways, and bays; gathering places; a meat processing location; and one birthplace of a CLFN member.
- Environmental values: observations of productive aquatic habitats; spring water sites; nesting locations for eagles and loons; habitats and trails for caribou and moose; and observations of food plant habitats.
- Habitation values: long- and short-term habitation sites for fishing cabins, camps, tents, and food gatherings.
- Subsistence values: seasonal and year-round fish harvesting locations; collection sites for drinking water; kill sites for moose; and a blueberry harvesting area.
- Transportation values: a wintertime terrestrial travel route to reach hunting grounds.

The values within about 25 kilometres of the Project include:

- Cultural values: a burial site; gathering places; spiritual areas; teaching areas; game processing sites; place names for locations such as bays and creeks; and medicine harvesting locations.
- Environmental values: an observation of a wild rice (manoomin) habitat important for duck subsistence; and a pickerel spawning site.
- Habitation values: short- and long-term habitation such as trapping cabins, tourist camps, campgrounds, and seasonal- and annual-use recreational cabins.
- Subsistence values: seasonal and year-round fish harvesting locations; collection sites for drinking water; food plant harvesting locations; kill sites for moose; duck harvesting areas; and a generational

trapline and trapping sites for fur-bearing animals including marten, mink, beaver, bobcat, otter, and muskrat.

- Transportation values: a portage travel route.

A key comment theme across the TLRU areas is that CLFN is concerned about increasing access into their traditional lands. Access is discussed in detail below in Section 6.21.6.

The valued components used by CLFN in their Indigenous Knowledge and Use Study (CLFN 2024a) are:

- Water (Nibi);
- Fishing;
- Hunting and trapping;
- Food plants and medicines; and,
- Cultural continuity.

These valued components are considered in this assessment of effects on TLRU. The linkages between these valued components and the assessment criteria and indicators for TLRU are presented in Table 6.21-8.

6.21.2.3 Lac Seul First Nation

Lac Seul First Nation is an Anishinaabe community located 128 kilometres southeast of the Project. The community is comprised of three settlements at Frenchmen's Head, Whitefish Bay, and Kejick Bay within reserve lands totaling 27,966 hectares. Its members traditionally speak Ojibway and Oji-Cree. The communities are approximately 40 to 60 kilometres west to northwest of Sioux Lookout and are accessible by road year-round. The registered population of LSFN was 3,783 in February 2024 with 932 members living on reserve (LSFN 2024a).

The earliest written reference to LSFN is from 1791. The community established a Hudson's Bay Company trading post in 1803 which operated until the 1980s. Anishinaabe peoples, including LSFN, signed Treaty 3 in 1873 (LSFN 2024a). The Treaty 3 territory covers areas west of Thunder Bay, north of Sioux Lookout and extends into Manitoba, and does not cover the Project area which is located within Treaty 9 lands.

The traditional territory of LSFN includes various commercial activities including mining, forestry, and hydro-electric power generation industries. In 1929, a dam was constructed at Ear Falls for hydro-electric power generation. Lac Seul became a reservoir and the lake water level rose flooding 4,450 hectares of reserve land and caused the loss of homesteads, farms, wild rice fields, and gravesites. Upper Ear Falls and surrounding landforms were submerged. In 1957, the Albany River was rerouted to flow into Lac Seul via the Root River to expand hydro-electric power generation at Ear Falls which led more water level fluctuations in Lake St. Joseph and Lac Seul.

LSFN has identified 32 TLRU values within about 25 kilometres of the Project (Figure 6.21-4). These values were categorized as environmental, habitation, subsistence, and transportation values. The sites were recorded as part of their Indigenous Knowledge and Use Study and by previous studies completed by LSFN. The sites were identified based on LSFN use from the 1960s onward. The Project or Project footprint, as generalized in the LSFN report includes the physical footprint of the mine, the mine access road, and the transmission line corridor plus a distance of 250 metres around all three components.

The information gathered identified six values within proximity of the Project including:

- Environmental values – observation of a spring water site;

- Habitation values – a cabin used for fishing; and,
- Subsistence values – seasonal harvesting sites for fish such as walleye and northern pike.

The observed spring water site and reported cabin are not known to be near the mine site area, and FMG has visited the area noted and a cabin has not been observed.

Four values were identified within 5 kilometres of the Project including a seasonal harvesting location for lake trout. Twenty-two values were reported within about 5 kilometres and 25 kilometres of the Project including a game cache and a trapping cabin.

The valued components used by LSFN in their Indigenous Knowledge and Use Study (LSFN 2024a) are:

- Water (Nibi);
- Fishing;
- Hunting and trapping;
- Plants and medicines; and,
- Cultural continuity.

These valued components are considered in this assessment of effects on TLRU. The linkages between these valued components and the assessment criteria and indicators for TLRU are presented in Table 6.21-8.

6.21.2.4 Mishkeegogamang Ojibway Nation

The Mishkeegogamang Ojibway Nation has two reserves 144 kilometres southeast of the Project in the area where the Albany River meets Lake St. Joseph. The two reserves are accessible by road year-round. Approximately 900 people live on reserve and 500 members live off reserve. Ojibwe is understood and spoken by about two-thirds of MON members (MON 2010a).

The MON traditional territory extends in all directions from the two reserves. MON describes land use and occupancy as holistic and includes food harvesting, medicine gathering, cultural and sacred ceremonies, family camps, language, and traditional knowledge (MON 2023).

MON reports TLRU and occupancy south and west of Slate Falls Nation reserve lands along the previously preferred transmission line route (Alternative 3) (Figure 6.21-5) (MOFN 2023).

MON TLRU has been affected by historical developments. In 1934 and 1935, a dam was constructed at Rat Raids between the two MON reserves for the purpose of generating electricity. Water levels rose, without warning, and washed away homes and gardens on the reserve and gravesites along the shores of Lake St. Joseph. By 1957, the dams at Rat Rapids were no longer being used for power generation and the dams were converted to sluice ways to regulate water flow westward. Water began to be diverted from Lake St. Joseph and reserve land above the pre-1957 high water mark was alternately flooded and drained. This fluctuation in water levels changed the vegetation, fish, and wildlife habitat, increased erosion, and dislodged shoreline debris into the lake. The flow of the Albany River was reduced affecting hunting and fishing; the cultivation of wild rice halted as it will not tolerate irregular water levels (MON 2010b).

The interests and activities noted by MON in its Indigenous knowledge and land use report (MON 2023) are:

- Water
- Food harvesting
- Medicine gathering
- Cultural and sacred sites and ceremonies, family camps, language, recreational activities.

These themes are considered in this assessment of effects on TLRU. The linkages between these themes and the assessment criteria and indicators for TLRU are presented in Table 6.21-8.

6.21.2.5 Northwestern Ontario Métis Community

The Northwestern Ontario Métis Community have been present in the northwestern Ontario since the early nineteenth century. Individuals from 18 Verified Métis Family Lines were recorded at locations in and around the region between 1823 and 1931. There are over 3,000 Métis represented by the NWOMC. Métis from this region were not included in treaties signed with First Nations.

In the early 1800s, Métis lived, worked, and raised families at fur trade posts and outposts in the region. They worked as general labourers, steersmen and bowsmen, clerks, interpreters, and guides. The Métis learned how to hunt, trap, fish, harvest natural resources, and produce handmade items. They were experts in safely traversing rivers and lakes, knowing portage routes, and where to harvest game and materials, Métis continue to harvest in and around the region where they hunt, fish, and gather plants and natural materials. Harvesting is essential to their families, identity and way of life.

NWOMC reported identifying 18 traditional ecological sites (Figure 6.21-6 and Figure 6.21-7) within the NWOMC Study Area (within 100 kilometres of the Project), three within the NWOMC Regional Study Area, and one site within the NWOMC Local Study Area (within 10 km of the proposed mine site). Some of these sites were identified as caribou habitat or travel routes and the study area is considered a nursery because of the number of cow moose found there. NWOMC members reported hunting bear, deer, moose, wolf, rabbit, sharp tailed grouse, spruce grouse, partridge (ruffed grouse), and waterfowl (ducks and geese) in the Study Area and identified 95 locations where they harvest moose. They also identified 41 fishing locations within the Study area, seven of which were in the Regional Study Area and one in the Local Study Area (Birch Lake). Members fish for walleye, northern pike, trout, perch, sauger and whitefish; one member caught minnows for bait. Plants that are harvested include blueberries, choke cherries, cranberries, fiddleheads, Labrador tea, nuts, raspberries, pin cherries, saskatoon berries, wild rice, chaga, and mushrooms (MNOMC 2024).

The themes noted by NWOMC in its traditional knowledge and land use report (NWOMC 2024) are:

- Hunting
- Fishing
- Natural material gathering
- Cultural sites

These themes are considered in this assessment of effects on TLRU. The linkages between these themes and the assessment criteria and indicators for TLRU are presented in Table 6.21-8

6.21.2.6 Ojibway Nation of Saugeen

The Ojibway Nation of Saugeen is located in northwestern Ontario on Kashawagama Lake, approximately 20 kilometres northwest of Savant Lake and 50 kilometres east of Sioux Lookout, 152 kilometres southeast of the Project. The Nation has a registered population of 201; 109 members live off reserve (ONS 2024).

6.21.2.7 Pikangikum First Nation

Pikangikum First Nation is located on Pikangikum Lake 126 kilometres northwest of the Project. The community is accessible by air, boat, and winter road. The population of PFN is 3000 people. There is nearly 100% fluency in Ojibway and it is the language of work in PFN (WFI 2008).

PFN members are active users of their traditional territory. A majority of the community members obtain a substantial portion of their domestic and livelihood needs from the land. They spend a substantial part of the year on the land engaged in hunting, trapping, and gathering (WFI 2008).

In *Keeping the Land: A Land Use Strategy*, PFN identified that for the management of the Whitefeather Forest within their traditional territory, the land use strategy should consider customary land uses, commercial forestry, non-timber forest products, mineral development, tourism, recreation, strategic access / infrastructure, and dedicated protected areas. Customary land uses include traditional activities which are protected by treaty and Aboriginal rights including trapping, hunting, fishing, gathering, and craft making (PFN 2006).

6.21.2.8 Slate Falls Nation

Slate Falls Nation members identify as Anishnabeg. SFN was once part of Mishkeegogamang First Nation and established themselves in the vicinity of Bamaji Lake in the 1930s. The SFN reserve was established in 2018 (Indigenous Services Canada 2019) and is located 52 kilometres southeast of the Springpole Project and covers 6,559 hectares. The reserve is accessible by a year-round forestry road (Vermillion Road) and by plane, SFN had 300 registered members in 2021 with a population growth of 29% between 2016 and 2021. A total of 213 members live on reserve. Approximately one half of the population is under 29 years of age and 27% are under 18 years of age. Ojibway is the traditional language of SFN and is still spoken by some members. Ojibway is also taught at the school in the community.

In the 1930s, mining expanded in the Pickle Lake area near Mishkeegogamang Ojibway Nation and a dam was constructed for hydroelectric power generation. The dam caused water levels to rise in Lake St. Joseph displacing some members from MON to SFN and disrupted traditional annual journeys by SFN members. In 1958, waters from Lake St. Joseph were diverted to support hydroelectric power generation and caused shoreline flooding in several lakes damaging wild rice patches, fish spawning areas, and sturgeon breeding grounds and submerged cultural sites including blueberry picking areas, burial sites, and campgrounds (Kunicky 2021, SFN 2024a). Fluctuating water levels believed to be related to the dam have affected travel by boat.

SFN is a signatory to Treaty 9 and is a member of Nishinawbe Aski Nation and the Windigo First Nations Council. SFN describe that they are stewards of the Cat River System and are reliant on the land and its resources for subsistence, commercial benefit, spiritual connection, teaching, and healing. The quality and quantity of the water in the Cat River System is a high priority for SFN. Fish from lakes and rivers in SFN's traditional territory are a staple food in their diet and provide commercial fishing opportunities. Walleye is the most commonly harvested fish for personal and commercial use. Whitefish, suckers, northern pike, and lake trout are harvested for personal use. Hunting and trapping provide a large portion of the community members' diet. Moose and duck are the most frequently harvested animals; community members also

harvest caribou, rabbit, beaver, geese, and partridge. Moose is present throughout the traditional territory but seem to be declining in numbers. Trapping furbearers, including beaver, lynx, fox, fisher, mink weasel, muskrat, wolverine, squirrel, rabbit, and marten made up a large portion of the community's economy prior to 1970. Trapping declined after 1970 with the drop in the market for furs; trapping has experienced an additional decline in the last five years. Many traditional trails and access routes are located (Figure 6.21-8) around Bamaji Lake, Kezik Lake, and Lake St. Joseph and are used to access hunting, trapping, gathering, and fishing locations. Community members have camps and cabins throughout the region for harvesting, teaching traditional practices, interacting with nature, and conducting cultural events. SFN traditional territory includes historic settlements, burial grounds, areas with cultural artifacts and areas for gathering, teaching and spiritual use. Plants are harvested for sustenance, medicinal purposes, and for tools and building materials (Kunicky 2021, SFN 2024).

SFN's use of their traditional territory has been impacted by forestry clearcuts and use of herbicides, forest fires, water level fluctuations believed to be due to hydroelectric dam developments, power line, historic mine sites, and roadside herbicide spraying (SFN 2024).

The themes noted by SFN in its Indigenous Knowledge and land use report (SFN 2024) are:

- Habitation areas;
- Transportation routes;
- Cultural heritage;
- Fishing;
- Hunting / trapping;
- Plant harvesting; and,
- Impaired use locations and areas.

These themes are considered in this assessment of effects on TLRU. The linkages between these themes and the assessment criteria and indicators for TLRU are presented in Table 6.21-8.

6.21.2.8.8 Wabauskang First Nation

Wabauskang First Nation is an Ojibway community in northwestern Ontario 124 kilometres southwest of the Project. In 2024 WFN had 390 registered members, an increase from 2014 of 21%; 141 members live on reserve (CIRNAC 2024). Its reserve is 3255 ha in size and the community is accessible year-round by road. WFN is a signatory to Treaty 3 and a member of Grand Council Treaty 3 (ArrowBlade 2014).

The WFN traditional territory contains many wildlife species including black bear, caribou, moose, wolves, foxes and migratory birds as well as many plant species of importance to WFN. The territory is geologically diverse and contains the potential for discovery of new mineral deposits and expansion of mining activities (ArrowBlade 2014).

The contributors to the WFN TK/TLRU study spoke of their Aboriginal and treaty rights and how those rights had been practiced on the land since time immemorial, how stewardship practices had been taught to them, and about the importance of plants, fish, and animals for both sustenance and spiritual purposes (ArrowBlade 2014).

Animals that are currently hunted and trapped by WFN members include moose, deer, mink, muskrat, rabbit, otter, beaver, fox, bobcat, weasel, squirrel, wolf, marten, and partridge. In the past, WFN members hunted caribou until extirpation. WFN members harvest fish for commercial and personal use including sturgeon, pickerel, northern pike, whitefish, and trout. Plants are harvested for nutrition, healing, and for personal consumption. These plants include wild rice, blueberries, raspberries, cherries, juniper, sage, sweet grass, willow, cedar, and tree bark. WFN established camps and cabins, particularly along lakeshores and an extensive network of travel routes continue to exist between settlements, camps, cabins, and communities (Figure 6.21-9). WFN reported a decline in wildlife populations since the 1970s due to natural factors as well as man-made factors such as deer mortality on roads, forestry and clear cutting, and the presence of moose on roads. Some species, including marten, partridges, and rabbit have high population numbers (ArrowBlade 2014).

The study (ArrowBlade 2014) identified several key themes which were:

- Hunting and Trapping;
- Fishing and fish harvesting practices;
- Plants (Nutrition and Ceremony);
- Travel (Settlements and Corridors); and,
- Wildlife.

These key themes are considered in this assessment of effects on TLRU. The linkages between these key themes and the assessment criteria and indicators for TLRU are presented in Table 6.21-8.

6.21.2.9 Teaching of Anishinaabe Law

The Seven Teachings of Anishinaabe Law were summarized by Cat Lake First Nation and Lac Seul First Nation in the community socio-economic (CLFN 2024b, LSFN 2024b) and Indigenous knowledge and land use reports (CLFN 2024a, LSFN 2024b) prepared as part of engagement on the Project. The summary from the Cat Lake Indigenous Knowledge (CLFN 2024a) report is presented in Table 6.21-13 to help represent the relationship between the Nations and the land.

The EIS/EA examines the potential effects to traditional land and resource use by means of indicators which describe potential changes in the availability of, access to, and experience related to hunting and trapping, fishing, plant gathering and the use of habitation, cultural and spiritual sites and areas. The valued components and themes identified in the available Indigenous knowledge and land use studies are directly linked to the indicators used to describe potential effects. Those linkages are shown in Table 6.21-8.

6.21.2.10 Traditional Harvesting of Wildlife Species, including Hunting and Trapping

Information gathered indicates that those Indigenous communities identified as having an interest in the Project currently use Crown land within the RSA for traditional purposes, which includes the harvesting of wildlife species. This activity includes hunting and/or trapping but can also include opportunistic gathering of terrestrial wildlife sheds (e.g., antlers, feathers). Table 6.21-14 identifies traditionally harvested wildlife species.

In general, harvesting locations are identified around lakes where habitat would support wildlife species (ArrowBlade 2014). Specific areas that support habitat needs of Caribou (Boreal population) and other hunted species (including seasonal habitats) were identified throughout the RSA (PFN 2006; CLFN/SFN 2011; ArrowBlade 2014; Domtar 2021; MNO 2021).

In general, trapping locations are common around lakes and take advantage of trails and resource movement patterns within the surrounding forest (CLFN/SFN 2011; ArrowBlade 2014; Domtar 2021; MNO 2021). The mine site area of the PDA intersects primarily with trapline SL197 and to a lesser extent with trapline SL200 (Figure 6.21-2) with both being held by members of CLFN. The mine access road of the PDA intersects primarily trapline SL197 and, to a lesser extent, traplines SL193, SL194, and SL200 and the transmission line of the PDA intersects with an additional four traplines (SL186, SL191, SL192 and SL196). Historical trapping records collected between 1993 and 2017 across the RSA indicate that American marten was the most trapped species, followed by beaver, red squirrel and other mustelids (weasels). CLFN identified generalized sites within approximately 250 metres of the PDA (Figure 6.21-3) for seasonal camping for hunting and processing hunted game such as moose, muskrat and beaver, loon nesting sites, and river trails to hunting areas. In their local study area (within approximately 5 km of the PDA) and regional study area (within approximately 25 km of the PDA), CLFN identified additional meat processing sites, moose kill sites, and a winter terrestrial travel route. CLFN described transportation routes and subsistence harvesting sites east and north of the PDA (CLFN 2024a).

LSFN reported a game cache, a cabin, and a transportation route within their regional study area (within approximately 25 km of the PDA; Figure 6.21-4). They also described hunting and transportation areas west and south of their regional study area (LSFN 2024a).

SFN considered the Cat Lake – Slate Falls River System as their study area, which includes Birch Lake, Springpole Lake for their report on Indigenous knowledge and land use. SFN identified areas of community use on Birch Lake, over the PDA, and around and east of SFN community (Figure 6.21-5). Hunting and trapping areas were shown to be located on Birch Lake and along the transmission line corridor. Hunting and trapping areas extend southeast of the proposed mine site, centered mainly around the SFN reserve. The most commonly hunted animals are moose and duck (SFN 2024).

MON noted areas of land use and occupancy along the southern portion of transmission line corridor (Figure 6.21-6) and south and southeast of SFN (MFN 2023).

WFN reported the highest concentration of important sites more than 25 km from the PDA (Figure 6.21-7), however, several sites were noted with 25 km to the west and south of the PDA (ArrowBlade 2014).

NWOMC identified three large game kill sites within the RSA (Figure 6.21-8) and an overlap of small game harvesting areas along the west edge of the RSA to the west of the PDA (MNO 2021, NWOMC 2024).

Information gathered to date identified hunting and trapping as TLRU activities taking place in the RSA, although site-specific hunting or trapping locations have not been identified or observed at the proposed mine site it has been assumed Indigenous communities harvest wildlife species on occasion within the PDA.

6.21.2.11 Traditional Harvesting of Aquatic Resources, including Fishing

Information gathered to date indicates that Indigenous communities use waterbodies and watercourses on Crown land within the RSA for traditional harvesting of aquatic resources, including fishing and gathering of other aquatic species (e.g., baitfish) as supplemental resources.

Of the fish species identified within the RSA, nine species have been identified as being traditionally fished species (Table 6.21-15). Lake Sturgeon are noted as being historically present in the Birch Lake watershed and may have supported a harvest by members of several Indigenous communities in the past (CLFN/SFN 2011).

In general, preferred fishing locations are identified around waterbodies and watercourses where habitat would support the various stages of aquatic resource, including spawning sites. Traditional fishing activities primarily support personal/domestic yields but also supplement commercial activity in the RSA (CLFN/SFN 2011; PFN 2006; ArrowBlade 2014; NWES 2020; Domtar 2021; MNO 2021). Specific fishing areas used by CLFN have been identified in Birch Lake and Springpole Lake during consultation activities. The Birch Lake location is northwest of the mine site. The Springpole Lake location is a camp site on the southeast arm of Springpole Lake approximately three kilometres from the mine site. It is owned by trapline holder SL197. FMG has worked with trapline holder SL197 to support their TLRU pursuits and a letter of support for the Project has been received.

CLFN reported sites within approximately 250 metres of the Project footprint fishing sites for walleye, sturgeon and trout together (Figure 6.21-3) with mooring sites for boats. Within approximately 25 km of the PDA, CLFN reported observations of productive aquatic habitats, a pickerel spawning site, and fishing cabins, camps and tents (CLFN 2024a).

LSFN reported the existence of a cabin and seasonal fishing sites for walleye and northern pike within approximately 250 m of the PDA (Figure 6.21-4) and a seasonal harvesting site for lake trout within 5km of the PDA (LSFN 2024a). FMG is seeking to confirm the location of the camp.

SFN mapped fishing areas on Birch Lake and southeast of Springpole Lake including in the area of the transmission line corridor (Figure 6.21-5). The types of fish harvested by SFN are lake trout, northern pike / jackfish, sturgeon, suckers, walleye / pickerel (okanz), tullibee, and whitefish (atikoomehk) SFN 2024).

WFN identified several waterbodies (Figure 6.21-7) within their traditional lands, that overlap with the RSA (WFN 2014; Domtar 2021).

NWOMC reported fishing locations (Figure 6.21-9) including within 25 km of the PDA and one within 5 km of the PDA (NWOMC 2024). NWOMC identified a general non-commercial fish harvesting area on Birch Lake around the north and west sides of the mine site area of the PDA which extends into a portion of the LSA and RSA beyond (MNO 2021, NWOMC 2024). Several baitfish harvesting areas are located within the RSA, as noted in Section 6.17 (Domtar 2021).

6.21.2.12 Traditional Harvesting of Plants

Indigenous communities use Crown land within the RSA for traditional harvesting of a variety of plants, including berries, trees, mosses and other plants. The plants are harvested for a variety of purposes, including medicinal, nutritional, domestic and ceremonial use. Categories of consumables (e.g., berries and tea) were identified as important species and are generally defined by their use, including construction of structures (e.g., cabins, trapping and fishing structures) and domestic activity (e.g., home heating, baskets, snowshoes and absorption pads) (CLFN/SFN 2011; ArrowBlade 2014; Domtar 2021; MNO 2021). Traditionally harvested plant species in the PDA are identified in Table 6.21-16.

Indigenous communities have noted the relationship between plant species and habitats that are suitable to support other traditionally harvested species (e.g., Caribou) (PFN 2006; Domtar 2021). Emphasis is placed on the protection of fish and wildlife habitat, and the avoidance of unnecessary disturbance of vegetation and wildlife (CLFN/SFN 2011). Specific habitat types that support plants that are traditionally gathered are noted to be essential to TLRU. For example, wetlands support traditional harvesting of plant species such as wild rice (Domtar 2021) although wild rice has not been reported to occur in the PDA.

CLFN reported that within approximately five km of the PDA, food plant habitats and a blueberry harvesting area (Figure 6.21-3). Within approximately 25 km of the PDA, CLFN reported wild rice (manoomin) and food plant harvesting sites (CLFN 2024a).

LSFN primarily harvested wild rice, cedar and weekay (rat root or sweet flag) as well as cranberries and blueberries (Figure 6.21-4; LSFN 2024a).

SFN reported that berries are eaten by almost all community members in the summer; blueberries are the most commonly harvested together with strawberries, raspberries, blackberries, saskatoon berries, cranberries and pin cherries (Figure 6.21-8). Other traditional plants include wild rice, rat root, wild carrots, and bulrush roots. Medicines that are harvested include cedar, pine, balsam fir, alder, chaga, Labrador tea, mint, and rosehip (SFN 2024).

WFN members harvest wild rice, blueberries, raspberries, cherries, juniper, sage, sweet grass, willow, cedar, and tree barks (Figure 6.21-7; WFN 2022).

NWOMC reported harvesting plants and natural materials south and southwest of the PDA within approximately 25 km of the PDA (Figure 6.21-8). The plants include blueberries, choke cherries, cranberries, fiddleheads, labrador tea, nuts, raspberries, wild rice, chaga, mushroom and wood and bark (NWOMC 2024).

6.21.2.13 Habitation, Cultural and Spiritual Sites

Information gathered to date indicates that Indigenous communities use Crown land within the RSA for habitation (cabins), cultural practices and as spiritual sites. Indigenous communities noted that camps and cabins are commonly found along lakeshores (ArrowBlade 2014).

As noted above, a camping site periodically used for harvesting activities was identified south of the PDA (Figure 6.21-3) within the north basin of Springpole Lake but does not include a permanent structure. Several other built heritage sites have been identified in the LSA; however, these sites are not used for TLRU activities (Section 6.24).

Waterway connections were identified as being integral to maintaining access to the land and support TLRU activities. As a result, waterway connections were identified as contributing to the spiritual and cultural landscapes of Indigenous communities and directly relate to subsistence, recreation, and socio-economics (PFN 2006, CLFN/SFN 2011, ArrowBlade 2014, MNO 2021). Based on historical research and fieldwork for cultural heritage within the RSA, travel routes exist in Springpole Lake and Birch Lake, as shown in Figure 6.21-6 (Section 6.18). Two portages are located within the mine site area of the PDA. These portages represent a mix of current and historic land use with one of the portages being maintained by FMG in proximity to the exploration camp and the other having been abandoned. A third portage route between Birch Lake and Springpole Lake that is no longer in use is located southwest of the PDA, and is the location for the alternate portage to be established and maintained from Project construction through active closure (Figure 6.21-2). Further details on the travel routes and portages can be found in the Cultural Heritage Impact Assessment report in Appendix S-5.

Indigenous communities have noted a collection of pictographs located on exposed rock along the northeast shoreline of the southeast arm of Springpole Lake within the LSA (Section 6.23 and Section 6.24). This location is outside the PDA and will be avoided by Project development and no new access to the area will be created. CLFN noted the significance of Bigfoot, the forest people, and the little rock people in the region and oral storytelling traditions.

CLFN has reported there are cultural values within approximately 250 m of the PDA and within five km of the PDA including seasonal game processing sites, place names, and gathering sites (Figure 6.21-3). Within approximately 25 km of the PDA, CLFN identified that there a burial site, spiritual areas, teaching areas, game processing sites, place names, and medicine harvesting areas. CLFN reported there are short and long term habitation sites for hunting and trapping and recreation within approximately 5 and 25 km of the PDA (CLFN 2024a).

LSFN recorded a cabin within approximately 250 m of the PDA and a trapping cabin within 25 km of the PDA (Figure 6.21-4). FMG is seeking to confirm the location of the camp.

SFN stated that the entirety of their traditional territory holds cultural significance to the community with cultural heritage areas, sites and trails (Figure 6.21-5). The cultural areas and sites include historic settlements, burial grounds, areas with cultural artifacts and areas for gathering, teaching, and spiritual use. The areas and specific cultural heritage sites mapped by SFN are southeast of Springpole Lake and the area overlaps the transmission line corridor. SFN described habitation sites to the north and east of the community in the RSA (SFN 2024).

MON (2023) shared that certain general areas within proximity of the southern portion of transmission line noted in the draft EIS/EA include cultural value sites (Figure 6.21-6).

NWOMC mapped boat launches, portages, trailhead and travel routes within approximately 25 km of the PDA to the southwest of the Project (Figure 6.21-8; NWOMC 2024).

6.21.3 Identification of Pathways to Potential Effects

The initial step in the assessment process is to identify interactions between the Project and the VC that can result in pathways to potential effects prior to the application of mitigation measures. These potential effects may be direct, indirect and/or positive effects, where applicable. Table 6.21-17 includes the potential interactions of the Project with TLRU, prior to the application of the mitigation measures. The professional judgement of technical experts experienced with mining projects in Ontario and Canada as well as input from Indigenous communities, government agencies and the public informed the identification of those interactions that are likely to result in a pathway to a potential effect due to a measurable change on TLRU activities. These pathways to potential effects are further described below for each phase of the Project, along with the rationale for those interactions excluded from further assessment. Section 6.21.4 and Table 6.21-18 provide a description of the mitigation measures applied to during all phases of the Project. The residual effects, after the application of the mitigation measures, are then described and further evaluated in Section 6.21.6, using the criteria and indicators identified in Section 6.21.1.4.

Construction Phase

The construction phase of the Project is expected to occur over a three-year period and will include preparation of the site and the construction of mine infrastructure. The following interactions with the Project result in pathways to potential effects on TLRU as described below. After mitigation is applied to each pathway, as described in Table 6.21-18, the residual effects are assessed using the criteria identified for each pathway

- Site preparation activities in the mine site area including clearing, grubbing, and bulk earthworks which interact with TLRU. These activities result in pathways to potential effects on TLRU due to the loss of vegetation which may affect the availability of plant harvesting opportunities; the loss of vegetation leading to changes in wildlife habitat, which may affect the availability of wildlife harvesting



opportunities; the use of equipment leading to changes in the risks of wildlife mortality, which may affect the availability of wildlife harvesting opportunities; the use of equipment leading to sensory disturbance from changes in sound levels and viewscapes, which may affect the experience associated with traditional harvesting and cultural activities; ground disturbance leading to erosion and sedimentation that could result in a change in surface water quality, which may affect the availability of fish harvesting opportunities; and, changes in access to traditional wildlife harvesting areas, traditional fishing harvesting areas, traditional plant harvesting areas and traditional habitation, cultural and/or spiritual areas. The assessment of potential effects on TLRU includes the evaluation of changes in the availability, access and experience associated with traditional wildlife harvesting, changes in the availability, access and experience associated with traditional fish harvesting, changes in the availability, access and experience associated with traditional plant harvesting and changes in the access and experience associated with traditional habitation, cultural and/or spiritual areas from these pathways.

- The construction of the mine access road, including the development and operation of potential aggregate resources interacts with TLRU. These activities result in pathways to potential effects on TLRU due to the loss of vegetation, which may affect the availability of plant harvesting opportunities; the loss of vegetation leading to changes in wildlife habitat, which may affect the availability of wildlife harvesting opportunities; the use of equipment leading to changes in the risks of wildlife mortality, which may affect the availability of wildlife harvesting opportunities; the use of equipment leading to sensory disturbance from changes in sound levels and viewscapes, which may affect the experience associated with traditional harvesting and cultural activities; ground disturbance leading to erosion and sedimentation that could result in a change in surface water quality, which may affect the availability of fish harvesting opportunities; and, changes in access to traditional wildlife harvesting areas, traditional fishing harvesting areas, traditional plant harvesting areas and traditional habitation, cultural and/or spiritual areas. The assessment of potential effects on TLRU includes the evaluation of changes in the availability, access and experience associated with traditional wildlife harvesting, changes in the availability, access and experience associated with traditional fish harvesting, changes in the availability, access and experience associated with traditional plant harvesting and changes in the access and experience associated with traditional habitation, cultural and/or spiritual areas from these pathways.
- The construction of the transmission line interacts with TLRU. These activities result in pathways to potential effects on TLRU due to changes in vegetation communities which may affect the availability of plant harvesting opportunities; changes in vegetation communities leading to changes in wildlife habitat, which may affect the availability of wildlife harvesting opportunities; the use of equipment leading to changes in the risks of wildlife mortality, which may affect the availability of wildlife harvesting opportunities; the use of equipment leading to sensory disturbance from changes in sound levels and viewscapes, which may affect the experience associated with traditional harvesting and cultural activities; and, changes in access to traditional wildlife harvesting areas, traditional fishing harvesting areas, traditional plant harvesting areas and traditional habitation, cultural and/or spiritual areas. The assessment of potential effects on TLRU includes the evaluation of changes in the availability, access and experience associated with traditional wildlife harvesting, changes in the access and experience associated with traditional fish harvesting, changes in the availability, access and experience associated with traditional plant harvesting and changes in the access and experience associated with traditional habitation, cultural and/or spiritual areas from these pathways.
- The development of temporary construction camp and staging areas, the fish habitat development area, the onsite haul and access roads, the buildings and onsite infrastructure, the commissioning of the process plant, the construction of the starter embankments for the co-disposal facility (CDF), the



development of the surficial soil stockpile and ore stockpiles interacts with TLRU. These activities result in pathways to potential effects on TLRU due to changes in wildlife habitat, which may affect the availability of wildlife harvesting opportunities; the use of equipment leading to changes in the risks of wildlife mortality, which may affect the availability of wildlife harvesting opportunities; the use of equipment leading to sensory disturbance from changes in sound levels and viewscales, which may affect the experience associated with traditional harvesting and cultural activities; and, changes in access to traditional wildlife harvesting areas, traditional fishing harvesting areas, traditional plant harvesting areas and traditional habitation, cultural and/or spiritual areas. The assessment of potential effects on TLRU includes the evaluation of changes in the availability, access and experience associated with traditional wildlife harvesting, changes in the access and experience associated with traditional fish harvesting, changes in the access and experience associated with traditional plant harvesting and changes in the access and experience associated with traditional habitation, cultural and/or spiritual areas from these pathways.

- The construction of the dikes and the controlled dewatering of the open pit basin interacts with TLRU. These activities result in pathways to potential effects on TLRU due to the use of equipment leading to sensory disturbance from changes in sound levels and viewscales, which may affect the experience associated with traditional harvesting and cultural activities; the use of equipment leading to changes in the risk of mortality of fish, which may affect the availability of fish harvesting opportunities; the disturbance of aquatic habitat leading to sedimentation that could result in a change in surface water quality, which may affect the availability of fish harvesting opportunities; the loss of aquatic habitat, which may affect the availability of fish harvesting opportunities; and, changes in access to traditional wildlife harvesting areas, traditional fishing harvesting areas, traditional plant harvesting areas and traditional habitation, cultural and/or spiritual areas. The assessment of potential effects on TLRU includes the evaluation of changes in access and experience associated with traditional wildlife harvesting, changes in the availability, access and experience associated with traditional fish harvesting, changes in the access and experience associated with traditional plant harvesting and changes in the access and experience associated with traditional habitation, cultural and/or spiritual areas from these pathways.
- The stripping of lake bed sediments and overburden in the open pit, and the initiation of pit development interacts with TLRU. These activities result in a pathway to a potential effect on TLRU due to the use of equipment leading to sensory disturbance from changes in sound levels and viewscales, which may affect the experience associated with traditional harvesting and cultural activities. The assessment of potential effects on TLRU includes the evaluation of changes in the experience associated with traditional wildlife harvesting, changes in the experience associated with traditional fish harvesting, changes in the experience associated with traditional plant harvesting and changes in the experience associated with traditional habitation, cultural and/or spiritual areas from this pathway.
- The development of the central water storage pond, water management infrastructure and treatment facilities interact with TLRU. These activities result in pathways to potential effects on TLRU due to changes in surface water quantity, leading to changes in vegetation communities and wildlife habitat, which may affect the availability of plant and wildlife harvesting opportunities; the use of equipment leading to sensory disturbance from changes in sound levels and viewscales, which may affect the experience associated with traditional harvesting and cultural activities; the loss of aquatic habitat, which may affect the availability of fish harvesting opportunities; and, changes in access to traditional wildlife harvesting areas, traditional fishing harvesting areas, traditional plant harvesting areas and traditional habitation, cultural and/or spiritual areas. The assessment of potential effects on TLRU

includes the evaluation of changes in the availability, access and experience associated with traditional wildlife harvesting, changes in the availability, access and experience associated with traditional fish harvesting, changes in the availability, access and experience associated with traditional plant harvesting and changes in the access and experience associated with traditional habitation, cultural and/or spiritual areas from these pathways.

During all Project phases, the interaction between the employment and expenditures activities and TLRU is viewed as positive given that income derived from the Project supports the ability of participating land users to acquire and maintain the equipment and infrastructure associated with hunting, fishing, and getting out on the land.

Operations Phase

The operations phase is anticipated to occur over a 10-year period. The following interactions with the Project result in pathways to potential effects on TLRU as described below. After mitigation is applied to each pathway, as described in Table 6.21-18, the residual effects are assessed using the criteria identified for each pathway:

- The operation of the process plant interacts with TLRU. This activity results in a pathway to potential effects on TLRU due to the operation of process plant and associated equipment may result in sensory disturbance from noise, which may affect the experience associated with traditional harvesting and cultural activities and may affect wildlife habitat used by species that are traditionally harvested. The assessment of potential effects on TLRU includes the evaluation of changes in the availability and experience associated with traditional wildlife harvesting, changes in the experience associated with traditional fish harvesting, changes in the experience associated with traditional plant harvesting and changes in the experience associated with traditional habitation, cultural and/or spiritual areas from this pathway.
- The operation of the open pit mine interacts with TLRU. This activity results in pathways to potential effects on TLRU due to the operation of equipment and blasting may result in sensory disturbance from noise, which may affect the experience associated with traditional harvesting and cultural activities, and may affect wildlife habitat used by species that are traditionally harvested; blasting in the open pit may result in changes in vibration, which may affect the fish species that are traditionally harvested; and, the generation of dust and ongoing water management which could lead to changes in plant communities and habitat for wildlife species, which may affect the availability of traditional plant and wildlife harvesting areas. The assessment of potential effects on TLRU includes the evaluation of changes in the availability and experience associated with traditional wildlife harvesting, changes in the availability and experience associated with traditional fish harvesting, changes in the availability and experience associated with traditional plant harvesting and changes in the experience associated with traditional habitation, cultural and/or spiritual areas from this pathway.
- The operation of the overburden stockpile, CDF and ore stockpiles interacts with TLRU. These activities result in pathways to potential effects on TLRU due to the operation of equipment and haul trucks and may result in sensory disturbance from noise, and the development of these facilities may change viewsapes, which may affect the experience associated with traditional harvesting and cultural activities, and may affect wildlife habitat used by species that are traditionally harvested. Further, the generation of dust which could lead to changes in plant communities and habitat for wildlife species, which may affect the availability of traditional plant and wildlife harvesting areas. The assessment of potential effects on TLRU includes the evaluation of changes in the availability and experience associated with traditional wildlife harvesting, changes in the experience associated with traditional fish

harvesting, changes in the availability and experience associated with traditional plant harvesting and changes in the experience associated with traditional habitation, cultural and/or spiritual areas from these pathways.

- The operation of the water management and treatment facilities interacts with TLRU. These activities result in a pathway to potential effects on TLRU due to the ongoing water management which could lead to changes in plant communities, and habitat for fish and wildlife species, which may affect the availability of traditional plant, fish and wildlife harvesting areas. The assessment of potential effects on TLRU includes the evaluation of changes in the availability of traditional wildlife harvesting, changes in the availability of traditional fish harvesting and changes in the availability of traditional plant harvesting from this pathway.
- The operation of the accommodations complex interacts with TLRU. This activity results in a pathway to potential effects on TLRU due to the increased workforce in the area, which may lead to more fishing and hunting, and may affect the availability of traditionally harvested fish and wildlife. The assessment of potential effects on TLRU includes the evaluation of changes in the availability of traditional wildlife harvesting and the availability of traditional fish harvesting from this pathway.
- The operation of the mine access road interacts with TLRU. This activity results in pathways to potential effects on TLRU due to the operation of Project vehicles may result in sensory disturbance from noise, which may affect the experience associated with traditional harvesting and cultural activities, and may affect wildlife habitat used by species that are traditionally harvested; the generation of dust from Project vehicles could lead to changes in plant communities and habitat for wildlife species, which may affect the availability of traditional plant and wildlife harvesting areas; and, the operation of Project vehicles may change the risk of wildlife mortality, which may affect the availability of wildlife used for traditional harvesting. The assessment of potential effects on TLRU includes the evaluation of changes in the availability and experience associated with traditional wildlife harvesting, changes in the experience associated with traditional fish harvesting, changes in the availability and experience associated with traditional plant harvesting and changes in the experience associated with traditional habitation, cultural and/or spiritual areas from this pathway.
- Progressive reclamation activities interact with TLRU. These activities result in pathways to potential effects on TLRU due to the operation of equipment and haul trucks may result in sensory disturbance from noise, which may affect the experience associated with traditional harvesting and cultural activities, and may affect wildlife habitat used by species that are traditionally harvested; ground disturbances that could lead to erosion and sedimentation lead to changes in surface water quality, which may affect the availability of traditional fish harvesting areas; changes in water management which could lead to changes in plant communities, and habitat for fish and wildlife species, which may affect the availability of traditional plant, fish and wildlife harvesting areas; and, the generation of dust from Project vehicles could lead to changes in plant communities and habitat for wildlife species, which may affect the availability of traditional plant and wildlife harvesting areas. The assessment of potential effects on TLRU includes the evaluation of changes in the availability and experience associated with traditional wildlife harvesting, changes in the availability and experience associated with traditional fish harvesting, changes in the availability and experience associated with traditional plant harvesting and changes in the experience associated with traditional habitation, cultural and/or spiritual areas from these pathways.

All other interactions during operation between the Project and the TLRU VC are unlikely to result in potential effects.

Decommissioning and Closure Phase

Activities occurring during the active closure phase, which is expected to occur over a five-year period, are similar to those that occur during the construction phase and use similar mining equipment but generally on a smaller scale. The following interactions with the Project result in pathways to potential effects on TLRU as described below. After mitigation is applied to each pathway, as described in Table 6.21-18, the residual effects are assessed using the criteria identified for each pathway:

- Final reclamation activities of disturbed areas during the active closure phase may require activities such as re-grading, placement of cover and revegetation, which interacts with TLRU. These activities result in pathways to potential effects on TLRU due to the operation of equipment and haul trucks may result in sensory disturbance from noise, which may affect the experience associated with traditional harvesting and cultural activities, and may affect wildlife habitat used by species that are traditionally harvested; ground disturbances that could lead to erosion and sedimentation lead to changes in surface water quality, which may affect the availability of traditional fish harvesting areas; changes in water management which could lead to changes in plant communities, and habitat for fish and wildlife species, which may affect the availability of traditional plant, fish and wildlife harvesting areas; and, the generation of dust from Project vehicles could lead to changes in plant communities and habitat for wildlife species, which may affect the availability of traditional plant and wildlife harvesting areas. The assessment of potential effects on TLRU includes the evaluation of changes in the availability and experience associated with traditional wildlife harvesting, changes in the availability and experience associated with traditional fish harvesting, changes in the availability and experience associated with traditional plant harvesting and changes in the experience associated with traditional habitation, cultural and/or spiritual areas from these pathways.
- The filling of the open pit basin with water interacts with TLRU. This activity results in pathways to potential effects on TLRU due to the discontinuation of groundwater management in the open pit that may lead to changes in water levels and flows, which may affect availability and access to traditional plant, fish and wildlife harvesting areas. The assessment of potential effects on TLRU includes the evaluation of changes in the availability and access to traditional wildlife harvesting, changes in the availability and access to traditional fish harvesting, and changes in the availability and access to traditional plant harvesting from this pathway.

During decommissioning and closure, the removal of assets, demolition of remaining materials and the disposal of demolition-related wastes are not expected to have an interaction with TLRU activities.

Once decommissioning has been completed, access to traditional harvesting areas and habitation, cultural and spiritual sites is expected to return. The effect of sensory disturbances due to noise and light on TLRU activities will cease, although the changes in viewscape may continue. Beyond closure, the activities will be primarily monitoring, and only in exceptional circumstances, would rehabilitation activities occur to stabilize specific areas.

6.21.4 Mitigation Measures

Measures to be implemented to avoid or minimize the effects of the Project on TLRU include:

- Development of a compact mine site to limit the extent of disturbance including a mine footprint of 867 ha including minimizing the open pit mining area to 6% of Springpole Lake;
- Maintain Project designs such that no new public access points are developed on Springpole Lake;
- Maintain treed buffers between Project infrastructure and waterbodies to reduce visual disturbance;



- Building dimensions, layout and orientation will be designed to shield noise sources, where possible;
- During construction, operation and closure phases of the Project, implement the mitigation measures for the following VCs. The specific mitigation measures cited for each of the VCs are not a comprehensive list of mitigation measures but are indicative of measures applicable to the management of effects on traditional land and resource use.
 - Air quality including for dust (Section 6.2) including:
 - During operation, the process plant emission sources will be enclosed where possible and be designed to allow good atmospheric dispersion. To reduce emissions, dust control equipment and best practices will be used, where necessary, as described below:
 - Conveyor transfer (drop) points will be controlled via enclosure or water spray;
 - Crushed ore stockpile will be enclosed, and emissions controlled by a baghouse;
 - A wet scrubber or equivalent will be used to control emissions in grinding (baghouse controlled);
 - Truck unloading at the primary crusher will be enclosed and emissions controlled by a baghouse;
 - Drill rigs will be equipped with a dust shroud on the drill and a wet suppression (spray) system will be used;
 - Truck placement of mine rock onto the CDF will be controlled using water sprays and surface wetting;
 - Travel surfaces will be maintained to minimize silt (fine material);
 - Crushing of ore materials and reclaim at stockpiles will be controlled by baghouses;
 - The vents from the lime silo will be controlled by a dust collector;
 - Areas for ore mixing and handling will be controlled by dust collectors; and
 - A regular maintenance schedule will be followed to ensure baghouses and dust collectors are functioning properly.
 - During construction, operations and active closure, a dust management plan will be implemented to identify potential sources of fugitive dusts, outline mitigation measures that will be employed to control dust generation and detail the inspection and record keeping required to demonstrate that fugitive dusts are being effectively managed;
 - Vehicle speeds will be limited;
 - During construction, operations and active closure, dust emissions from roads and mineral stockpiles will be controlled through the application of water spray and supplemented by dust suppressants if required;
 - During operations, the process plant emission sources will be designed to allow good atmospheric dispersion, and dust control equipment such as dust collectors and water sprays will be used together with best practices, where necessary, to reduce emissions;
 - During active closure, exposed dust sources will be revegetated, and progressive reclamation will be conducted wherever appropriate to better control dust emissions from the mineral waste stockpiles and CDF;
 - Noise and vibration (Section 6.3.4) including:



- During construction and operations, site equipment will be operated to meet NPC-300, NPC-119, Fisheries and Oceans Canada and Health Canada operational noise and vibration limits at points of reception, when applicable;
- Motorized equipment will be selected or designed with mufflers / silencers to limit noise emissions:
- Reversing alarms should be dimmable with white noise and/or strobe lights, but in accordance with the applicable health and safety regulations, during all phases of the Project;
- Checks will take place to confirm that equipment and machinery used on site are maintained and in good working condition through regular maintenance and inspection;
- The use of engine brakes will be prohibited and engines will need to be stopped for vehicles on standby, depending on seasons and weather, during all phases of the Project, during all phases of the Project;
- Vehicles and equipment will be operated in such a way that impulsive noise is minimized, where possible, during all phases of the Project;
- For helicopter use during transmission line construction, minimum flight altitudes will be maintained unless the helicopters are engaged in construction tasks, landing or departure.
- Surface water (Sections 6.6.4, 6.7.4 and 6.8.4) including:
 - During construction, operation and active closure, an integrated water management system will be designed to collect and control all contact water from the stockpiles, CDF and plant site areas;
 - During construction, operation and active closure phases, water collection ditches will be constructed and operated around the perimeter of infrastructure, including the CDF and stockpiles to collect overland flow and seepage and direct it to the integrated water management system. Non-contact water will be diverted away from Project components using ditches, diversion berms and other suitable measures.
 - The effluent treatment plant will be designed and operated to produce an effluent quality appropriate for discharge to the environment in accordance with applicable regulatory requirements, including the Metal and Diamond Mining Regulations.
 - During operation and closure phases, revegetation and encouragement of natural revegetation / recolonization of disturbed areas will be undertaken as part of progressive and final reclamation to minimize the length of time disturbed areas are exposed, to reduce erosion;
- Fish and fish habitat (Section 6.10.4) including:
 - Implement the measures outlined in the revised Fish Habitat Offsetting and Compensation Plan (Appendix F);
 - A freshwater intake will be installed in Birch Lake to provide freshwater to the Project for use in the camp and periodic use in the process plant for make-up water needs.
- Vegetation communities and wetlands (Section 6.11.4) including:



- During construction and operation, minimize the clearing of vegetation within the mine access road and transmission line corridor to that needed for the construction and safe operation;
- During construction and operation, minimize the removal of woody vegetation within the transmission line corridor to maintain natural cover to adjacent areas;
- During operations and closure phases, undertake progressive and final rehabilitation of mine development in accordance with the filed Closure Plan, and implement a revegetation plan that preferentially uses local vegetation sources, incorporates plant species of interest to Indigenous communities, and avoids the use of non-native or invasive species.
- Wildlife and wildlife habitat (Section 6.12.4) including:
 - During all phases of the Project, where practical, avoid sensitive wildlife habitat by implementing buffers;
 - In collaboration with Indigenous communities and the Ministry of the Environment, Conservation and Parks, design and implement a habitat restoration program for Boreal Caribou;
- Archaeology (Section 6.23.4) including:
 - Archaeological assessment programs will be conducted in areas of archaeological potential prior to ground disturbance activities;
 - Key construction and operation staff will be trained to recognize archaeological artifacts and cultural material;
- Cultural heritage (Section 6.24.4) including:
 - Heritage properties will be noted on applicable Project maps to identify the heritage status of the property to Project personnel;
- Prior to construction, establish Environment Committee(s) with interested local Indigenous communities to:
 - Facilitate on-going communications and meaningful engagement during construction, operation and closure of the Project;
 - Facilitate the sharing and integration of Traditional knowledge in Project-related activities during construction, operation and closure of the Project; and,
 - Share and evaluate environmental information, review Project approvals and environmental management and monitoring plans, participate in adaptive management and identify mitigation measures, address emerging issues and areas of interest identified by communities.
- Local Indigenous communities and identified points of reception will be advised ahead of transmission line construction work periods and as the construction work proceeds.
- Work with local Indigenous communities to coordinate construction activities related to the transmission line to minimize overlap with the timing of traditional land use activities (e.g., fall moose hunt) and other sensitive periods.
- During construction, operation and closure phases, engage Indigenous environmental monitors from local communities in the implementation of mitigation and monitoring measures;



- Where there is interest, provide opportunities to local Indigenous communities and traditional land users to harvest plants and aquatic resources within the PDA prior to construction;
- Support the development and delivery of Indigenous led ceremonies on site to pay respect to the land air, and water prior to construction and at other key Project milestones;
- Facilitate the development and implementation of a community-based monitoring program to supplement (not duplicate) regulatory monitoring requirements;
- Support reasonable requests and work schedule flexibility for Indigenous employees for time off to pursue TLRU activities, during construction, operation and closure phases;
- Support community land-based cultural activities, during construction, operation and closure of the Project;
- Prior to construction, develop an access management strategy with local Indigenous communities to manage access along the mine access road, during construction, operation and closure phases of the Project, with the purpose of supporting TLRU access and minimizing new public access;
- Prohibit fishing and hunting within the controlled access portion of the PDA by Project personnel while working or residing on site, during construction, operations and closure phases
- Maintain regular communication with trapline holders SL197 and SL 200 regarding activities and opportunities to facilitate their land use activities;
- Prior to construction, establish the alternate navigation route identified to maintain access between Springpole Lake and Birch Lake, and maintain the alternate route until post closure when the existing portage has been re-established;
- During the operation and closure of the Project, undertake revegetation in the mine site area, where practical, and include input from Indigenous communities and TLRU planning documents;
- Preserve a tree line as a buffer around the mine site to diminish the amount of the mine site that can be seen. This buffer around the Project will be maintained wide enough to withstand the loss of trees, such as those toppled by wind.
- During active closure, continue to participate in the Environment Committee(s) at a rate commensurate with activity in the project development area;
- Support reasonable community-based engagement and cultural activities;
- Work with MNR and trapline licence holders to determine alternative options for trapline losses during construction and operation phases;
- Prior to closure, develop and implement a Lake Sturgeon reintroduction and restoration program harmonizing with the interest of local Indigenous communities and MNR; and,
- Achieve fish habitat offsetting objectives (Appendix F) and overall benefit requirements for Caribou (Section 6.13).

In addition to the mitigation measures to reduce potential environmental effects on TLRU, FMG is committed to fostering cultural awareness across the company through all phases of the Project and providing opportunities for local Indigenous communities to share TLRU knowledge for incorporation into Project planning.

The application of mitigation measures for the pathways of potential effects is illustrated in Table 6.21-18. Mitigation measures described in this section are expected to be effective for their intended purposes given their effective implementation at similar projects and their targeted approach to addressing the Project specific context.

6.21.5 Analytical Methodology

The assessment of effects on TLRU uses both quantitative and qualitative methods to assess the availability of resources used for TLRU activities, access to areas used for TLRU activities and the overall experience of conducting the TLRU activities affected by the Project.

The quantitative assessment was achieved by using:

- Geographic Information Systems analysis for other VCs such as fish, vegetation communities, and wildlife; and
- Modelling results from the analysis of direct and indirect effects on other VCs, where applicable.

Where direct quantitative comparisons were not possible, qualitative evaluations of potential Project effects were conducted considering the relative areas of use and the potential extent of Project effects, relying on information gathered to date, published information, the information shared by Indigenous Nations in TK/TLRU reports, an understanding of the Project activities, information from other VCs, professional judgement and experience from other similar mines in operation.

Baseline environmental data for the Project and relevant information sources, identified in Section 6.21.2, are used to inform the selection of TLRU indicators and the assessment.

The analytical methodology assumes traditionally used species are present and traditional practices take place within the LSA, even if Indigenous communities did not identify specific activities, species or sites.

6.21.5.1 Assumptions and the Use of the Conservative Approach

The assessment takes a conservative approach by assuming TLRU activities occur throughout the LSA even if primary or secondary information sources did not specifically identify those activities in general or within site-specific areas. The PDA used in the assessment includes a buffer beyond the Project footprint to allow for minor adjustments during detailed engineering which adds 661 ha to the actual area of direct disturbance that will occur. Further, the conservative assumptions for the assessment of interacting VCs were also included, such as fish and fish habitat (Section 6.10) and terrestrial VCs (Sections 6.11 to 6.16).

6.21.6 Characterization of Potential Residual Effects

Residual effects are described as they relate to the direct and indirect effects on species that support TLRU activities, changes in the access to areas used for TLRU activities (if any) and sensory disturbances affecting the experience of TLRU activities.

6.21.6.1 Changes in the Availability, Access to and Experience related to Traditional Wildlife Harvesting

CLFN reported kill sites and seasonal processing sites for hunted game, habitat and trails for moose and caribou, and transportation routes to hunting areas within five kilometres of the PDA. MON and SFN have identified areas of traditional land use along the transmission line corridor which could include wildlife harvesting.

The Project has been designed with a small footprint. The mine site, mine access road and transmission line will result in a localized loss of wildlife habitat in the PDA during construction, operation, and active closure.

The PDA covers 2,026 ha, which is conservatively assumed to be fully cleared as part of Project development and includes a buffer beyond the Project footprint as noted above. It should also be noted that vegetation within the transmission line portion (315 ha) of the PDA will not be fully cleared at construction (i.e., grubbing will not occur), and will be maintained through operations as an altered vegetation community and will provide habitat for wildlife. The extent of the total PDA affects only 1% of the furbearer habitat in the LSA and less than 0.1% of the furbearer habitat in the RSA. The extent of the total PDA affects only 4.9% of the large mammal habitat in the LSA and 0.2% of the RSA. Again, these numbers provide an overestimation of the amount of habitat overprinted based on the assumption that all habitat within the PDA will be removed. The assessment of effects also assumes that progressive reclamation does not occur during life of mine and restoration activities will only be completed during the closure phase. The effects on wildlife resources due to habitat loss will be largely reversed at closure following habitat restoration activities in the mine site area of the PDA. Overall, the amount of wildlife harvesting areas affected by the Project within the LSA and RSA is very limited.

Wildlife response to construction and operation may result in a localized decline in species abundance which could directly affect traditional wildlife harvesting in areas immediately adjacent to the PDA. However, with the implementation of the mitigation measures for wildlife (Section 6.12.4), the effects on wildlife will be limited. These measures include: reducing noise, dust and light, maintaining treed buffers along the PDA, and enforcing speed limits along Project-controlled roads within high quality wildlife habitat. It is also expected that wildlife will become habituated to the activities in the PDA and that any localized decline in adjacent areas will be short term. Changes to viewscales, which may affect the experience for TLRU on Birch Lake and Springpole Lake, is mitigated by Project setbacks and buffers with the CDF being the only visible component of the Project from a distance and appearing as rock plateau on the landscape. Therefore, the experience related to wildlife harvesting in the LSA is expected to remain high value. This is consistent with local trapline holder SL197 in proximity to the mine site where FMG will continue to work collaboratively towards ensuring TLRU continues and is facilitated in the LSA for others as well.

During construction, operation and active closure of the Project, trapping and hunting will not occur directly in the PDA for safety. Prior to construction, FMG will develop an access management strategy with local Indigenous communities to manage access along the mine access road, during construction, operation and closure phases of the Project, with the purpose of supporting TLRU access and minimizing new public access. In addition, there will be no new public access points created on Springpole Lake, therefore there will be no increase in public activity that could disturb TLRU. FMG will also prohibit hunting and fishing at the Project by employees and contractors while at site, during all phases to avoid potential increased pressure on local resources and not disturb TLRU. An alternate navigation route between Birch Lake and Springpole Lake will be established and maintained by FMG prior to construction such that access will continue until post closure when the existing portage route has been re-established. Finally, given the maintenance of vegetation along the transmission line, it is not likely that new access will be achieved along its route.

During construction and operations there is the potential for Project-related noise in the areas adjacent to the PDA. The CDF optimization from filtered tailings to thickened tailings storage will reduce disturbance to wildlife harvesting due to the significant reduction in haul truck activity. Changes to viewscales, which may affect the experience for TLRU on Birch Lake and Springpole Lake is mitigated by Project setbacks and buffers with the CDF being the only visible component of the Project from a distance and appearing as rock plateau on the landscape. Sensory disturbance to TLRU harvesting will cease in closure. With the implementation of mitigation measures identified for noise in Section 6.3.4 and viewscales in Section 6.19.4, the sensory disturbances to traditional wildlife harvesting will be limited.

6.21.6.2 Changes in the Availability, Access to and Experience related to Traditional Fishing

CLFN described that within 5 kilometres of the PDA, they know of productive aquatic habitat and that they harvest fish. LSFN fish for lake trout within 5 kilometres of the PDA. MON and SFN have identified use of parts of the PDA which could include fishing. NWOMC identified Birch Lake as one of their fishing areas. Lake Trout fishing opportunities occur throughout Springpole Lake which includes six deepwater basins. Five of the deepwater basins are located in the north basin of Springpole Lake, and only one will be overprinted by the Project and the restored at closure. Two dikes will be constructed in the north basin of Springpole Lake and result in the disruption of 156 ha of fish habitat, which makes up approximately 6% of the surface area of Springpole Lake. Refilling of the open pit basin at closure will re-establish productive Lake Trout habitat and habitat for additional fish species. In addition, as described in the revised Fish Habitat Offset and Compensation Plan (Appendix F), the two dikes that isolate the open pit basin will incorporate fish habitat enhancement features on their lake-facing side to promote spawning and fish productivity and these measures have been shown to be effective at other similar mines in Canada including for Lake Trout and other species. The effect will be fully reversed at closure with the restoration of the open pit basin and enhanced with the creation of targeted fish habitat features resulting in an increase in the surface area of Springpole Lake by approximately 3.5% compared to baseline. In addition, the effects on traditional aquatic harvesting due to the loss of fish habitat will be offset during the operation and closure phase with the additional measures outlined in the revised Fish Habitat Offsetting and Compensation Plan (Appendix F).

A freshwater intake will be installed in Birch Lake to provide freshwater to the Project for use in the camp and periodic use in the process plant for make-up water needs. The water intake design will follow Fisheries and Oceans Canada requirements and will not affect fish in Birch Lake, and the water volume required for the Project is minimal and will have no effect on the water quantity in Birch Lake. Therefore, there will be no change in traditional fishing opportunities in Birch Lake. CLFN expressed concern about non-Indigenous recreation fishing in the LSA; FMG has acquired a number of commercial outfitters on Birch Lake and this will result in a reduction of non-Indigenous fishing activity and associated reduction in fishing pressure, which will benefit traditional land users.

Water quality within Birch Lake and Springpole Lake will also be maintained such that there are no effects to aquatic health or ecosystem function. Further, prohibiting fishing by employees and contractors while working at the Project site will avoid placing additional fishing pressure on local waterbodies during all phases of the Project.

There will be no new public access points created to either Birch Lake or Springpole Lake. TLRU access will remain unchanged and FMG will establish the alternate navigation route identified to maintain access between Springpole Lake and Birch Lake, and maintain the alternate route until post closure when the existing portage has been re-established. While the open pit basin will be in operation during mine life, the two dikes have been strategically located to maintain ample fishing opportunities within the north basin's other deepwater areas. At closure, following the restoration plan for the open pit basin, the goal is to create an enhanced fish habitat area increasing the surface area Springpole Lake by approximately 3.5% and to re-establish the original portage route.

During construction and operations there is the potential for Project-related noise in the areas adjacent to the PDA. The noise and vibration mitigation measures (Section 6.3.4) will be applied, and given the location of the dikes being setback for the mining operations, it is expected that TLRU fishing opportunities will remain throughout the north basin of Springpole Lake up to the dikes themselves such that new fishing opportunities will be created with enhanced fish habitat features along the dikes.

The CDF optimization from filtered tailings to thickened tailings will also reduce disturbance to TLRU fishing in Birch Lake and Springpole Lake due to the significant reduction in haul truck activity. Changes to viewscales, which may affect the experience for TLRU on Birch Lake and Springpole Lake is minimized by Project setbacks and buffers with the CDF being the only component of the Project visible from a distance and appearing as rock plateau on the landscape. Sensory disturbance to TLRU harvesting will cease in closure. With the implementation of mitigation measures identified for noise in Section 6.3.4 and viewscales in Section 6.19.4, the sensory disturbances to traditional aquatic harvesting will be limited.

6.21.6.3 Changes in the Availability, Access to and Experience related to Traditional Plant Harvesting

Food plant habitats and a blueberry harvesting area were identified by CLFN within approximately 5 kilometres of the PDA. MON and SFN use areas that overlap with part of the transmission line portion of the PDA may include plant harvesting.

TLRU plant harvesting opportunities will only be affected within the PDA where vegetation is overprinted by Project infrastructure. However, as vegetation will be maintained along the transmission line route plant harvesting may still continue following construction and may be enhanced by the earlier successional type vegetation including berries that will establish along the corridor. As noted in Section 6.11, the conservative quantities of vegetation community and wetland overprinted are noted as 2,026 ha of potential TLRU plant harvesting areas within the PDA. Accordingly, on a conservative basis, Project development is anticipated to affect 7.4% of the vegetation community and wetland LSA and 0.3% of the applicable RSA. Mitigation measures include maintenance of vegetation and wetlands in specific areas to provide a buffer along waterbodies and mine site infrastructure. Vegetation communities along the transmission line of the PDA will be altered but vegetation growth will be maintained supporting plant harvesting potential. It is further expected that progressive rehabilitation will occur at select locations during operation when work activities have been completed in certain areas. Nevertheless, the assessment of the effects assumes that final rehabilitation activities will only be completed during the closure phase. These assumptions result in overestimation of the amount of vegetation and wetlands removed. During closure activities, the progressive and final rehabilitation of the mine site area will include a revegetation plan that will incorporate plant species of interest to Indigenous communities, where practical. Further, reclamation efforts carried out during closure will be guided by input from Indigenous communities and land use planning documents. Finally, measures implemented to offset Caribou habitat in accordance with the requirements of achieving an overall benefit will also serve to offset aspects of traditional plant harvesting in the region.

During construction, operation, and active closure of the Project, traditional plant harvesting areas will not occur directly in the mine site for safety. An access management strategy will be developed with local Indigenous communities to manage access along the mine access road, during construction, operation and closure phases of the Project, with the purpose of supporting TLRU access and minimizing new public access. In addition, there will be no new public access points created on Springpole Lake, therefore there will be no increase in public activity that could disturb TLRU. FMG will also prohibit hunting and fishing at the Project by employees and contractors while at site, during all phases to avoid potential increased pressure on local resources and not disturb TLRU. Prior to construction, the alternate navigation route identified will be established to maintain access between Springpole Lake and Birch Lake and maintain the alternate route until post closure when the existing portage has been re-established. Finally, given the maintenance of vegetation cover along the transmission line, it is not likely that new access will be achieved along its route.

During construction and operations there is the potential for Project-related noise in the areas adjacent to the PDA which could affect the experience of plant harvesting due to sensory disturbance. The CDF optimization from filtered tailings to thickened tailings storage will also reduce disturbance to plant harvesting due to the reduction in haul truck activity. Changes to viewscales, which may affect the experience for TLRU on Birch Lake and Springpole Lake is minimized by Project setbacks and buffers with the CDF being the visible component of the Project from a distance and appearing as rock plateau on the landscape. Sensory disturbance to TLRU harvesting will cease in closure. With the implementation of mitigation measures identified for noise in Section 6.3.4 and viewscales in Section 6.19.4, the sensory disturbances to traditional plant harvesting will be limited.

6.21.6.4 Changes in the Availability, Access to and Experience related to the Habitation, and Use of Spiritual or Cultural Sites

Indigenous communities have identified that there are place names for locations, habitation sites for harvesting activities, transportation routes, and ceremonial sites within approximately 5 kilometres of the PDA.

Based on information gathered to date, the Project will not directly overprint traditional habitation, cultural or spiritual sites. FMG will work with local Indigenous communities to coordinate construction activities related to the transmission line to minimize overlap with the timing of TLRU activities (e.g., fall moose hunt) and other sensitive periods. Local Indigenous communities and identified points of reception will be advised ahead of transmission line construction work periods and as the construction work proceeds.

During construction, operation and active closure of the Project, trapping and hunting will not occur directly in the mine site area for safety. An access management strategy will be developed with local Indigenous communities to manage access along the mine access road, during construction, operation and closure phases of the Project, with the purpose of supporting TLRU access and minimizing new public access. In addition, there will be no new public access points created on Springpole Lake, therefore there will be no increase in public activity that could disturb traditional use. FMG will also prohibit hunting and fishing at the Project by employees and contractors while at site, during all phases to avoid potential increased pressure on local resources and not disturb traditional land use. An alternate navigation route between Birch Lake and Springpole Lake will be established and maintained by FMG prior to construction such that access will continue through all phases of the Project and a portage route will be re-established at closure. FMG will support the delivery of Indigenous-led ceremonies on site to pay respect to the land, air and water prior to construction and at other key Project milestones. FMG will support work schedule flexibility for Indigenous employees to take time off to pursue TLRU activities and FMG will support community land-based activities during construction, operations and closure. Finally, given the maintenance of vegetation cover along the transmission line, it is not likely that new access will be achieved along its route.

During construction and operations, there is the potential for Project-related noise in the areas adjacent to the PDA to affect the experience of conducting traditional activities. However, given the location of the dikes being setback for the mining operations, it is expected that TLRU opportunities will remain throughout the north basin of Springpole Lake up to the dikes themselves. The CDF optimization from filtered tailings to thickened tailings storage will also reduce noise disturbance due to the reduction in haul truck activity. Changes to viewscales, which may affect the experience for TLRU on Birch Lake and Springpole Lake is mitigated by Project setbacks and buffers with the CDF being the visible component of the Project from a distance and appearing as rock plateau on the landscape. Sensory disturbance to TLRU activities will cease at closure. With the implementation of mitigation measures identified for noise in Section 6.3.4 and viewscales in Section 6.19.4, the sensory disturbances to traditional activities will be limited.

6.21.7 Significance of Residual Effects

The residual effects on TLRU is the change in traditional wildlife harvesting due to the loss of wildlife habitat, the change in traditional fish harvesting due to the loss of fish habitat, and a change in traditional plant harvesting due to a loss of vegetation and wetland communities in the PDA during construction.

TLRU activities are typical of northern Ontario ecosystems, and widespread throughout the RSA. In terms of the social context, the VC assessment identified tailored measures to mitigate the effects of the predicted change (Level II) including opportunities for Indigenous communities to develop and deliver Indigenous-led ceremonies on site, support for community land-based cultural activities, opportunities to establish an Environmental Committee(s), and implement an access management strategy to facilitate traditional land and resource use in the area of the mine access road.

6.21.7.1 Changes in the Availability, Access to and Experience related to Traditional Wildlife Harvesting

The residual effect on traditional wildlife harvesting is a minor and localized loss of 3 ha of habitat for furbearers and overprinting of 478 ha of habitat for large mammals in the PDA.

With the implementation of mitigation, the magnitude of the residual effect due to the loss of habitat for furbearers and large mammals is low (Level I) due to the predicted limited change (<1% change) in the RSA for both furbearers and large mammals. The habitat for these species is common throughout the LSA and RSA, and therefore, removal in the PDA is unlikely to affect the availability of traditional wildlife harvesting opportunities. The geographic extent of the residual effect is low (Level I), as it is constrained within the PDA. However, the duration of the residual effect is high (Level III), as it occurs over the long-term and the results of final rehabilitation will occur post-closure. Further, the frequency of the residual effect is considered to be low (Level I) as it occurs once during construction and is expected to be partially reversible (Level II) at post-closure as some areas of the PDA will not be revegetated and not return to the existing condition (i.e., CDF embankments).

As a result, the adverse residual effect on traditional wildlife harvesting due to the loss of habitat for furbearers and large mammals is predicted to be not significant.

6.21.7.2 Changes in the Availability, Access to and Experience related to Traditional Fish Harvesting

The residual effect on traditional fish harvesting is a localized loss of 156 ha of fish habitat, totalling 6% of the surface area of Springpole Lake in the PDA.

With the implementation of mitigation, the magnitude of the residual effect to traditional fish harvesting is low (Level I) due to the predicted limited loss of fish habitat and implementation of the Fish Habitat Compensation and Offsetting Plan. The reduction of fish habitat is 6% of the surface area of Springpole Lake and the harvested fish species are common elsewhere in Springpole Lake and elsewhere in the LSA and RSA and removal of fish habitat from within the PDA is unlikely to affect the availability of fish harvesting areas. The geographic extent of the residual effect is low (Level I) as it contained within the PDA. The duration is high (Level III) as the effect occurs over the long term and full restoration of the fish habitat will be complete after post-closure. The frequency of the effect is low (Level I) as it will occur once during construction and will be fully reversible during closure (Level I) through refilling the open pit basin and improving upon the existing condition by enlarging the surface area of Springpole Lake by approximately 3.5%.

As a result, the adverse residual effect on traditional fish harvesting due to the loss of fish habitat is predicted to be not significant.

6.21.7.3 Changes in the Availability, Access to and Experience related to Traditional Plant Harvesting

The residual effect on traditional plant harvesting is a loss of 1,358 ha of vegetation communities and a loss of 352 ha of wetland communities in the PDA.

With the implementation of mitigation, the magnitude of the residual effect due to the loss of vegetation and wetland communities is low (Level I) due to the predicted limited change (<1% change) in the RSA for both communities. The plants species harvested are common throughout the LSA and RSA, and therefore, removal in the PDA is unlikely to affect the availability of traditional plant harvesting opportunities. The geographic extent of the residual effect is low (Level I), as it is constrained within the PDA. However, the duration of the residual effect is high (Level III), as it occurs over the long-term and the results of final rehabilitation will occur post-closure. Further, the frequency of the residual effect is considered to be low (Level I) as it occurs once during construction and is expected to be partially reversible (Level II) at post-closure as some areas of the PDA will not be revegetated and not return to the existing condition (i.e., CDF embankments).

As a result, the adverse residual effect on traditional plant harvesting due to the loss of vegetation and wetland communities is predicted to be not significant.

6.21.8 Confidence Prediction

The prediction confidence reflects the TLRU and TK information available through project specific TLRU studies shared with FMG, understanding of applicable mitigation measures and reliance on assessments of other VCs of relevance to TLRU. While there is substantial information forming the basis of the assessment, given the qualitative and subjective nature of assessing TLRU, the view of Indigenous communities may differ from the finding of this assessment. Therefore, the level of confidence in the prediction is moderate. As the Project progresses, through the proposed Environment Committee(s), there will be on-going sharing of traditional land use information with corresponding follow-up and adaptive management as needed.

6.21.9 References

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Table 6.21-1: Examples of how Traditional Knowledge was used in the Final EIS/EA

Indigenous Communities	Traditional Knowledge	How it was Implemented in the final EIS/EA	Final EIS/EA Reference Section
CLFN	Transportation values including a portage travel route.	Used to inform the selection of an alternate portage route to address the temporary removal of the Springpole Lake – Birch Lake travel route	<ul style="list-style-type: none"> Section 6.23 (Built Heritage Resources and Cultural Heritage Landscapes)
CLFN, LSFN, SFN, MON, WFN and NWOMC	Information on areas used for traditional land use activities within the regional study area	Used to inform the assessment of effects on traditional land use activities, and the potential effects of the Project on Indigenous people	<ul style="list-style-type: none"> Section 6.2 (Air Quality), and Air Quality Baseline Report (Appendix G-2) Section 6.3 (Noise and Vibration), and Noise Modelling Report (Appendix H-3) Section 6.21 (Traditional Land and Resource Use) Section 6.24 (Human and Ecological Health), and Human and Ecological Health Risk Assessment (Appendix R) Section 6.26 (Effects on Indigenous People)
CLFN, LSFN, SFN, MON, WFN and NWOMC	Information on plant species used for traditional purposes and general locations	Used to inform the assessment of effects on plant species of importance to Indigenous People	<ul style="list-style-type: none"> Section 6.11 (Vegetation Communities and Wetlands) Baseline Terrestrial Resources Report (Appendix P-1)
CLFN, LSFN, SFN, MON, WFN and NWOMC	Information on wildlife species used for traditional purposes and general locations	Used to inform the understanding of terrestrial resources with the Baseline Investigation Area	<ul style="list-style-type: none"> Section 6.11 (Vegetation Communities and Wetlands) Section 6.12 (Wildlife and Wildlife Habitat) Section 6.13 (Caribou) Baseline Terrestrial Resources Report (Appendix P-1)
CLFN, LSFN, SFN, and WFN	Identified historical presence of Lake Sturgeon	Used to inform the historical understanding of Lake Sturgeon in the Birch Lake and Cat Lake watershed, and inform baseline fisheries investigation programs	<ul style="list-style-type: none"> Section 6.10 (Fish and Fish Habitat) Revised Fish Habitat Compensation and Offsetting Plan (Appendix F) Baseline Aquatic Resources Report (Appendix O)
MON, SFN	Identified culturally important areas along the southern portion of the preferred transmission line route (as proposed in the draft EIS/EA)	Used to inform the re-evaluation of the proposed route for the transmission line	<ul style="list-style-type: none"> Section 5 (Project Description)

Table 6.21-2: Concordance for Comments identified in Cat Lake First Nation Indigenous Knowledge and Use Study

Comment from Cat Lake First Nation Indigenous Knowledge and Use Study	Springpole Gold Project Concordance
Cultural Continuity	
Study participants voiced concerns about potential impacts to CLFN culture and way of life from the proposed Project based on observations and negative experiences with other mines in the region	Sections 6.21 and 6.26 include assessments of potential effects on TLRU and on the physical and cultural heritage of Indigenous peoples. The Project includes modern designs, technologies and best practices in accordance with modern regulations to protect the environment.
Fish and Fish Habitat	
CLFN study participants expressed concern that the Project would impact members' fishing rights and practices.	Section 6.21 includes an assessment of potential effects on TLRU including fishing.
Participants voiced concerns related to accessibility and the extent to which the Project will interfere with CLFN members' access to fishing areas as well as the impacts to those fishing areas.	Section 6.21 includes an assessment of potential effects on TLRU including fishing.
Several participants described a preferred trout fishing area that is located in the same area that the Project's open pit is proposed, which would alter the landscape and affect fishing rights and practices in the area	Section 6.12 includes an assessment of potential effects on fish and fish habitats and Section 6.21 includes an assessment of potential effects on traditional land and resource use including fishing.
<p>Participants viewed possible Project interactions as impacting resource quality (the health and edibility of fish), and as a consequence their ability to use that resource. Key concerns raised by participants include:</p> <ul style="list-style-type: none"> • Impacts to fish populations and distribution (including possible dispersal from the area) due to ongoing Project disturbance, • Anticipated impacts to fish health (and possible avoidance by CLFN fishers) due to the possibility of Project-related environmental contamination; • Impacts to CLFN's access to unique fish habitats or features including preferred freshwater areas for fishing within the Project footprint and general area; • Impacts to the long-term quality and health of the freshwater environment which fish, plants and animals depend on; and, • Resulting impacts to CLFN's practices of fishing. 	Section 6.10 includes an assessment of potential effects on fish and fish habitat and Section 6.21 includes an assessment of potential effects on TLRU including fishing.

Table 6.21-2: Concordance for Comments identified in Cat Lake First Nation Indigenous Knowledge and Use Study

Comment from Cat Lake First Nation Indigenous Knowledge and Use Study	Springpole Gold Project Concordance
Human and Ecological Health	
Concern for the Project's downstream impacts were voiced by several participants.	Sections 6.6 through 6.9 include assessment of potential effects on water quality in Birch Lake, Springpole Lake and local inland waterbodies.
Study participants explained that the Project will change the landscape. Based on their experiences with other mines and their effects, participants anticipated that the Project would introduce contaminants to the environment that would persist beyond the mine's projected lifecycle...concern for the impacts to the health of wildlife populations and habitat, even after the closure of the mine	Sections 6.11 and 6.12 include assessments of the potential effects on vegetation communities and wetlands and on wildlife and wildlife habitat. Section 6.24 includes an assessment of risk to human and ecological health.
Subsistence	
Participants reported declines in animal populations including moose and beaver... Participants also reported recent moose kills and the presence of moose measles (cysticercosis) which prevents CLFN members from consuming the meat... Participants voiced concern about the ongoing decline of moose populations, and the effect this has on younger generations' opportunities to learn CLFN hunting practices.	Sections 6.11 and 6.12 include assessments of the potential effects on vegetation communities and wetlands and on wildlife and wildlife habitat. Section 6.24 includes an assessment of risk to human and ecological health. Section 6.21 includes an assessment of potential effect on TLRU including hunting. Section 6.26 includes an assessment of potential effects on health conditions of Indigenous peoples.
Traditional Land and Resource Use	
Some participants explained that preferred hunting and trapping areas on Birch Lake are not necessarily in the Project Footprint, however, the Project could impose a hunting restriction area that encompasses Birch Lake	Section 6.21 includes access management strategies for the PDA, and they do not include restrictions on Birch Lake.
CLFN members also expressed concern about the possibility of constrained or restricted access to preferred harvesting areas as a result of the proposed Project.	Section 6.21 includes an assessment of potential effect on TLRU including access management strategies for the PDA.
Study participants voiced concern that they will be deterred from – or will entirely avoid – harvesting plants and medicines from their preferred areas . Key concerns include water contamination from the tailings ponds and the associated loss of abundant, healthy plants and medicines in the Study Area.	Sections 6.6 through 6.9 include assessment of potential effects on water quality in Birch Lake, Springpole Lake and local inland waterbodies. Sections 6.11 includes assessments of the potential effects on vegetation communities and wetlands. Section 6.24 includes an assessment of risk to human and ecological health.
Water quality	
Potential impacts to the potability of water were described by participants as being particularly important. Participants anticipated impacts from the Project on water quality, especially in and around Springpole Lake. As a result, participants expressed their likely caution or avoidance with collecting drinking water in the Study Area.	Sections 6.6 through 6.9 include assessment of potential effects on water quality in Birch Lake, Springpole Lake and local inland water bodies.

Table 6.21-2: Concordance for Comments identified in Cat Lake First Nation Indigenous Knowledge and Use Study

Comment from Cat Lake First Nation Indigenous Knowledge and Use Study	Springpole Gold Project Concordance
A participant expressed concern that the Study area is not indicative of the likely degradation of important watercourses and waterbodies and the understanding how the water system flows in the territory	Sections 6.6 through 6.9 include assessment of potential effects on Birch Lake, Springpole Lake and local inland water bodies.
Uncertainty and a lack of confidence in the Project's monitoring and reporting practices related to contamination in waterbodies and watercourses	Sections 6.6 through 6.9 include assessment of potential effects on Birch Lake, Springpole Lake and local inland water bodies. Section 12 describes follow-up monitoring frameworks including for surface water.
<p>Participants viewed possible Project interactions as impacting the quality of water resources (including its potability and health for fish and animals). Key concerns raised by participants include:</p> <ul style="list-style-type: none"> • Impacts to water quality, with attendant impacts to the long-term quality and health of the freshwater environment which fish, plants and animals depend on; • Impacts to CLFN's use of preferred freshwater areas due to the Project activities; and • Resulting impacts to CLFN's practices of collecting water for drinking. 	Sections 6.6 through 6.9 include assessment of potential effects on Birch Lake, Springpole Lake and local inland water bodies.
Wildlife and Wildlife Habitat	
Several participants explained the Project would directly impact known habitats used by moose. Many CLFN members consume moose meat for subsistence, year-round, and use areas in and adjacent to the Project as preferred harvesting areas	Section 6.12 includes assessment of the potential effects on wildlife and wildlife habitat. Section 6.24 includes an assessment of risk to human and ecological health. Section 6.21 includes and assessment of potential effect on TLRU including hunting.
Project activities have already commenced and the increases in traffic and sensory disturbance, including visual and noise disturbance, have already been observed by CLFN members... Study participants described impacts to moose populations that are causing the animals to move away and stay away from the Project area, resulting in the displacement of CLFN hunting rights and practices from areas near the Project that members have relied on for generations. Noise disturbance from helicopters is a particular concern.	Section 6.3 includes and assessment of potential effects on noise and vibration and Section 6.12 include assessments of the potential effects on wildlife and wildlife habitat.
Study participants also expressed concern about visual markers for Project activities that have appeared around the Project footprint. Participants described how markers on the land are a visual disturbance to moose populations and moose habitats.	Section 6.21 includes an assessment of potential effect on TLRU and Section 6.12 includes assessments of the potential effects on wildlife and wildlife habitat.

Table 6.21-2: Concordance for Comments identified in Cat Lake First Nation Indigenous Knowledge and Use Study

Comment from Cat Lake First Nation Indigenous Knowledge and Use Study	Springpole Gold Project Concordance
A participant expressed concern that wildlife would become ill from the presence of the mine, and move away from the area	Section 6.12 includes assessments of the potential effects on wildlife and wildlife habitat.
The possibility of a mine expansion, and the continued impacts this could have to animals.	Section 5 contains a description of the Project and its components. Section 6.12 includes assessments of the potential effects on wildlife and wildlife habitat.

Table 6.21-3: Concordance for Comments identified in the Lac Seul First Nation Indigenous Knowledge and Use Study

Comment from Lac Seul First Nation Indigenous Knowledge and Use Study	Springpole Gold Project Concordance
Fish and Fish Habitat	
The movement of water through the landscape is a cause for concern for many LSFN members – but in the case of fish it is paired with the natural movement of fish populations (often seasonally, for example during spawning), which some LSFN participants perceive as an important way in which Project effects may move through the landscape.	Sections 6.6 through 6.9 include assessments of potential effects on water quality in Birch Lake, Springpole Lake and local inland waterbodies and Section 6.10 includes an assessment of potential effects on fish and fish habitat.
Human and Ecological Health	
Study participants voiced concerns about the proposed Project’s possible impacts on freshwater environments specifically linked to the possibility of contamination from the mine site in surrounding lakes and rivers. For Study participants these impacts were particularly concerning for the potential for these contaminants to enter waterways and flow downstream to the lakes and rivers used for fishing.	Section 6.24 includes an assessment of risk to human and ecological health. Sections 6.6 through 6.9 include assessments of potential effects on water quality in Birch Lake, Springpole Lake and local inland water bodies.
Study participants raised concerns about the proposed Project’s possible impacts on the quality and quantity of hunted and trapped game specifically linked the possibility of contamination from the mine site spreading downstream, and s animal dispersal from the Project footprint area.	Section 6.12 includes an assessment of the potential effects on wildlife and wildlife habitat and Section 6.24 includes an assessment of risk to human and ecological health.
Interviewees expressed unease over the uncertainty of the potential for contaminants to leach into the broader environment based on their experiences with existing mine sites (e.g. the South Bay site in the RSA). They explained animals feed in wetland areas where waste from mining is present, and contamination is suspected to affect water, soil, and thus the plants that moose feed on.	Section 6.24 includes an assessment of risk to human and ecological health.
Participants anticipate that the Springpole Project will negatively impact the quality and quantity of plant and medicine species in the Study Area, primarily due to widescale landscape alteration and the introduction of contaminants into the environment. This is a particular concern because given the existing impacts to plants and medicines further south in the Lac Seul area, LSFN members rely on access to lands to north in the vicinity of the Study Area in order to exercise their harvesting rights (in these hitherto less impacted/industrialized areas).	Sections 6.11 include assessments of the potential effects on vegetation communities and wetlands.



Table 6.21-3: Concordance for Comments identified in the Lac Seul First Nation Indigenous Knowledge and Use Study

Comment from Lac Seul First Nation Indigenous Knowledge and Use Study	Springpole Gold Project Concordance
A participant explained that the removal of rocks, and presence of tailings in the area, would likely affect the ability of plants to grow back. The long-term effects of open pit mining on the entire landscape and ecosystem are hard to predict, and LSFN members expressed caution about the presence of this industry in an otherwise relatively pristine, boreal forest environment.	Sections 6.11 include assessments of the potential effects on vegetation communities and wetlands and includes discussions of re-vegetation.
SAR Caribou	
Another interviewee wondered whether the proposed Project would affect caribou migration corridors in the region, and the general presence of the species in the Study Area.	Section 6.13 includes an assessment of the potential effects on Caribou.
Subsistence	
An interviewee cautioned that all animals travel across vast areas, and do not know to avoid mine sites or contaminated areas. They described that animals or fish may be contaminated in the Study Area, and then enter LSFN's core territory, where community members harvest these wild foods to contribute to their diets and cultural practices.	Section 6.12 includes an assessment of the potential effects on wildlife and wildlife habitat and Section 6.24 includes an assessment of risk to human and ecological health.
Treaty Rights	
Overall, LSFN members are also concerned about how the Project would impact future generations' ability to harvest in the future. They described that the Springpole mine and associated developments would significantly alter the landscape, posing a deterrence to younger members who want to practice their hunting and trapping rights. Another interviewee expressed their uncertainty of trapping in this area when the proposed mine would be in operation	Section 6.21 includes and assessment of potential effects on TLRU including hunting and trapping.
Vegetation / Wetlands	
Participants raised concerns about the impacts mining could have on the abundance and diversity of plants. In particular, the long-term effects of chemicals on medicines, and the overall landscape, is a worry. For this reason, the member below explained they want to know more about chemical usage and potential long-term environmental effects.	Section 6.11 include assessments of the potential effects on vegetation communities and wetlands and Section 6.24 includes an assessment of risk to human and ecological health.
Water quality	



Table 6.21-3: Concordance for Comments identified in the Lac Seul First Nation Indigenous Knowledge and Use Study

Comment from Lac Seul First Nation Indigenous Knowledge and Use Study	Springpole Gold Project Concordance
<p>The upstream location of the proposed Springpole Project was a cause for concern, with participants describing how the connectedness of waterways would necessarily result in the transmission of any impacts to water around the Project footprint downstream to their areas. They expressed their reservations around the safety and security of Springpole’s systems for preventing this contamination – and their concerns that water would be the first and most important element of the landscape to be impacted – transferring these contaminants to other resources like plants or animals</p>	<p>Sections 6.6 through 6.9 include assessment of potential effects on water quality in Birch Lake, Springpole Lake and local inland water bodies.</p>
<p>Wildlife and Wildlife Habitat</p> <p>Another concern raised is the potential for animal abundance to decrease due to game dispersal caused by disturbance from the Project footprint. LSFN hunters have observed species such as moose being pushed further north (see also Section 4.4.2), and the participant suspects disturbance from the Project would disperse moose away from the Study Area. Another participant reported animal dispersal occurring near busy areas such as towns, and expressed concern that moose would likewise move away from the Project footprint if there was less available habitat in which to breed.</p>	<p>Section 6.12 includes assessment of the potential effects on wildlife and wildlife habitat.</p>

Table 6.21-4: Concordance for Comments identified in the Mishkeegogamang Ojibway Nation Traditional Land Use and Occupancy and Traditional Ecological Knowledge Study Report for Springpole Gold Mining Project

Comment from Mishkeegogamang Ojibway Nation Traditional Land Use and Occupancy and Traditional Ecological Knowledge Study Report for Springpole Gold Mining Project	Springpole Gold Project Concordance
Consultation	
Community members raised concerns regarding the consultations that were inadequate to find solutions to revitalize their mino bimaadiziwin, but their land use areas were encroached and impacted negatively. They considered consultation had been inadequate.	Section 2 contains detailed information about consultation conducted for the Project.
The temporary winter road access and human health or safety permit did not provide adequate engagement/consultation. The road will have significant impacts on Wildlife and Species at Risk.	Section 2 contains detailed information about consultation conducted for the Project.
Human and Ecological Health	
Some community members worried about the risk of contamination of their food system (fish, moose, wild rice, caribou, berries, etc.) and wildlife habitats through pollution in rivers and lakes due to mining.	Section 6.24 includes an assessment of risks to human and ecological health.
Contamination of land and water: They expressed concern regarding whether the food they eat gets contaminated; moose, caribou, deer, fish, berries, geese, wild rice, etc. drink the water in the lakes that will be unfit for drinking.	Sections 6.6 through 6.9 include assessments of potential effects on water quality in Birch Lake, Springpole Lake and local inland waterbodies. Section 6.24 includes an assessment of risks to human and ecological health.
Water quality	
Some community members worried about the quality of water that is unfit for drinking as they had witnessed contamination of lakes and river by past mining activities.	Sections 6.6 through 6.9 include assessments of potential effects on water quality in Birch Lake, Springpole Lake and local inland waterbodies. Section 6.24 includes an assessment of risks to human and ecological health.
Draining of the lake for gold mining was of concern for MON members: they worried about flooding as well as the fish and animal habitats that rely on the micro-ecosystem of Springpole Lake.	Sections 6.7 and 6.8 include assessments of potential effects on Springpole Lake including discussions on water levels; Section 6.10 includes an assessment of potential effects on fish and fish habitat; Section 6.12 includes an assessment of potential effects on wildlife and wildlife habitat.
In the past, MON members have suffered from flooding due to the regulation of lakes and rivers for the mining activity. Potential flooding of their land use and occupancy areas were of key concern and burden for some community members.	Sections 6.7 and 6.8 include assessments of potential effects on Springpole Lake including discussions on water levels.

Table 6.21-5: Concordance for Comments identified in the 'Métis Nations of Ontario Traditional Knowledge and Land Use Study for the First Mining Gold (FMG) Springpole Mine Project'

Métis Nations of Ontario Traditional Knowledge and Land Use Study (Know History 2021)	Springpole Gold Project Concordance
MNO noted that due to the small sample size, this Study does not identify the full extent of land use by MNO citizens within the Study Area. At best it provides information on the types of land use activities that might occur on the lands and waters across the region.	FMG continues to support MNO in the collection of land use information for consideration in Project planning.
Comments Relating to the Proposed Project	
	<p>FMG respects Aboriginal and treaty rights. FMG has received an updated traditional knowledge and land use report from NWOMC.</p> <p>FMG has supported MNO's selection of a technical advisor to review environmental assessment documentation and provide input on behalf of MNO. FMG will continue to share information about the Project and receive input from community members, elders and leadership.</p> <p>The Project is being planned and designed with sound environmental practices in mind. The Project has been designed to minimize the footprint as much as possible (a key consideration is co-locating the mine rock and tailings). Progressive rehabilitation will be included in the Project where possible and monitoring will be ongoing throughout the duration of the Project.</p> <p>We can do better by working together. FMG's goal is to:</p> <ul style="list-style-type: none"> • Increase Indigenous employment in the Project; • Increase Indigenous business involvement in the Project; and • Prioritize information and topics most important to the communities. <p>FMG will continue to work with MNO to establish:</p> <ul style="list-style-type: none"> • Sharing in the financial benefits generated from the mine; • Training and employment opportunities; and • Business opportunities related to mine construction and operation.
Potential adverse effects on water quality and potential for contamination to spread through the water system beyond the immediate study area.	Sections 6.5 to 6.9 includes an assessment of potential effects on groundwater and surface water systems (including Birch Lake, Springpole Lake and local inland waterbodies).
Potential adverse effects on terrestrial animals (e.g., moose and caribou).	Section 6.12 includes an assessment of potential effects on moose and Section 6.13 includes an assessment of potential effects on Caribou.

Table 6.21-5: Concordance for Comments identified in the 'Métis Nations of Ontario Traditional Knowledge and Land Use Study for the First Mining Gold (FMG) Springpole Mine Project'

Métis Nations of Ontario Traditional Knowledge and Land Use Study (Know History 2021)	Springpole Gold Project Concordance
Potential adverse effects on air quality and resulting health implications to resources and people who rely on those resources.	Section 6.2 includes an assessment of potential effects of the Project on air quality and Section 6.24 includes an assessment of potential effects on human and ecological health.
Potential adverse effects on biological systems (e.g., invasive species and contaminants introduced into the greater ecosystem).	Section 6.24 includes an assessment of potential effects on human and ecological health.
Potential adverse effects on fish species and resulting health implications to those who ingest contaminated fish.	Section 6.10 includes an assessment of potential effects on fish and fish habitat and Section 6.24 includes an assessment of potential effects on human and ecological health.
Potential adverse effects on plants (e.g., impacts to species, soil chemistry to impact efficacy of medicinal plants, and resulting health to those that ingest medicinal plants).	Section 6.11 includes an assessment of potential effects on vegetation communities and wetlands and Section 6.24 includes an assessment of potential effects on human and ecological health.
Potential adverse effects on birds, including local and migratory species, that may be affected by contaminants and affect the health of those that ingest bird species.	Sections 6.12 and 6.16 includes an assessment of potential effects on local and migratory birds and Section 6.24 includes an assessment of potential effects on human and ecological health.
Potential adverse effects on Métis Culture, including an increase in the population of non-Métis people that could threaten the future of Métis Culture.	Section 6.21 includes an assessment of potential effects on TLRU.
Potential increase in harvesting competition and scarcity of resources for Métis, including effects of new road and transmission corridor to increase access options for non-Métis hunters and create more competition.	Section 6.21 includes an assessment of potential effects on TLRU.
Potential adverse effects on local community well-being (e.g., increase in drug and alcohol use, crime, and human trafficking), that can introduce adverse social change.	Section 6.20 includes an assessment of potential effects on local and regional infrastructure and services.
Potential adverse effects on the local economy related to unsustainable long-term employment, or a possible reduction in the available work force.	Section 6.19 includes an assessment of potential effects on local and regional economy.
Potential beneficial effects on the local economy; increased employment	Section 6.19 includes an assessment of potential effects on local and regional economy.
Potential adverse effects on local infrastructure and services resulting in an increase to cost of living, increase pressure on health and education infrastructure.	Section 6.20 includes an assessment of potential effects on local and regional infrastructure and services.

Table 6.21-5: Concordance for Comments identified in the 'Métis Nations of Ontario Traditional Knowledge and Land Use Study for the First Mining Gold (FMG) Springpole Mine Project'

Métis Nations of Ontario Traditional Knowledge and Land Use Study (Know History 2021)	Springpole Gold Project Concordance
Potential beneficial effects on First Nation communities related to year-round access roads.	Section 6.20 includes an assessment of potential effects on local and regional infrastructure and services.

Note:

The Métis Nations of Ontario (MNO) regard their traditional territory to extend beyond the limits of the defined Project and Study Areas. The Traditional Knowledge (TK) and Land Use Study addresses lands and activities both outside and within the areas defined by the Project. The MNO document is recognized as an important document for its guiding principles. The table above outlines how the TK and Land Use study has, and will continue to be, considered by FMG.

Table 6.21-6: Concordance for Comments identified in the Slate Falls Nation - Health, Socio-economic, Indigenous Knowledge and Land Use Baseline Study

Comment from Slate Falls Nation Health, Socio-economic, Indigenous Knowledge and Land Use Baseline Study	Springpole Gold Project Concordance
Consultation	
Concerns also exist about how the access road and other infrastructure decisions are being made without consultation of our members or neighbouring communities	Section 2 contains detailed information about consultation conducted for the Project.
Concern has been expressed that decisions are made to satisfy investor interests without suitable consideration of the environmental assessment processes.	Section 2 contains detailed information about consultation conducted for the Project.
A settlement was reached with land users that were impacted by mine operations at Dobie Lake north-east of SFN. FMG has indicated having no information about this issue, which is concerning to our community.	Section 2 contains detailed information about consultation conducted for the Project.
Fish and Fish Habitat	
Some dead fish and fish with unusual lesions have been observed by our members. We need to understand what is causing this and whether there are contaminants in the water.	Sections 6.6 through 6.9 include assessments of potential effects on water quality in Birch Lake, Springpole Lake and local inland waterbodies.
Human and Ecological Health	
Our community is concerned about the health of moose and other wildlife in areas near previous mining activity, including areas close to the former Golden Patricia Mine northeast of Kezik Lake... Our people are concerned that future mines could have similar effects, especially mines near our water system.	Section 6.24 includes an assessment of risk to human and ecological health.
Members are concerned that contaminated areas like these have larger scale impacts on animals that migrate along old waste dumps. As a result, it is difficult for our members to know which wildlife has come in contact with such sites, creating uncertainty about harvesting and consumption our traditional foods.	Section 6.24 includes an assessment of risk to human and ecological health.
That our community and territory are downstream of the proposed Springpole Gold Project is particularly concerning especially because previous mining activity in our territory has resulted in concerns about contaminated water and land in our territory.	Section 6.24 includes an assessment of risk to human and ecological health.
Climate change and microbursts have also been identified as concerns requiring further consideration.	Section 8 includes an assessment of potential effects due to climate change and weather events as effects of the environment on the Project.

Table 6.21-6: Concordance for Comments identified in the Slate Falls Nation - Health, Socio-economic, Indigenous Knowledge and Land Use Baseline Study

Comment from Slate Falls Nation Health, Socio-economic, Indigenous Knowledge and Land Use Baseline Study	Springpole Gold Project Concordance
Labour and Economy	
The loss of employment after industry leaves can have devastating social effects on communities and should be considered at the outset.	Section 6.19 includes an assessment of potential effects on the local and regional economy including potential effects at closure.
Monitoring and Management	
More water monitoring stations need to be installed and additional stations are required further downstream of the proposed Springpole Gold Project site. Concerns also exist about the long-term impacts to water from the mine with doubts raised about whether the naturally occurring clay in the mine pit is sufficient to prevent chemical leaching into the water system post-closure.	Section 12 describes follow-up monitoring frameworks including for groundwater and surface water.
Reclamation	
Concerns about the visual aesthetics of the proposed Springpole Gold Project have been identified by members. It is also noted that the waste rock pile will continue to be seen after the mine closes and will remain for hundreds of years.	Section 6.21 includes an assessment of potential effects on TLRU including a discussion on visual aesthetics.
Concerns exist about the long-term impacts of the proposed Springpole Gold Project, including the nature and position of waste rock piles that remain after closure.	Section 6.11 includes an assessment of potential effects on vegetation communities and wetlands including a discussion on re-vegetation. Section 6.21 includes an assessment of potential effects on TLRU including a discussion on visual aesthetics.
Socioeconomic	
Concerns about the potential for racism were identified based on our members' experiences of discrimination while working on projects such as the Wataynikaneyap Transmission Line construction. It is recommended that mandatory cultural awareness training be completed by future industry operators in the region, including FMG employees and contractors.	Appendix Q-3 contains a Health and Wellness Strategy and contains actions regarding harassment and cultural awareness training.
Some members have expressed concerns about expanding the road network because of the potential for additional hunters or drug trafficking.	New access will be created by the mine access road and an access management strategy will be developed to allow traditional activities to continue along the mine access road. The transmission line corridor is not expected to create new access.

Table 6.21-6: Concordance for Comments identified in the Slate Falls Nation - Health, Socio-economic, Indigenous Knowledge and Land Use Baseline Study

Comment from Slate Falls Nation Health, Socio-economic, Indigenous Knowledge and Land Use Baseline Study	Springpole Gold Project Concordance
Vegetation / Wetlands	
Mines such as Pickle Lake Gold, Golden Patricia, or McIntyre Gold are near or within the Cat River Watershed. Although these mines are no longer operating, no vegetation grows on these sites, and we have concerns about potential residual contamination.	Section 6.11 includes an assessment of potential effects on vegetation communities and wetlands and includes a discussion on reclamation.
Water quality	
There is similarly doubt that the naturally occurring clay bed at the proposed mine site will be sufficient to prevent chemical leaching into the water system.	Section 6.5 includes an assessment of potential effects on groundwater including a discussion regarding water quality. Section 6.24 includes and assessment of potential risks to human and ecological health.
Some of our members expressed concerns regarding hydro dams which have been controlling water levels in our watershed and have destroyed key spawning locations, especially for sturgeon.	Section 6.6 through 6.9 include assessments of potential effects on Birch Lake, Springpole Lake and local inland water bodies including discussions about water levels. Section 6.10 includes an assessment of potential effects on fish and fish habitat.
Wildlife and Wildlife Habitat	
Some of our community hunters and Elders are also concerned about a general decline in moose populations over the past few decades. Some causes of the moose decline are believed to be related to mining contamination, forestry, shifting water levels, and climate change	Section 6.12 includes an assessment of potential effects on wildlife and wildlife habitat.
Our members are also concerned about herbicide spraying in powerline rights-of-way and the potential for these chemicals to contaminate wildlife that more frequently traverse the cleared areas.	Section 6.11 includes an assessment of potential effects on vegetation communities and wetlands including a discussion of vegetation along the transmission line corridor.
Additional air traffic could potentially increase stress on this species at-risk.	Section 6.3 includes an assessment of the potential effects of noise and Section 6.12 includes an assessment of potential effects on wildlife and wildlife habitat.

Table 6.21-7: Concordance for Comments identified in the 'Wabauskang Traditional Knowledge and Use in the area of the Springpole Gold Access Corridor Project'

Wabauskang Traditional Knowledge and Use Study (ArrowBlade 2014)	Springpole Gold Project Concordance
Comments Relating to the Proposed Project	
Application of Wabauskang resource management principles and methods.	<p>FMG recognizes the intent to maintain the WFN relationship to the land and to maintain their way of life in harmony with new land use activities.</p> <p>FMG respects Aboriginal and treaty rights The Project will be integrated with traditional land uses in a way that is guided by traditional values and principles. FMG will continue to share information about the project and receive input from community members, Elders and leadership.</p> <p>We can do better by working together. FMG's goal is to:</p> <ul style="list-style-type: none"> • Increase Indigenous employment in the Project; • Increase Indigenous-owned business involvement in the Project; • Training and employment opportunities; and • Prioritize information and topics most important to the communities.
Displacement, disturbance, and decline of wildlife and plant species due to development (e.g., roads, spraying, clear cutting).	<p>The environmental assessment considers wildlife (Section 6.12), vegetation communities and wetlands (Section 6.11), groundwater (Section 6.5), surface water systems (Section 6.6 to 6.9), TLRU (Section 6.21), and recreational land use (Section 6.18) and identifies mitigation where potential effects are identified.</p>
Decline in water quality.	
Lack of protection for bird nests.	
Lack of buffers around lakes.	
Lack of proper reclamation or clean-up after development.	
Effects from forestry operations.	
Increased access by non-WFN land users.	
Increased poaching.	
Changes in traditional food consumption.	
Increased mortality of wildlife on roads.	
Private road with restricted access for mining only (no forestry).	
Hunting and fishing restrictions.	

Table 6.21-7: Concordance for Comments identified in the 'Wabauskang Traditional Knowledge and Use in the area of the Springpole Gold Access Corridor Project'

Wabauskang Traditional Knowledge and Use Study (ArrowBlade 2014)	Springpole Gold Project Concordance
Mitigation Ideas	
<ul style="list-style-type: none"> • Tailings management to reduce or eliminate downstream water quality effects; • Construction of water crossings to reduce or eliminate in-stream effects on fish; and • Identification and respect for protected area to reduce or eliminate effects on nesting birds. 	<p>The environmental assessment considers groundwater (Section 6.5) surface water systems (Sections 6.6 to 6.9), wildlife and wildlife habitat (Section 6.12), species at risk (Sections 6.13 to 6.16) and fish and fish habitat (Section 6.10), and identifies mitigation where potential effects are identified.</p> <p>FMG has undertaken numerous environmental baseline studies on fish and wildlife over the last 10 years to better understand the existing conditions and to support the development of mitigation measures to reduce potential effects of the Project.</p>
<ul style="list-style-type: none"> • Review baseline studies to ensure they have adequate information (i.e., moose aerial surveys) and study periods; • Review baseline studies to ensure TK and TU has been integrated and considered in the reports to enhance or benefit the environmental management of the (Project); and • Review water crossings plan and investigate winter installation of water crossings. 	<p>FMG has provided the baseline reports for the Project to Wabuskang First Nation for information and input. FMG will continue to share information such as monitoring plans as they are developed throughout the life of the Project. The final EIS/EA describes the mitigation measures proposed for site specific environmental management. FMG would be pleased to present the final EIS/EA material to Wabuskang First Nation.</p>
<ul style="list-style-type: none"> • Ensure Environmental Management Plans and site-specific environmental monitoring plans are developed for the (Project). 	
<ul style="list-style-type: none"> • Review the intent of First Nations environmental training. 	<p>Given the remote nature of the Springpole site, FMG has focused efforts on providing the local Indigenous Nations with the opportunity to have an environmental monitor participate in field work including training to develop environmental skills.</p>
<ul style="list-style-type: none"> • Conduct a risk assessment of the Cumulative Effects of (the Project) being constructed in the Trout Lake Forest Management Plan area and habitat fragmentation and predation of Woodland Caribou. 	<p>The environmental assessment considers the potential cumulative effects, including on caribou and identifies mitigation where required (Section 7.12).</p>

Note:

Although the Project does not fall entirely within the boundaries of the Wabauskang Traditional Knowledge (TK) and Use Study completed for the Springpole Gold Access Corridor (Gold Canyon Resources Inc. Project), it is recognized as an important document for its guiding principles. The table above outlines how the TK and Use study has, and will continue to be, considered by FMG.

Table 6.21-8: Linkages between Assessment Criteria for TLRU and Input Provided by Indigenous Communities

Criteria Used in the Assessment of Traditional Land and Resource Use	Indicators Used in the Assessment of Traditional Land and Resource Use	Cat Lake and Lac Seul First Nations Valued Components	Slate Falls Nation Indigenous Knowledge Land Use Themes	Mishkeegogamang Ojibway Nation Land Use Interests and Activities	Wabauskang First Nation Themes	Northwestern Ontario Métis Community
Change in availability, access to and experience related to traditional terrestrial wildlife harvesting (hunting and trapping)	<ul style="list-style-type: none"> • Quantity of direct habitat lost • Quality of experience • Quality of harvested resource • Quality of access to land 	<ul style="list-style-type: none"> • Water • Hunting and trapping • Cultural continuity 	<ul style="list-style-type: none"> • Water • Hunting and trapping • Cultural heritage • Transportation routes • Visual impacts • Impaired uses 	<ul style="list-style-type: none"> • Water • Food harvesting 	<ul style="list-style-type: none"> • Hunting and trapping • Travel 	<ul style="list-style-type: none"> • Hunting
Change in availability, access to and experience related to traditional aquatic wildlife harvesting (fishing)		<ul style="list-style-type: none"> • Water • Fishing • Cultural continuity 	<ul style="list-style-type: none"> • Water • Fishing • Cultural heritage • Transportation routes • Visual impacts • Impaired uses 	<ul style="list-style-type: none"> • Water • Food harvesting 	<ul style="list-style-type: none"> • Fish and fish harvesting • Travel 	<ul style="list-style-type: none"> • Fishing
Change in availability, access to and experience related to traditional plant (food and medicinal) harvesting		<ul style="list-style-type: none"> • Water • Food plants and medicines • Cultural continuity 	<ul style="list-style-type: none"> • Water • Plant harvesting • Cultural heritage • Transportation routes • Visual impacts • Impaired uses 	<ul style="list-style-type: none"> • Water • Food harvesting • Medicine gathering 	<ul style="list-style-type: none"> • Plants 	<ul style="list-style-type: none"> • Natural material gathering
Change in availability, access to and experience related to traditional habitation, cultural, spiritual sites/areas		<ul style="list-style-type: none"> • Quantity of areas lost • Quality of experience • Quality of access to land 	<ul style="list-style-type: none"> • Water • Cultural continuity 	<ul style="list-style-type: none"> • Water • Cultural heritage • Habitation sites • Transportation routes • Visual impacts • Impaired uses 	<ul style="list-style-type: none"> • Cultural and sacred sites and ceremonies; family camps; language; recreational activities 	<ul style="list-style-type: none"> • Travel



Table 6.21-9: Criteria, Indicators and Rationale for TLRU

Indicator	Measurable Parameters	Rationale
Change in availability, access to and experience related to traditional terrestrial wildlife harvesting (hunting and trapping)	<ul style="list-style-type: none"> Quantity of direct habitat lost, in ha Quality of experience in area due to change in sensory disturbances and viewscales Quality of harvested wildlife Quality of access to land 	Traditional wildlife harvesting activities depend upon the availability and quality of wildlife that are used for hunting and trapping and requires access to preferred harvesting areas. The quality of the experience may be affected due to sensory disturbances from changes in sound and viewscales.
Change in availability, access to and experience related to traditional aquatic wildlife harvesting (fishing)	<ul style="list-style-type: none"> Quantity of direct habitat lost, in ha Quality of experience in area due to change in sensory disturbances and viewscales Quality of harvested fish Quality of access to land 	Traditional aquatic resource harvesting activities depend upon the availability and quality of aquatic resources that are used for fishing and requires access to preferred harvesting areas. The quality of the experience may be affected due to sensory disturbances from changes in sound and viewscales.
Change in availability, access to and experience related to traditional plant (food and medicinal) harvesting	<ul style="list-style-type: none"> Quantity of direct habitat lost, in ha Quality of experience in area due to change in sensory disturbances and viewscales Quality of harvested plants Quality of access to land 	Traditional plant harvesting activities depend upon the availability and quality of vegetation species that are used for traditional food and medicine and requires access to preferred harvesting areas. The quality of the experience may be affected due to sensory disturbances from changes in sound and viewscales.
Change in availability, access to and experience related to traditional habitation, cultural, spiritual sites/areas	<ul style="list-style-type: none"> Quantity of areas lost, in ha Quality of experience in area due to change in sensory disturbances and viewscales Quality of access to land 	Traditional habitation, cultural, and spiritual sites/areas activities depend upon the continued availability of these sites and requires access using preferred methods. The quality of the experience may be affected due to sensory disturbances from changes in sound and viewscales.



Table 6.21-10: Significance Determination Attributes and Rankings for TLRU

Attribute	Description	Category
Magnitude	A qualitative or quantitative measure to describe the size or degree of the residual effects relative to baseline conditions	<p>Level I: Residual effects result in a change to traditional activities and/or use by Indigenous groups but could be practiced in the same or similar manner as before</p> <p>Level II: Residual effects result in a change to preferred resources, locations or means to practice traditional activities and the use by Indigenous groups may be modified or limited</p> <p>Level III: Residual effects result in a change so that traditional activities that can no longer be carried out by an Indigenous group in their preferred manner and/or location.</p>
Geographic Extent	The spatial extent over which the residual effect will take place	<p>Level I: Effect is restricted to the PDA.</p> <p>Level II: Effect is restricted to the LSA.</p> <p>Level III: Effect extends beyond and/or into the RSA.</p>
Duration	The time period over which the residual effect will or is expected to occur	<p>Level I: Effect occurs over the short term: less than or equal to 3 years.</p> <p>Level II: Effect occurs over the medium term: more than three years but less than 20 years.</p> <p>Level III: Effect occurs over the long term: greater than 20 years.</p>
Frequency	The rate of occurrence of the residual effect	<p>Level I: Effect occurs once, infrequently or not at all.</p> <p>Level II: Effect occurs intermittently or with a certain degree of regularity.</p> <p>Level III: Effect occurs frequently or continuously.</p>
Reversibility	The extent to which the residual effect can be reversed	<p>Level I: Effect is fully reversible.</p> <p>Level II: Effect is partially reversible or potentially reversible with difficulty.</p> <p>Level III: Effect is not reversible.</p>
Timing	A measure of whether the residual effect occurs during a sensitive period of the year	<p>Level I: Effects do not occur during a sensitive period; or related effects are fully mitigated.</p> <p>Level II: Effects occur during a sensitive period and related effects are partially mitigated.</p> <p>Level III: Effects do not occur during a sensitive period; or related effects cannot be mitigated.</p>

Table 6.21-11: Springpole Gold Project Concordance with 'Cat Lake – Slate Falls Community Based Land Use Plan (2011)'

Cat Lake – Slate Falls Community Based Land Use Plan	Springpole Gold Project Concordance
Vision Statement	
<p><i>"Cat Lake First Nation and Slate Falls First Nation will maintain our ancestral stewardship responsibilities for the land that was given to us as a sacred gift from the Creator and pursue resource-based opportunities including forest management"</i></p>	<p>FMG recognizes the intent to maintain the <i>Ahneesheenhbay</i> relationship to the land and to maintain the <i>Ahneesheenhbay</i> way of life in harmony with new land use activities.</p> <p>FMG is working with Cat Lake First Nation and Slate Falls Nation to consider TLRU and areas in Project planning, identifying mitigation that is guided by traditional values and principles.</p>
Goals	
<p>Improve the social and economic benefits of lands and resources to Cat Lake and Slate Falls First Nations through identification of environmentally sustainable economic development opportunities.</p>	<p>FMG's goal is to:</p> <ul style="list-style-type: none"> • Increase Indigenous employment in the Project; • Increase Indigenous-owned business involvement in the Project; and • Prioritize information and topics most important to the communities. <p>FMG continues to work with local communities to establish training and employment opportunities and opportunities to participate in the Project.</p> <p>FMG continues to work collaboratively towards community goals related to:</p> <ul style="list-style-type: none"> • Renewable energy opportunities; and • Cat Lake First Nation community road access.
<p>Provide for development that will contribute to self-reliant, self-sustaining communities.</p>	
<p>Provide for conservation and protection of ecosystems.</p>	<p>FMG has supported and funded the establishment of a community based working group. A community liaison and environmental monitor positions have also been offered for participation and input into the project. This team will provide input into conservation and protection to be considered throughout the environmental assessment process.</p>
Objectives	
<p>Communicate the relationship of First Nations to the land.</p>	<p>FMG respects Aboriginal and treaty rights. We are working with Cat Lake First Nation and Slate Falls Nation to incorporate TK into Project planning.</p> <p>We will continue to hold open house sessions in the communities to share information about the Project and receive input from community members, Elders and leadership.</p>
<p>Describe and support maintenance of the inherent cultural, social and economic benefits of the lands and resources to Cat Lake and Slate Falls First Nation people who traditionally use the area for subsistence and spiritual value.</p>	

Table 6.21-11: Springpole Gold Project Concordance with ‘Cat Lake – Slate Falls Community Based Land Use Plan (2011)’

Cat Lake – Slate Falls Community Based Land Use Plan	Springpole Gold Project Concordance
Provide a balance between protection and sustainable economic development.	The Springpole Environment Committee has retained independent technical advisors to review technical documentation, such as environmental baseline, alternatives and the draft environmental impact statement/ assessment and provide feedback to the communities and FMG.
Sustain waterways that are a defining feature of the planning area and the foundation of the communities.	Environmental workplans for 2022 have been updated to reflect the input received from the Cat Lake First Nation and Slate Falls Nation. The surface water sampling program has been expanded to include three additional sampling locations downstream of the Project including stations representative of drainages associated with Cat Lake First Nation and Slate Falls Nation.
Provide strategic direction what will contribute to the sustainability of lands and resources ... (waterways and biological diversity e.g., Woodland Caribou, Lake Sturgeon and Wolverine).	FMG continues to work with local communities to establish training and employment opportunities and opportunities to participate in the Project.
Provide zoning and strategic direction to support existing land uses and identify new livelihood opportunities for Cat Lake and Slate Falls, addressing...mineral sector interests with emphasis on areas of significant mineral potential, new renewable energy business opportunities, electrical transmission and telecommunication priorities, access opportunities...	FMG continues to work collaboratively towards community goals related to:
Provide direction for the harmony of new uses with customary uses.	<ul style="list-style-type: none"> • Renewable energy opportunities; and • Cat Lake First Nation community road access.
Identify learning, training and educational opportunities for communities to build long term planning and resource management capacity.	The environmental monitors and community liaison will have opportunities to continue to be involved in the Project throughout the environmental assessment and permitting phases.
Provide strategic direction to support decision making in subsequent processes such as resource management planning or environmental assessments.	The Project is being planned and designed with sound environmental practices in mind. Participation and input from the communities will further help achieve these shared goals.
Emphasize the importance of environmentally sound practices to sustain economic opportunities.	Potential effects of climate change on the Project during the construction, operation and closure phases have been considered and incorporated in the planning and design of Project infrastructure. FMG will also implement an adaptive management approach throughout the life of the Project to monitor for observed effects of the environment, and adapt the Project infrastructure and operation, maintenance and closure activities, as necessary.
Consider opportunities to mitigate and adapt to climate change.	

Table 6.21-11: Springpole Gold Project Concordance with ‘Cat Lake – Slate Falls Community Based Land Use Plan (2011)’

Cat Lake – Slate Falls Community Based Land Use Plan	Springpole Gold Project Concordance
Land and Resources	
<p>Mammals: Wildlife in the planning area typically includes black bear, moose, woodland caribou, wolf, lynx, pine marten, red squirrel, wolverine, fisher, short-tailed weasel, red-backed vole, least chipmunk, beaver, snowshoe hare, otter, ermine, mink and fox.</p>	<p>Species of traditional importance are considered in the environmental assessment as is traditional and commercial use information.</p>
<p>Birds: Bird species in the planning area include, spruce grouse, herring gul and double crested cormorant, as well as bald eagle, osprey, great horned owl, red-tailed hawk, waterfowl, sharp-tailed grouse, common nighthawk, raven, grey jay, bald eagle, hawk owl.</p> <p>Geese ducks and other waterfowl are seasonally hunted.</p> <p>Bald eagles are considered sacred, and their locations are noted.</p>	
<p>Fish: Fish species include, walleye, yellow perch, northern pike, lake trout, lake whitefish and lake sturgeon.</p> <p>Fish have been important as a food source for subsistence and whitefish and lake sturgeon have been utilized for cultural practices.</p>	
<p>Traditional Use: Lands and resources have been managed and protected for centuries, for subsistence (food, clothing), traditional livelihood activities (fur harvesting) and spiritual and cultural practices.</p> <p>Substantial quantities of country food, meat and fish are harvested for consumption in the communities. There is also a considerable amount of infrastructure in the field that harvesters rely upon for activities (campsites, trails, portages).</p> <p>Waterways are valued travel routes. Water supports life that people depend on for spiritual, hunting, trapping, fishing and gathering activities.</p>	
<p>Commercial Use: Resource-based commercial activities have included fur harvesting, commercial fishing and commercial tourism.</p>	

Table 6.21-11: Springpole Gold Project Concordance with ‘Cat Lake – Slate Falls Community Based Land Use Plan (2011)’

Cat Lake – Slate Falls Community Based Land Use Plan	Springpole Gold Project Concordance
<p>Access and Infrastructure: Cat Lake First Nation has interest in having an all-weather road accessing the municipality of Sioux Lookout and beyond for goods and services.</p>	<p>FMG believes that when viewed on a regional scale with the Project, working together we will be able to provide enough rationale to obtain funding to build the Cat Lake Road connection to Sioux Lookout.</p> <p>A road committee has been formed with Cat Lake, Windigo First Nation Council, FMG and Sioux Lookout. FMG continues to offer support for the undertaking of design work for the Cat Lake First Nation Road.</p>
Strategic Direction	
<p>Mineral exploration and mining activities will be conducted in a manner which:</p> <ul style="list-style-type: none"> • Emphasizes use of ‘Cat Lake – Slate Falls Guidelines for Mineral Sector Projects: Best Management Practices’ for mineral sector development (refer to Appendix B in rows below); • Supports early consultation and engagement requirements; • Encourages development of Impact Benefit Agreements; • Addresses mining withdrawals for culturally sensitive sites as identified by community leadership and members; • Minimizes surface disturbance near water bodies and streams to ensure health/intake watersheds are maintained; • Respects the people of Cat Lake and Slate Falls emphasize protection of fish and wildlife habitat; • Emphasizes the importance of rehabilitating mineral development areas in a timely manner; and • Incorporates ongoing monitoring schedules and water quality sampling. 	<p>FMG undertook to initiate early consultation and engagement with communities:</p> <ul style="list-style-type: none"> • Established the Springpole Environment Committee ; • Offered community liaison and environmental monitor positions; • Supported retaining independent consultants as the communities’ technical advisors; • Initiated open house events to present the Project, environmental baseline and alternatives; • FMG will continue to work with Cat Lake First Nation and Slate Falls Nation to participate in economic and employment opportunities generated from the mine; • FMG looks forward to receiving information for consideration on culturally sensitive sites; • The Project has been designed to minimize the footprint as much as possible (a key consideration is co-locating the mine rock and tailings); • Progressive rehabilitation will be included in the Project where possible; • Monitoring will be ongoing throughout the duration of the Project; • Support community based traditional land use initiatives with Elders and youth; and • Support reasonable requests and work schedule flexibility for Indigenous employees for time off to pursue traditional land use activities.

Note:

Although the Project does not fall within the boundaries of the Cat Lake – Slate Falls Community Based Land Use Plan (LUP) FMG recognizes the importance of this document and its guiding principles. The table above outlines how the LUP has, and will continue to be, considered by FMG.

Table 6.21-12: Concordance with 'Keeping the Land: A Land Use Strategy for the Whitefeather Forest and Adjacent Areas'

Pikangikum First Nations Community Based Land Use Plan (PFN 2006)	Springpole Gold Project Concordance
Vision Statement	
<p><i>"Our vision expresses our intention to maintain this Ahneesheenhbay relationship to the land, to maintain our Ahneesheenhbay way of life, in conjunction with and through the new land use activities proposed in this Land Use Strategy. These new activities will be integrated with existing land uses...in a way that is guided by the Pikangikum customary stewardship approach."</i></p>	<p>FMG recognizes the intent to maintain the Ahneesheenhbay relationship to the land and to maintain the Ahneesheenhbay way of life in harmony with new land use activities.</p> <p>FMG has offered to support Pikangikum First Nation in gathering TLRU information and considering the data as it is made available.</p>
Goals	
<p>Ensure Pikangikum First Nation customary stewardship responsibilities for Keeping the Land guide the protection and orderly development of lands and resources.</p>	<p>We can do better by working together. FMG's goal is to:</p> <ul style="list-style-type: none"> • Increase Indigenous employment in the Project; • Prioritize information and topics most important to the communities; • Fully understand and respect the efforts that went into developing the Keeping the Land: A Land Use Strategy for the Whitefeather Forest and Adjacent Areas Plan; and • FMG will continue to work with local communities to establish training and employment opportunities.
<p>Secure resource-based economic development and employment opportunities for Pikangikum people.</p>	
<p>Harmonize proposed new land uses with existing and customary land use practices of Pikangikum people.</p>	<p>FMG supports community-based traditional land use activities and through the preparation of the Closure Plan will consult with Indigenous communities to confirm closure objectives and end land uses.</p>
Objectives	
<p>Maintain the Pikangikum Ahneesheenhbay relationship to the land as a cultural landscape (i.e., an area that has been modified and given meaning through habitation and use by Pikangikum people).</p>	<p>FMG respects Aboriginal and treaty rights. FMG has undertaken to engage with PFN to receive share Project information and discuss TK for consideration in Project planning.</p> <p>FMG has offered and would like to hold open house sessions in the community to share information about the Project and receive input from community members, elders and leadership.</p>
<p>Sustain the biological diversity and abundance of the WFPA.</p>	<p>FMG has shared technical documentation, such as environmental baseline, alternatives and the draft environmental impact statement / environment assessment in order to receive feedback and will continue to share Project information as it becomes available.</p> <p>The environmental assessment considers protected areas and needs of species at risk (Section 6.13 to 6.16)</p>
<p>Maintain remoteness as a defining feature of this land (specific to WFPA).</p>	
<p>Sustain free-flowing waterways and healthy intact watersheds.</p>	
<p>Support existing and identify new livelihood opportunities in commercial forestry, non-timber forest products, commercial fisheries, recreation and tourism, protected areas management, and the mineral sector.</p>	

Table 6.21-12: Concordance with 'Keeping the Land: A Land Use Strategy for the Whitefeather Forest and Adjacent Areas'

Pikangikum First Nations Community Based Land Use Plan (PFN 2006)	Springpole Gold Project Concordance
Identify land use area for economic development opportunities that provide primary benefits for PFN members.	and identifies mitigation where potential effects are identified.
Secure the best-end and highest value use of resources.	
Enhance recreation opportunities	
Establish dedicated protected areas for the conservation of special natural heritage and cultural landscape features.	
Contribute to larger scale objectives such as protected areas systems, adjacent First Nation interests, and needs of Species at Risk.	
Amendments may be required to the Fire Strategy to reflect new land use direction and priorities. Resource management planning will provide greater detail on the role of fire and fire management direction required to ensure long-term ecological processes are sustained while achieving resource management objectives.	<p>Planning and design of the Project considers how natural hazards such as fires could potentially affect the Project to ensure appropriate design measures are followed and identify areas where emergency response protocols may need to be developed for construction and operation phases.</p> <p>FMG is undertaking an adaptive management approach throughout the life of the Project. to monitor for observed effects of the environment, and adapt the Project infrastructure and operation, maintenance and closure activities, as necessary.</p>
Land and Resources	
<p>Water and waterways are a central focus for Pikangikum people's livelihood practices.</p> <p>Waterways are a focal point for transportation routes, traditional camp and other habitation sites, cultural and heritage sites, and sites for customary livelihood pursuits.</p> <p>Waterways also provide habitat and travel routes for many important species that Pikangikum people make use of.</p>	FMG looks forward to receiving information from Pikangikum First Nation for consideration on culturally sensitive sites.
<p>Wetlands play a significant role in keeping waterways clean and healthy.</p> <p>Wetlands include habitat for medicine, domestic use species.</p> <p>Wetlands are important habitat for various species of significance.</p>	<p>The Project is being planned and designed with sound environmental practices in mind.</p> <p>The environmental assessment considers wetlands in Section 6.11 of the final EIS/EA, as a Valued Component and identifies mitigation where potential effects are identified.</p>

Table 6.21-12: Concordance with 'Keeping the Land: A Land Use Strategy for the Whitefeather Forest and Adjacent Areas'

Pikangikum First Nations Community Based Land Use Plan (PFN 2006)	Springpole Gold Project Concordance
<p>Forests are a central aspect of Pikangikum cultural identity. Any new land use that includes commercial forestry would be regarded as an extension of PFN historical and customary use of the forest as a means of exercising customary stewardship.</p>	<p>The Project will be integrated with TLRU in a way that is guided by traditional values and principles</p> <p>We can do better by working together. FMG's goal is to prioritize information and topics most important to the communities.</p>
<p>Fish species valued as food sources include, walleye, northern pike, lake whitefish, and lake trout.</p> <p>Fish species valued for cultural purposes include whitefish and lake sturgeon.</p> <p>Fisheries resources support and further contribute to economic self-sufficiency as a food item, and non-consumptive or eco-cultural tourism.</p>	<p>Species of traditional importance are considered in Section 6.21 of the EIS/EA as well available traditional and commercial use information.</p> <p>FMG has offered to support Pikangikum First Nation in gathering TLRU information and considering the data as it is made available.</p>
<p>Waterfowl play a significant role in traditional seasonal practices, as well as a source of food sustenance.</p>	
<p>Wildlife is highly valued for food, income, and cultural purposes.</p> <p>Wildlife species of significance include moose, woodland caribou, wolverine, black bear, red fox, gray wolf, beaver, American marten, fisher, Canada Lynx, snowshoe hare, weasel, and river otter.</p> <p>Wildlife Species at Risk recognized include Woodland Caribou (forest dwelling population), wolverine, bald eagle, and great grey owl.</p> <p>Trapping of furbearing mammals an important livelihood activity for Pikangikum people, and includes connection with travel routes.</p> <p>Hunting an important livelihood activity for Pikangikum people.</p>	

Table 6.21-12: Concordance with ‘Keeping the Land: A Land Use Strategy for the Whitefeather Forest and Adjacent Areas’

Pikangikum First Nations Community Based Land Use Plan (PFN 2006)	Springpole Gold Project Concordance
Strategic Direction	
<p>Mineral exploration and mining activities will be conducted in a manner with use of Best Practice guidelines established by MNDM and MNR and developed in consultation with Pikangikum will be encouraged (e.g., mineral exploration within the Whitefeather Forest Planning Area [WFPA]); including:</p> <ul style="list-style-type: none"> • Discussions and consultations prior to work programs; • Potential sensitivities associated with fish and fish habitat, wildlife, downstream water quality, marshes, and wetlands; • All natural heritage, recreational, fish and wildlife, tourism, and forestry values in the area of proposed work; • Minimizing surface disturbances near streams and ponds; • Special sites of cultural significance can be identified by PFN and provided to MNDM for withdrawal from mineral sector activities; • Mineral sector activities will respect the WFPA remoteness objective; • Consider options to enhance mineral exploration opportunities in areas where this is a permitted activity; • Area dedication guide the integration of mineral sector with other uses in area dedications (specific to WFPA). • Mineral land use contributes to Pikangikum objectives for economic renewal and employment opportunities; and • Provincially Significant Mineral Potential analysis and Indigenous Knowledge provides guidance to mineral sector opportunities. 	<p>FMG has provided Project information to receive feedback from Pikangikum First nation and has offered open house events to present the project, environmental baseline and alternatives.</p> <p>FMG will continue to share information and looks forward to receiving information from Pikangikum First Nation for consideration on culturally sensitive sites.</p> <p>The Project has been designed to minimize the footprint as much as possible (a key consideration is co-locating the mine rock and tailings).</p> <p>Progressive rehabilitation will be included in the Project where possible.</p> <p>Monitoring will be ongoing throughout the duration of the Project.</p> <p>FMG supports community based traditional land use initiatives with Elders and youth.</p> <p>FMG will support reasonable requests and work schedule flexibility for Indigenous employees for time off to pursue traditional land use activities.</p>

Note:

Although the Project does not fall within the boundaries of the Whitefeather Forest Planning Area (WFPA), the Pikangikum First Nations Land Use Plan (LUP) is recognized as an important document for its guiding principles. The table above outlines how the LUP has, and will continue to be, considered by FMG.



Table 6.21-13: Summary of the Seven Teaching of Anishinaabe Law

	Teaching	Description
1	Manitoo Inaakonigewin (Creator’s Law)	We can transform the landscape, but only in a matter that is consistent with our respect and responsibilities to the land and water. Each of us has a gift, but none of us have all the gifts we need for a good life. We share our gifts freely, because we rely on one another, and in the knowledge that our gift will be respected and reciprocated.
2	Manitoo Ogitigaan (Creator’s Garden)	Creation is a gift, is not something we own. Because it is a gift, we do not have a right to do or not to do something. We must ask permission, give something back, and do so in ceremony.
3	Kakinakitinawemaakaninaanak (All our Relations)	We depend on creation for our well-being. Since the animals, plant, water, etc. are not resources, but relatives, we must ask their permission in order to use their gifts.
4	Mino-bimaadiiziwin (the Good Life)	In all our decision-making we should orient ourself to fulfilling mino-bimaadiiziwin, for ourselves and those yet to be born.
5	Gidaakiiminaan (Mother Earth)	The land is our mother. From her all life springs forth She is not something to be bought, sold or traded. She takes care of all beings and entities, and in return the parties must reciprocate that care for her.
6	Nibi (Water)	Nibi is alive and has a spirit. It cannot be owned or controlled. Nibi is the lifeblood of Mother Earth and connects everything. Women have a sacred connection and responsibility to water.
7	Aki (Land)	Creation is bountiful. We must ensure equitable sharing which provides for the needs of all, including future generations.

Table 6.21-14: Traditionally Harvested Wildlife Species Identified by Indigenous Communities

	Common Name	Scientific Name
Traditional Hunted Resource	Geese	Not specified
	Ducks	Not specified
	Other Waterfowl	Not specified
	Partridge/Chicken	Not specified
	Sharp-Tailed Grouse	<i>Tympanuchus phasianellus</i>
	Spruce Grouse	<i>Falci pennis canadensis</i>
	Ruffed Grouse	<i>Bonasa umbellus</i>
	Woodland caribou	<i>Rangifer tarandus</i>
	Moose	<i>Alces alces</i>
	Deer	<i>Odocoileus virginianus</i>
	Snowshoe hare	<i>Lepus americanus</i>
Traditional Trapped Resource	Wolverine	<i>Gulo gulo</i>
	Muskrat	<i>Ondatra zibethicus</i>
	Black bear	<i>Ursus americana</i>
	Red Fox	<i>Vulpes vulpes</i>
	Gray Wolf	<i>Canis lupus</i>
	Beaver	<i>Castor canadensis</i>
	American Marten	<i>Martes americana</i>
	Fisher	<i>Martes pennanti</i>
	Mink	<i>Neogale vision</i>
	Canada Lynx	<i>Lynx canadensis</i>



Table 6.21-14: Traditionally Harvested Wildlife Species Identified by Indigenous Communities

	Common Name	Scientific Name
Traditional Hunted Resource	Geese	Not specified
	Ducks	Not specified
	Other Waterfowl	Not specified
	Partridge/Chicken	Not specified
	Sharp-Tailed Grouse	<i>Tympanuchus phasianellus</i>
	Spruce Grouse	<i>Falcapennis canadensis</i>
	Ruffed Grouse	<i>Bonasa umbellus</i>
	Woodland caribou	<i>Rangifer tarandus</i>
	Moose	<i>Alces alces</i>
	Deer	<i>Odocoileus virginianus</i>
	Snowshoe hare	<i>Lepus americanus</i>
	Bobcat	<i>Lynx rufus</i>
	Snowshoe Hare	<i>Lepus americanus</i>
	Rabbit	<i>Sp. Leporidae</i>
	Weasel	<i>Sp. Mustelidae</i>
Squirrel	<i>Sp. Sciuridae</i>	
River Otter	<i>Lutra canadensis</i>	

Source: CLFN/SFN (2011), PFN (2006), ArrowBlade (2014), NWES (2020), MNO (2021).

Table 6.21-15: Traditionally Harvested Fish Species Identified by Indigenous Communities

	Common Name	Scientific Name
Traditional Fish Resource	Walleye/Pickerel	<i>Sander vitreum</i>
	Yellow Perch	<i>Perca flavescens</i>
	Crappie	<i>Pomoxis annularis</i>
	Northern Pike	<i>Esox lucius</i>
	Lake trout	<i>Salvelinus namaycush</i>
	Lake whitefish	<i>Coregonus clupeaformis</i>
	Lake Sturgeon	<i>Acipenser fulvescens rafinesque</i>
	Sauger	<i>Sander canadensis</i>
	Baitfish ⁽¹⁾	Not specified

Source: CLFN/SFN (2011), PFN (2006), ArrowBlade(2014), NWES (2020), MNO (2021).

Note:

1 Baitfish include minnows and leeches.



Table 6.21-16: Traditionally Harvested Plant Species Identified by Indigenous Communities

Type	Common Name	Scientific Name
Tree	Cedar	Genus <i>Thuja</i>
	Willow	Genus <i>Salix</i>
	Paper Birch	<i>Betula papyrifera</i>
	Tree barks ⁽¹⁾	Not specified
Shrubs	Berries	Not specified
	Blueberry	Genus <i>Vaccinium</i>
	Saskatoon Berry	<i>Amelanchier alnifolia</i>
	Cranberry	Genus <i>Viburnum</i>
	Raspberry	Genus <i>Rubrus</i>
	Cherry	Genus <i>Prunus</i>
	Nuts	Not specified
	Teas	Not specified
	Labrador Tea	<i>Rhododendron groenlandicum</i>
	Juniper	Genus <i>Juniperus</i>
	Sage	Genus <i>Salvia</i>
	Red Osier Dogwood	<i>Cornus stolonifera</i>
	Prickly Rose	<i>Rosa acicularis</i>
Fungi	Mushrooms	Not specified
	Chaga	<i>Inonotus obliquus</i>
Graminoid	Wild rice	Genus <i>Zizania</i>
	Sweetgrass	Genus <i>Anthoxanthum</i>
Moss	Peat moss	Genus <i>Sphagnum</i>
Fern	Fiddlehead	Not specified
Forb	Plantain	<i>Plantago major</i>

Source: CLFN/SFN (2011), PFN (2006), arrowBlade (2014), NWES (2020), MNO (2021).

Note:

1 The terrestrial resources baseline also recognized Black Ash (*Fraxinus nigra*) as a tree used to supply bark used to make baskets.

Table 6.21-17: Potential Interactions of Project Components on Traditional Land and Resource Use

Project Component / Activity	Traditional Land and Resource Use
Construction Phase	
Site preparation activities including clearing, grubbing and bulk earthworks	Yes
Construction of the mine site access road and airstrip, including the development and operation of aggregate resource areas	Yes
Development of temporary construction camp and staging areas	Yes
Construction of the fish habitat development area	Yes
Construction of the transmission line to the Project site	Yes
Construction of the onsite haul and access roads	Yes
Construction of the dikes in north basin of Springpole Lake	Yes
Construction of buildings and onsite infrastructure	Yes
Construction of the central water storage pond	Yes
Controlled dewatering of the open pit basin	Yes
Construction of the starter embankments for the CDF	Yes
Stripping of lake bed sediment and overburden at the open pit	Yes
Development of the surficial soil stockpile	Yes
Initiation of pit development in rock	Yes
Initiation of stockpiling of ore	Yes
Commissioning of the process plant	Yes
Establishment and operation of water management and treatment facilities	Yes
Employment and expenditures	-
Operations Phase	
Operation of the process plant	Yes
Operation of open pit mine	Yes
Management of overburden, mine rock, tailings and ore in designated facilities	Yes
Operation of water management and treatment facilities	Yes
Accommodations complex operations	Yes
Operation and maintenance of mine site infrastructure	Yes
Progressive reclamation activities	Yes
Employment and expenditures	-
Decommissioning and Closure Phase	
Removal of assets that can be salvaged	-
Demolition and recycling and/or disposal of remaining materials	-
Removal and disposal of demolition-related wastes in approved facilities	-
Reclamation of impacted areas, such as by re-grading, placement of cover, and revegetation	Yes
Filling of the open pit with water	Yes
Monitoring and maintenance	-
Employment and Expenditures	-

Note:

(-) The interaction is not expected, and no further assessment is warranted.



Table 6.21-18: Proposed Mitigation Measures for Potential TRLU Effects

Pathways to Potential Effects / Criteria	Phase			Proposed Mitigation Measure
	Con.	Op.	Cl.	
Change in availability, access to and experience related to traditional terrestrial wildlife harvesting (hunting and trapping)	•	–	–	Development of a compact mine site to limit the extent of disturbance including a mine footprint of 867 ha including minimizing the open pit mining area to 6% of Springpole Lake
	•	•	•	Maintain Project designs such that no new public access points are developed on Springpole Lake
	•	•	•	Maintain treed buffers between Project infrastructure and waterbodies to reduce visual disturbance
	•	•	–	Building dimensions, layout and orientation will be designed to shield noise sources, where possible
	•	•	•	Implement the mitigation measures for: Air quality including for dust (Section 6.2.4); Noise and vibration (Section 6.3.4); Vegetation communities and wetlands (Section 6.11.4); and, Wildlife and wildlife habitat (Section 6.12.4).
	•	•	•	Engage Indigenous environmental monitors from local communities in the implementation of mitigation and monitoring measures.
	•	•	•	Prior to construction, establish Environmental Committee(s) to: <ul style="list-style-type: none"> Facilitate communications and meaningful engagement during construction, operation and closure of the Project; Facilitate the use of Traditional knowledge in Project-related activities during construction, operation and closure of the Project; and, Share and evaluate environmental information, review Project approvals and environmental management and monitoring plans, participate in adaptive management and identify mitigation measures, address emerging issues and areas of interest identified by communities.
	•	–	–	Local Indigenous communities and identified points of reception will be advised ahead of transmission line construction work periods and as the construction work proceeds.
	•	–	–	Work with local Indigenous communities to coordinate construction activities related to the transmission line to minimize overlap with the timing of traditional land use activities (e.g., fall moose hunt) and other sensitive periods.
•	•	•	Support the development and delivery of Indigenous led ceremonies on site to pay respect to the land air, and water prior to construction and at other key Project milestones	

Table 6.21-18: Proposed Mitigation Measures for Potential TRLU Effects

Pathways to Potential Effects / Criteria	Phase			Proposed Mitigation Measure
	Con.	Op.	Cl.	
	•	•	•	Facilitate the development and implementation of community-based monitoring programs to supplement (not duplicate) regulatory monitoring requirements
	•	•	•	Support community land-based cultural activities.
	•	•	•	Support reasonable requests and work schedule flexibility for Indigenous employees for time off to pursue traditional land use activities.
	•	•	•	Prior to construction, develop an access management strategy with local Indigenous communities to manage access along the mine access road with the purpose of supporting TLRU access and minimizing new public access
	–	•	•	Maintain regular communication with trapline holders SL197 and SL 200 regarding activities and opportunities to facilitate their land use activities
	•	•	•	Prior to construction, establish the alternate navigation route identified to maintain access between Springpole Lake and Birch Lake, and maintain the alternate route until post closure when the existing portage has been re-established
	•	•	•	Hunting and fishing at the Project will be prohibited by employees and contractors while at site, during all phases
	•	•	–	Undertake revegetation in the mine site area, where practical, and include input from Indigenous communities and TLRU planning documents.
	–	–	•	Continue to participate in the Environmental Committee(s) at a rate commensurate with activity in the PDA.
	•	•	•	Support reasonable community-based engagement and cultural activities.
	•	•		Work with MNR and trapline licence holders to determine alternative options for trapline losses during construction and operation phases;
		•	•	Achieve overall benefit requirements for Caribou (Section 6.13)
Change in availability, access to and experience related to traditional aquatic wildlife harvesting (fishing)	•	–	–	Development of a compact mine site to limit the extent of disturbance including a mine footprint of 867 ha including minimizing the open pit mining area to 6% of Springpole Lake
	•	•	–	Maintain Project designs such that no new public access points are developed on Springpole Lake
	•	•	–	Maintain treed buffers between Project infrastructure and waterbodies to reduce visual disturbance



Table 6.21-18: Proposed Mitigation Measures for Potential TRLU Effects

Pathways to Potential Effects / Criteria	Phase			Proposed Mitigation Measure
	Con.	Op.	Cl.	
	•	•	•	Implement the mitigation measures for: Noise and vibration (Section 6.3.4); Surface water (Section 6.6.4, Section 6.7.4 and Section 6.8.4); and, Fish and fish habitat (Section 6.10.4).
	•	•	•	Engage Indigenous environmental monitors from local communities in the implementation of mitigation and monitoring measures.
	•	•	•	Prior to construction, establish Environment Committee(s) and offer opportunities to participate to members of proximate Indigenous communities during the construction, operation and closure of the Project. The EAC aims to: <ul style="list-style-type: none"> Facilitate communications and meaningful engagement during construction, operation and closure of the Project; Facilitate the use of Traditional knowledge in Project-related activities during construction, operation and closure of the Project; and, Share and evaluate environmental information, review Project approvals and environmental management and monitoring plans, participate in adaptive management and identify mitigation measures, address emerging issues and areas of interest identified by communities.
	•	•	•	Support community land-based traditional cultural activities.
	•	•	•	Support reasonable requests and work schedule flexibility for Indigenous employees for time off to pursue traditional land use activities.
	•	–	–	Where there is interest, provide opportunities to local Indigenous communities and traditional land users to harvest plants and aquatic resources within the PDA prior to construction.
	•	•	•	Support the development and delivery of Indigenous led ceremonies on site to pay respect to the land air, and water prior to construction and at other key Project milestones
	•	•	•	Facilitate the development and implementation of community-based monitoring programs to supplement (not duplicate) regulatory monitoring requirements
	•	•	•	Prior to construction, develop an access management strategy with local Indigenous communities to manage access along the mine access road, during construction, operation and closure phases of the Project, with the purpose of supporting TLRU access and minimizing new public access.
	•	•	•	Prohibit fishing and hunting within the controlled access portion of the PDA by Project personnel while working or residing on site



Table 6.21-18: Proposed Mitigation Measures for Potential TRLU Effects

Pathways to Potential Effects / Criteria	Phase			Proposed Mitigation Measure
	Con.	Op.	Cl.	
	–	–	•	Continue to participate in the EACs at a rate commensurate with activity in the PDA.
	–	•	–	Prior to closure, develop and implement a Lake Sturgeon reintroduction and restoration program harmonizing with the interest of local Indigenous communities and MNRF.
	•	•	•	Achieve fish habitat offsetting objectives (Appendix F)
Change in availability, access to and experience related to traditional plant (food and medicinal) harvesting	•	–	–	Development of a compact mine site to limit the extent of disturbance including a mine footprint of 867 ha including minimizing the open pit mining area to 6% of Springpole Lake
	•	•	•	Implement the mitigation measures for: Air quality including for dust (Section 6.2); Noise and vibration (Section 6.3); Surface water (Section 6.6); and, Vegetation communities and wetlands (Section 6.11).
	•	•	•	Engage Indigenous environmental monitors from local communities in the implementation of mitigation and monitoring measures.
	•	•	•	Prior to construction, establish Environmental Committee(s) (EAC) and offer opportunities to participate to members of proximate Indigenous communities during the construction, operation and closure of the Project. The EAC aims to: <ul style="list-style-type: none"> Facilitate communications and meaningful engagement during construction, operation and closure of the Project; Facilitate the use of Traditional knowledge in Project-related activities during construction, operation and closure of the Project; and, Share and evaluate environmental information, review Project approvals and environmental management and monitoring plans, participate in adaptive management and identify mitigation measures, address emerging issues and areas of interest identified by communities.
	•	–	–	Work with local Indigenous communities to coordinate construction activities related to the transmission line to minimize overlap with the timing of traditional land use activities (e.g., fall moose hunt) and other sensitive periods.
	•	•	•	Support community land-based traditional cultural activities.
	•	•	•	Support reasonable requests and work schedule flexibility for Indigenous employees for time off to pursue traditional land use activities.
	•	–	–	Where there is interest, provide opportunities to local Indigenous communities and traditional land users to the harvest plants and aquatic resources within the PDA prior to construction.



Table 6.21-18: Proposed Mitigation Measures for Potential TRLU Effects

Pathways to Potential Effects / Criteria	Phase			Proposed Mitigation Measure
	Con.	Op.	Cl.	
	•	•	•	Prior to construction, develop an access management strategy with local Indigenous communities to manage access along the mine access road, during construction, operation and closure phases of the Project, with the purpose of supporting TLRU access and minimizing new public access.
	•	•	•	Support the development and delivery of Indigenous led ceremonies on site to pay respect to the land air, and water prior to construction and at other key Project milestones
	•	•	•	Facilitate the development and implementation of community-based monitoring programs to supplement (not duplicate) regulatory monitoring requirements
	•	•	–	Undertake revegetation in the mine site area, where practical, and include input from Indigenous communities and TLRU planning documents.
	–	–	•	Continue to participate in the Environmental Committee(s) at a rate commensurate with activity in the PDA.
Change in availability, access to and experience related to traditional habitation, cultural, spiritual sites/areas	•	–	–	Development of a compact mine site to limit the extent of disturbance including a mine footprint of 867 ha including minimizing the open pit mining area to 6% of Springpole Lake.
	•	•	–	Maintain Project designs such that no new public access points are developed on Springpole Lake
	•	•	–	Maintain treed buffers between Project infrastructure and waterbodies to reduce visual disturbance
	•	•	–	Building dimensions, layout and orientation will be designed to shield noise sources, where possible
	•	•	•	Implement the mitigation measures for: Noise and vibration (Section 6.3); Archaeology (Section 6.23); and, Cultural heritage (Section 6.24).
	•	•	•	Engage Indigenous environmental monitors from local communities in the implementation of mitigation and monitoring measures.
	•	•	•	Prior to construction, establish Environment Committee(s) and offer opportunities to participate to members of proximate Indigenous communities during the construction, operation and closure of the Project. The EAC aims to: <ul style="list-style-type: none"> Facilitate communications and meaningful engagement during construction, operation and closure of the Project;



Table 6.21-18: Proposed Mitigation Measures for Potential TRLU Effects

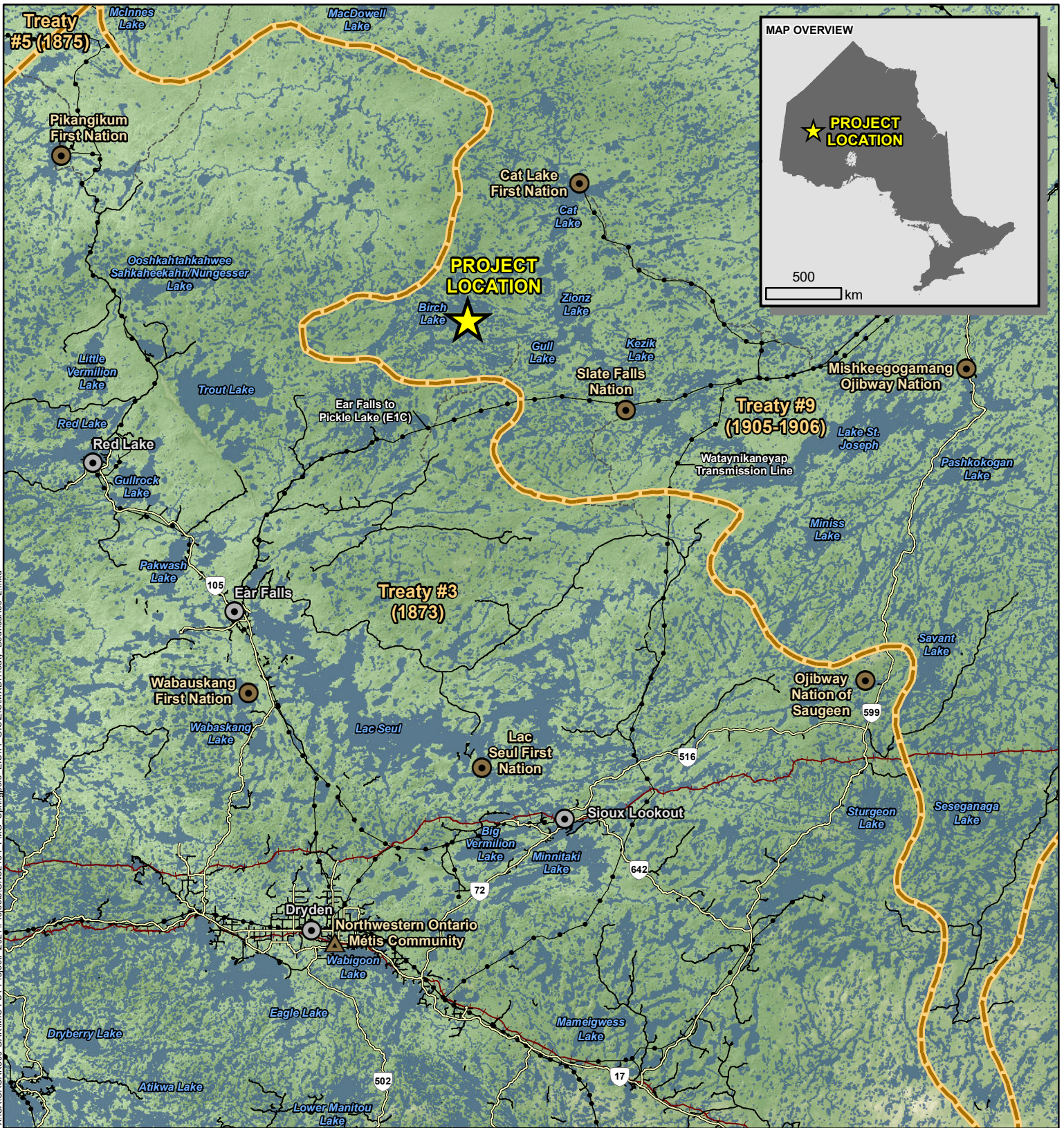
Pathways to Potential Effects / Criteria	Phase			Proposed Mitigation Measure
	Con.	Op.	Cl.	
				<ul style="list-style-type: none"> Facilitate the use of Traditional knowledge in Project-related activities during construction, operation and closure of the Project; and, Share and evaluate environmental information, review Project approvals and environmental management and monitoring plans, participate in adaptive management and identify mitigation measures, address emerging issues and areas of interest identified by communities.
	•	•	•	Support the development and delivery of Indigenous led ceremonies on site to pay respect to the land air, and water prior to construction and at other key Project milestones
	•	•	•	Support community land-based traditional cultural activities.
	•	–	–	Local Indigenous communities and identified points of reception will be advised ahead of transmission line construction work periods and as the construction work proceeds.
	•	–	–	Work with local Indigenous communities to coordinate construction activities related to the transmission line to minimize overlap with the timing of traditional land use activities (e.g., fall moose hunt) and other sensitive periods
	•	•	•	Support reasonable requests and work schedule flexibility for Indigenous employees for time off to pursue traditional land use activities.
	•	•	•	Prior to construction, develop an access management strategy with local Indigenous communities to manage access along the mine access road, during construction, operation and closure phases of the Project, with the purpose of supporting TLRU access and minimizing new public access.
	•	•	•	Prior to construction, establish the alternate navigation route identified to maintain access between Springpole Lake and Birch Lake, and maintain the alternate route until post closure when the existing portage has been re-established
	–	–	•	Continue to participate in the Environmental Committee(s) at a rate commensurate with activity in the PDA.

Notes:

Con: Construction Op: Operation Cl: Closure

• Mitigation is applicable

– Mitigation is not applicable



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LEGEND

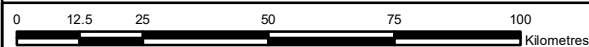
- Project Location
- Town
- First Nation Reserve
- MNO Northwest Métis Council
- Treaty Boundary
- Highway
- Secondary Road
- Resource / Winter Road
- Railway
- Transmission Line

NOTES:

- Topographic information extracted from LIO, MNRF.
 - Treaty boundaries downloaded from Government of Canada Open Government website "Historic treaties", <https://open.canada.ca/data/en/dataset/f281b150-0645-48e4-9c30-01f55f93f78e>

SPRINGPOLE GOLD PROJECT

Treaty Boundaries



Datum: NAD83
 Projection: UTM Zone 15N



PROJECT N°: ONS2104

FIGURE: 6.21-1

SCALE: 1:1,500,000

DATE: August 2024



**FIRST MINING
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Figure 6.21-3: Cat Lake First Nation Traditional Land Uses
Confidential Figure



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Figure 6.21-4: Lac Seul First Nation Traditional Land Uses
Confidential Figure



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Figure 6.21-5: Miskkeegogamang Ojibway Nation Traditional Land Uses
Confidential Figure



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Figure 6.21-6: Northwest Ontario Métis Community Traditional Land Uses (Hunting)

Confidential Figure

Figure 6.21-7: Northwest Ontario Métis Community Traditional Land Uses (Fishing)

Confidential Figure



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GOLD**



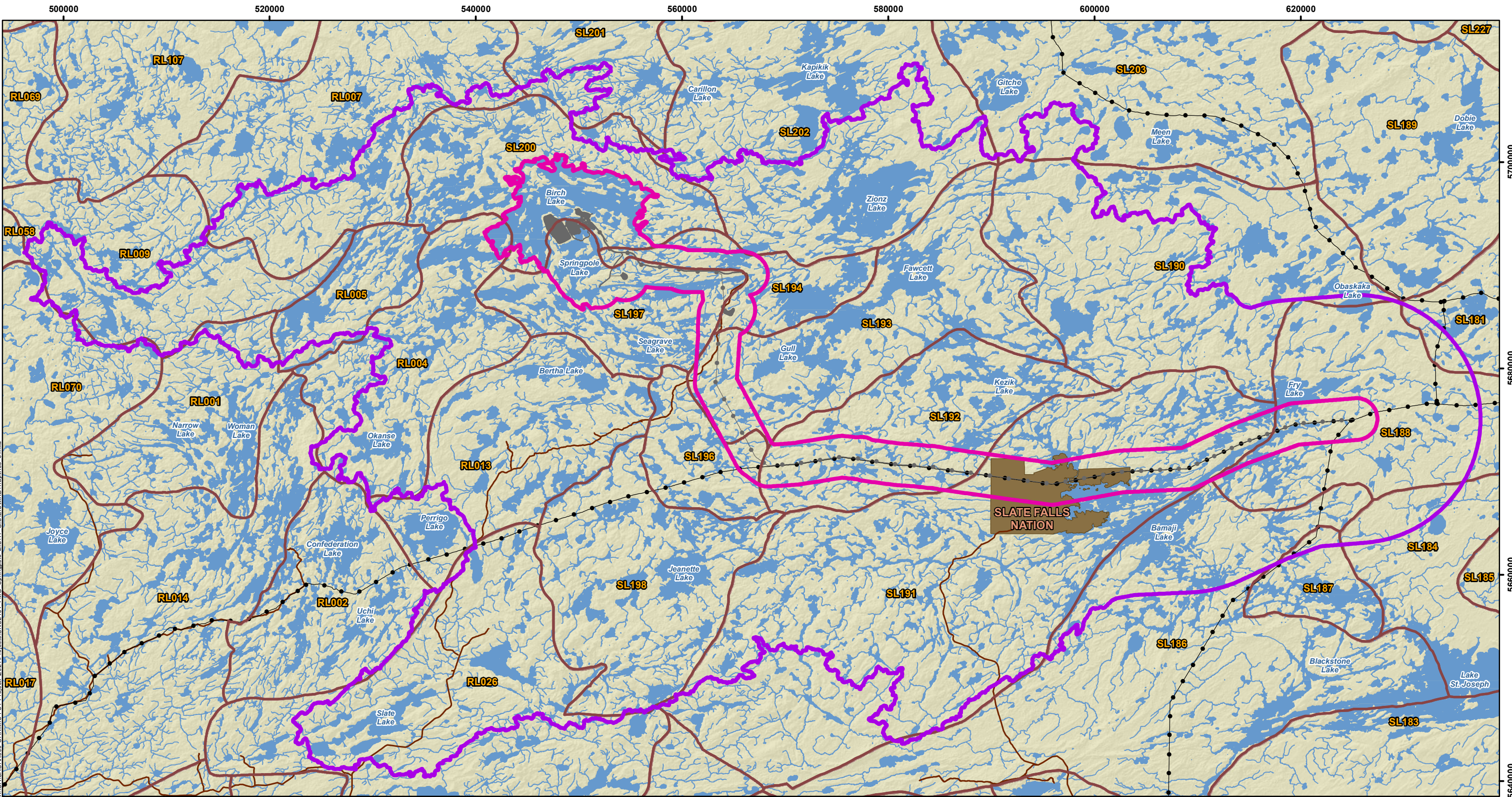
Figure 6.21-8: Slate Falls Nation Traditional Land Uses
Confidential Figure



**FIRST MINING
GOLD**



Figure 6.21-9: Wabauskang First Nation Traditional Land Uses
Confidential Figure



LEGEND

- Proposed Mine Feature
- Local Study Area for Commercial Land and Resource Use
- Regional Study Area for Commercial Land and Resource Use
- Trapline Area (Labelled with ID)
- First Nation Reserve
- Existing Road
- Existing Transmission Line
- Watercourse
- Waterbody

NOTES:

- Topographic information extracted from LIO, MNRF.
- Proposed site plan provided by Ausenco, drawing number 104496-GX-03000-31344-003, Rev 1, 26 June 2023 and modified by WSP July 2023.
- 230 kV transmission line provided by First Mining Gold, April 2024.

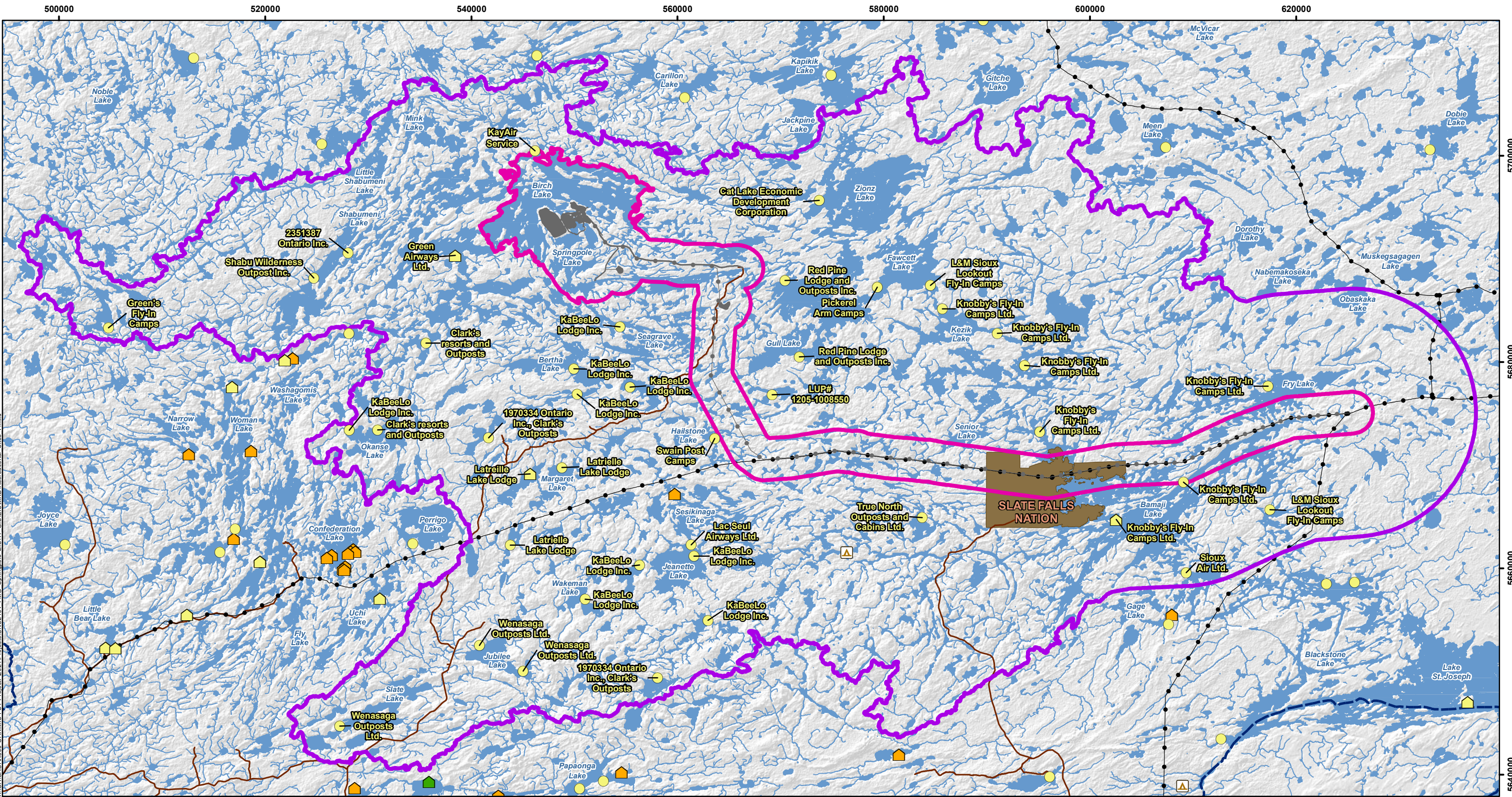
Datum: NAD83
Projection: UTM Zone 15N

SPRINGPOLE GOLD PROJECT

Trapline Areas

PROJECT N°: ONS2104	FIGURE: 6.21-10
SCALE: 1:350,000	DATE: October 2024

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LEGEND

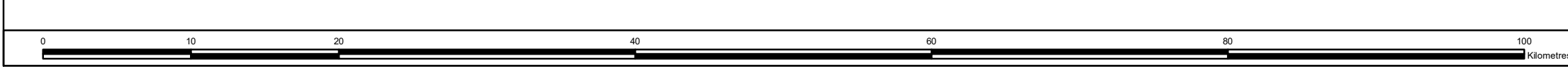
- Proposed Mine Feature
- Local Study Area for Commercial Land and Resource Use
- Regional Study Area for Commercial Land and Resource Use
- First Nation Reserve
- Existing Road
- Existing Transmission Line
- Watercourse
- Waterbody
- Cottage Site (Not Remote)
- Cottage Site (Remote)
- Main Base Lodge
- Outpost Camp
- Designated Camping Site
- Canoe Route

NOTES:
 - Topographic information extracted from LIO, MNRF.
 - Proposed site plan provided by Ausenco, drawing number 104496-GX-03000-31344-003, Rev 1. 26 June 2023 and modified by WSP July 2023.
 - 230 kV transmission line provided by First Mining Gold, April 2024.



SPRINGPOLE GOLD PROJECT

Cabins, Lodges and Outfitters



Datum: NAD83
 Projection: UTM Zone 15N

PROJECT N°: ONS2104
 SCALE: 1:350,000

FIGURE: 6.21-11
 DATE: October 2024

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