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SECTION 6

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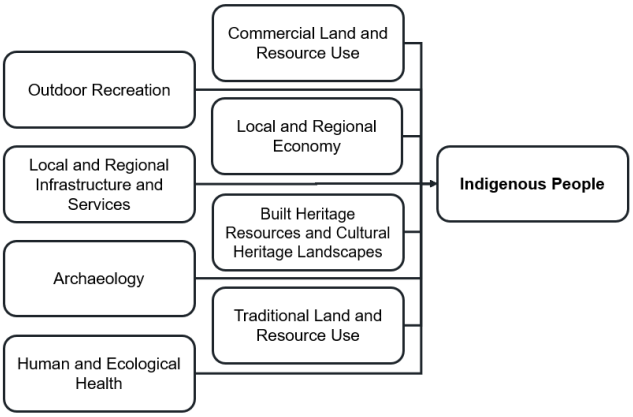
6.26 Effects on Indigenous Peoples

This section assesses the effects of the changes to the environment on Indigenous peoples, as required by Section 5(1)(c) of CEAA 2012. This section integrates the assessment of effects of the changes to the environment included in other sections of the EIS/EA into a single section.

In the absence of mitigation, the assessment of the potential effect of changes to the environment on Indigenous peoples is directly linked to other valued components (VCs) and is informed by the following sections:



- **Commercial Land and Resource Use (Section 6.17):** the assessment of potential effects commercial land and resource use includes the potential change in forestry, trapping, bait harvesting and outfitting during the construction, operation and closure of the Project which may affect Indigenous people.
- **Outdoor Recreation (Section 6.18):** the assessment of potential effects on outdoor recreation includes the potential change in recreational hunting, recreational fishing, use of recreational areas and navigation during the construction, operation and closure of the Project which may affect Indigenous people.
- **Local and Regional Economy (Section 6.19):** the assessment of potential effects on the economy includes the potential change in employment, labour income, business opportunities and demand for training during the construction, operation and closure of the Project which may affect Indigenous people.
- **Local and Regional Infrastructure and Services (Section 6.20):** the assessment of potential effects in infrastructure and services includes the potential change in the demand for educational services, housing, emergency services, community services, infrastructure and community resources during the construction, operation and closure of the Project which may affect Indigenous people.
- **Traditional Land and Resource Use (Section 6.21):** the assessment of potential effects Traditional land and resource use (TLRU) includes the potential change to the availability, access and experience related to traditional harvesting (wildlife, fishing and plants), and traditional areas (habitation, cultural, and spiritual sites) during the construction, operation and closure of the Project which may affect Indigenous people.
- **Archaeology (Section 6.22):** the assessment of potential effects archaeology includes the potential change to archaeological resources during the construction, operation and closure of the Project which may affect Indigenous people.
- **Built Heritage Resources and Cultural Heritage Landscapes (Section 6.23):** the assessment of potential effects on heritage resources includes the potential change to the presence or alteration of built heritage resources and cultural heritage landscapes during the construction, operation and closure of the Project which may affect Indigenous people.

- **Human and Ecological Health (Section 6.24):** the assessment of potential effects on human and ecological health includes the potential change to human health and ecological health (country foods) during the construction, operation and closure of the Project which may affect Indigenous people.

The assessment of the potential effects due to the changes to the environment on Indigenous peoples from the Project are compared to relevant provincial and federal criteria (Section 6.26.1) and existing conditions (Section 6.26.2). The assessment is informed by:

- Socio-economic technical support documentation, including the Baseline Socio-economic Report (Appendix Q-1);
- Non-confidential Traditional Knowledge (TK) and TLRU and socio-economic baseline reports for Cat Lake First Nation (CLFN), Lac Seul First Nation (LSFN), and Slate Falls Nation (SFN);
- Non-confidential TK/TLRU information for the Northwest Ontario Métis Community (NWOMC), Mishkeegogamang Ojibway Nation (MON), and Wabauskang First Nation (WFN);
- Census information for Ojibway Nation of Saugeen (ONS); and,
- Relevant information related to land use planning for Pikangikum First Nation (PFN).

6.26.1 Assessment Approach

The approach to the assessment of potential effects due to changes to the environment on Indigenous peoples from the Project 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 together 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 6.26.2), the identification and description of applicable pathways of potential effects on the VC (Section 6.26.3) and a description of applicable mitigation measures for the VC (Section 6.26.4). An outline of the analytical methodology conducted for the assessment and the key assumptions and/or conservative approach is found in Section 6.26.5. With the application of mitigation measures to the potential effects on the VC, the residual effects are then characterized in Section 6.26.6 and the significance of the residual effects is determined in Section 6.26.7.

6.26.1.1 Regulatory and Policy Setting

The effects assessment for Indigenous peoples has been prepared in accordance with the requirements of the federal Environmental Impact Statement (EIS) Guidelines (Appendix B-1). Concordance tables, indicating where EIS Guidelines requirements have been addressed, are provided in Appendix B-2. Government policies, objectives, standards or guidelines most relevant to the VC are summarized below.

Canadian Environmental Assessment Act, 2012

Section 5(1)(c) of *Canadian Environmental Assessment Act*, 2012 (CEAA 2012) states that the environmental effects that are to be considered with respect to Aboriginal peoples include "…an effect occurring in Canada of any change that may be caused to the environment on:

i. health and socio-economic conditions,

ii. physical and cultural heritage,

iii. the current use of lands and resources for traditional purposes, or

iv. any structure, site or thing that is of historical, archaeological, paleontological or architectural significance."

EIS Guidelines

In addition to the requirements set out in *CEAA 2012*, the Impact Assesement Agency of Canada (IAAC) released the EIS Guidelines (IAAC 2018) on June 19, 2018, which specified the nature, scope and extent of the information required in the EIS. On March 11, 2022, IAAC provided an addendum update to the EIS Guidelines for the Project (IAAC 2022) which included changes to the federal list of Indigenous communities with which First Mining Gold (FMG) was expected to engage for the environmental assessment (EA). Those Indigenous communities were:

- CLFN;
- LSFN;
- MON:
- SFN;
- WFN; and,
- Métis Nation of Ontario Region 1 Consultation Committee 8, now known as NWOMC

In addition, FMG has engaged with ONS and PFN as required by the provincial environmental assessment process.

Section 7.3.4 of the EIS Guidelines requires an assessment of effects of the changes to the environment on Indigenous peoples. That section of the Guidelines reflects the requirements of Section 5(1)c of CEAA 2012 to assess the effects to Indigenous health and socio-economic conditions, physical and cultural heritage including any structure, site or thing of historical, archaeological or paleontological importance, and the current use of lands and resources for traditional purposes.

6.26.1.2 Influence of Consultation with Indigenous communities

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.

As part of the consultation activities, FMG circulated a draft EIS/EA to the Indigenous communities, including a draft discussion on the effects on Indigenous peoples, and supported their review of the materials. Where feedback has been received, it has been addressed through direct responses (in writing and follow up meetings) and incorporated in the final EIS/EA, as appropriate. The key comments related to the assessment of the potential effect of changes to the environment on Indigenous peoples are provided below:

Indigenous health conditions

Potential changes in air quality

SFN identified that dust with unknown chemical composition being blown onto Birch Lake and Springpole Lake could affect water quality, fish, and the consumption of water and fish by Indigenous peoples. MON commented that the effect of dust in snow and water and the impact of air quality on the snowpack for drinking and runoff. NWOMC identified that air quality has an intrinsic importance to the health and well-being of humans, wildlife and vegetation and that changes in air quality due to dust or dust suppressants may impact the perceptions of Métis harvesters resulting in avoidance of the Project area. NWOMC also said impacts on air quality could result in ecosystem impacts.

The Air Quality Assessment Report (Appendix G-2) and Section 6.2 of the final EIS/EA have been updated and include an assessment of the construction phase activities, including the development of site infrastructure such as the aggregate areas, the construction of the transmission line, and the construction and operation of the mine access road. The predicted changes to dust have been carried forward into the assessment of potential water quality effects and quantitatively assessed. The results are included in both the Surface Water Quality Model (Appendix N-2, Section 4) as well as the Human and Ecological Health Risk Assessment (Appendix R). Results of these models informed the assessment of potential effects from fugitive dust on surface water systems and included in Sections 6.6 through Section 6.9. The effects from atmospheric dust deposition on water quality is not predicted to be distinguishable from base case predictions (Appendix N-2). However, the potential effect of dust will be mitigated with a dust management plan, and erosion and sediment control plan that will be developed during the permitting phase. The Project has developed mitigation measures for air quality (Section 6.2.4) and has committed to a follow-up program (Section 12.2) that will be initiated during construction and will include particulate monitoring to allow a feedback loop between conditions and maintenance activities; this will confirm the efficacy of controls at the property line.

Potential changes in current and future availability of country foods

CLFN and LSFN requested further information about mercury and recommended mercury levels for baseline and operating conditions be established. Baseline water quality monitoring from the Project water bodies indicate mercury levels are generally below analytical detection limits and are less than the Canadian Water Quality Guidelines for the Protection of Aquatic Life for mercury. Further, mercury is not proposed to be used in the process for gold mining at the Project, and the Project will not be a source of mercury.

CLFN asked whether the mine effluent discharged into Springpole Lake would raise the level of contaminants in fish. LSFN have experienced a declining availability of previously harvested species and have diminished confidence in the edibility of some catches. During construction, operations and active closure, water collection ditches will be constructed to collect and control all contact water from the stockpiles, CDF, and plant site areas. Collected water that is not recycled in ore processing will be treated at the effluent treatment plant and the treated effluent be discharged to the southeast arm of Springpole Lake in accordance with final permitting requirements. The minor changes in surface water quality have been included in the Human and Ecological Health Risk Assessment (Appendix R), and the Project will not result in a change to ecological health.

CLFN and LSFN identified that the Local Study Area (LSA) includes harvesting sites for moose, fish, and food plants, as well as trapping sites. They also use areas adjacent to the Project footprint for subsistence moose harvesting. CLFN, LSFN, and NWOMC observed that impacts to animal populations, including dispersal from the Project area due to auditory stressors from initial Project activities could affect wildlife harvesting. CLFN

and LSFN expressed that fish distribution, populations, health and habitat and critical fishing areas could be impacted, impeding their members' ability to harvest fish for subsistence. CLFN and LSFN identified that the loss of plants and plant habitats would deter harvesters from using their preferred areas. The change in wildlife distribution and the experience of harvesters due to sensory disturbances will be minimized with the implementation of mitigation measures as described in Section 6.3 (Noise and Vibration), Section 6.10 (Fish and Fish Habitat), Section 6.11 (Vegetation Communities and Wetlands), and Section 6.12 (Wildlife and Wildlife Habitat). The key measures include: the development of a compact mine site will reduce the loss of habitat, and the development and implementation of an access management strategy to allow continuation of TLRU practices by Indigenous peoples along the mine access road. Fishing will be able to continue at both Birch Lake and Springpole Lake throughout all phases of the Project. Fish habitat features will be incorporated in to the design of the dikes supporting fishing opportunities, and the Closure Plan will enhance fish habitat in the reclaimed open pit basin increasing Springpole Lake by 3.5% in surface area.

NWOMC noted that herbicide spraying in the transmission line corridor could potentially contaminate wildlife, reduce the abundance of harvested plants, and contaminate fish which could impact the ability of NWOMC to harvest. Mechanical vegetation removal practices will be used, when possible, as described in Section 6.11 (Vegetation Communities and Wetlands).

NWOMC noted that the mine employees and the increased access by the new road and transmission line may create competition for Métis harvesters and an increased scarcity of resources. The key measures include prohibiting Project employees from hunting and fishing while on the Project site, and the development and implementation of an access management strategy to allow continuation of traditional land use practices by Indigenous peoples along the mine access road. The access management strategy aims to address Indigenous concerns regarding public access to TLRU areas. The strategy will describe appropriate signage to advise the public of the road's intended use, safety communication protocol for traditional land users, and the establishment of a gatehouse/checkpoint towards the end of the Wenasaga Road to ensure unauthorized use does not occur. Further, 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.

Potential changes in water quality (drinking, recreational and cultural uses)

CLFN, LSFN and SFN requested further information on the potential and perceived risk of contamination of surface water and ground water that is consumed by humans, and the potential effects to the health of plants and animals due to water contamination. They also requested information on the change in groundwater flow or levels. SFN identified potential concern for contamination to Birch Lake from runoff. NWOMC observed that contamination of water that could be beyond the Project area and have impacts on the health of the entire ecosystem, including human health, for multiple generations. The development of the Project will be within a compact mine site to limit the areal extent of disturbance, and to limit the overall areas of site contact water that requires management. A 120 metre (m) setback will be maintained around the mine site, where practical. The co-disposal facility (CDF) has been located on the most favourable geologic conditions at the Project site to support long term stability and effective seepage management. Further, a geosynthetic clay liner will be installed on the upstream side of the perimeter dam of the CDF south cell (specifically the south, west, and east sides) to mitigate seepage potential. During construction, an erosion and sediment control plan will be implemented to manage runoff water around disturbed areas. During all phases, an integrated water management system will be designed to collect and control contact water from the mine site area. Water collection ditches will be constructed and operated around the perimeter of infrastructure to collect overland flow and seepage and direct it to the integrated water

management system. Collected contact water that is not recycled in ore processing will be treated at the effluent treatment plant and the treated effluent will be discharged to the southeast arm of Springpole Lake in accordance with permitting requirements. Non-contact water will be diverted away from Project components using ditches, diversion berms and other suitable measures. The changes in surface water quality have been predicted in the Surface Water Quality Modelling Report (Appendix N-2), with the Project meeting stringent Canadian Water Quality guidelines during all phases as discussed in Section 6.6 to Section 6.9. Further, the changes in surface water quality have been incorporated into the Human and Ecological Health Risk Assessment (Appendix R), which determined that the Project will not result in a change to human and ecological health.

Indigenous socio-economic conditions

The use of navigable waters (including any water used for Indigenous transport)

CLFN, LSFN and SFN commented that changes in water levels impacts travel routes and the accessibility of areas and can expose hazards that interfere with safe passage and interrupt navigation. SFN stated that ensuring that trails and access routes are protected is important for maintaining culture. NWOMC observed that Project activities will remove a portage route which provides a travel route for its members. An assessment of the potential effects on water quantity due to the Project is provided in Sections 6.6, 6.7, 6.8 and 6.9. The assessment determined that the expedited filling of the open pit basin at closure can be achieved while maintaining water levels with Springpole Lake well within the observed range of natural baseline conditions and is not anticipated to have an effect on navigation. Monitoring will be undertaken and pumping will be adjusted as needed in real time to ensure there is no effect. An alternate navigation route between Birch Lake and Springpole Lake will be established and maintained by FMG through all Project phases. The existing portage route located at the existing exploration camp will be relocated prior to construction of the Project to a historical portage route on the west side of the north basin of Springpole Lake that will be reestablished and maintained by FMG. The original portage route will be reestablished at post closure.

Forestry and logging operations

CLFN noted that poplar wood, used to smoke moose meat, is becoming harder to find with habitat loss and disturbance. Cat Lake – Slate Falls Community Based Land Use Plan (2011) proposes the establishment of a sustainable forestry license. Further, CLFN is planning to advance a northern bioeconomy using forest biomass. The removal of timber will be limited through the development of a compact mine site, the co-location of the transmission line, airstrip, and mine access road, and through the optimization of the transmission line route during detailed engineering. FMG will work with local forestry companies to salvage merchantable timber and will work with communities to explore opportunities to set aside harvested poplar for potential use by local communities.

Hunting and gathering activities and commercial fishing and trapping activities

CLFN described the decline in commercial fishing. CLFN noted that the Project may impact fishing areas and access to fishing areas, impact to animal populations due to sensory stressors, change access to preferred hunting and trapping areas, and impact the long-term health of the environment upon which animals depend. LSFN identified that the Project may impact the ability to hunt and trap on its traditional territory, the impact on the abundance of animals in the area, and the quality of hunted and trapped game. MON identified there may be Project impacts on the abundance of harvested plants and NWOMC expressed concerns that impacts to fish, animals, and birds may impact harvesting. NWOMC also cited the potential for increased competition for harvested resources with mine employees and due to increased access via the

new road and transmission line corridor. With the exception of the mine site footprint, all other areas will remain available for TLRU activities. The change in wildlife distribution and the experience of harvesters due to sensory disturbances will be minimized with the implementation of mitigation measures as described in Section 6.3 (Noise and Vibration), Section 6.11 (Vegetation Communities and Wetlands), and Section 6.12 (Wildlife and Wildlife Habitat). The key measures include: the development of a compact mine site to reduce the loss of habitat, and the development and implementation of an access management strategy to allow continuation of TLRU practices by Indigenous peoples along the mine access road. The access management strategy aims to address Indigenous concerns regarding public access to TLRU areas. The strategy will describe appropriate signage to advise the public of the road's intended use, safety communication protocol for traditional land users, and the establishment of a gatehouse/checkpoint towards the end of the Wenasaga Road to ensure unauthorized use does not occur. Further, 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. The change in fish habitat supporting fisheries will be mitigated with measures outlined in the revised Fish Habitat Offset and Compensation Plan (Appendix F) and described in Section 6.10 (Fish and Fish Habitat) which includes fish habitat enhancements to the lake-facing embankments of the dikes, enhancements and reclamation of the open pit basin, the creation of new fish habitat adjacent to the open pit basin, and the proposed reclamation of fish habitat at the abandoned South Bay mine. In addition, fishing and hunting will be prohibited within the controlled access portion of the Project Development Area (PDA) by Project personnel while working or residing on site, during all phases of the Project.

Commercial outfitters

CLFN noted that commercial outfitters had been purchased by FMG, which may affect CLFN's ability to access preferred harvesting areas. Several commercial outfitting operations surrounding the Project have been purchased by FMG, and operations at these locations will be or have been discontinued. As a result, there will be reduced pressure on the resources harvested by the outfitters, which provides opportunities for local Indigenous communities to harvest these resources or explore potential business opportunities associated with the reduced pressure. There will be no change in access to preferred harvesting 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 infrastructure and heavy equipment and has certain activity restrictions in place for safety, which will be similar for the Project.

Recreational use

CLFN pointed out that within the Project footprint there are boat mooring sites, river trails to camping and hunting areas, and seasonal snowmobile trails. LSFN identified a potential cabin within the Project footprint that is used for fishing however a cabin has not been found in the proposed footprint. With the exception of the mine site footprint, all other areas will remain available for TLRU activities. As described above, there will be an access management strategy developed and implemented to allow for continued TLRU activities in the area of the mine access road. Further, no new access will be created on Springpole Lake.

Food security

CLFN and LSFN identified that the Project may impact harvested plants, fish, birds and animals due to displacement by the Project or by contamination which could affect harvesting and food security. LSFN noted that areas generally north of Lac Seul have a reliable environment where the quality and quantity of resources are not affected by anthropogenic stressors and impacts to harvested resources could impact LSFN's use of and reliance on clean water, fish, and animals. SFN expressed that herbicide spraying on the

transmission line corridor could contaminate wildlife in that area. NWOMC consider that potential impacts to fish, wetlands and wildlife could affect their ability to exercise their harvesting rights and could affect food security. The change in wildlife distribution due to habitat loss and sensory disturbances will be minimized with the implementation of mitigation measures as described in Section 6.3 (Noise and Vibration), Section 6.11 (Vegetation Communities and Wetlands), and Section 6.12 (Wildlife and Wildlife Habitat). The key measures include: the development of a compact mine site to reduce the loss of habitat, and the development and implementation of an access management strategy to allow continuation of TLRU practices by Indigenous peoples along the mine access road, locating noise producing stationary equipment inside of buildings, and the implementation of a revegetation plan that preferentially uses local vegetation sources and incorporates plant species of interest to Indigenous communities and wildlife habitat features, and uses mechanical vegetation removal practices. Further, a Human and Ecological Health Risk Assessment (Appendix R) has been prepared for the proposed Project, and concluded that there will be no change to human and ecological health from the Project.

Income inequity

CLFN and LSFN requested further information on where money from the Project would go. LSFN observed that uncertainty about impacts from existing mines, habitat loss from logging, and increased regulations on trapping have the cumulative impact that some members place more reliance on welfare. SFN commented that the loss of employment after industry leaves can have a devastating effect on a community and should be considered from the start. The Project may provide new employment opportunities and NWOMC wants local Indigenous communities to be included in preferential employment opportunities by the Project. Local businesses may not be able to compete with the Project as employers, creating a shortfall of workers for small businesses. NWOMC noted that an influx of new workers and their families may provide an economic boom but also a decline when the mine closes.

The Project will give preference to local and Indigenous workers and businesses and participation will provide skills and experience for future opportunities. This will increase labour and business income directly and through spending of income at local and regional businesses. The skills and experience gained by participating in the Project will assist in gaining future employment and contracts.

Changes in community socio-economic conditions

CLFN and LSFN stated that the socio-economic effects on their communities had not been adequately addressed, including potential effects on safety. They also inquired about benefits to the communities and how Nation members would benefit from Project employment.

The Project will give preference to local and Indigenous workers and businesses and participation will provide additional labour and business income. FMG will support retraining programs to establish transferable skills for employees during the latter part of the operations phase and will provide job search assistance at the closure phase. The skills and experience acquired through the Project are anticipated to be highly transferable to other employment opportunities in the region at closure.

SFN expressed concerns about racism based on their experience with other projects and recommended mandatory cultural awareness training be completed by FMG employees and contractors. SFN also identified that increasing the road network has the potential for drug trafficking. MON noted that if there is significant in-migration of workers, it could introduce unwanted behaviors at the on-site accommodations and affect the quality of life for community members. NWOMC observed that the Project could introduce social changes including increases in drug and alcohol use and crime rates and the potential for human trafficking. FMG has developed an Employee Health and Wellness Strategy (Appendix Q-3) as a result of

engagement with local Indigenous communities with goals to support physical and emotional well-being and culturally safe workplaces, maximize the recruitment, employment and retention of northern and Indigenous people, and successfully integrate northern and Indigenous people into the Project workforce for the long-term.

SFN also commented that in-migration may stress local infrastructure and services and increase the costs for maintaining infrastructure and delivering services. The Project will accommodate a rotational workforce in on-site accommodations, however it is acknowledged that the Project will provide an opportunity through working with government to deliver improvements to local infrastructure and services.

SFN expressed interest in transmission line alternatives, including the potential to increase power access opportunities for the community and to utilize the alternate route parallelling the existing E1C transmission line. FMG has worked with SFN towards adjusting the transmission line route to pass through the SFN reserve lands along the existing E1C transmission line route which will continue to be the preferred route where SFN remains supportive.

Non-commercial / trade economy

NWOMC pointed out that its right to hunt, trap, fish, gather, or use cultural and spiritual sites goes beyond subsistence or occupation and may have an economic trade component. Métis harvesting includes harvesting resources as gifts or exchange with Aboriginal persons. FMG will not affect harvesting in the RSA. No harvesting will be permitted in the mine site area during construction, operations, and active closure for safety. An access management strategy will allow continuation of TLRU activities along the mine access road during construction, operations and closure.

Indigenous physical and cultural heritage

The loss or destruction of physical and cultural heritage

CLFN and LSFN observed that the archaeological status of known cabins is incomplete, and the inventory of built heritage resources needs to be included for the LSA. CLFN stated that in the Springpole Lake general area there are pictographs, graves, and sacred sites. LSFN requested information on the potential for water level changes that may affect culturally significant areas such as gravesites. MON stated that the Project location is ceremonial ground. NWOMC reported that the Project will remove portage access between Birch Lake and Springpole Lake.

Archaeology studies have been completed for the mine site and mine access road areas and no archaeological resources have been found. Sites along the transmission line corridor that have archaeological potential will be investigated after completion of the detailed engineering of the transmission line and based on the precise location on the poles. The identified pictographs are outside the PDA and will not be affected by the Project. FMG will continue to share Project plans and schedules with Indigenous communities and coordinate construction activities related to the transmission line to minimize overlap with the timing of TLRU activities and other sensitive periods.

Changes to access to physical and cultural heritage

LSFN requested information on the potential loss of access to important areas and changes in water levels that may affect culturally sensitive areas such as gravesites. As described above, access will be restricted only in the mine site area for safety and an access management strategy will provide for improved access for traditional activities in the area of the mine access road. As described in Section 6.7.6.1, model results indicate that the Springpole Lake water level will be maintained within natural variation and verified by real

time monitoring during construction and closure. At closure, during the pit filling period, the water surface level of Springpole Lake will be also be maintained within natural variation.

Changes to sacred, ceremonial or culturally important places, objects, or things

CLFN stated that there are pictographs, graves, and sacred sites in the Springpole Lake general area that may be impacted by the Project and there are place names that exist within the Project footprint. LSFN requested information on the potential changes in water levels that may affect culturally significant areas such as gravesites. MON stated that the location the Project described in the draft EIS/EA is a ceremonial ground. NWOMC reported that the Project will remove portage routes.

The identified pictographs are outside the PDA and will not be affected by the Project. As described above, access will be restricted only in the mine site area for safety reasons, however the mine site area contains no known archaeological resources (Appendix S-1 and Appendix S-2). An access management strategy will provide for improved access for traditional activities in the area of the mine site road and will be developed in consultation with Indigenous communities and MNR. As described earlier, the changes in water level during the construction, operation and closure of the Project are within natural variations and real time monitoring will be undertaken during construction and closure. As a result of TK/TLRU information shared with FMG, the selected alternative for the transmission line route in the draft EIS/EA, which was routed west and south of SFN, has been optimized, and the selected route for the transmission line route avoids sensitive land use areas identified by MON. As noted earlier, a portage route will be reestablished by FMG at a previously used location and will be used to maintain access between Springpole Lake and Birch Lake. At closure, the portage route located at the exploration camp will be reestablished.

Changes to visual aesthetics over the life of the Project

SFN members noted concerns about the visual aesthetics of the Project as the mine rock pile will be visible permanently after the mine closes. Changes to viewscapes, 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, which will be revegetated at closure.

Current use of lands and resources for Traditional Purposes

Changes to resources used

LSFN identified that the Project may impact the quality of hunted and trapped game due to potential environmental contamination of water and food that animals rely on and to the health and quality of harvested plants and medicines in the study area. NWOMC observed that Project activities may result in Metis harvesters viewing the land as non-functional or less desired, resulting in avoidance during the exercise of harvesting rights including changes in air quality and dust, the loss of wetland habitat, fragmentation, and loss of wildlife habitat, effects of harvesting competition and scarcity of resources. As stated above, Project design and implementation of mitigation measure will reduce effects to resources that are harvested and plants and animals in the vicinity of the mine site will remain healthy posing no new risk for consumption. Country foods monitoring will take place periodically during operations.

Changes in access to areas and resources

CLFN noted that harvesters may be deterred from their preferred areas due to water contamination from the tailings ponds and the associated loss of abundant, healthy plants and medicines in the study area. LSFN and SFN identified that significant changes in water levels can interrupt navigation and the ability to navigate rivers and lakes. SFN stated that ensuring trails and access routes used for hunting, trapping, harvesting, and fishing are protected and preserved is critical for the community. NWOMC identified that the Project will remove a portage route which provide contemporary modes of travel for the NWOMC.

As described above, the development of the Project will be within a compact mine site and site contact water will be managed with an integrated water management system that will collect, control and treat contact water with an effluent treatment plant that is not recycled in ore processing. The treated effluent will be discharged to the southeast arm of Springpole Lake in accordance with permitting requirements. The changes in surface water quality have been incorporated into the Human and Ecological Health Risk Assessment (Appendix R), which determined that the Project will not result in a change to human and ecological health. Country foods monitoring will take place periodically during operations. The navigation route between Birch Lake and Springpole Lake will be maintained and the portage route at the exploration camp will be re-established at closure. As noted earlier, an access management strategy will be developed and implemented to provide for improved access for traditional activities in the area of the mine site road.

Changes in the experience by Indigenous peoples

CLFN stated that changes in water levels impact travel routes and accessibility of areas, with low water levels exposing hazards that interfere with safe unhindered passage. LSFN reported that the Project is likely to result in interruptions and curtailments to the transmission of intergenerational knowledge. Teaching sites extend through the study area and these sites are vital to the preservation of community knowledge, to increasing member resilience, and to the ability to adapt to the everchanging land.

The Project will not affect the water levels of adjacent lakes, upstream or downstream. An access management strategy will allow for new access along the mine road area for traditional purposes. FMG will 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. FMG will also support community land-based cultural activities during all Project phases and facilitate land use for local area Indigenous trappers.

6.26.1.3 Spatial and Temporal Boundaries

The 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 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 the potential effect of changes to the environment on Indigenous peoples defined as follows:

- **LSA**: the LSA for the effects on Indigenous peoples VC is based on the combined LSAs for the surface water systems and wildlife. 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 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 plant harvesting as well as the broader area for wildlife.

- **RSA:** the effects on Indigenous peoples VC RSA use is also based on the RSAs for surface water systems and wildlife for similar reasons as the LSA.

Where the discussion of effects includes reference to spatial areas such as the PDA, LSA and RSA, these refer to the spatial areas associated with the effects assessments for the related VCs.

The temporal boundaries for the assessment of the potential effect of changes to the environment on Indigenous peoples 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).

6.26.1.4 Criteria and Indicators

In undertaking the assessment of the potential effect of changes to the environment on Indigenous peoples, the following criteria were used:

- Changes in Indigenous health conditions;
- Changes in Indigenous socio-economic conditions;
- Changes in Indigenous physical and cultural heritage; and
- Changes in current use of lands and resources for traditional purposes.

The specific indicators for each criteria are defined by the EIS guidelines are described in Table 6.26-1.

6.26.1.5 Description of Residual Effect Attributes

The residual effects for the assessment of the potential effect of changes to the environment on Indigenous peoples 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 6.26-2. Given the differences in the criteria, a separate magnitude ranking has been defined for each, as described in Table 6.26-3.

In addition, the residual effects for surface water 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 is 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.

6.26.2 Existing Conditions

A summary of the baseline conditions is presented below to characterize the existing conditions for the assessment of the potential effect of changes to the environment on Indigenous peoples and is based on several years of study that has resulted in comprehensive information for this stage of project planning. The existing conditions are used to support the assessment of potential effects from the Project and will support long-term monitoring for the Project.

The baseline conditions for Indigenous health conditions, socio-economic conditions, physical and cultural heritage, and current use of land and resources for traditional purposes were obtained through review of TK/TLRU studies, community led socio-economic baseline reports, and Indigenous engagement activities for the Project, as well as other primary and secondary data sources identified in Section 6.17 (Commercial Land and Resources), Section 6.18 (Outdoor Recreation), Section 6.19 (Local and Regional Economy), Section 6.20 (Local and Regional Infrastructure and Services), Section 6.21 (Traditional Land and Resource Use), Section 6.22 (Archaeology) and Section 6.23 (Built Heritage Resources and Cultural Heritage Landscapes). Publicly available literature was reviewed for information for Indigenous communities engaged on the Project to deepen the understanding of current Indigenous health conditions, socio-economic conditions, and physical and cultural heritage. Confidential studies or those stipulating one-time use were excluded from the literature review. As previously noted, the information is current to October 2024. The sources of information from Indigenous communities considered in this section are the same as those used in the preparation of the final EIS/EA and include:

- **Indigenous knowledge, traditional land use and socio-economic studies**: All eight Indigenous communities were approached regarding their interest in participating in Indigenous engagement for the Project and providing TLRU information. CLFN, LSFN, MON, SFN, WFN and NWOMC have produced Indigenous knowledge and land use studies including:
    - 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);
    - Wabauskang Traditional Knowledge and Use in the area of Springpole Gold Access Corridor Project (ArrowBlade 2014);
    - 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); and,
    - Health, Socio-economic, Indigenous Knowledge and Land Use Baseline Study (SFN 2024).
- **Community Knowledge**: acquired through engagement activities with Indigenous communities such as meetings and oral input, as described in Section 2.
- **Publicly Available Secondary Literature Sources**: relevant documents such as land use plans and forest management plans, which contain TK/TLRU 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).
    - Aboriginal communities' websites
    - government databases.
- **Other Relevant Primary 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).

- **Other Relevant Information Sources**:
  - Results of effects assessment for other valued components to inform changes in the environment (Section 6.2 to 6.24)
  - Comments on the draft EIS/EA completed by independent experts retained by Indigenous communities

Below is a description of Indigenous health conditions, socio-economic conditions, Indigenous physical and cultural heritage and provides cross references for Traditional land and resource use (a full description is included in Section 6.21). Information related to these conditions is presented for the Indigenous communities engaged on the Project and provides context for the assessment. This is a summary of existing conditions designed to inform the assessment and is not intended to be comprehensive.

6.26.2.1 Indigenous Health Conditions

This section provides an overview of information related to health conditions that are common amongst the identified Indigenous communities (CLFN, SFN, LSFN, MON, ONS, PFN and WFN). Additional community-specific information is provided in the community-specific sections (6.26.2.5 to 6.26.2.12) below.

The Sioux Lookout First Nations Health Authority (SLFNHA) serves 33 First Nation communities in the Sioux Lookout region (including CLFN, SFN, LSFN, MON, ONS, PFN and WFN) by providing a variety of health services (e.g., primary care, mental health services, development services, diabetes programs, and cancer screening).

The SLFNHA released reports providing information about health outcomes for children and youth (newborns to aged 19) (Sioux Lookout First Nations Health Authority, 2018) and for adults (aged 20 and over) (Sioux Lookout First Nations Health Authority, 2019) for 31 First Nations in northwestern Ontario including the First Nations included in the final EIS/EA.

The health of children and youth of the Sioux Lookout area First Nations was worse than the rest of Ontario in several areas. The SLFNHA highlighted the following:

- In 2016, preschool children were seen in surgery for oral health issues 14 times more that the Ontario average, and
- Mental health referrals for youth increased 18 times between 2008 and 2017 and youth visited emergency departments five times more than an average Ontario youth. Suicide rates for youth were significantly higher than the provincial average (Sioux Lookout First Nations Health Authority, 2018).

For adults, physical health is much worse than the Ontario average. With data up to 2016, health care concerns for community members aged 20 and older identified by Sioux Lookout First Nations Health Authority (2019) are:

- Being seen in a hospital emergency department 2.5 times the Ontario rate despite nursing stations being the first point of access;

- Injuries are the leading cause of visits to the emergency department and hospital admissions and falls account for the majority of hospital admissions related to unintentional injury;

- Being admitted to hospital 2.5 times the Ontario rate;
- Being admitted to hospital for respiratory disease 2.5 times the Ontario rate;
  - Half of the hospital admissions for respiratory disease are related to pneumonia;
- Being admitted to hospital for chronic diseases two times the Ontario rate;
- Being admitted to hospital for diabetes four times the Ontario rate;
- Being admitted to hospital for infectious and parasitic diseases six to seven times the Ontario rate;
- Almost one quarter of people age 20 and above have diabetes; and
- Men are admitted to hospital at a higher rate than women for ischemic heart disease.

6.26.2.2 Indigenous Socio-economic Conditions

This section provides an overview of information related to socio=economic conditions that are common amongst the identified Indigenous communities (CLFN, SFN, LSFN, MON, ONS, PFN and WFN). Additional community-specific information is provided in the community-specific sections (6.26.2.5 to 6.26.2.12) below.

The socio-economic existing conditions information for population, age, education and labour force presented here is drawn from Section 6.19 (Local and Regional Economy) and information about community services is from Section 6.20 (Local and Regional Infrastructure and Services). The information from those sections was enhanced by the socio-economic reports prepared for the Project by some First Nations,

This section provides an overview of information related to the socio-economic conditions that are common amongst the identified communities. Additional community-specific information is provided in the community-specific sections (6.26.2.5 to 6.26.2.12) below.

As of August 2023, the total registered membership in the First Nations in the study area is 10,926; individual First Nation memberships range from 246 to 3,357. The numbers of First Nation members living on their own reserves ranged from 11.7% at SFN to 95.6% at PFN. The First Nation populations are young and growing. In 2021, the median age of the population in CLFN, LSFN, MON, ONS SFN, and WFN was between 18.6 and 30.4.

In 2021, of respondents 15 years and over, in CLFN, LSFN, MON, ONS SFN, between 33.3% and 81.8% did not have a degree, certificate or diploma and between 11.4% and 33.3% had achieved a high school diploma or equivalent only. In the same communities, between 0.0% and 33.3% had achieved a trades/apprenticeship or other non-university certificate, between 0.0% and 2.6% had achieved a university certificate below bachelor level, and between 0.0 and 8.6% had achieved a university degree. Data on educational attainment in PFN was not available.

In 2016, of respondents 15 years and over that identified as Métis living in the municipalities, between 12.9% and 25.0% did not have a degree, certificate or diploma. For those communities, between 31.3% and 48.4% had achieved a high school diploma or equivalent only, between 0.0% and 25.0% had achieved a trades/apprenticeship or other non-university certificate, between 7.4% and 25.8% had achieved a college or non-university certificate, between 0.0% and 9.3% had achieved a university certificate below bachelor level, and between 0.0% and 16.7% had achieved a university degree.

Public administration, health care and social assistance are the primary industries in the Indigenous communities. Figures presenting the workforce by industry for each of the Indigenous communities can be found in Section 6.19 (Local and Regional Economy). Census data for PFN are not available regarding workforce characteristics.

Where available, the 2021 Census indicates that employment income comprises a lower percentage of total income in the Indigenous communities (49.0% in CLFN, 66.0% in SFN, 61.6% in LSFN, and 36.0% in MON) than in Ontario as a whole (67.4%). Census data was not available to present income composition for ONS, PFN, and WFN.

Indigenous communities do not conduct forestry or logging operations, commercial fishing, or commercial outfitter operations, in the PDA or LSA and therefore these topics are not assessed further in this section.

The mine site area and the mine access road overlap three trapline areas, taking up between 0.9% and 4.4% of those trapline areas. The transmission line corridor overlaps five trapline areas and takes up less than 1% of each of those trapline areas.

Communities that provided socio-economic information noted that there are lower levels of participation in traditional harvesting activities than in the past and more reliance on store bought food.

Recreation facilities vary among the First Nations from outdoor rinks to arenas to event centres. Many of the communities host ice fishing derbies, community social events and events to recognize Treaty Day, National Indigenous Peoples Day and Canada Day.

6.26.2.3 Indigenous Physical and Cultural Heritage Conditions

The information regarding Indigenous Physical and Heritage Conditions is drawn from the TK/TLRU studies provided by communities, 6.21 Traditional Land and Resource Use, 6.22 Archaeology, and 6.23 Built Heritage Resources and Cultural Landscapes.

The TK/TLRU reports provided for the Project by CLFN, LSFN, MON, WFN and NWOMC all describe the importance of their traditional territories and their historic and current use. As an example, SFN explained that their whole traditional territory holds cultural significance for them and includes historic settlements, burial grounds, areas with cultural artifacts and areas for gathering, teaching and spiritual use. The traditional use of the region indicates that there could be archaeological or cultural heritage in the Project LSA and is described further in the community-specific sections (6.26.2.5 to 6.26.2.12) below.

6.26.2.4 Current Use of Lands and Resources for Traditional Purposes

This section provides an overview of information related to the current use of lands and resources for traditional purposes that is common amongst the identified Indigenous communities (CLFN, SFN, LSFN, MON, ONS, PFN and WFN). Additional community-specific information is provided in the community-specific sections (6.26.2.5 to 6.26.2.12) below.

The information about the current use of land and resources is from the TK/TLRU studies provided by communities and is described in more detail in 6.21 (Traditional Land and Resource Use). While the available information about Indigenous land and resource use may not have identified site specific activities or distinguished between historic and current use, it has been assumed that Indigenous peoples are using the PDA, LSA, and RSA for traditional purposes.

The current use of lands and resources includes hunting and trapping and the incidental collection of wildlife sheds such as antlers and feathers. Wildlife harvesting locations are identified around lakes where suitable

habitat would be located. Specific areas that support habitat for Caribou and other harvested species (including seasonal habitats) were identified across the RSA.

In general, trapping locations are common around lakes and take advantage of trails and wildlife movement patterns within the surrounding forest. The mine site intersects portions of two trapline areas and the mine access road and transmission line corridor intersect other trapline areas.

Indigenous communities use the waterbodies and watercourses in the RSA for the traditional harvesting of aquatic resources, including fishing and the gathering of other aquatic species such as turtles and baitfish. The TK/TLRU reports shared with FMG identified nine species of fish that have been traditionally harvested.

Indigenous communities use land throughout the RSA and beyond for the traditional harvesting of a variety of plants for medicinal, nutritional, domestic, and ceremonial use. The habitats for plant harvesting vary with plant species and the relationship between plant species and habitats that support traditionally harvested species such as Caribou is recognized by Indigenous land users.

6.26.2.5 Cat Lake First Nation

Cat Lake First Nation is an Ojibwe community located approximately 50 kilometres northeast of the Project on the northern shore of the Cat Lake river system. First Nation residents live on the southeast corner of the Reserve Lands. The First Nation was established on June 22, 1970. In 2003, the Government of Canada Addition to Reserve Policy enabled CLFN to increase its lands from 218 ha to 1,771 ha. CLFN is accessible by winter road and air.

The Cat Lake First Nation and Slate Falls Nation joint community-based land use plan was completed in 2011. The plan addresses a 1.5-million ha area, including a portion of the Nations' self-described traditional territories in the Far North of Ontario. The plan was approved by both First Nations and the Government of Ontario under the Far North Act, 2010. The plan provides an understanding of Cat Lake First Nation and Slate Falls Nation Peoples' relationship to the land (Government of Ontario 2020) and enables opportunities for environmentally sustainable economic development.

CLFN provided an Indigenous Knowledge and Use Study and Socio-economic Baseline Study for the Project that has been considered in this assessment.

Health Conditions

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. Additional key infrastructure needs include additional office space, an updated water distribution system, and more secure road access or other means of delivering heavy goods.

The current water distribution system in the community needs to be completely turned off when a new home is added and then a boiled water advisory notice is issued. Each boil advisory lasts about a week.

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. The effects extend 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.

A number of services are provided directly in the community or accessible to the community from regional services. The Cat Lake Health Authority oversees the following programs:

- Aboriginal Diabetes Initiative;
- Aboriginal Healthy Babies Healthy Children;
- Brighter Futures Program;
- Family Well Being Program;
- Maternal Child Health Program; and
- National Native Alcohol and Drug Abuse Program.

Cat Lake First Nation also has a Wellness Centre that offers residents a variety of services such as: counselling and educational program on mental wellness, emergency victim service referrals, referrals to other out of community services for legal, clinics and treatment programs. The Wellness Centre also organizes community events and education / awareness campaigns related to health.

The Medical Transportation Program offers support for individuals to either access medical travel funds or to be reimbursed for medical trips they make from the community for medical appointments. The program also helps individuals to make travel and accommodation arrangements to attend medical appointments at the Sioux Lookout Meno Ya Win Health Centre.

- Clinical treatment and counselling during addictions recovery;
- Coping and life skills teachings;
- Counselling for emotional and behavioral issues;
- Cultural land-based activities; and
- Survival skills and ancient lifestyle perspectives from traditional instructors and Elders (North West LHIN 2020b).

Hospital services are provided in Sioux Lookout at the Sioux Lookout Meno Ya Win Health Centre (211 Northern Region - Lakehead Social Planning Council 2020a).

Socio-economic Conditions

According to the CLFN Socio-economic Baseline Study, CLFN's social conditions have a heavily impacted baseline, with the main sources of impact being:

- Intergenerational trauma;
- Housing and overcrowding; and
- Substance use.

Cat Lake First Nation has a total registered population of 829 people; 534 of whom live on the Cat Lake 63C reserve (the community), 26 members live on other reserves, and 150 live off-reserve. The Cat Lake First

Nation population increased by 15.2% between 2016 and 2012; half the population is under 20 and 42% are 14 years old or younger.

CLFN does not currently conduct forestry or logging operations in the PDA or LSA; however, the CLFN and SFN Land Use Plan includes plans for the establishment of a sustainable forestry license that does not overlap with the Project.

The mine site area and the mine access road overlap three trapline areas, taking up between 0.9% and 4.4% of those trapline areas. The transmission line corridor overlaps five trapline areas and takes up less than 1% of each of those trapline areas. FMG has worked with the Head Trapper and license holder of the closest trapline to the Project (SL197), who is a member of CLFN to answer questions and address their concerns and interests towards supporting their ongoing and future traditional land use activities. The licence holder (SL197) has submitted a letter of support to the IAAC and the Ministry of the Environment, Conservation and Parks for the Project.

CLFN discussed the decline in the commercial fishing industry in the region and that fishing revenues were unable to meet the costs of fishing; there is no commercial fishing in the Project LSA by Indigenous people.

Between 2016 and 2021, the labour force participation rate remained consistent (32.4% in 2016 and 32.5% in 2021). The percentage of women+ participating in the workforce increased (28.6% to 34.2%), surpassing the participating rate for men+ (35.9% in 2016 to 30.8% in 2021). The unemployment rate decreased from 25% in 2016 to 8% in 2021.

CLFN reported that low participation and employment levels are influenced by low levels of education and participation, inadequate childcare, especially for the 30% of families that are single-parent families, concerns about being able to adapt to a mining job culture, fear of discrimination, and fear of being away from the community and family for extended time periods. There is also a low level of participation in available training programs.

Mental health and addiction issues in CLFN have resulted in youth and young adults being disproportionately affected, and less engaged in activities, not participating in the workforce, not completing high school, and not participating in training or other educational opportunities. These results decrease the potential workforce for community and mining project positions.

A school within the community provides education at the kindergarten to grade 8 levels. Students from CLFN attend high schools in Sioux Lookout or Thunder Bay while boarding in those communities. They also have the opportunity to take high school courses while living at home through distance learning programs.

The CLFN nursing station is operating out of temporary facilities because their nursing station was destroyed by fire in March 2024. The community level services are typically supplemented by regularly scheduled visits by various health care professionals and Sioux Lookout provides hospital resources to those communities. CLFN identified that they have medical transportation services and the Oshkee Meekena Residential Treatment Centre for youth with addictions.

Child and family services are provided by Tikinagan Child and Family services in CLFN. Choose Life is a youth mental health program that is active in CLFN.

CLFN has overcrowded housing, inadequate maintenance capacity, and a lack of temporary accommodations. Factors contributing to the lack of suitable housing and overcrowding are the cost of new housing, insufficient funding, and the logistics of delivering supplies to the community. The lack of housing affects the ability of CLFN to attract teachers and workers.

Nishnawbe-Aski Pollice Service provides policing for CLFN and CLFN emergency services are at capacity.

Physical and Cultural Heritage Conditions

Historic and current travel routes exist through Birch Lake and Springpole Lake (Section 6.23). Those routes are connected by overland portages, two of which cross the PDA.

Within the area of the mine site, effluent pipeline, mine access road and aggregate sites, there are no identified archaeological resources and a chance find procedure is place (Appendix S-5). Outfitter camps and the Springpole exploration camp within the mine site area were evaluated and were found to have no cultural heritage value or interest. CLFN noted that there are sites of interest within proximity of the PDA including seasonal camping sites, boat mooring sites, river trails to camping and hunting sites, and a seasonal snowmobiling trail. Within five kilometres of the PDA, CLFN identified that there are seasonal game processing sites, culturally significant place names, and gathering sites for community members.

There is a known portage route that crosses the mine site area at the existing exploration camp that is maintained by FMG which was also reported by CLFN which is considered to have cultural heritage value.

Pictographs in the Springpole Lake southeast arm area outside the PDA were observed and reported by CLFN.

Current Use of Lands and Resources for Traditional Purposes

Among the reporting Indigenous communities, CLFN identified the greatest concentration of land use sites in proximity to the Project PDA. This includes sites within about 250 m of the PDA used for camping during hunting and processing harvested game and fishing and boat mooring sites within the LSA adjacent to the PDA. Hunting and trapping continue to be important activities for CLFN members. These activities are conducted in numerous areas including the Birch Lake and Springpole Lake areas. Within five kilometres of the PDA, CLFN identified additional meat processing sites, moose kill sites, and a winter travel route. CLFN described extensive transportation routes and subsistence harvesting sites east and north of the PDA.

Fishing is a fundamental to the lives and cultural of CLFN members and CLFN reported harvesting an abundance and variety of fish species in their traditional territory. CLFN identified seasonal and year-round fishing locations within 5 km of the PDA including on Birch Lake northeast of the mine site and on Springpole Lake and within the PDA.

CLFN members harvest plants for food and medicinal purposes in their traditional territory which contribute to community members' well-being and health, provides opportunities for teaching and learning, and facilitates opportunities to be on the land. CLFN pointed out that there are food plant habitats and a blueberry harvesting area within five kilometres of the PDA.

6.26.2.6 Lac Seul First Nation

Lac Seul First Nation is located approximately 130 km southwest of the Project. Lac Seul First Nation is comprised of three separate settlements: Frenchman's Head, Kejick Bay and Whitefish Bay. Programs and services are provided across these communities. The communities are located on the shores of Lac Seul and Lost Lake. The area of the reserve covers 66,248 acres (Lac Seul First Nation 2019). LSFN is located approximately 40 to 60 km northwest of Sioux Lookout and is accessible by all-season road.

LSFN provided an Indigenous Knowledge and Use study and Socio-economic Baseline Study for the Project that has been considered in this assessment.

Health Conditions

While LSFN members appear satisfied with the medical staff employed in the communities, the participants in the Socio-economic Baseline Study did note that there is a shortage of doctors and nurses. LSFN highlighted the high rates of diabetes and other dietary health concerns, health challenges and deaths caused by substance abuse, and concerns about environmental contaminants in their communities.

LSFN described how the use of opioids 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. LSFN stated that the use of needles in association with increased injected substance abuse has increased the rates of Hepatitis C across northern Ontario.

Socio-economic Conditions

Lac Seul has a total registered population of 3,783 people as of February 2024. 26.1% of the population live on-reserve over the three communities (Kejick Bay, Whitefish Bay, and Frenchman's Head), and 73.9% live off-reserve.

Between 2016 and 2021, the labour force participation rate decreased from 59.4% to 50.0%, a trend that was true for both women+ (53.2% to 48.4%) and men+ (64.8% to 50%). In the same period, the unemployment rate dropped from 36.7% (2016) to 11.9% (2021).

LSFN traditional economies, including wild rice farming, commercial fishing, and trapping played a central role for LSFN households until at least the 1940s. LSFN reported how the community members livelihood and generational wealth was lost during the historic floods in the 1930s and how the loss of prime hunting grounds, fishing, and the rice industry were blows to self-sufficiency and sustenance. Since that time, these economies have been greatly diminished, either effectively disappearing, in the case of wild rice, or being reduced to just a few practitioners, as with trapping.

LSFN has a labour force of approximately 335 working-age people who are willing and able to work. LSFN notes that 41.3% of the First Nation's families are single parent families and rotation work at a mine site and being away from home overnight and for extended periods would not be possible. This presents challenges for approximately 95 members from participating in Project-related employment at the mine site. Other barriers to employment include a lack of a high school equivalent or other educational requirements, a lack of a driver's license or access to transportation, low motivation, lack of interest, or reduced capacity to work due to social or mental health issues. In addition, members who use substances and are in recovery may not be able to obtain employment if they have been charged with a criminal offence or are actively receiving treatment.

Substance abuse in LSFN communities has affected social and mental wellness. Youth and adults using substances are engaged in fewer activities and are not participating in the labour force, not completing high school or other educational opportunities, and are challenged in their ability to find or maintain employment.

Schools within the communities of LSFN provide education at the kindergarten to grade 8 levels. LSFN high school students commute daily to schools in Sioux Lookout.

LSFN has a Health Department that oversees the operation of community health services and facilities and two community nurses. The Health Clinic in Kejick Bay serves all three communities with visiting physicians providing services. The nurses provide emergency treatment, initial assessments, and public health education. Three Community Health Representatives work in the communities. They promote health activities in the schools and at the clinic. Two community doctors are also employed by LSFN. Transportation for medical services and appointments are provided to families/individuals with "high health costs". The Department maintains three vehicles and employs four drivers and a shift coordinator. There are plans to purchase a wheelchair access van. LSFN is currently working on improving the capacity of first responders. Two first responders exist in each community but there is no transportation van or ambulance. LSFN has an independent police service that works with Nishnnawbe-Aski Police Service in Sioux Lookout.

Child and family services are provided by Tikinagan Child and Family services in LSFN and Choose Life is a youth mental health program that is active in LSFN.

Housing conditions in LSFN communities are currently challenged by lack of supply, inadequate maintenance, and affordability. Limited housing currently affects community growth and capacity. The communities lack sufficient accommodations to attract new workers or staff; however, In 2023, six new homes were approved for development.

Physical and Cultural Heritage Conditions

There were no specific values reported within the PDA or LSA by LSFN in their Indigenous Knowledge and Use Study.

LSFN requested further archaeological assessment for parts of the Project that have not undergone archaeological study. A Stage 1 archaeological assessment (Appendix S-4 of the final EIS/EA) has been completed to cover portions of the Project footprint that extended outside the lands assessed by two previous studies (Appendix S-1 and Appendix S-2). The additional areas were found to be of no to low archaeological potential, requiring no further archaeological assessment. Based on the results of the Stage 1 archaeological assessment report for the transmission line (Appendix S-3) alternatives, a Stage 2 assessment will be required for identified areas of archaeological potential along the transmission line route prior to construction. Work and planning for the Stage 2 archaeological assessment fieldwork will commence once detailed engineering has been completed for the transmission line, given that the precise location of infrastructure such as transmission line poles need to be identified prior to fieldwork.

LSFN requested clarification of the study area for the Stage 1 archaeological assessment for the mine site area. The Stage 1 study area is approximately 1,000 ha and was focused on those parts of the Project that are centred on the north basin of Springpole Lake. Specifically, desktop study and property inspection were completed for the open pit, stockpiles, process plant and mine rock areas in 2020 (as shown in Map 4 of Appendix S-1). The open pit is proposed for the dewatered portion of Springpole Lake in the north basin of the lake, so shorelines within this basin and the island were reviewed during the property inspection.

LSFN requested clarification on the status of cabins in the LSA for archaeological resources. The fieldwork for the Stage 2 archaeological assessment (Appendix S-2) examined the cabin sites noted on historical mapping and provides a description of the cabins. Additional information was gathered from existing and empty cabins and buildings within the mine site area and is included in Table 5-1 of the Cultural Heritage Research Report (Appendix S-7).

LSFN requested additional information on the potential for marine archaeological resources in the dewatered basin of Springpole Lake. A discussion of the potential for marine archaeological resources is provided in Section 6.22.2.

LSFN requested information on participation in future fieldwork opportunities and clarification on how Indigenous Knowledge will be incorporated into future archaeological work. FMG has continued ongoing engagement with LSFN, including extending invitations to participate in environmental fieldwork. FMG acknowledges that archaeological sites and resources are important to Indigenous communities and avoidance of impacts / effects on archaeological resources is preferred over other alternative mitigation measures. FMG encourages continued involvement from Indigenous communities regarding the identification of archaeological resources or sites of importance during the life of mine to help mitigate potential effects on archaeological resources. Indigenous communities will also be provided with an opportunity to participate in supplemental archaeological work that may occur through life of mine.

Current Use of Lands and Resources for Traditional Purposes

LSFN reported their areas of land use to be focused around Lac Seul, south of the Project, and extending to the northwest and generally outside the LSA. Hunting and trapping continue to be important activities to support member diets and livelihoods. LSFN reported hunting in the Springpole Lake area and described hunting and transportation areas on Birch Lake and to the west of the mine site area and identified a game cache, a cabin, and a transportation route within 25 km of the PDA. LSFN pointed out that the importance of hunting and trapping extends beyond harvesting food to having opportunities to learn, teach, spend time with family, and being on their land.

LSFN reported fishing is an important subsistence harvest and fish remains a significant portion of some community members' diet. LSFN identified Springpole Lake as one of their fishing areas. LSFN identified a cabin, a spring, and seasonal fishing sites within 250 m of the PDA and a seasonal fishing site within 5 km of the PDA.

Harvesting plants for subsistence and medicinal use is an important part of LSFN culture. LSFN reported harvesting plants within their traditional territory but did not identify plant harvesting sites within the PDA or LSA.

6.26.2.7 Mishkeegogamang Ojibway Nation

This First Nation community had previously been known as Osnaburgh. In the early 1990s, the community changed their name to Mishkeegogamang, which is Ojibwa for 'People of the Lake' (Mishkeegogamang First Nation 2010). MON is located in Northwestern Ontario, approximately 145 km southeast of the Project. It is accessible year-round by Provincial Highway 599, which passes through Reserves 63A and 63B. On reserve communities include, Main Reserve, Sandy Road, Doghole Bay Area, Ten Houses, Eric Lake and Ace Lake. There are a number of cabins and camps along Highway 599 and Highway 808 (Northern Ontario Resource Trail) that are primarily owned and occupied by members of MON. Notable locations are Fitchie Lake and Lake St. Joseph.

MON provided a Traditional Land Use and Occupancy and Traditional Ecological Knowledge Study Report for the Project that has been considered in this assessment.

Health Conditions

MON houses a Health Centre on the main reserve that has been open since May 1998. The clinic is staffed by doctor once every five weeks, as well as nurses throughout the year. Routine health care (i.e.,

immunizations and dispensing of medication) is provided at the Health Centre. For health care beyond this, community members travel to Winnipeg, Manitoba or Thunder Bay, Ontario.

MON is also serviced by medical vans with local drivers to take community members to appointments or to the hospital. In addition, Pickle Lake ambulance services the community. However, for severe illnesses, patients are flown out of Pickle Lake by air ambulance.

Since 2002, through a funded program by Health Canada, MON has a Home and Community Program that provides home health care services to the elderly and physically challenged. To take part in the program, referrals are made by family members, friends or nurses for clients wishing to receive services. The Home Care program has also introduced 'Elders Tele-Health Visit' via video conference to provide elders with care.

The Pashkokogan Healing Lodge is located on MON territory on Lake Pashkokogan. The Healing Lodge provides a 14-day family treatment program aimed to support families overcoming addictions and trauma while regaining a spiritual connection to the land. The Healing Lodge is staffed with a program manager, intake worker, case manager, program counsellors, youth counsellors and an elder.

Socio-economic Conditions

MON had a total registered population of 755 people in 2021, which was an increase from 665 in 2016. According to the 2016 Census, the median age of the population in the community was 20.1 years and 49.6% of the population was under 20 years of age. Men constituted 53% of the population.

Labour force information for MON is not available for the 2021 Census. In 2016, the labour force participation rate was 41.2%. The participation rate for women was 36.8%, while the percentage of men participating in the labour force was 47.6% in 2016. The unemployment rate was 27.3% in 2016.

MON has two schools. The Missabay Community School provides education for junior kindergarten to grade 8 including special education, Native language and cultural education as well as breakfast and lunch to its students. The Charlie Neekan Memorial School (commonly known as the Mile 50 School) is a branch of the Missabay Community School that serves students in the vicinity of Mile 50. This school has two teachers who provide junior kindergarten to grade 8 education.

Secondary students can attend school through education and funding services provided by the Northern Nishnawbe Education Council, as distance education through Wahsa Distance Education Centre or by attending area high schools such as Pelican Fall First Nations High School in Sioux Lookout or Dennis Franklin Cromarty High School located in Thunder Bay. Students attending these high schools board with families in the communities of the high school they attend. Distance education is available for secondary students who choose to stay in the community.

Post-secondary students have access to Northern Nishnawbe Education Council's Post-Secondary Program. Students leave the community for post-secondary schools / institutions of their choice.

MON had a total of 135 dwellings in 2016, which is an increase from 115 total dwellings in 2006. Data indicate that in 2016, approximately 63% of the total dwellings were constructed more than 10 years ago, which is an increase from 2006. The dwellings need repairs, with 7% requiring minor repairs and 78% requiring major repairs.

Physical and Cultural Heritage Conditions

MON TLRU areas were reported for the southern portion of the transmission line route between the mine access road and SFN. MON reported that the LSA and RSA run through the traditional land use and occupancy of MON members.

Current Use of Lands and Resources for Traditional Purposes

In its report, MON identified areas of land use along the southern transmission line corridor and south and southeast of SFN. They did not show areas of use in or around the mine access road or the mine site areas. MON described their land use and occupancy as holistic, encompassing food harvesting, medicine gathering, cultural and sacred ceremonies, family camps, language and TK and other recreational activities to sustain their way of life. MON reported their food system includes moose, wild rice, caribou, berries among other resources.

6.26.2.8 Northwestern Ontario Métis Community

The Métis are a distinct Indigenous People with a unique culture, language and history with ancestry resulting from the relationships between Indigenous females and European men. Métis settlements emerged as an outgrowth of the fur trade, along waterways and watersheds. In Ontario, the settlements were part of larger regional communities, interconnected by the mobile lifestyle of the Métis, the fur trade, seasonal rounds and extensive kinship connections and a shared collective history and identity.

The Métis Nation of Ontario (MNO) has a province-wide governance structure and is a Governing Member of the Métis National Council. The MNO exists to represent and advance the interests of the Métis people of Ontario. The MNO has a Consultation Agreement with the Ontario Government signed on July 31, 2015, that establishes a consultation process with members of the Ontario Métis communities represented by MNO to consult on proposed actions or decisions that may adversely impact asserted or established Indigenous rights. There are a total of nine MNO regions across the province.

The NWOMC represents over 3,000 Métis. Individuals from 18 Verified Métis Families were recorded at locations in and around the region between 1823 and 1931. Members of NWOMC live in municipalities including but not limited to Sioux Lookout, Ear Falls, and Red Lake.

The NWOMC provided a Traditional Knowledge and Land Use Report for the Project that has been considered in this assessment.

Health Conditions

Health services and other programs available to Métis people in the local municipalities and areas in which they reside. Information regarding health services and other programs specific to Métis population was not available.

The MNO Healing and Wellness branch facilitates and coordinates programs, services, and activities to address the holistic needs of Métis people in Ontario at the provincial, regional, and local levels. They also offer webinars on a variety of healing and wellness and mental health and addictions related topics.

Socio-economic Conditions

The total population of Self-Identified Métis in Ear Falls, Red Lake and Sioux Lookout in 2021 was 90, 350, and 190 respectively. The Métis population decreased in all three municipalities in the study area between 2016 and 2021 by between 13% and 33%.

In 2016, of respondents 15 years and over that identified as Métis living in the municipalities, between 12.9% and 25.0% did not have a degree, certificate or diploma. For those communities, between 31.3% and 48.4% had achieved a high school diploma or equivalent only, up to 25.0% had achieved a trades/apprenticeship or other non-university certificate, between 7.4% and 25.8% had achieved a college or non-university certificate, up to 9.3% had achieved a university certificate below bachelor level, and up to 16.7% had achieved a university degree.

The Métis population of Sioux Lookout (83.9%) had a higher labour participation rate than those in Red Lake (70.4%) and Ear Falls (62.5%) in 2021. The census data indicate more men+ were employed than women+. The Métis population of Red Lake had the highest unemployment rate (9.9%) compared to the Métis population in Ear Falls and Sioux Lookout (both 0.0%).

Most Métis individuals in the labour force in Ear Falls and Red Lake work in the mining industry, while the majority of those in the labour force in Sioux Lookout work in health care and social assistance. A detailed breakdown of workforce by industry for the Métis population of the municipalities according to the 2021 Census data is presented in Section 6.19. The Métis population in Sioux Lookout had the highest proportion of income from employment (84.0%), followed by Red Lake (77.0%) and Ear Falls (68.0%).

Métis students attend schools in communities in which they reside and can access additional programming provided by MNO. Métis community members access services within their community of residence and have access to social services through Ontario Works.

Physical and Cultural Heritage Conditions

There were no physical or cultural heritage values reported within the PDA or LSA by the NWOMC in their Traditional Knowledge and Land Use Studies (NWOMC 2023, 2024).

Current Use of Lands and Resources for Traditional Purposes

NWOMC fish, hunt, and gather natural materials. The areas shown in their report as harvesting areas are mainly to the west and southwest of the Project and extending into the western and southern edges of the RSA. NWOMC identified wildlife kill sites within the RSA and a small game harvesting area on the western edge of the RSA. NWOMC mapped fish harvesting areas on Birch Lake to the north and west of the mine site extending into the LSA and RSA.

6.26.2.9 Ojibway Nation of Saugeen

ONS is located in Northwestern Ontario, in Thunder Bay District, approximately 150 kilometres southeast of the Project. The community is located on the shores of Kashawagama Lake and is accessible year-round by road.

Health Conditions

ONS offers services through the Saugeen Health Centre located on reserve. The Health Centre provides the Nation with services that promote physical and mental health including:

- Coordination of health care services through nursing staff, community health representative and visiting physician;
- Assistance with arrangements to Sioux Lookout Meno Ya Win Health Centre for health care needs outside the scope of community Nursing Station;

- Health awareness and counselling, education and prevention workshops, predominantly in the areas of diabetes and alcohol / drug abuse;
- Coordination of clinics / workshops in areas that may include diabetes, immunization, sexual health and communicable diseases;
- Palliative care program when required;
- Services of a first responder vehicle; and
- Participation in teaching of medical students and residents from Northern Ontario School of Medicine.

The Health Centre also addresses individual health care needs by providing:

- Support on behalf of an individual with other health professionals;
- Coordination of one-on-one pre-natal care with the community health nurse;
- Home visits to the sick, elderly, new mothers and individuals with health care needs;
- Suboxone program for individuals battling addictions to prescription drugs; and
- Coordination of long-distance travel arrangements for medical appointments.

Socio-economic Conditions

ONS had a total registered population of 244 people in 2021. Less than half of the population (34%) lives in the community. According to the 2016 Census, the median age of the population in the community was 24.8 years. Approximately 44% of the population was under 20 years od age in 2016..

Between 2016 and 2021, the labour force participation rate decreased from 63.6% to 58.3%. The percentage of women+ participating in the labour force decreased from 66.7% in 2016 to 50.0% in 2021, while the percentage of men+ participating in the labour force remained consistent at 66.7% in both census years.

Ojibway Nation of Saugeen School, located on reserve, provides education for junior kindergarten to grade 8. At the time of publishing this report no further information was available regarding education.

Physical and Cultural Heritage Conditions

To date, there have been no physical or cultural heritage values identified within the PDA or LSA by ONS during engagement on the Project.

Current Use of Lands and Resources for Traditional Purposes

To date, ONS has not identified areas of use in proximity to the Project. However, FMG will maintain on-going information sharing during the life of the Project to facilitate awareness of Project activities and participation in Project related opportunities in the region.

6.26.2.10 Pikangikum First Nation

PFN is one of the largest Nations in the Sioux Lookout District. PFN is an Ojibwe Nation located approximately 125 km northwest of the Project on Pikangikum Lake. PFN is accessible by winter road and air.

Health Conditions

Since 2008, the Pikangikum Health Authority has been responsible for providing health and well-being programs and services. The Pikangikum Health Authority works in collaboration with the Nursing Station, First Nation and Inuit Health Branch and Sioux Lookout First Nation Health Authority. Table 3-56 in the Socio-economic Baseline Study (Appendix Q-1) presents the various services and programs provided by Pikangikum Health Authority.

PFN has a nursing station located on reserve that provides home and community care services for patients who are ill, injured or elderly. Other services provided through a Case Manager / Nurse, Personal Support Workers and Homemakers include:

- Assessment to determine individual health history and develop a personalized care plan;
- Case management to ensure that care plans are carried out and suitable;
- Home care nursing;
- Personal care (i.e., dressing and bathing);
- Basic or advanced practice foot care;
- Home support light housekeeping, laundry and meal preparation;
- Respite for family members and caregivers; and
- Help with light outdoor / yard work.

In addition, the Sioux Lookout First Nation Health Authority provides services to PFN, with a focus on health promotion and disease prevention, supporting the Nation to deliver quality primary health care services and support health staff and provide specialized and regional services not provided by Nations. Sioux Lookout First Nation Health Authority provides support for the following programs and services:

- Physician services;
- Tuberculosis Control and Surveillance Program;
- Canada Pre-natal Nutrition Program;
- Developmental Services Program;
- Telemedicine Program;
- First Nations and Inuit Health Information System;
- Nodin Child & Family Interventions Services;
- Trauma teams;
- Client Services Program; and
- Visiting psychiatrist / mental health specialists.

Socioeconomic Conditions

Census data for PFN are not available for population characteristics for the First Nation or information on other socioeconomic conditions such as housing and education services.

Physical and Cultural Heritage Conditions

To date, there have been no physical or cultural heritage values identified within the PDA or LSA by PFN during engagement on the Project.

Current Use of Lands and Resources for Traditional Purposes

To date, PFN has not identified areas of use in proximity to the Project. However, FMG will maintain on-going information sharing during the life of the Project to facilitate awareness of Project activities.

6.26.2.11 Slate Falls Nation

SFN is an Ojibway community located approximately 50 km southeast of the Project. Historically, members of MON used the area of Slate Falls to set up camps for managing surrounding traplines and hunting grounds since the 1700s. In the 1930s, members of MON began to establish themselves in the area of Slate Falls. In 1985, SFN was one of six new First Nations established under the Six Nishnawbe Aski Bands Agreement between the Government of Ontario and the six Nations of the Northwestern Ontario Bands. On December 14, 2018, a federal Order in Council was signed to establish 6,599.176 ha as reserve lands, including the mines and minerals, for the use and benefit of SFN under the Canadian Additions to Reserves / New Reserves Policy. The SFN reserve is accessible via a forestry road or by charter plane from Sioux Lookout.

The Cat Lake – Slate Falls Community Based Land Use Plan was completed in 2011. The plan addresses a 1.5-million ha area, including a portion of the Nations' self-described traditional territories in the Far North of Ontario. The plan was approved by both First Nations and the Government of Ontario under the Far North Act, 2010. The plan provides an understanding of CLFN and SFN Peoples' relationship to the land (Government of Ontario 2020) and enables opportunities for environmentally sustainable economic development.

SFN provided a Health, Socio-economic, Indigenous Knowledge and Land Use Baseline Study for the Project that has been considered in this assessment.

Health Conditions

SFN has a nursing station which provides the following community and individual health programs, services and referrals:

- Physician consultations a few days per month with a visiting Physician from Sioux Lookout;
- Health awareness and counselling, education and prevention workshops especially in the areas of diabetes and alcohol / drug abuse;
- Coordination of clinics / workshops in areas that may include diabetes, immunization, sexual health and communicable diseases;
- Palliative care program when required; and
- National Native Alcohol and Drug Abuse Program.

In addition, the Nursing Station addresses individual health care needs by providing:

- Advocacy on behalf of individual with other health professionals;
- Coordination of one-on-one pre-natal care with the community health nurse;
- Home visits to the sick, elderly, new mothers and persons with health care needs;

- Non-urgent medical transportation service for residents to Sioux Lookout; and
- Assistance with coordinating local and long distance travel arrangements for medical appointments.

The SFN community water treatment plant was completed in 2018, and treats water taken from North Bamaji Lake. It has the capacity to service the communities existing 65 home and current planned expansion of 20 homes. All homes and public buildings, including the band office and school, are connected to the potable water supply. Type 2 diabetes and hypertension have been issues in SFN since the 1970s which are, in part, attributable to restricted access to healthy and traditional foods. The number of skin issues among children have declined since the opening of a new water treatment plant. The use of opioid drugs in the community has increased, particularly among those aged 20 to 44.

Socio-economic Conditions

According to the most recent census data, SFN has a registered population of 300 as of 2021, with a population increase of 29% between 2016 and 2021. The SFN band list identifies 298 SFN members, and approximately 22 non-members living in the community (excluding workers such as nurses, police officers, and contractors), for a total of approximately 320. 213 members live on-reserve, while off-reserve members are mostly located in Sioux Lookout and Thunder Bay with others living across Canada and internationally.

Approximately 80 SFN members are under 18 years old. Nine members are Elders based on age or knowledge. The SFN population continues to grow with around half of the members being under 29.

Between 2016 and 2021, the labour force participation rate increased from 45.8% to 48.6%. The participation rate for women+ decreased in the same period, from 60.0% in 2016 to 47.1% in 2021, as the participation rate for men+ increased, from 38.5% in 2016 to 52.9% in 2021.

According to the 2021 census, 85 SFN members were in the labour force and employed. Of those employed, 65 worked full-time all year, and 20 worked part-time or for only part of the year, with members being mostly employed in public administration and educational services. The average household income in 2020 $72,000.

SFN has planned to develop forestry in the area and has identified forest management as an opportunity in their Community Based Land Use Plan. SFN has applied for a licence and completed a Forest Resource Inventory and is looking to develop a forest management plan for the Cat Slate Forest, in partnership with CLFN.

There are 80 children and youth in SFN; 52 are elementary school age, 20 are high school age, and eight are pre-school age. The students attend the Bimaychikamah elementary school and a virtual high school in the community, as well as schools in Sioux Lookout and Thunder Bay. According to 2021 census data, 170 of SFN members over the age of 15 have a high school diploma and 25 have completed a post-secondary program.

Physical and Cultural Heritage Conditions

In the SFN Health, Socio-economic, Indigenous Knowledge and Land Use Baseline Study, SFN explained that their whole traditional territory holds cultural significance for them and includes historic settlements, burial grounds, areas with cultural artifacts and areas for gathering, teaching and spiritual use.

SFN reported the presence of pictographs outside the LSA in the Lake St. Joseph and Kezick Lake areas.

SFN reported that there are burial grounds on the Cat River system within the RSA, particularly along travel routes and at old settlements of their traditional territory some of which were used historically and currently by specific families; no archaeological resources, including burial sites, have been identified within the mine site and mine access road areas. There are also unmarked burial grounds within the SFN traditional territory and two burial grounds within the SFN reserve land.

Current Use of Lands and Resources for Traditional Purposes

SFN reported its general use areas to be mainly centered around its community and southeast of the mine site area, including a portion of the transmission line corridor.

A large portion of SFN community members' diet is from hunted and trapped food. SFN mapped hunting and trapping areas on Birch Lake, along the transmission line corridor, with higher levels of activity centered on the SFN reserve lands.

Fish provide a stable food in the diet of SFN members. SFN identified fishing sites on Birch Lake and southeast of Springpole Lake along the transmission Line corridor.

SFN harvest plants and medicines for sustenance, medicinal purposes, and for natural materials including tools and building materials. Their plant harvesting areas are southeast of the mine site area and would include a portion of the transmission line corridor.

6.26.2.12 Wabauskang First Nation

WFN is the most northern community of Treaty No. 3 territory, located approximately 125 km southwest of the Project. WFN is accessible by an all-season road.

Health Conditions

WFN members have access to health services and programs including:

- Services that promote physical and mental health for community members;
- Coordination for consultations with visiting professionals including a nurse practitioner and a community health nurse;
- Health awareness, education and prevention workshops and seminars;
- Coordination of clinics in areas that may include diabetes, immunization, sexual health and communicable diseases;
- Coordination of regular foot care sessions with visiting chiropodist; and
- Identification to correct health hazards.

Community members have access to health care needs such as:

- Intake services to determine health care needs of individual;
- Referrals to appropriate health care providers based on information in the intake assessment;
- Advocacy on behalf of individual with other health professionals;
- Coordination of one-on-one pre-natal care with the community health nurse;
- Home visits to the sick, elderly, new mothers and persons with health care needs; and

- Assistance with coordinating local and long-distance travel arrangements for medical appointments.

In addition, community members have access to services and programs including:

- Aboriginal Healthy Babies Healthy Children;
- Brighter Futures;
- Canada Prenatal Nutrition Program;
- Aboriginal Diabetes Initiative;
- Community Wellness Program;
- Home and Community Care Program - Progression and Maintenance;
- Medical Transportation Program; and
- National Native Alcohol and Drug Abuse Program.

Socioeconomic Conditions

According to the 2016 Census, the median age of the population in the community was 33.6 years. The population has an equal number of males and females. Of the total population, approximately 38% were under 20 years of age and 54% were between 20 and 64 years of age.

Of the 2016 respondents 15 years and over, 45.5% did not achieve a degree, certificate or diploma compared to the 91.6% in 2006. In comparison approximately 18.2% of respondents achieved a high school diploma or equivalent, which was an increase over the 10-year period from 2006 to 2016. The data show that of the 2016 respondents, an equal number of males and females achieved a high school diploma or equivalent.

Between 2016 and 2021, the labour force participation rate increased from 72.7% to 77.8%. The participation rate for women+ remained consistent at 80.0% in both census years, while the percentage of men+ participating in the labour force increased from 66.7% in 2016 to 75.0% in 2021. The unemployment rate increased from 25.0% in 2016 to 28.6% in 2021.

There are no schools within Wabauskang First Nation. Elementary students attend Ear Falls Public school, of the Keewatin Patricia District School Board. Secondary students attend school in either Sioux Lookout or Kenora.

WFN is provided with economic development services, programs and support through the Bimose Tribal Council's Kakina Economic Development Group.

Physical and Cultural Heritage Conditions

WFN reported that there are several recorded sacred sites within their traditional area including burial sites, ceremonial sites and pictographs. None of these sites have been identified as being within the PDA or LSA.

Current Use of Lands and Resources for Traditional Purposes

WFN conducts traditional harvesting of wildlife, fish and plants (nutrition and ceremonial) in its traditional territory. WFN reported the highest concentration of sites of importance west of the PDA with some appearing to be located along the southwestern boundary of the LSA. The types of activities conducted at these sites were not identified.

6.26.3 Identification of Pathways to Potential Effects

The initial step in the assessment process is to identify interactions from the Project that can result in pathways to potential effects on Indigenous people. These potential effects may be adverse direct, indirect effects and/or positive effects, where applicable. Table 6.26-4 includes the potential interactions of the Project on the environment that could have effects on Indigenous people, 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 and government agencies informed the identification of those interactions that are likely to result in a pathway to a potential effect on Indigenous people. 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 6.26.4 and Table 6.26-5 provide a description of the mitigation measures applied to these pathways during all phases of the Project. The residual effects, after the application of the mitigation measures, are then described and further evaluated in Section 6.26.6, using the criteria and indicators identified in Section 6.26.7.

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 Indigenous people as described below. After mitigation is applied to each pathway, as described in Table 6.26-5 the residual effects are assessed using the criteria identified for each pathway:

- Without mitigation, a change in Indigenous health conditions could occur from the identified interactions through the following pathways:
    - The use of equipment will result in changes to air quality and sound levels. Further, site preparation will result in a direct change in vegetation and an indirect change in wildlife. These may lead to a potential indirect change in wildlife habitat that may affect the availability of country foods (plants and wildlife);
    - The construction of the dikes and the controlled dewatering of the isolated portion of Springpole Lake will result in a direct and indirect change in aquatic habitat that may potentially affect the availability of country foods (fish); and,
    - Site preparation will result in changes to erosion and sedimentation that may potentially affect water quality.
    - The establishment and operation of water management and treatment facilities will result in effluent discharge to the southeast arm of Springpole Lake that may potentially affect water quality.
- Without mitigation, a change in Indigenous socio-economic conditions could occur from the identified interactions through the following pathways:
    - The construction of the dikes and the controlled dewatering of the isolated portion of Springpole Lake which may potentially affect the use of navigable waters;
    - Site preparation will result in a direct change in vegetation which may potentially affect forestry and logging operations;

- Site preparation will result in a direct change in vegetation and an indirect change in wildlife, and the use of equipment will result in changes to air quality and sound levels which may lead to a potential indirect change in wildlife habitat. These may potentially affect the availability of resources for harvesting (hunting, trapping and plant gathering) activities and the availability of country foods;
- The construction of the dikes and the controlled dewatering of the isolated portion of Springpole Lake will result in a direct and indirect change in aquatic habitat and may potentially affect the availability of resources for fishing activities for food;
- The construction of the dikes and the controlled dewatering of the isolated portion of Springpole Lake may potentially affect access for outfitting and recreational areas;
- The use of equipment will result in changes to air quality and sound levels which potentially affect the experience associated with outfitting and the use of recreational areas;
- Project employment and expenditures will result in a change in personal income levels and business opportunities, a change in social protection programs (social safety nets, food assistance), and a change in the resiliency of regional infrastructure (due to the transmission line), all which may potentially affect health and social services;
- Project employment and expenditures will result in a change in personal income levels and business opportunities which may potentially affect income inequity;
- Project employment and expenditures will result in a change in personal income levels and business opportunities which may potentially affect the population, economic activity and cost of living in local communities;,
- Project employment and expenditures will result in a change in personal income levels and business opportunities which may potentially affect non-commercial / trade economy through a transition from a traditional trade economy to a wage economy;
- Project employment and expenditures will provide skill and capacity building opportunities which may enhance the probability of future employment and contracting successes; and
- Employment by the Project may expose Indigenous workers to racism or harassment which may potentially affect their mental health and indirectly place a greater burden on community health and social services.

- Without mitigation, a change in Indigenous physical and cultural heritage could occur from the identified interactions through the following pathways:
  - Site preparation will result in a direct change in the local landscape and may potentially affect the presence of heritage and cultural features;
  - The use of equipment will result in changes to sound levels and the construction of mine site infrastructure will result in a change in the visual aesthetics. These may both lead to a change in the experience associated with heritage and cultural features, and may potentially affect the value of heritage and cultural features; and,
  - The construction of the dikes and the controlled dewatering of the isolated portion of Springpole Lake may potentially affect access to heritage and cultural features.

- Without mitigation, a change in the current use of lands and resources for traditional purposes could occur from the identified interactions through the following pathway:
    - Site preparation will result in a direct change in vegetation and the indirect change in wildlife, and the use of equipment will result in changes to sound levels and air quality which may lead to a potential indirect change in wildlife habitat. The may both lead to potential affect on the availability of resources used for traditional harvesting activities (trapping, hunting and plant gathering);
    - The construction of the dikes and the controlled dewatering of the isolated portion of Springpole Lake will result in a direct and indirect change in aquatic habitat which may potentially affect the availability of resources used for traditional harvesting activities (fishing);
    - The construction of Project infrastructure (including the mine site, linear infrastructure and the dikes) will result in a change to the landscape which may potentially affect access to resources used for traditional harvesting activities (trapping, hunting and plant gathering);
    - The use of equipment will result in changes to sound levels and air quality, and the construction of mine site infrastructure will result in a change in aesthetics. These may both lead to a change in the experience associated with traditional harvesting activities (trapping, hunting, plant gathering and fishing);
    - Site preparation will result in a direct change in the landscape which may potentially affect the availability of areas where cultural activities occur;
    - The construction of Project infrastructure (including the mine site, linear infrastructure and the dikes) will result in a change to the landscape which may potentially affect access to areas where cultural activities occur; and,
    - The use of equipment will result in changes to sound levels and air quality, and the construction of mine site infrastructure will result in a change in aesthetics. These may both lead to potential affect on the experience associated with the use of cultural areas.

Mitigation measures are applied to these pathways to avoid or minimize changes in Indigenous health conditions, Indigenous socio-economic conditions, Indigenous heritage features and current use, as described in Section 6.26.4 and Table 6.26-5. An assessment of the potential residual effects, after the application of mitigation, is presented in Section 6.26.6.

All other interactions during the construction of the Project (Table 6.26-4) are not considered plausible and potential effects on Indigenous people are unlikely.

Operations Phase

Project result in pathways to potential effects on Indigenous people as described below. After mitigation is applied to each pathway, as described in Table 6.26-5, the residual effects are assessed using the criteria identified for each pathway:

- Without mitigation, a change in Indigenous health conditions could occur from the identified interactions through the following pathways:
    - The use of equipment will result in changes to air quality and sound levels. Further, these changes may result in an indirect change in wildlife habitat, that may affect the availability of country foods (plants and wildlife); and,

- The operation of the effluent discharge that may potentially affect water quality.

- Without mitigation, a change in Indigenous socio-economic conditions could occur from the identified interactions through the following pathways:
  - The use of equipment will result in changes to air quality and sound levels which may lead to a potential indirect change in wildlife habitat, which may potentially affect the availability of resources for commercial harvesting (hunting, trapping and plant gathering) activities and the availability of country foods;
  - The use of equipment will result in changes to air quality and sound levels which potentially affect the experience associated with outfitting and the use of recreational areas;
  - Project employment and expenditures will result in a change in personal income levels and business opportunities, a change in social protection programs (social safety nets, food assistance), and a change in the resiliency of regional infrastructure (due to the transmission line), all which may potentially affect community health and social services;
  - Project employment and expenditures will result in a change in personal income levels and business opportunities which may potentially affect income inequity;
  - Project employment and expenditures will result in a change in personal income levels and business opportunities which may potentially affect the population, economic activity and cost of living in local communities; and,
  - Project employment and expenditures will result in a change in personal income levels and business opportunities which may potentially affect non-commercial / trade economy through a transition from a traditional trade economy to a wage economy;
  - Project employment and expenditures will provide skill and capacity building opportunities which may enhance the probability of future employment and contracting successes; and
  - Employment by the Project may expose Indigenous workers to racism or harassment which may potentially affect their mental health and indirectly place a greater burden on community health and social services.

- Without mitigation, a change in Indigenous physical and cultural heritage could occur from the identified interactions through the following pathway:
  - The use of equipment will result in changes to air quality and sound levels which may lead to a change in the experience associated with heritage and SCC features, which may potentially affect the value of heritage and cultural features.

- Without mitigation, a change in the current use of lands and resources for traditional purposes could occur from the identified interactions through the following pathway:
  - The use of equipment will result in changes to sound levels and air quality which may lead to a potential indirect change in wildlife habitat, which may lead to potential affect on the availability of resources used for traditional harvesting activities (trapping, hunting and plant gathering);
  - The use of equipment will result in changes to sound levels and air quality which may lead to a change in the experience associated with traditional harvesting activities (trapping, hunting, plant gathering and fishing); and,

- The use of equipment will result in changes to sound levels and air quality which may lead to potential affect on the experience associated with the use of cultural areas.

Mitigation measures are applied to these pathways to avoid or minimize changes in Indigenous health conditions, Indigenous socioeconomic conditions, Indigenous heritage features and current use, as described in Section 6.26.4 and Table 6.26-5. An assessment of the potential residual effects, after the application of mitigation, is presented in Section 6.26.6.

All other interactions during the operation of the Project (Table 6.26-4) are not considered plausible and potential effects on Indigenous people are unlikely.

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 Indigenous people as described below. After mitigation is applied to each pathway, as described in Table 6.26-5, the residual effects are assessed using the criteria identified for each pathway:

- Without mitigation, a change in Indigenous health conditions could occur from the identified interactions through the following pathways:
  - The use of equipment will result in changes to air quality and sound levels. Further, these changes may result in an indirect change in wildlife habitat, that may affect the availability of country foods (plants and wildlife); and,
  - The refilling of the open pit basin will result in a direct and indirect change in aquatic habitat that may potentially affect the availability of country foods (fish).
- Without mitigation, a change in Indigenous socio-economic conditions could occur from the identified interactions through the following pathways:
  - The refilling of the open pit basin which may potentially affect the use of navigable waters;
  - The use of equipment will result in changes to air quality and sound levels which may lead to a potential indirect change in wildlife habitat, which may potentially affect the availability of resources for commercial harvesting (hunting, trapping and plant gathering) activities; and,
  - The refilling of the open pit basin will result in a direct and indirect change in aquatic habitat and may potentially affect the availability of resources for commercial harvesting (fishing) activities;
  - The refilling of the open pit basin may potentially affect access for outfitting and recreational areas; and,
  - The use of equipment will result in changes to air quality and sound levels which potentially affect the experience associated with outfitting and the use of recreational areas.
- Without mitigation, a change in Indigenous physical and cultural heritage could occur from the identified interactions through the following pathway:
  - The refilling of the open pit basin may potentially affect access to heritage and cultural features; and,

- The use of equipment will result in changes to air quality and sound levels which may lead to a change in the experience associated with heritage and cultural features, which may potentially affect the value of heritage and cultural features.

- Without mitigation, a change in the current use of lands and resources for traditional purposes could occur from the identified interactions through the following pathway:
  - The use of equipment will result in changes to sound levels and air quality which may lead to a potential indirect change in wildlife habitat, which may lead to potential affect on the availability of resources used for traditional harvesting activities (trapping, hunting and plant gathering);
  - The refilling of the open pit basin will result in a direct and indirect change in aquatic habitat which may potentially affect the availability of resources used for traditional harvesting activities (fishing);
  - The use of equipment will result in changes to sound levels and air quality which may lead to a change in the experience associated with traditional harvesting activities (trapping, hunting, plant gathering and fishing); and,
  - The use of equipment will result in changes to sound levels and air quality which may lead to potential affect on the experience associated with the use of cultural areas.

Mitigation measures are applied to these pathways to avoid or minimize changes in Indigenous health conditions, Indigenous socioeconomic conditions, Indigenous heritage features and current use, as described in Section 6.26.4 and Table 6.26-5. An assessment of the potential residual effects, after the application of mitigation, is presented in Section 6.26.6.

All other interactions during the closure of the Project Table 6.26-4) are not considered plausible and potential effects on Indigenous people are unlikely.

6.26.4 Mitigation Measures

Extensive mitigation measures have been developed to address changes in the environment as a result of the Project, as described in Section 6.2 to 6.24. These mitigation measures help to avoid or reduce residual environmental effects and subsequently can help to avoid or reduce effects on Indigenous people. Key mitigation measures are considered in the characterization of residual effects of changes in the environment on Indigenous peoples include:

- Development of a compact mine site to limit the areal 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;
- Prior to construction, provide the opportunity to establish Environment Committee(s) with interested Indigenous communities to:
  - Facilitate on-going communications and meaningful engagement during construction, operation and closure of the Project;
  - Facilitate the sharing and integration of TK 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.

- Prior to construction, provide opportunities to Indigenous communities that reported traditional land and resource use in the LSA to elaborate on site-specific information with the goal to refine mitigation measures, if required.
- 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 traditional land use activities, during construction, operation and closure phases.
- During construction, operation and closure phases of the Project, support community land-based cultural activities.
- Give preference to hiring employees for the Project to Indigenous communities and local municipalities.
- Give preference to contracting for goods and services from the businesses in the Indigenous communities and local municipalities.
- Establish a Health and Wellness Strategy (Appendix Q-3) focused on employee mental health and wellness to complement health and safety programs and to support local and Indigenous employees.
- Provide onsite accommodations that are safe and welcoming for the Project workforce during construction and operations phases.
- The construction and operation of the Project will utilize a rotational workforce to support the employment of local and regional workers.
- Prior to construction, develop an access management strategy with local Indigenous communities to manage access in the 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.

- Hunting and fishing at the Project will be prohibited by employees and contractors while at site, during all phases.
- Maintain regular communication with trapline holders SL197 and SL200 regarding activities and opportunities to facilitate their land use activities.
- Prior to construction, establish the alternate portage 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.
- All buildings and facilities will be deconstructed and removed, and disturbed areas will be stabilized during closure.
- 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.

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:

- Implement the mitigation measures for potential effects on air quality for dust (Section 6.2.4) 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.

- Implement the mitigation measures for potential effects on noise (Section 6.3.4), including:
  - During construction and operations, site equipment will be operated to meet NPC-300 and Health Canada operational noise and vibration limits at points of reception, when applicable;
  - Building dimensions, layout and orientation will be designed to shield noise sources, where possible;
  - 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; and,
  - For helicopter use during transmission line construction, minimum flight altitudes will be maintained unless the helicopters are engaged in construction tasks, landing or departure.
- Implement the mitigation measures for potential effects on surface water (Section 6.6.4, Section 6.7.4 and Section 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 using Best Available Technology Economically Achievable will be designed and operated to produce an effluent quality appropriate for discharge to the environment in accordance with applicable regulatory requirements, including the MDMER; and,
  - During construction, operation and active closure, an erosion and sediment control plan will be implemented to manage runoff water.
- Implement the mitigation measures for potential effects on fish and fish habitat (Section 6.10.4), including:
  - Implement the measures outlined in the revised Fish Habitat Offset and Compensation Plan (Appendix F);
  - Prohibit fishing within the gated controlled access portion of the PDA by Project personnel while working or residing on-site, during construction, operation and closure phases; and,
  - 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.
- Implement the mitigation measures for potential effects on vegetation (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 wildlife habitat features; and,
  - Use mechanical vegetation removal practices, when possible.
- Implement the mitigation measures for potential effects on wildlife (Section 6.12.4), including:
  - During all phases of the Project, where practical, avoid sensitive wildlife habitat by implementing buffers;
  - Prohibit hunting within the gated controlled access portion of the PDA by Project personnel while working or residing on-site, during construction, operation and closure phases;
  - During construction, minimize the area cleared with heavy machinery for the mine access road, as practical, recognizing the need for clear sightlines for safety.

- During construction, operation and closure phases, enforce reduced speed limits along Project-controlled roads within high-quality wildlife habitats, particularly along segments with known or recurrent wildlife crossings;
- During construction, operation and closure phases, Project-related vehicles travelling on the mine access road must come to a stop if wildlife is encountered and provide them with the right-of-way to cross the road;
- During, domestic solid waste products and similar materials will be properly secured, stored, and disposed of at an offsite licensed facility, particularly anything that is an attractant for scavenging wildlife; and,
- In collaboration with Indigenous communities and Ministry of the Environment, Conservation and Parks, design and implement a habitat restoration program for Boreal Caribou.

- Implement the mitigation measures for potential effects on archaeology (Section 6.22.4), including:
  - Archaeological assessment programs will be conducted in areas of archaeological potential prior to ground disturbance activities and,
  - Key construction and operation staff will be trained to recognize archaeological artifacts and cultural material.
- Implement the mitigation measures for potential effects on heritage resources (Section 6.23.4), including:
  - Heritage properties will be noted on applicable Project maps to identify the heritage status of the property to Project personnel.

The application of mitigation measures for the pathways of potential effects is illustrated in Table 6.26-5. Mitigation measures described in this section are expected to be effective for their intended purposes given their effective implementation at similar projects.

Monitoring programs will be implemented to verify the accuracy of the predicted effects, assess the effectiveness of the implemented mitigation measures and may be further optimized in response to monitoring data.

6.26.5 Analytical Methodology

The assessment of the potential effect of changes to the environment on Indigenous peoples uses both quantitative and qualitative methods.

The quantitative assessment was achieved by using:

- GIS analysis for other VCs such as fish, vegetation communities, 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 reports, an understanding of the Project activities, information from other VCs and professional judgement.

Existing conditions for the Project and relevant information sources, identified in Section 6.26.2, are used to inform the selection of indicators and the assessment of effects on changes to the environment on Indigenous peoples.

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.

6.26.5.1 Assumptions and the Use of the Conservative Approach

As this section has integrated information from other sections of the final EIS/EA, the assumptions and conservative approach associated with each related VC are also applicable to this discussion. This includes, for example, that the PDA incorporates a buffer around the Project footprint which adds over 600 ha that in fact won't be disturbed. A conservative approach has been applied, whereby if it is uncertain if an activity is practiced, it is assumed to be practiced and activities with a degree of uncertainty have been assumed to contribute to the assessment of the potential effect of changes to the environment on Indigenous peoples. Where the conservative approach identified the effects of changes to the environment on Indigenous peoples, mitigation has been identified to reduce these effects.

6.26.6 Characterization of Potential Residual Effects

The potential residual effects of the Project on Indigenous peoples were assessed as discussed below.

- Changes in health;
- Changes in socioeconomics;
- Changes in archaeology and heritage resources; and,
- Changes in traditional land and resource use.

6.26.6.1 Change in Health Conditions

Predicted changes to health conditions of Indigenous peoples are driven by potential changes in the environment from the Project, including air quality, water quality, and noise and vibration and in potential changes in the current and future availability and quality of country foods.

Changes in air quality will be mitigated using the measures described in Section 6.2.4 and are predicted to be below regulatory guidelines (provincial ambient air quality criteria) at the property boundary and will not affect land users in adjacent areas. Noise from the Project will be confined to within the LSA around the mine site area. Noise along the transmission line will occur only during its construction and only for a short period at any one location as the line will be constructed in a linear manner. Noise effects will be mitigated by the measures identified in Section 6.3.4 and will not affect the health of Indigenous people as it is will be limited to areas near the Project where land users are expected only occasionally or periodically, or only for a short period while the transmission line is being constructed. Vibration effects will be mitigated with the measures discussed in Section 6.3.4. Changes in water quality will be mitigated by measures described in Sections 6.6.4, 6.7.4, 6.8.4 and 6.9.4 and water released from the mine site will have been treated, will be within regulatory guidelines and will have no impact on health conditions of Indigenous peoples.

Potential changes in the availability of country foods could occur due to removal or alteration of habitat, noise, and water quality which could the health of Indigenous people. Vegetation, wetlands, and wildlife habitat will be removed from the PDA during construction; however, the Project footprint is small and there is an abundance of available habitat for wildlife throughout the RSA. Habitat restoration will occur

progressively and at closure. The Project is not predicted to affect the health or abundance of country foods in the RSA.

The potential risks to human health through the consumption of country foods is not anticipated (see Section 6.24).

Employment can be challenging especially for new workers and those managing personal circumstance and family. This will be managed through the implementation of a Health and Wellness Strategy (Appendix Q-3) focused on employee mental health and wellness to complement health and safety programs and to support local and Indigenous employees. Elements of the Health and Wellness Strategy include implementation of anti-discrimination policies, mandatory diversity, cultural, and gender sensitivity training for supervisors, managers, and contractors, Indigenous cultural awareness training content in site orientation, and cultural spaces at the mine site for smudging, prayer, and other ceremonies. In addition, FMG will support reasonable requests and work schedule flexibility for Indigenous employees for time off to pursue traditional land use activities, during construction, operation and closure phases.

There will not be a residual affect to Indigenous health conditions with the application of mitigation measures and FMG aims for the Project to be beneficial in terms of Indigenous health and well-being both at the individual and community level. Therefore, a determination of significance is not required.

6.26.6.2 Change in Socio-economic Conditions

Predicted changes to the socio-economic conditions of Indigenous peoples related to the environment are driven by potential changes to navigation, commercial and recreational land and resource use, food security, and community level socio-economic conditions. However, importantly, the Project will deliver major socio-economic uplift to the region through training, employment and business opportunities which are not accounted for in this discussion and is addressed in Local and Regional Economy (Section 6.19) and Summary of Benefits (Section 10).

The travel routes on Birch Lake and Springpole Lake will not be affected by the Project. An alternate access to navigation routes between Birch Lake and Springpole Lake has been identified (Figure 6.18-7) and will be established and maintained prior to construction through the closure phases when the existing portage route will be re-established at post-closure. As there is no residual effect on navigation, a change in socio-economic conditions from this pathway is not anticipated.

As described in Section 6.17.6.2, the Project construction will result in the removal of wildlife habitat within the PDA, which can cause a displacement of wildlife species and reduce areas for trapping. The PDA will affect 0.6% of the total area of the eight traplines it overlaps. The area of disturbance will be minimized through the development of a compact mine site, by using existing road infrastructure where possible and co-locating the transmission line, airstrip, and mine access road. In addition, indirect effects to wildlife habitat could occur due to sensory disturbances from Project activities that could change wildlife abundance and potentially have a negative effect on the experience of trapping near the mine site area and the mine access road during construction and operations and near the transmission line during construction. However, with the implementation of mitigation measures for noise (Section 6.3.4) from Project activities, these indirect changes in wildlife habitat will be minimized. Trapping may also be affected by changes in access to preferred locations. Prior to construction, FMG will develop an access management strategy with local Indigenous communities to manage access along the mine access road, throughout construction, operation and closure phases of the Project. The mine access road will then facilitate access for Indigenous community members for TLRU activities. Further, FMG will maintain regular communication with trapline holders SL197 and SL200 regarding activities and opportunities to facilitate their land use activities, along

with the other trapline holders along the Project' transmission line. An alternate navigation route to maintain access between Springpole Lake and Birch Lake will be established and maintained during construction and operation phases and the existing portage route will be re-established during closure. There will be a residual effect due to changes in trapping, and its contribution to socio-economic conditions.

Recreational activity will be prohibited only within the mine site area of the PDA during construction and operations for safety. There will be restrictions on the use of the transmission line corridor only during construction for safety, and there will be no restrictions on Birch Lake and Springpole Lake. No new access will be created for Springpole Lake and FMG has acquired certain outfitters in the vicinity of the PDA which will reduce pressure on resources to the benefit of Indigenous community members. The remoteness of the area and the abundance of other areas in the RSA for recreation indicates that any potential effect on recreational activity will be negligible; therefore, a residual effect from changes in recreational activities is not predicted.

Country foods and their availability, contribute to food security. As discussed under changes to Indigenous health conditions in Section 6.26.6.1, the availability of fish, wildlife, and plants as country foods will not change except in the mine site area and adjacent to the mine access road during construction and operations and temporarily along the transmission line during construction. The quality of country foods will not be affected by the Project. Harvesting within the mine site area of the PDA will be prohibited during construction and operations for safety, however, that is a very small percentage of the available habitat in which to harvest country foods throughout the RSA and traditional territories of Indigenous communities. An access management strategy will create new opportunities for traditional activities accessible along the mine access road. FMG will support reasonable requests and flexibility in work schedules for Indigenous employees for time off to pursue traditional land use activities, during construction, operation and closure phases. In addition, during construction, operation and closure phases of the Project, FMG will support community land-based cultural activities. As a result, there is no residual effect predicted from changes in food security.

Socio-economic effects within Indigenous communities could change due to Project-related effects. While an influx of workers into a community can cause changes to the socio-economic conditions of the community, it is unlikely people will move to the Indigenous communities to seek employment at the Project because housing is in short supply or appropriate for current population levels. The Project will provide onsite accommodations that are safe and welcoming for the Project workforce during construction and operations phases and the construction and operation of the Project will utilize a rotational workforce to support the employment of local and regional workers. Without an increase in population, additional demands on community infrastructure, services and resources will not increase due to the Project.

FMG will give preference to hiring employees from Indigenous communities and local municipalities and give preference to contracting for goods and services from the businesses in the Indigenous communities and local municipalities. The increased personal and business income will provide a positive effect on community socio-economic conditions and not have a residual adverse effect.

There is a localized residual effect on Indigenous socio-economic conditions due to the overlap with traplines; therefore, a determination of significance is required (Section 6.26.7.1). The effect on trapping and socio-economic conditions apply primarily to the trapline areas within the mine site and mine access road areas.

6.26.6.3 Change in Indigenous Physical and Cultural Heritage

Project-related effects on Indigenous physical and cultural heritage could include change to a cultural value or importance or access to physical and cultural heritage, change to a sacred, ceremonial or culturally important place, object or thing, or change to visual aesthetics over the life of the Project.

There are no archaeological resources identified within the area of the mine site, effluent pipeline, mine access road, and aggregate sites that would be affected by Project activities. The portage route that provides access across the mine site area (current exploration camp area) between Birch Lake and Springpole Lake is considered to have cultural heritage interest or value. An alternate portage route has been identified that was historically used which will be re-established and maintained by FMG prior to construction and through closure, when the existing portage will be returned at post closure.

Along the transmission line, there are six locations that are considered to have archaeological potential. These will be investigated in more detail prior to construction, and measures to mitigate effects will be developed, if necessary, such as avoidance when constructing the transmission line poles. There is one bridge of cultural heritage value along the transmission line route, however, it will not be affected by construction of the transmission line. The transmission line portion that follows the existing E1C transmission line crosses through SFN reserve lands. This optimized route was selected in consultation with SFN, and FMG will continue to work with SFN through all phases of the Project.

Prior to construction, FMG will provide opportunities to Indigenous communities that reported traditional land and resource use in the LSA to participate in an Environment Committee(s) to facilitate on-going information sharing and inform adaptive management and monitoring. There is no residual effect on physical and cultural heritage.

Changes to the value or importance and access to physical and cultural heritage as well as changes to sacred, ceremonial or culturally important places, objects, or things could be caused by Project construction disturbing the landscape and sensory disturbances affecting the experience of being in an area. CLFN identified there are culturally significant place names within 5 km of the PDA and MON reported that they have ceremonial areas in the LSA along the southern transmission line route which has since been optimized to avoid this area. Prior to construction, FMG will provide opportunities to Indigenous communities that reported traditional land and resource use in the LSA to participate in an Environment Committee(s) to facilitate on-going information sharing and inform adaptive management and monitoring. During detailed design, the transmission line design will be optimized and regular communication will occur during construction to ensure ceremonial practices can continue. As described in Section 6.23.6, there no residual effects to known built heritage resources or cultural heritage landscapes.

The Project will increase ambient light (at night) during construction, operations and active closure. A tree buffer will be preserved around the mine, as practical, to diminish the amount of infrastructure that can be seen from the immediate area. During closure, buildings and facilities will be dismantled and removed and disturbed areas will be revegetated, however, the CDF will remain visible above the tree line during operations and after closure. Construction of the mine access road and a portion of the transmission line will create new linear disturbances on the landscape while the east-west portion of the transmission line will parallel an existing transmission line in the same corridor. As a result, there will be a residual effect from a change in visual aesthetics and a determination of significance is required (Section 6.26.7.2).

The residual effect due to changes in visual aesthetics is related to the CDF and will be observed by individual community members who periodically use the PDA and LSA near the mine site area who are most often from CLFN including trapline holder SL197, and not to the exclusion of LSFN or SFN.

6.26.6.4 Change in Current Use of Land and Resources for Traditional Purposes

Predicted changes to the current use of lands and resources for traditional purposes are driven by changes in the resources used, changes to access to areas of traditional use, and changes to the experience of conducting traditional practices. The current use of lands and resources is discussed in more detail in Section 6.21 (Traditional Land and Resource Use).

The Project will remove or alter habitat in the PDA during construction and displacement of wildlife may extend into the LSA in the vicinity of the mine site area during construction and operations of the mine. Effects to wildlife will be managed through implementation of mitigation measures for wildlife and wildlife habitat (Section 6.12). The localized loss of vegetation and wetland communities is less than a 1% change for the RSA. Plant harvesting will be affected only in the Project footprint where it is overprinted by Project infrastructure. Vegetation will be maintained along the transmission line route.

Fish will be temporarily displaced from the open pit area to facilitate safe mining operations. However, 94% of Springpole Lake will remain as it is at baseline with productive fishing opportunities, including several other lake trout habitat fishing areas, and Springpole Lake will increase in size by 3.5% at closure with the establishment of enhanced fish habitat areas. There will be no effect to fish of fishing in Birch Lake.

CLFN uses the mine site area, the area of the mine access road, and surrounding areas on Springpole Lake and Birch Lake. SFN and MON identified areas of land and resource use along the transmission line corridor.

Prior to construction, FMG will provide opportunities to Indigenous communities that reported traditional land and resource use in the LSA to participate in an Environment Committee(s) to facilitate on-going information sharing and inform adaptive management and monitoring. Where there is interest, FMG will provide opportunities to local Indigenous communities and traditional resource users the opportunity to harvest vegetation and aquatic resources within the PDA prior to construction. During the operation and closure of the Project, FMG will undertake revegetation in the mine site area, and include input from Indigenous communities and TLRU planning documents. There will be a limited residual effect to the availability of traditionally harvested resources in the mine site and mine access road areas during construction and operations and along the transmission line corridor during construction.

During construction, operation, and active closure, traditional hunting, fishing and plant gathering will not occur directly in the mine site and mine access road areas for safety reasons. FMG will, develop an access management strategy with local Indigenous communities prior to construction to support traditional activities, throughout construction, operation and closure phases of the Project along the mine access road area. There is a currently used portage route between Birch Lake and Springpole Lake that crosses the mine site area at the existing exploration camp that is maintained by FMG. Prior to construction, 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. There will be no new public access points created for Birch Lake or Springpole Lake. There will be access restrictions for safety along the transmission line corridor only during the short construction period. Given the retention of vegetation along the transmission line, it is not likely that new access will be created along its route and the terrain along the transmission line will make the route largely impassable. In addition, FMG will support reasonable requests and work schedule flexibility for Indigenous employees for time off to pursue traditional land use activities, during construction, operation and closure phases. There will be a residual effect to access to land and resource use areas.

There may be changes in the experience of Indigenous peoples in conducting traditional practices due to sensory disturbances while on the land or through negative perceptions about the effect of the Project,

however, with the establishment of an Environment Committee(s) and community based monitoring initiative and on-going communication with community members these perceptions can be addressed. Sensory disturbances will be managed as discussed in 6.26.6.3. Prior to construction, FMG will provide opportunities for affected Indigenous communities to conduct traditional ceremonies within the PDA. There will be a limited residual effect on the experience of conducting traditional practices.

There will be a residual effect on the current use of land and resources for traditional purposes due to localized changes in the availability of harvested resources, changes in access to some areas used for traditional purposes (alternate portage route location), and changes to the experience of land users while conducting traditional activities; therefore, a determination of significance is required (Section 6.26.7.3).

The residual effect due to changes in the current use of lands and resources for traditional purposes will be observed by individual community members who periodically use the PDA and LSA near the mine site area who are most often from CLFN including trapline holder SL197, and not to the exclusion of LSFN or SFN, or SFN and MON who periodically use the transmission line LSA.

6.26.7 Significance of Residual Effects

With the proposed design and mitigation measures, there will be residual effects on the Indigenous people socio-economics (trapping), physical and cultural heritage (visual aesthetics), and traditional use (vegetation and wildlife harvesting).

6.26.7.1 Change in Socio-economic conditions

The changes in Indigenous socio-economic conditions are related to predicted localized change in trapping, as a result of the Project footprint decreasing the area available for trapping, the localized change in abundance of the wildlife species trapped in the vicinity of the mine site, and the quality of the experience associated with trapping. The magnitude of these changes is low (Level I) because the reduction in the area available for trapping is small compared to the total available area remaining of the affected traplines. Noise could have a localized effect on the experience of individual trappers and FMG will seek opportunities to facilitate the ability of the trappers to undertake activities in the area as has been established for SL197. The access management strategy proposed will also facilitate land access for local trappers. The degree to which trappers may avoid the area is subject to individual sensitivities and choices and the Environment Committee(s) will provide an on-going forum for information sharing, monitoring and adaptive management complimented by community-based monitoring opportunities. The magnitude of the effect on trapping is low (Level I), the residual effect is limited to the LSA (Level I). The duration of the residual effect will occur over the long term, lasting through all phases of the Project (Level III) and will be partially reversed (Level II) at closure due to reduced activities and revegetation and/or restoration of wildlife habitat within the PDA, though not fully returning to the existing condition.

In terms of the social context of trapping, it is a cultural and economic activity of importance to Indigenous communities, however, with the planned mitigation measures and the availability of trapping resources within the RSA, changes to trapping can be effectively managed (Level I). The effect on Indigenous socio-economic conditions due to changes in trapping is not significant.

6.26.7.2 Change in Indigenous Physical and Cultural Heritage

Predicted changes to Indigenous physical and cultural heritage are the result of changes in the value or importance of those resources and changes in visual aesthetics.

The alteration of the landscape by the Project is restricted to the PDA although negative perceptions about the changes and the effects on the value of physical and cultural resources may extend into the LSA. Additional investigations for potential cultural resources will be undertaken and mitigation measures (such as providing opportunities to conduct ceremonial practices) may be refined, if necessary, once the detailed design of the transmission line route has been further advanced.

Predicted effects to visual aesthetics in relation to Indigenous physical and cultural heritage are the primarily the result the CDF during operations and closure. The view of the mine will be reduced by retention of a tree line around the site, where practical, and all structures will be removed at closure. The CDF will remain as a visible rock plateau after closure and will be partially revegetated.

The magnitude of the changes to changes in the value or importance of physical and cultural heritage resources and changes in visual aesthetics while experiencing those resources is low (Level I) and restricted to the PDA and LSA around the mine site area (Level I). The effect will last beyond closure for the mine site area (Level III) but will be partially reversible with revegetation (Level II), though not fully returning to the existing condition. The localized effect on visual aesthetics will be experienced on an individual level and the traditional use of physical and cultural heritage resources can continue within the LSA and RSA during construction and operations and in the PDA at closure and has a low effect in terms of social context (Level I). The effect on physical and cultural heritage is not significant.

6.26.7.3 Change in Current use of Land and Resources for Traditional Purposes

The residual effect to the current use of land and resources for traditional purposes is a function of the localized reduction of abundance of harvested species, and changes in the experience of conducting traditional land activities adjacent to the PDA during construction and operations.

The reduction in abundance of harvested species will be limited to wildlife adjacent to the mine site and mine access road area which are a small portion of the total area available for traditional harvesting. An access management strategy for mine access road to be developed with Indigenous communities and MNR will support TLRU by Indigenous community members. Prior to construction, 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. The experience of Indigenous people while conducting traditional practices at the PDA boundary will change visually, however, sensitivity levels may vary among individual land and resource users and all areas outside the PDA will continue to provide hunting and fishing opportunities through all phases of the Project. The magnitude of the effect on current use of land and resources for traditional purposes is low (Level I) and restricted to the LSA (Level I). The effect will occur once (Level I), be continuous through construction and operations (Level III) and partially reversible at closure (Level II), though not fully returning to the existing condition. The importance of conducting traditional practices is very high for Indigenous people, however the small, localized effect can be accommodated in terms of social context (Level I). The residual effect is not significant.

6.26.7.4 Confidence Prediction

Prediction confidence in the assessment of effects on Indigenous health conditions, Indigenous socio-economic conditions, and Indigenous physical and cultural heritage is moderate. This reflects the level of information available for Indigenous communities engaged on the Project and the results of the Indigenous engagement process for the Project and a higher degree of certainty associated with the continued ability carry on TLRU activities in the Project area based on the supporting assessments for related VCs. Given the nature of assessing effects Indigenous people the views of Indigenous communities may differ from the

findings of this assessment. Environment Committee(s) and community-based monitoring opportunities will be provided as a forum for on-going information sharing, monitoring and adaptive management throughout the Project.

6.26.8 References

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Table 6.26-1: Criteria and Indicators for Indigenous peoples

Criteria	Indicator	Rationale
Change in Indigenous Health Conditions	• Potential changes in air quality • Potential changes in current and future availability and quality of country foods • Potential changes in noise exposure and effects of vibration from blasting • Potential changes in water quality (drinking, recreational and cultural uses)	The Project may result in changes to health conditions of Indigenous peoples driven by potential changes in the environment, including air quality, water quality, and noise and vibration and in potential changes in the current and future availability and quality of country foods.
Change in Indigenous Socio-economic Conditions	• The use of navigable waters (including any water used for Indigenous transport) • Forestry and logging operations • Commercial fishing, hunting, trapping, and gathering activities • Commercial outfitters • Recreational use • Food security • Income inequity • Changes at the community level that affect socio-economic conditions for Indigenous peoples as result of increased population, economic activity, cost of living, among other factors • Non-commercial / trade economy	The Project may result in changes changes to the socio-economic conditions of Indigenous peoples related to the environment driven by potential changes to navigation, commercial and recreational land and resource use, food security, and community level socio-economic conditions.
Change in Indigenous Physical and Cultural Heritage	• The loss or destruction of physical and cultural heritage • Changes to the cultural value or importance associated with physical and cultural heritage • Changes to access to physical and cultural heritage • Changes to sacred, ceremonial or culturally important places, objects, or things • Changes to visual aesthetics over the life of the Project	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 viewscapes.

Criteria	Indicator	Rationale
Change in Current Use of Lands and Resources for Traditional Purposes	• Resources used, such as changes to the quantity, quality, and availability of resources and habitat, as well as to the sufficiency of resources required to conduct an activity or practice, including perception of effects, avoidance, and consideration of the seasonal round • Access to areas and resources without difficulty or additional cost used to conduct an activity or practice, as well as the opening up of areas to non-Indigenous populations for access and use, and consideration of preferred areas, timing of harvest, and options of traveling there in preferred manner • Experience by Indigenous peoples, including changes that affect the spiritual and cultural experiences of the activity or practice, as well as sense of place and wellbeing, and the applicability and transmission of Indigenous knowledge, laws, customs and traditions	Traditional activities depend upon the availability and quality of resources that are used for hunting, trapping, fishing and harvesting and requires access to preferred harvesting areas. The quality of the experience may be affected due to sensory disturbances from changes in sound and viewscapes.

Table 6.26-2: Significance Determination Attributes and Rankings for Indigenous peoples

Attribute	Description	Category
Magnitude	A qualitative or quantitative measure to describe the size or degree of the residual effects relative to baseline conditions	Defined separately for each Criteria, in Table 6.26-3
Geographic Extent	The spatial extent over which the residual effect will take place	**Level I:** Effect is restricted to the LSA. **Level II:** Effect is extends beyond the LSA. **Level III:** Effect extends beyond and/or into the RSA.
Duration	The time period over which the residual effect will or is expected to occur	**Level I:** Effect occurs over the short term: less than or equal to 3 years. **Level II:** Effect occurs over the medium term: more than three years but less than 20 years. **Level III:** Effect occurs over the long term: greater than 20 years.
Frequency	The rate of occurrence of the residual effect	**Level I:** Effect occurs once, infrequently or not at all. **Level II:** Effect occurs intermittently or with a certain degree of regularity. **Level III:** Effect occurs frequently or continuously.
Reversibility	The extent to which the residual effect can be reversed	**Level I:** Effect is fully reversible. **Level II:** Effect is partially reversible or potentially reversible with difficulty. **Level III:** Effect is not reversible.
Timing	A measure of whether the residual effect occurs during a sensitive period of the year	**Level I:** Effects do not occur during a sensitive period; or related effects are fully mitigated. **Level II:** Effects occur during a sensitive period and related effects are partially mitigated. **Level III:** Effects do not occur during a sensitive period; or related effects cannot be mitigated.

Table 6.26-3: Criteria-specific Magnitude Rankings for Indigenous peoples

Criteria	Magnitude Ranking
Change in Indigenous Health Conditions	• **Level I:** Project-related environmental exposures do not result in a change in human health. • **Level II:** Project-related environmental exposures are unlikely to substantially result in a change in human health. • **Level III:** Project-related environmental exposures may result in a long term, substantive change in human health.
Change in Indigenous Socio-economic Conditions	• **Level I:** Small, measurable change in: o Land and resource use and capacity – activities can take place at or near similar levels as baseline. o Use of, access to, or interference with infrastructure and services within the current available capacity, without effect to quality of service. o Local employment, goods and services, and economic activity. • **Level II:** Measurable change in: o Baseline land, resource use and capacity conditions that are at capacity and may affect the ability to use land and resources. o Use of, access to, or interference with infrastructure and services that nears the available capacity, or which may affect the quality of services provided. o Risk or benefit to the economy while unlikely to pose a substantial risk or benefit to it. • **Level III:** Measurable change in: o Land, resource use, and capacity, such that activities and production cannot take place at similar levels as under baseline conditions. o The use of, access to, or interference with infrastructure and services that meets or exceeds the available capacity or degrades the quality of service provided. o Scale that is substantial compared to current economic conditions and if negative, represents a management challenge.
Change in Indigenous Physical and Cultural Heritage	• **Level I:** Measurable change from existing conditions to Indigenous physical and cultural heritage but insufficient to result in disturbance to heritage sites. • **Level II:** Measurable change to Indigenous physical and cultural heritage, but less than a high degree of change. Effects to heritage sites would be moderate. • **Level III:** High degree of physical disturbance on heritage sites and cultural areas. Loss of integrity of heritage sites.
Change in Current Use of Lands and Resources for Traditional Purposes	• **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. • **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. • **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.

Table 6.26-4: Potential Interactions of Project Components on Indigenous peoples

Project Component / Activity	Indigenous Peoples
Construction Phase	
Site preparation activities in the mine site area including clearing, grubbing and bulk earthworks	Yes
Construction of the mine access road and airstrip, including the development and operation of the aggregate resource areas	Yes
Development of temporary construction and staging areas	-
Construction of the fish habitat development area	-
Construction of the transmission line to the Project site	Yes
Construction of the onsite haul and access roads	Yes
Construction of dikes in the north basin of Springpole Lake	Yes
Construction of buildings and onsite infrastructure	Yes
Construction of the central water storage pond	-
Controlled dewatering of the open pit basin	Yes
Construction of the starter embankments for the CDF	-
Stripping of lake bed sediment and overburden at the open pit	-
Development of the surficial soil stockpile	-
Initiation of pit development in rock	-
Initiation of stockpiling of ore	-
Establishment and operation of water management and treatment facilities	Yes
Commissioning of the process plant	-
Employment and expenditures	Yes
Operations Phase	
Operation of the process plant	-
Operation of open pit mine	Yes
Management of overburden, mine rock, tailings and ore in designated facilities	-
Operation of water management and treatment facilities	Yes
Accommodations complex operations	-
Operation and maintenance of mine site infrastructure	-
Progressive reclamation activities	Yes
Employment and expenditures	Yes
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 regrading, placement of cover and revegetation	Yes
Filling the dewatered open pit basin with water	Yes
Monitoring and maintenance	-
Employment and expenditures	Yes

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

Table 6.26-5: Proposed Mitigation Measures for Potential Effects on Indigenous peoples

Pathways to Potential Effects / Criteria	Phase			Proposed Mitigation Measure
	Con.	Op.	Cl.	
Change in Indigenous health conditions	•	•	–	Development of a compact mine site to limit the areal 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.
	•	–	–	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 relevant to Indigenous health conditions for air quality (Section 6.2.4), noise and vibration (Section 6.3.4), surface water (Section 6.6.4, Section 6.7.4 and Section 6.8.4), fish and fish habitat (Section 6.10.4), vegetation communities and wetlands (Section 6.11.4), and wildlife and wildlife habitat (Section 6.12.4).
	•	•	–	Maintain regular communication with trapline holders SL197 and SL200 regarding activities and opportunities to facilitate their land use activities.
	•	•	–	Prior to construction, establish an alternate portage 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.
	•	–	•	Undertake revegetation in the mine site area, where practical, and include input from Indigenous communities and TLRU planning documents.
	•	•	•	During construction, operation and closure phases of the Project, support community land-based cultural activities.
Change in Indigenous socio-economic conditions	•	•	–	Development of a compact mine site to limit the areal extent of disturbance including a mine footprint of 867 ha including minimizing the open pit mining area to 6% of Springpole Lake.
	•	•	•	During construction, operation and closure phases of the Project, implement the mitigation measures relevant for Indigenous socioeconomic conditions for air quality (Section 6.2.4), noise and vibration (Section 6.3.4), surface water (Section 6.6.4, Section 6.7.4 and Section 6.8.4), vegetation communities and wetlands (Section 6.11.4), and wildlife and wildlife habitat (Section 6.12.4).
	•	•	•	Give preference to hiring employees for the Project to Indigenous communities and local municipalities.
	•	•	•	Give preference to contracting for goods and services from the businesses in the Indigenous communities and local municipalities.

Pathways to Potential Effects / Criteria	Phase			Proposed Mitigation Measure
	Con.	Op.	Cl.	
	•	•	•	Establish a Health and Wellness Strategy (Appendix Q-3) focused on employee mental health and wellness to complement health and safety programs and to support local and Indigenous employees.
	•	•	–	Provide onsite accommodations that are safe and welcoming for the Project workforce during construction and operations phases.
	•	•	–	The construction and operation of the Project will utilize a rotational workforce to support the employment of local and regional workers.
	•	•	•	Support reasonable requests and work schedule flexibility for Indigenous employees for time off to pursue traditional land use activities, during construction, operation and closure phases.
Change in Indigenous Physical and Cultural Heritage	•	•	–	Development of a compact mine site to limit the areal 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.
	•	•	–	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.
	•	–	–	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 archaeology (Section 6.22.4) and cultural heritage (Section 6.23.4).
	•	–	–	Prior to construction, provide opportunities to Indigenous communities that reported traditional land and resource use in the LSA to elaborate on site-specific information with the goal to refine mitigation measures, if required.
	•	•	•	During construction, operation and closure phases of the Project, support community land-based cultural activities.
	–	–	•	All buildings and facilities will be deconstructed and removed, and disturbed areas will be stabilized during closure.
	•	•	–	Development of a compact mine site to limit the areal extent of disturbance including a mine footprint of 867 ha including minimizing the open pit mining area to 6% of Springpole Lake.

Pathways to Potential Effects / Criteria	Phase			Proposed Mitigation Measure
	Con.	Op.	Cl.	
Change in Current Use of Lands and Resources for Traditional Purposes	●	●	–	Maintain Project designs such that no new public access points are developed on Springpole Lake.
	●	●	–	Preserve a tree buffer around the mine site to diminish the amount of the mine site that can be seen.
	●	–	–	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 relevant to current use for air quality (Section 6.2.4), noise and vibration (Section 6.3.4), surface water (Section 6.6.4, Section 6.7.4 and Section 6.8.4)) , fish and fish habitat (Section 6.10.4), vegetation communities and wetlands (Section 6.11.4), and wildlife and wildlife habitat (Section 6.12.4).
	●	–	–	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.
	●	●	●	During construction, operation and closure phases of the Project, support community land-based cultural activities.
	●	–	–	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.
	●	●	●	During construction, operation and closure phases, engage Indigenous environmental monitors from local communities in the implementation of mitigation and monitoring measures.
	●	●	●	Hunting and fishing at the Project will be prohibited by employees and contractors while at site, during all phases.
	●	●	●	Prior to construction, provide the opportunity to establish Environment Committee(s) with interested Indigenous communities to: ▪ Facilitate on-going communications and meaningful engagement during construction, operation and closure of the Project; ▪ Facilitate the sharing and integration of TK in Project-related activities during construction, operation and closure of the Project; and,

Pathways to Potential Effects / Criteria	Phase			Proposed Mitigation Measure
	Con.	Op.	Cl.	
				▪ 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 reasonable requests and work schedule flexibility for Indigenous employees for time off to pursue traditional land use activities, during construction, operation and closure phases.
	●	–	–	Prior to construction, develop an access management strategy Plan with local Indigenous communities to manage access in the along the mine access road, north of the Birch River crossing, 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 an alternate portage 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.
	–	–	●	All buildings and facilities will be deconstructed and removed, and disturbed areas will be stabilized during closure.
	–	●	●	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.

Notes:
Con: Construction; Op: Operation; Cl: Closure
● Mitigation is applicable
– Mitigation is not applicable