Springpole Gold Project Mitigation, Monitoring and Commitment List

Table 1: Mitigation, Monitoring and Commitments Related to the Atmospheric Environment (Air Quality and Greenhouse Gases)

Item #	Mitigation / Monitoring / Commitment	Description	Phase / Timing	Source
1.1	Mitigation	A blasting plan will be implemented and include measures to minimize the length of time the blasting material is allowed to sit in a drill hole before blasting. The blast schedule will optimize air dispersion to minimize effects on air quality, including by avoiding blasting during unfavourable meteorological conditions as needed.	Construction, Operations	Final EIS/EA Section 6.2.4
1.2	Mitigation	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.	Construction, Operations	Final EIS/EA Section 6.2.4
1.3	Mitigation	A preventive maintenance program will be employed that encompasses all pollution control equipment, diesel-fired engines (vehicle, equipment and standby power generation) and all processes with the potential for air quality effects.	All	Final EIS/EA Section 6.2.4
1.4	Mitigation	Air emissions from the use of diesel fuel for the mobile heavy equipment will be controlled through strategic mine scheduling to minimize the total distance travelled by haul trucks and other equipment and through the use of low sulphur diesel fuel.	All	Final EIS/EA Section 6.2.4
1.5	Mitigation	Dust emissions from roads and mineral stockpiles will be controlled through the application of water spray and supplemented by dust suppressants if required.	All	Final EIS/EA Section 6.2.4
1.6	Mitigation	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 co-disposal facility (CDF).	Closure	Final EIS/EA Section 6.2.4
1.7	Mitigation	Following completion of potentially acid generating (PAG) mine rock disposal within the north cell of the CDF, non-acid generating (NAG) tailings will be deposited over the entire north cell surface to fully cover the PAG mine rock and limit oxygen ingress. To minimize the exposure of tailings to winds generating dust, a vegetation cover will be established.	Closure	Final EIS/EA Section 6.2.4
1.8	Mitigation	Hydrogen cyanide emissions will be eliminated through the sulphur dioxide / oxygen cyanide treatment process to reduce cyanide in the tailings at the process plant and before deposition of tailings in the CDF. Excess sulphur dioxide used in this process will be recirculated (i.e., a closed-loop) without release to the air.	Operations	Final EIS/EA Section 6.2.4
1.9	Mitigation	PAG mine rock will be placed in the CDF with thickened tailings being deposited into the mine rock gaps and voids from the perimeter dam to minimize the exposure of tailings that could generate dust. Further, the mine rock level will be maintained above the tailings to minimize the exposed tailings surface area.	Operations	Final EIS/EA Section 6.2.4
1.10	Mitigation	Site roads will be maintained in good condition, with regular inspections and timely maintenance completed to minimize the silt loading on the roads.	All	Final EIS/EA Section 6.2.4
1.11	Mitigation	The process plant emission sources will be enclosed where possible and 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.	Operations	Final EIS/EA Section 6.2.4
1.12	Mitigation	Vehicle speeds will be limited.	All	Final EIS/EA Section 6.2.4
1.13	Mitigation	Implement mitigation for lighting and changes to viewscapes to minimize sensory disturbance, including: • To prevent a direct line-of-sight from light, maintain light sources below natural barriers such as tree lines or artificial barriers such as berms; • Minimize light spill and glare by through the use of shielding on stationary light sources and direct lighting downwards where practical; • Preserve a tree line as a buffer to minimize the amount of the mine site that can be seen from recreational areas.	All	Final EIS/EA Section 6.18.4
1.14	Mitigation	A Greenhouse Gas (GHG) Management Plan will be developed that will describe the energy and heat conservation, efficiency and management programs for the Project, and outline mitigation measures for GHG emissions, including but not limited to the following: • Fuel use tracking on a regular basis (such as monthly);	All	Final EIS/EA Section 6.4.5

Item #	Mitigation / Monitoring / Commitment	Description	Phase / Timing	Source
		• Limiting vehicle speeds; • No-idling policies, where practicable and safe, to avoid unnecessary releases of GHG emissions; • Regular maintenance and servicing of mining equipment and vehicles to maximize operational efficiency; • Operational planning to minimize the distances haulage trucks travel on site to the extent possible; and • Blast optimization to reduce the rehandling of materials.		
1.15	Mitigation	Construct a 230 kV transmission line to supply power during the operation of the Project, which obtains electricity from the Ontario grid.	Operations	Final EIS/EA Section 6.4.5
1.16	Mitigation	Implement the mitigation measures for air quality (Section 6.2) including: • During construction, operations and active closure, site roads will be maintained in good condition, with regular inspections and timely maintenance completed; and • During operations, GHGs from the use of diesel fuel for the mobile heavy equipment will be minimized through strategic mine scheduling to minimize the total distance travelled by haul trucks and other equipment.	All	Final EIS/EA Section 6.4.5
1.17	Mitigation	Implementation of Net-Zero Strategy to reduce the net GHG emissions over the life of the Project.	All	Final EIS/EA Section 6.4.5
1.18	Monitoring	The Dust Management Plan will be submitted as part of the Environmental Compliance Approval application for air and will identify fugitive dust sources, stipulate mitigation measures, inspection procedures, staff training requirements, and recordkeeping practices. The Air Quality Monitoring Plan will define monitoring locations, monitoring methods, parameters measured, and assessment criteria. Reporting and auditing requirements are specified in Ministry of the Environment, Conservation and Parks (MECP) Operations Manual for Air Quality Monitoring in Ontario (Ontario 2023).	All	Final EIS/EA Section 12.2.2
1.19	Monitoring	Dustfall samples will be collected monthly. Select samples will be assessed for metals (full metal scan, including mercury, arsenic, cadmium and lead). Monitoring results will be compared with predictions in the final Environmental Impact Assessment / Environmental Assessment (EIS / EA) and with applicable Ontario Regulation 419/05 standards and guidelines.	Construction, Operations	Final EIS/EA Section 12.2.3
1.20	Monitoring	The number of air quality monitoring stations, locations, and equipment will be described in the Air Quality Monitoring Plan. Equipment siting, operations, auditing and reporting will follow appropriate MECP requirements as provided in the Operations Manual for Air Quality Monitoring in Ontario PIBS 6687e, dated March 2018, as amended. SO_2 and NO_2 monitoring will also be undertaken at the same locations.	All	Final EIS/EA Section 12.2.3
1.21	Monitoring	A fully instrumented weather station will continue to operate at the site.	Construction, Operations	Final EIS/EA Section 12.2.3
1.22	Monitoring	GHG emissions will be calculated and reported annually in accordance with Ontario Regulation 390/18, the federal Greenhouse Gas Reporting Program, and associated guidelines as amended. Fuel consumption and relevant operational parameters will be tracked for the purpose of quantifying GHG emissions for the annual inventory. Reporting of GHGs would involve: • Quantifying the Project GHG emissions annually; and • Reporting the Project GHG emissions annually to applicable regulatory reporting program, which is Canada's GHG Reporting Program (ECCC 2019).	All	Final EIS/EA Section 12.4.2
1.23	Commitment	First Mining Gold (FMG) is committed to considering supplemental renewable energy sources to partially offset fossil fuel combustion.	All	Final EIS/EA Section 6.4.5
1.24	Commitment	On completion of the construction of the mine site and access road, FMG is committed to planting new trees to replace the removed forest, with additional reforestation to be carried out during the mine closure phase.	All	Final EIS/EA Section 6.4.5
1.25	Commitment	FMG is implementing a strategy to reduce the net GHG emissions to zero over the life of the Project. The Net-Zero Plan (Appendix I-2 of the EIS / EA) developed to achieve this target includes the use of technologies and practices to reduce fossil fuel use and carbon offsets to balance GHG emissions that cannot be eliminated. It also includes a commitment to considering opportunities to incorporate renewable energy sources and takes into consideration opportunities to reduce Scope 3 emissions.	All	Final EIS/EA Section 6.4.5 SFN-S5-002b
1.26	Commitment	During the permitting phase, the dust management plan and sediment and erosion control plan will be compiled and opportunities to share additional input by local Indigenous communities will be provided.	Pre-Construction	SFN-S2-049

Table 2: Mitigation, Monitoring and Commitments Related to Noise and Vibration

Item #	Mitigation / Monitoring / Commitment	Description	Phase / Timing	Source
2.1	Mitigation	A mechanism will be established for receiving and responding to noise complaints in a timely manner.	All	Final EIS/EA Section 6.3.4 SFN-S5-054
2.2	Mitigation	A mechanism will be established for receiving and responding to vibration complaints in a timely manner.	Construction, Operations	Final EIS/EA Section 6.3.4
2.3	Mitigation	Acoustical enclosures will be used in the process plant to limit overall noise emissions from key noise sources, such as the ball mills.	Operations	Final EIS/EA Section 6.3.4
2.4	Mitigation	Construction of the transmission line will occur primarily during the daytime hours.	Construction	Final EIS/EA Section 6.3.4
2.5	Mitigation	For helicopter use during transmission line construction, minimum flight altitudes will be maintained unless the helicopters are engaged in construction tasks, landing or departure.	Construction	Final EIS/EA Section 6.3.4 SFN-S2-044
2.6	Mitigation	Local Indigenous communities and identified points of reception (PORs) will be advised ahead of transmission line construction work periods and as the construction work proceeds.	Construction	Final EIS/EA Section 6.3.4
2.7	Mitigation	Motorized equipment will be selected or designed with mufflers / silencers to limit noise emissions.	All	Final EIS/EA Section 6.3.4
2.8	Mitigation	Prior to construction, a detailed blasting plan will be developed for the Project to determine the maximum allowable explosive loading at various locations within the project development area (PDA) to aid in complying with NPC-119, Health Canada and Fisheries and Oceans Canada (DFO) limits for vibration at receptors.	Construction, Operations	Final EIS/EA Section 6.3.4 CLLSFN-014
2.9	Mitigation	Regular inspections will take place to confirm that equipment and machinery used on site is operated in good working condition through regular maintenance.	All	Final EIS/EA Section 6.3.4
2.10	Mitigation	Reversing alarms should be dimmable with white noise and / or strobe lights, but they will be in accordance with the applicable health and safety regulations.	All	Final EIS/EA Section 6.3.4
2.11	Mitigation	Site equipment will be operated to meet NPC-119, DFO and Health Canada operational vibration limits at PORs, when applicable.	Construction, Operations	Final EIS/EA Section 6.3.4
2.12	Mitigation	Site equipment will be operated to meet NPC-300 and Health Canada operational noise and vibration limits at PORs, when applicable.	Construction, Operations	Final EIS/EA Section 6.3.4
2.13	Mitigation	The use of engine brakes will be prohibited and engines will need to be stopped for vehicles on standby, depending on seasons and weather.	All	Final EIS/EA Section 6.3.4
2.14	Mitigation	Vehicles and equipment will be operated in such a way that impulsive noise is minimized, where possible.	All	Final EIS/EA Section 6.3.4
2.15	Mitigation	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.	Construction	Final EIS/EA Section 6.3.4 CLLSFN-010
2.16	Mitigation	Building dimensions, layout and orientation will be designed to shield noise sources, where possible	Construction, Operations	Final EIS/EA Section 6.21.4
2.17	Mitigation	Generator intakes and exhausts in the process plant will use silencers.	Operations	Final EIS/EA Section 6.3.4
2.18	Monitoring	Subject to consultation and support from the regulatory agencies, FMG plans to measure sound levels at the two representative locations positioned north and south of the Project mine site. Exact locations will be determined prior to carrying out the monitoring, based on representative POR locations, accessibility, and Project activities that are ongoing at that time. Sound monitors will conform to MECP NPC-300 measurement protocols. As per these protocols, the hourly equivalent continuous sound level, the sound level that exceeds 10% of the time, the sound level that exceeds 90% of the time and the maximum sound level during a measurement period will be recorded. Audio samples based on trigger levels will also be recorded. Trigger levels, which will depend on the applicable criteria at the selected POR that is represented by the monitoring location, with automated alerts will be developed for addressing exceedances. Monitoring results will be analyzed, processed and compared to the final EIS / EA predictions, Environmental Compliance Approval (ECA) requirements and MECP sound guidelines	All	Final EIS/EA Section 12.3.2
2.19	Monitoring	Vibration monitoring will be required to confirm compliance with DFO limits for protection of fish habitat during spawning season. A blasting management plan will be prepared prior to construction by a qualified blasting contractor, and where blasting occurs within the vicinity of a fish-bearing waterbody, a detailed blast design will be developed to comply with federal blasting guidelines.	All	Final EIS/EA Section 12.3.2
2.20	Commitment	Subject to acceptance in writing of the follow-up monitoring program (FUP) by the federal and provincial governments, monitoring results will be provided to the parties involved in the FUP annually. Additional reporting mechanisms are expected to be prescribed in the provincial ECA.	All	Final EIS/EA Section 12.3.3

Table 3: Mitigation, Monitoring and Commitments Related to Groundwater

Item #	Mitigation / Monitoring / Commitment	Description	Phase / Timing	Source
3.1	Mitigation	A geosynthetic clay liner will be installed on the upstream side of the perimeter embankment of the CDF south cell (specifically the south, west, and east sides) to mitigate seepage potential.	All	Final EIS/EA Section 6.5.4
3.2	Mitigation	An integrated water management system will be operated to collect and control contact water from the stockpiles, CDF and plant site areas. Collected contact water that is not used in ore processing will be treated at the effluent treatment plant (ETP) and discharged to the southeast arm of Springpole Lake in accordance with permitting requirements.	All	Final EIS/EA Section 6.5.4
3.3	Mitigation	Best management practices (such as following approved blasting plans, and using appropriate drilling, explosive handling and loading procedures) will be implemented for the use of explosives to reduce the potential presence of blasting residuals on mine rock stored in the CDF that could otherwise infiltrate into groundwater.	Construction, Operations	Final EIS/EA Section 6.5.4
3.4	Mitigation	Development of a compact mine site to limit the areal extent of disturbance, and to limit the overall areas of site contact water that requires management.	Construction, Operations	Final EIS/EA Section 6.5.4
3.5	Mitigation	During the filling of the open pit basin, accelerate the return of groundwater levels to baseline conditions, by transferring water from Springpole Lake in a controlled manner while maintaining lake water levels in Springpole Lake within natural variation.	Closure	Final EIS/EA Section 6.5.4
3.6	Mitigation	Locating the CDF on favourable geologic conditions at the Project site to support long-term stability and effective seepage management.	All	Final EIS/EA Section 6.5.4
3.7	Mitigation	Revegetation and encouragement of natural revegetation / recolonization of disturbed areas, will be undertaken as part of progressive and final reclamation to minimize the length of time disturbed areas are exposed to reduce infiltration.	Operations, Closure	Final EIS/EA Section 6.5.4
3.8	Mitigation	Strategic placement of the open pit dikes which limit and isolate the open pit basin and maintain 94% of Springpole Lake untouched by the Project.	Construction	Final EIS/EA Section 6.5.4
3.9	Mitigation	Water collection ditches will be constructed and operated around the perimeter of key infrastructure, including the CDF and stockpiles, to collect overland flow and seepage and direct it to the integrated water management system.	Construction, Operations	Final EIS/EA Section 6.5.4
3.10	Monitoring	The average annual groundwater inflow rate to the open pit will be calculated for each year, based on dry-period pit dewatering rates (minimum three estimates per year, separated by minimum 1-month periods), to confirm model predicted groundwater inflow rates. The calculation of inflow rates will need to recognize the limitations in separating runoff and groundwater inflow components even during dry periods and varying open pit basin dewatering sump arrangements.	Construction	Final EIS/EA Section 12.5.2
3.11	Monitoring	Confirmation of the simulated groundwater dewatering cone will be determined from annual groundwater monitoring well water level data, determined from a subset of monitoring wells positioned around the CDF / open pit.	Construction	Final EIS/EA Section 12.5.2
3.12	Monitoring	The groundwater model will be periodically updated at approximately three-year intervals to allow for model calibration against measured and observed monitoring results.	Construction, Operations	Final EIS/EA Section 12.5.2
3.13	Monitoring	Groundwater samples collected from selected groundwater quality monitoring wells positioned around the CDF and the ore and mine rock stockpiles will be analyzed for physical-water parameters, major and minor ions, total metals and dissolved metals. Groundwater water quality samples will be collected at quarterly intervals during the open water period (i.e., three samples per year) from each monitoring well.	Operations and Closure	Final EIS/EA Section 12.5.2
3.14	Monitoring	Subject to acceptance in writing of the FMP by the federal and provincial governments, monitoring results will be provided to the parties involved in the FMP annually.	All	Final EIS/EA Section 12.5.3
3.15	Monitoring	Groundwater monitoring will proceed for as long as required to confirm key environmental outcomes have been achieved and maintained.	All	SFN-S6.5-003
3.16	Commitment	FMG will provide the opportunity for Slate Falls Nation (SFN) to consult on proposals to discontinue groundwater monitoring.	Closure	SFN-S6.21-039
3.17	Commitment	FMG will have a groundwater sampling program to test changes in water levels throughout the Project life. Indigenous monitors will be invited to participate.	All	CLLSFN-2025-053

Table 4: Mitigation, Monitoring and Commitments Related to Surface Water

Item #	Mitigation / Monitoring / Commitment	Description	Phase / Timing	Source
4.1	Mitigation	An Erosion, Sediment and Control (ESC) plan will be implemented to manage runoff water around disturbed areas. The ESC plan will be prepared with the intent to minimize site erosion and protect surface water from sedimentation. The ESC plan will provide further details on measures to minimize slope length and grade, ditching and diversion berms, contact water management ponds, use of natural vegetation buffers and runoff controls.	All	Final EIS/EA Section 6.6.4 MNR-73
4.2	Mitigation	An integrated water management system will be designed to collect and control contact water from the stockpiles, CDF and plant site areas. Collected contact water that is not used in ore processing will be treated at the effluent treatment plant and discharged to the southeast arm of Springpole Lake in accordance with permitting requirements	All	Final EIS/EA Section 6.6.4 CLLSFN-003
4.3	Mitigation	Best management practices (such as following approved blasting plans, and using appropriate drilling, explosive handling and loading procedures) will be implemented for the use of explosives used to reduce the potential presence of blasting residuals in the open pit and on stockpiled mine rock and ore.	Construction, Operations	Final EIS/EA Section 6.6.4
4.4	Mitigation	Development of a compact mine site to limit the areal extent of disturbance, and to limit the overall areas of site contact water that requires management.	Construction, Operations	Final EIS/EA Section 6.6.4
4.5	Mitigation	Co-manage and store PAG mine rock and thickened NAG tailings in the north cell of the CDF. PAG mine rock will be encapsulated with thickened NAG tailings to isolate it from atmospheric oxygen and mitigate potential acid generation and metal leaching.	Construction, Operations	Final EIS/EA Section 6.6.4 SFN-V-6
4.6	Mitigation	In the South Cell the PAG tailings will be maintained in a saturated condition and the water level maintained by pumping excess water to the mill as reclaimed process water or to the water treatment plant.	Construction, Operations	SFN-V-6 SFN-V-10
4.7	Mitigation	The internal berm is to separate the NAG tailings in the north cell and the PAG tailings to the south cell. The internal berm will be maintained at or lower than the south cell perimeter berms as to mitigate internal berm failure from breaching the south cell.	Operations, Closure	SFN-S5-038
4.8	Mitigation	Implementation of mitigation measures for potential effects on air quality relevant to dust (Section 6.2.4), including: • 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; and • Dust emissions from roads and mineral stockpiles will be controlled through the application of water spray and supplemented by dust suppressants, if required; • Site roads will be maintained in good condition, with regular inspections and timely maintenance completed to minimize the silt loading on the roads; and • Vehicle speeds will be limited.	All	Final EIS/EA Section 6.2.4 SFN-Geochem-20
4.9	Mitigation	In-plant destruction of cyanide in tailings using the sulphur dioxide / oxygen treatment process to minimize residual cyanide and metals concentrations in the CDF.	Operations	Final EIS/EA Section 6.6.4
4.10	Mitigation	Maintain a minimum 120 m setback from Birch Lake to the CDF, the low-grade ore stockpile and the associated seepage collection system.	All	Final EIS/EA Section 6.6.4 SFN-S2-050 MNR-73
4.11	Mitigation	Revegetation and encouragement of natural revegetation / recolonization of disturbed areas will be undertaken as part of progressive and final reclamation to minimize the length of time disturbed areas are exposed, to reduce erosion.	Operations, Closure	Final EIS/EA Section 6.6.4
4.12	Mitigation	To reduce freshwater demand from Birch Lake, water recycling measures will be implemented. For example, water collected in the CDF internal pond will be reclaimed and redirected to the plant / mill, minimizing the need for additional freshwater intake from the lake.	Operations	Final EIS/EA Section 6.6.4
4.13	Mitigation	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.	All	Final EIS/EA Section 6.6.4
4.14	Mitigation	During controlled dewatering of the open pit basin, clean water will be pumped over the dikes at a rate consistent with the natural variability of Springpole Lake while water not suitable for direct discharge will be pumped to the central water storage pond (CWSP) to manage suspended sediments prior to discharge.	Construction	Final EIS/EA Section 6.7.4
4.15	Mitigation	During filling of the open pit basin, efforts will also be made to minimize water takings during natural periods of low flow, to maintain lake levels within the same order of magnitude and scale as existing conditions of Springpole Lake.	Closure	Final EIS/EA Section 6.7.4
4.16	Mitigation	During the construction of the dikes, turbidity curtains will be implemented to minimize sedimentation in Springpole Lake, as a proven measure used for in-water works.	Construction	Final EIS/EA Section 6.7.4 SFN-S04-003
4.17	Mitigation	Implementation of mitigation measures for potential effects on groundwater relevant to surface water (Section 6.5.4) including:	Construction	Final EIS/EA Section 6.5.4

Item #	Mitigation / Monitoring / Commitment	Description	Phase / Timing	Source
		• Locating the CDF on favourable geologic conditions at the Project site to support long term stability and effective seepage management; and, • During construction, a geosynthetic clay liner will be installed on the upstream side of the perimeter embankment of the CDF south cell (specifically the south, west, and east sides) to mitigate seepage potential.		
4.18	Mitigation	Passive filling with precipitation and groundwater will be supplemented by water transferred from Springpole Lake in a controlled manner to reduce the fill time while maintaining lake water levels in Springpole Lake within the same order of magnitude and scale as existing conditions.	Closure	Final EIS/EA Section 6.7.4
4.19	Mitigation	Strategic placement of the open pit dikes limits and isolates the open pit basin so that the Project directly affects only 6% of Springpole Lake surface area, while maintaining dam stability.	Construction, Operations	Final EIS/EA Section 6.7.4
4.20	Mitigation	To reduce the overall volume of water required to refill the open pit basin and support future fish habitat creation, recontouring of a portion of the north end of the open pit basin will be undertaken during operations.	Operations	Final EIS/EA Section 6.7.4
4.21	Mitigation	Domestic sewage will be treated to meet regulatory requirements before discharge to the environment. Note that STP discharges will be combined with ETP effluent before discharge to the southeast arm; and excess water in the CWSP will be treated at the ETP, before being discharged to the southeast arm to maintain the site water balance.	Construction, Operations	Final EIS/EA Section 6.8.4
4.22	Mitigation	The ETP will be designed and operated to produce an effluent quality appropriate for discharge to the environment in accordance with applicable regulatory requirements, including the Metal and Diamond Mining Effluent Regulations (MDMER). Best available technologies that are economical achievable will be considered for the ETP to meet protection requirements. The ETP will be refined with ongoing Project planning and engineering design, and as discharge criteria are finalized during the approvals process.	Operations, Closure	Final EIS/EA Section 6.8.4
4.23	Mitigation	Treated effluent will be discharged at a location where sufficient flow exists to reduce the potential for erosion and promote assimilation at the discharge location. A diffuser or other means could be used to encourage greater mixing and attenuation of the effluent plume at the discharge location, if required. Consistent with MECP (2016) Policy B-1-5, the mixing zone size will be minimized to the extent practicable.	Operations, Closure	Final EIS/EA Section 6.8.4
4.24	Mitigation	Construction of the transmission line during frozen conditions to minimize effects on waterbodies and watercourses within the PDA of the transmission line corridor.	Construction	Final EIS/EA Section 6.9.4
4.25	Mitigation	Inspect culverts periodically and remove accumulated material and debris upstream and downstream of the culverts to prevent erosion, flooding, and mobilization of sediment.	Operations	Final EIS/EA Section 6.9.4
4.26	Mitigation	Watercourse crossings will be designed and constructed using best management practices such as appropriately sized structures (e.g., embedded culverts) to maintain hydraulic capacity and connectivity.	Construction	Final EIS/EA Section 6.9.4
4.27	Monitoring	Water quantity monitoring requirements are expected to be included in provincial approvals (ECAs and Permits to Take Water) issued by the MECP pursuant to the Ontario Water Resources Act. Details of the terms and conditions of provincial approvals, including monitoring methods, reporting and remedial actions, will be determined by the MECP with due consideration to other provincial and federal approvals and authorizations.	All	Final EIS/EA Section 12.6.1
4.28	Monitoring	Surface water quality monitoring requirements are anticipated to include monitoring of effluent quality as well as quality of peripheral and receiving waters and are anticipated to be included in provincial approvals pursuant to the Ontario Water Resources Act, as well as federal requirements pursuant to the MDMER. Details of the terms and conditions of provincial approvals, including monitoring methods, reporting and remedial actions, will be determined by the MECP with due consideration to other provincial and federal approvals and authorizations.	All	Final EIS/EA Section 12.6.1
4.29	Monitoring	For the active monitoring stations, water levels will be measured on a continuous basis using pressure transducer data loggers, with data downloads to occur monthly or quarterly depending on data needs and permit conditions. Transducer data loggers will be fixed to a plate weight and installed on the lake bottom and surveyed. Where flow measurements are required, manual flow measurements will be generated and carried out on an ongoing basis, as needed, sufficient to develop and maintain an accurate flow rating curve. All manual flow measurements will be completed as per Water Survey of Canada standards. As data availability permits, updated water level and flow statistics will be developed, including monthly and annual averages for lake water levels and flows along with time plot trends and return period statistics for varying return periods.	All	Final EIS/EA Section 12.6.2
4.30	Monitoring	Water quality sampling rates and parameters will be specified in the ECA issued by the province, as well as by MDMER requirements. Final effluent quality sampling frequencies are expected to include weekly sampling for pH, total suspended solids (TSS), and total cyanide (as applicable), with weekly, monthly and quarterly sampling for other parameters, as applicable. The list of parameters will vary depending on the effluent type and source, and in the case of the CWSP (via the ETP), on the Project phase. The list of parameters for interim construction facility effluents is expected to vary depending on the associated materials involved. Where the involved materials are confined to overburden, sampling is expected to include pH, TSS and TP thrice weekly for pH and TSS, TP. Sampling for a broader suite of parameters, potentially including hardness, conductivity, total dissolved solids (TDS), cations, anions, nutrients and a suite of metals, or a subset of these, is expected to be required on a monthly basis. Where mine rock materials are involved, the list of parameters to be monitored is expected to potentially or likely include pH, TSS, TDS, hardness, conductivity, sulphate, TP, nitrate, nitrite, total and un-ionized ammonia, along with additional cations and anions, a suite of metals, and acute toxicity sampling for rainbow trout and Daphnia magna. Sampling	All	Final EIS/EA Section 12.6.2

Item #	Mitigation / Monitoring / Commitment	Description	Phase / Timing	Source
		requirements for construction phase effluents, where rock materials are involved, is expected to be carried out thrice weekly for pH and TSS, and weekly or monthly for most other parameters, and monthly for acute toxicity testing. Final effluent sampling of treated effluent discharge via the ETP, is expected to be similar to that described above for catchments involving drainage associated with rock materials, but with the addition of cyanide species (total cyanide, weak acid dissociable cyanide, free cyanide, cyanate and thiocyanate) once seepage collection associated with ore processing begins. Final effluent from the permanent camp domestic sewage treatment facility is expected to be sampled weekly for biochemical oxygen demand, TSS, pH, TP, ammonia, and *E. coli*. Additional upstream sampling within the sewage treatment plant is also planned as a means of tracking overall system performance. Receiving and peripheral water sampling stations will be sampled monthly, with bottom and profile samples, where applicable, to be undertaken quarterly, or as defined in ECAs. Monitored parameters included in the monthly samples are expected to include pH, TSS, TDS, hardness, conductivity, dissolved organic carbon, sulphate, TP, nitrate, nitrite, total and un-ionized ammonia, temperature, along with additional cations and anions, a suite of metals. Cyanide species will also be sampled at applicable stations, once ore processing commences. In accordance with MDMER, data analysis will include as a minimum: • Computation of statistical metrics: namely annual means, minimums, maximums, and in the case of receiving and peripheral water samples – 75th percentile values; • Statistical trend analysis for key parameters; • Comparison to effluent limits and objectives in the case of effluents; and • Comparison to federal and provincial protection of aquatic life criteria in the case of receiving water and peripheral water samples.		
4.31	Monitoring	Subject to acceptance of the FUP by the federal and provincial governments, water quality monitoring results will be provided to the parties of the FUP annually. Additional reporting mechanisms will be prescribed in provincial and federal environmental approvals.	All	Final EIS/EA Section 12.6.3
4.32	Monitoring	FMG has proposed to continue sampling and monitoring water quality at the three regional monitoring stations that were added in the baseline studies at the request of SFN, including the station that is just north of SFN reserve on Wesleyan Lake.	All	SFN-S6.24-012
4.33	Monitoring	FMG commits to a comprehensive approach to monitor changes to water levels and flows. Monitoring programs will be developed to ensure that withdrawals remain within ecological thresholds to prevent downstream impacts. Continuous hydrological and ecological monitoring will be implemented to monitor compliance with water management objectives, and these details will be refined at provincial permitting and approvals.	Pre-construction	MECP Hydrologist-1 MECP Hydrologist-7
4.34	Commitment	The open pit basin will be maintained at a target level below the natural Springpole Lake elevation if needed, until such time as all regulatory requirements for reconnection are met.	Closure	SFN-S6.10-005 SFN-Geochem-19
4.35	Commitment	A detailed deposition plan will be developed for the CDF as part of future detailed design stages which further describes the deposition strategy for the PAG mine rock and NAG tailings and indicates how deposition will be monitored to demonstrate achievement of the plan.	Construction, Operation	MEM-2
4.36	Commitment	Water monitoring will be further developed and discussed with MINES as part of the permitting process.	Pre-construction	MEM-9
4.37	Commitment	If a flocculant is expected to be required, it will be provided in the environmental permitting documents submitted to the province for review and approval prior to construction dewatering.	Pre-construction	CLLSFN-2025-056
4.38	Commitment	FMG will engage NWOMC in monitoring implementation opportunities [*related to Springpole Lake levels]* through the Environment Committee.	All	NWOMC-182
4.39	Commitment	FMG will refine runoff coefficients during the permitting phase of the Project.	Pre-construction	MECP Hydrologist-17
4.40	Commitment	FMG will develop and implement receiver-based effluent criteria as well and short and long-term monitoring approach for the Undertaking	Construction	Provincial EA ToR Section 5.2.7
4.41	Commitment	The site-wide water balance will continue to be refined during ongoing engineering studies to support the permitting process	All	MFN-47 (2021 Review)

Table 5: Mitigation, Monitoring and Commitments Related to Fish and Fish Habitat

Item #	Mitigation / Monitoring / Commitment	Description	Phase / Timing	Source
5.1	Mitigation	Complete required maintenance of in-water structures following the guidance of DFO's Interim Code of Practice: Repair and Maintenance of In-Water Structures (DFO 2023b).	All	Final EIS/EA Section 6.10.4
5.2	Mitigation	Design culverts to provide fish passage and naturalized substrates to mitigate habitat impacts.	Construction, Operations	Final EIS/EA Section 6.10.4
5.3	Mitigation	Implement a site-specific ESC Plan to mitigate the entry of sediment into surrounding waterbodies.	All	Final EIS/EA Section 6.10.4
5.4	Mitigation	Implement the measures outlined in the revised Fish Habitat Offsetting and Compensation Plan, including: • Overbuild and integrate spawning shoals along the active lake-facing embankments of the dikes to replace Lake Trout and Lake Whitefish spawning opportunities lost within the dewatered basin. • Coordinate with the provincial government (Ministry of Energy and Mines) to implement the reclamation of fish habitat at the abandoned South Bay Mine. • Implement the investigation and study of Lake Sturgeon in the Birch River and Cat River system and consider measures to reinstate or augment the population. • Place coarse wood structure along Springpole Lake shorelines currently lacking structural diversity. • Construct a new and significant embayment (46 ha fish habitat development area) to the east of the dewatered area to be functional at closure. • Enhance the open pit basin (dewatered) area for selected key species (determined during engagement and consultation) by modifying cover, structure and substrates to improve habitat suitability where appropriate. • Contour the north end of the main open pit and the Phase 1 pit and optimize fish habitat structures, substrates and depth for selected key species as determined during engagement and consultation. • Restore flow to unnamed lake L-1 on completion of mining and filling of the dewatered basin.	All	Final EIS/EA Appendix F
5.5	Mitigation	Implement the measures to mitigate effects on surface water, including the treatment of mine effluent prior to discharging to the southeast arm of Springpole Lake, and the collection and management of runoff and seepage water from the perimeter of the CDF and ore stockpiles.	All	Final EIS/EA Sections 6.6.4, 6.7.4 and 6.8.4
5.6	Mitigation	Install isolation measures for in-water works associated with the construction of the dikes in the north basin of Springpole Lake and water crossings following the guidance of DFO's Interim Standard: In-Water Site Isolation (DFO 2023a).	Construction	Final EIS/EA Section 6.10.4
5.7	Mitigation	Install screens or use other measures at water intakes to prevent entrainment or impingement of fish as per the DFO Code of Practice (DFO 2020).	All	Final EIS/EA Section 6.10.4
5.8	Mitigation	Minimize the mine site footprint and overprinting of waterbodies where possible.	All	Final EIS/EA Section 6.10.4
5.9	Mitigation	Develop a detailed blasting management plan for areas adjacent to fish habitat that meets DFO criteria or alternate values derived in consultation with DFO.	All	Final EIS/EA Section 6.10.4
5.10	Mitigation	Prior to dewatering the open pit basin area, conduct a comprehensive fish removal program (fish-out) within the basin to minimize the unintentional death of fish.	Construction	Final EIS/EA Section 6.10.4
5.11	Mitigation	Prohibit fishing and hunting within the controlled access portion of the PDA by Project personnel while working or residing on site.	All	Final EIS/EA Section 6.10.4
5.12	Mitigation	Relocate fish from the work area prior to undertaking in-water works for the construction of Project infrastructure.	All	Final EIS/EA Section 6.10.4
5.13	Mitigation	Undertake in-water construction activities outside of the fish spawning and egg incubation periods to reduce the potential for effect on fish as per DFO's *Measures to Protect Fish and Fish Habitat* (DFO 2023c) and the MNR's in-water timing windows (MNR 2013), unless exempt.	All	Final EIS/EA Section 6.10.4
5.14	Monitoring	FUP implementation and effectiveness of the compensation and offset measures will be monitored to confirm that measures have been constructed as per the approved plans and are functioning as intended. Monitoring results will be documented in the as constructed report; and in performance monitoring reports submitted to DFO.	All	Final EIS/EA Section 12.7.1
5.15	Monitoring	Potential adverse effects to fish health will be assessed through water quality monitoring programs, as discussed in Section 12.6.	All	Final EIS/EA Section 12.7.1
5.16	Monitoring	Project environmental staff (or designates) will monitor construction and implementation of the final Fish Habitat Offsetting and Compensation Plan (FHOCP) to confirm that the measures and standards described are implemented as proposed. Monitoring will be reported to DFO in as-constructed reports provided within 12 months of the works being completed. The as-constructed monitoring will require multiple reports to reflect some of the measures being constructed at the beginning of the Project, with others completed during operations and closure. Documentation will be maintained to demonstrate effective implementation and function of the avoidance and mitigation measures, with summaries provided in the as-constructed report(s).	All	Final EIS/EA Section 12.7.2
5.17	Monitoring	Regular tracking and recording of blasting procedures will be carried out to confirm that fish protection measures defined in the site-specific blasting assessment (Appendix H-4) are carried out.	All	Final EIS/EA Section 12.7.2

Item #	Mitigation / Monitoring / Commitment	Description	Phase / Timing	Source
5.18	Monitoring	Key components of the fish and fish habitat monitoring program are expected to include water and sediment quality, benthic invertebrates, and fish. Monitoring for water quality is addressed in detail in Section 12.6. Monitoring would be carried out in accordance with the MDMER and requirements of environmental effects monitoring (EEM) and with conditions identified through the provincial ECA. Monitoring stations for benthic invertebrates and fish would be strategically located within each sampled waterbody to capture any potential effects in receiving waters. These stations would be identified under guidance of MDMER, MECP, and Indigenous communities, and would be co-located with water and sediment quality sampling stations. The final study design for the environmental monitoring plan and EEM would be determined through the permitting process and detailed planning, which would include consultation and engagement with regulatory agencies and local Indigenous communities. Project specific final effluent parameter concentrations, along with acute and chronic testing requirements, will be specified in the provincial ECA.	All	Final EIS/EA Section 12.7.2
5.19	Monitoring	The FHOCP performance monitoring will be assessed using fish species presence, fish biomass and density, as well as fish abundance for the enhancement areas which includes a lake-wide broadscale monitoring (BsM) program. Direct sampling of fish tissues for metals concentrations will be conducted within the BsM program, one year after start of construction, and every three years (at the same time of year) thereafter (as approved by the MNR), until the start of the closure phase or cessation of mining activity and may be required during or beyond the closure phase or cessation of mining activity, in accordance with EEM technical guidance. Tissue sampling will be conducted concurrently with the BsM performance monitoring as specified in the FHOCP to minimize sampling impacts to the fish community. Target fish species within each sampled waterbody will be sampled during each monitoring period; however, different fish species may be utilized within each waterbody in accordance with the local fish community and species abundance. All efforts will be made to sample the same species within the reference and receiving waterbodies, where possible. The fish survey measurements and expected precision will follow the EEM technical guidance document (EC 2012), as applicable. Performance monitoring reports will be due on or before December 31 of assessment years as per the approved FHOCP. A detailed record will be made of any contingency measures that were implemented to prevent impacts greater than those predicted in the final EIS / EA and the FHOCP in the event that mitigation measures did not function as described, as well as the effectiveness of the contingency measure. A summary of any contingency measures will be provided in the as-constructed report.	All	Final EIS/EA Section 12.7.2 CLLSFN-002 CLLSFN-006
5.20	Monitoring	Subject to acceptance of the FUP by the federal and provincial governments, monitoring results will be provided to the parties of the FUP annually. Additional reporting mechanisms will be prescribed in provincial and federal environmental approvals.	All	Final EIS/EA Section 12.7.3
5.21	Monitoring	L2 will be sampled post-operation to demonstrate suitable water quality and sediment quality following the use as a water management facility. Water and sediment samples will be compared to the provincial and federal environmental quality guidelines (for protection of aquatic life) and baseline values.	Closure	SFN-S6.10-031
5.22	Commitment	FMG will continue to offer opportunities for engagement on the FHOCP through the permitting process.	Pre-construction	CLLSFN- 2025-2-085
5.23	Commitment	FMG will undertake a fish salvage and relocation program prior to construction to remove any potentially stranded fish from the work areas. This will be done in accordance with DFO protocols and with the involvement of local First Nations if interested.	Construction	SFN-S6.10-031 SFN-S6.10-011
5.24	Commitment	Calculations to determine the potential amount of Lake Sturgeon habitats both under impact and restoration scenarios using DFO's Habitat Ecosystem Assessment Tool. will be provided as an Appendix within the FHOCP submitted during the permitting phase.	Pre-construction	SFN-S6.10-025
5.25	Commitment	FMG will provide the ESC Plan to SFN for review prior to construction.	Construction	SFN-S6.10-022 SFN-S8-013
5.26	Commitment	FMG will continue to work with MNR and DFO through completion of the provincial and federal EAs, and during permitting to demonstrate that potential effects to fish and fish habitat are addressed, including through the provision of financial assurance to DFO.	All	MNR-183

Table 6: Mitigation, Monitoring and Commitments Related to Vegetation Communities and Wetlands

Item #	Mitigation / Monitoring / Commitment	Description	Phase / Timing	Source
6.1	Mitigation	An invasive species management plan will be implemented to reduce the spread of invasive and non-native species from the Project, and include the following measures: • Construction equipment arriving on the Project site will be clean and free of any plant or soil material; • Where necessary, establish designated cleaning areas onsite to prevent or limit the spread of invasive and non-native species; • Where necessary, store stripped topsoil from the construction of the transmission line corridor in designated locations to avoid the introduction of invasive and non-native species from the existing disturbances due to forestry activities; • If required, topsoil stripped in or near areas with identified invasive and non-native species will be managed and stored in designated locations, where practical; and, • To limit the introduction of invasive and non-native species, certificates of seed analysis will be requested for seed mixes where available.	All	Final EIS/EA Section 6.11.4 Final EIS/EA Section 12.8.2 SFN-S6.13-010
6.2	Mitigation	Co-locate the transmission line, airstrip and mine access road within a shared infrastructure corridor, where feasible.	Construction	Final EIS/EA Section 6.11.4
6.3	Mitigation	Development of a compact mine site to limit the areal extent of disturbance.	Construction	Final EIS/EA Section 6.11.4
6.4	Mitigation	Undertake progressive rehabilitation of mine development areas, in accordance with a filed Closure Plan under the Mining Act. The progressive rehabilitation measures for the Project may include: • Removal of construction-related facilities and reclamation of disturbed lands, if not required during operations; • Rehabilitation of aggregate sources when no longer required for the Project; • Implementation of a revegetation plan that preferentially uses local vegetation sources, incorporates plant species of interest to Indigenous communities, and avoids the use of non-native or invasive species; and • Preserving organic material in place where reasonable and/or stockpiling material onsite.	Construction, Operations	Final EIS/EA Section 6.11.4
6.5	Mitigation	Implement the following mitigation measures for wetlands: • Conduct construction activities in wetlands during late summer, fall or winter, whenever practical; • Salvage topsoil and the upper organic layer when constructing in and adjacent to wetlands; • Isolate work areas prior to construction using feasible techniques when working in wetlands during the open water period; • Install silt fences prior to construction on approaches to wetlands to prevent erosion and sedimentation and remove silt fencing once the disturbed areas are stabilized.	All	Final EIS/EA Section 6.11.4
6.6	Mitigation	Undertake final rehabilitation activities of the mine development areas to create a stable, productive, and naturalized state. The plan includes the rehabilitation of disturbed lands (using commercially available native seed sources) and the establishment of self-sustaining vegetative cover. The closure phase will also include consultation with communities on opportunities for wetland creation.	Closure	Final EIS/EA Section 6.11.4
6.7	Mitigation	Implement mitigation measures for potential effects on air quality relevant to vegetation communities and wetlands (Section 6.2.4) including: • 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. • Dust emissions from roads and mineral stockpiles will be controlled through the application of water spray and supplemented by dust suppressants, if required; • Site roads will be maintained in good condition, with regular inspections and timely maintenance completed to minimize the silt loading on the roads; and, • Vehicle speeds will be limited.	All	Final EIS/EA Section 6.2.4
6.8	Mitigation	Implement mitigation measures for potential effects on groundwater relevant to vegetation communities (Section 6.5.4), including the following: • Revegetation and encouragement of natural revegetation / recolonization of disturbed areas, will be undertaken as part of progressive and final reclamation to minimize the length of time disturbed areas are exposed to reduce infiltration; and, • During the filling of the open pit basin, accelerate the return of groundwater levels to baseline conditions, by transferring water from Springpole Lake in a controlled manner while maintaining lake water levels in Springpole Lake within natural variation.	Operations, Closure	Final EIS/EA Section 6.5.4
6.9	Mitigation	Mechanical vegetation removal practices will be used, when possible.	All	Final EIS/EA Section 6.11.4
6.10	Mitigation	Minimize the clearing of vegetation within the mine access road and transmission line corridor as feasible.	Construction, Operations	Final EIS/EA Section 6.11.4
6.11	Mitigation	Minimize the removal of woody vegetation within the transmission line corridor to maintain natural cover to adjacent areas. The removal of woody vegetation will be limited to hazard trees and clearing to provide safe construction access and infrastructure needs.	Construction, Operations	Final EIS/EA Section 6.11.4

Item #	Mitigation / Monitoring / Commitment	Description	Phase / Timing	Source
6.12	Mitigation	Vehicular access will be restricted along the mine access road, and the road will be scarified to alleviate surface compaction to aid in vegetative regeneration.	Closure	Final EIS/EA Section 6.11.4
6.13	Mitigation	Chemical removal of vegetation will not be used during any phase of the Project.	All	Final EIS/EA Section 6.11.4 SFN-S2-64 NWOMC-180
6.14	Monitoring	Subject to acceptance of the FUP by the federal and provincial governments, monitoring results will be provided to the parties of the FUP annually.	All	Final EIS/EA Section 12.8.3
6.15	Commitment	The relevant management plans, including the dust management plan and invasive species management plan, will be developed prior to construction and reviewed by communities Environment Committee.	All	SFN-S6.11-003 SFN-S6.11-010 CLLSFN-2025-065
6.16	Commitment	FMG will engage with MNR during the permitting phase to see if there are specific recommendations for additional mitigation measures related to wetlands. FMG will engage with MNR on the Vegetation and Wetlands Management Plan which will include required timing windows related to wetlands.	Pre-construction	MNR-61
6.17	Commitment	Vegetation communities will be maintained in specific areas to provide a buffer along waterbodies and mine site infrastructure, where necessary.	All	CLLSFN-2025-082
6.18	Commitment	FMG will continue to engage with the NWOMC on mitigation *[related to soil and overburden, and vegetation]* during the permitting phase of the Project through the Environment Committee.	Pre-construction	NWOMC-156
6.19	Commitment	Areas within the PDA will be revegetated through active seeding of commercially available native plant species and preparation of the ground surface to promote natural revegetation. Monitoring requirements for reclamation would be outlined in the Closure Plan and would include details on reclamation treatments to be used during revegetation, schedules for the frequency of monitoring, and action levels where adaptive management may be required. Post-reclamation wetland surveys would be conducted to understand if reclaimed wetlands (if any) are achieving similar functions.	Closure	Final EIS/EA Section 12.8.2
6.20	Commitment	Revegetation trials will occur during the operations phase to evaluate and optimize the revegetation strategy for closure. In addition, planned revegetation trials during life of mine will improve the effectiveness of rehabilitation and revegetation efforts. The Closure Plan will assist in revising or adding mitigation measures to facilitate successful long-term reclamation and establishment of vegetation communities and provision of functional wildlife habitat.	Operations, Closure	Final EIS/EA Section 12.8.2 MNR-72
6.21	Commitment	Revegetation plans, including metrics, will be presented through the Certified Closure Plan process.	Pre-construction	MNR-80
6.22	Commitment	FMG commits to monitoring impacts during the refilling period on vegetation within the littoral zone of Springpole lake as a result of the drawdown and will develop a mitigation plan should impacts become apparent as part of the Closure Plan.	Closure	MNR-154

Table 7: Mitigation, Monitoring and Commitments Related to Wildlife and Wildlife Habitat

Item #	Mitigation / Monitoring / Commitment	Description	Phase / Timing	Source
7.1	Mitigation	Co-locate the transmission line, airstrip and mine access road within a shared infrastructure corridor, where feasible.	Construction, Operations	Final EIS/EA Section 6.12.4
7.2	Mitigation	Development of a compact mine site to limit the areal extent of disturbance.	Construction	Final EIS/EA Section 6.12.4
7.3	Mitigation	During construction of the mine access road and transmission line: • Minimize the area cleared with heavy machinery for the construction of the mine access road, as practicable, recognizing the need for clear sightlines for safety; and • Minimize the removal of woody vegetation along the transmission line by limiting removal to hazard trees and only clearing for safe access and infrastructure need.	Construction	Final EIS/EA Section 6.12.4
7.4	Mitigation	Minimize the disturbance by using existing trails and roads for travel, where practicable.	Construction	Final EIS/EA Section 6.12.4
7.5	Mitigation	Implement mitigation measures for lighting to minimize sensory disturbance (Appendix J), including: • To prevent a direct line-of-sight from light, maintain light sources below natural barriers such as tree lines or artificial barriers such as berms; and, • Minimize light spill and glare using shielding on stationary light sources and direct lighting downwards where practicable.	All	Final EIS/EA Appendix J
7.6	Mitigation	Log (and report as needed) observed wildlife, sign / tracks and wildlife–vehicle collisions and alter mitigation measures as appropriate.	All	Final EIS/EA Section 6.12.4
7.7	Mitigation	Prohibit hunting and trapping within the gated controlled access portion of the PDA by Project personnel while working or residing on-site.	All	Final EIS/EA Section 6.12.4
7.8	Mitigation	Where practicable, avoid sensitive wildlife habitat by implementing buffers (Table 6.12-8) around sensitive habitats.	All	Final EIS/EA Section 6.12.4 SFN-S7-002
7.9	Mitigation	Wildlife awareness training will be provided to Project employees.	All	Final EIS/EA Section 6.12.4
7.10	Mitigation	During the operation of the mine access road and transmission line: • Enforce reduced speed limits along Project-controlled roads within high-quality wildlife habitats, particularly along segments with known or recurrent wildlife crossings; • 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; and • Minimize vegetation management along the transmission line corridor to that necessary for safe operation.	Construction, Operations	Final EIS/EA Section 6.12.4
7.11	Mitigation	Follow appropriate timing windows for vegetation removals; in combination with timing windows for Boreal Caribou (6.13), Wolverine (6.14), bats (Section 6.15), and Species at Risk (SAR) birds (6.16), vegetation removals should only occur between September 15 to January 14. Note that construction activity should never occur during the critical breeding period for Bald Eagle, defined as March 5 to August 31 in northwest Ontario.	Construction, Operations	Final EIS/EA Sections 6.12.4, 6.13.4, 6.14.4, 6.15.4, 6.16.4
7.12	Mitigation	Implement measures outlined in a spill prevention and contingency plan to be developed prior to construction.	All	Final EIS/EA Section 6.12.4
7.13	Mitigation	Implement the mitigation measures for air quality relevant to wildlife (Section 6.2.4) including: • During construction, operation 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. • Routine maintenance of all pollution control equipment, diesel-fired engines (vehicle, equipment and standby power generation) • The process plant emission sources will be enclosed where possible and 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. • Dust emissions from roads and mineral stockpiles will be controlled through the application of water spray and supplemented by dust suppressants if required. • Site roads will be maintained in good condition, with regular inspections and timely maintenance completed to minimize the silt loading on the roads. • Vehicle speeds will be limited.	All	Final EIS/EA Section 6.2.4
7.14	Mitigation	Implement the mitigation measures for noise and vibration relevant to wildlife (Section 6.3.4) including: • Building dimensions, layout and orientation will be designed to shield noise sources, where possible. • Acoustical enclosures will be used in the process plant to limit overall noise emissions from key noise sources, such as the ball mills. • Generator intakes and exhausts in the process plant will use silencers. • Motorized equipment will be selected or designed with mufflers / silencers to limit noise emissions. • Reversing alarms will be dimmable with white noise and/or strobe lights, • The use of engine brakes will be prohibited.	All	Final EIS/EA Section 6.3.4

Item #	Mitigation / Monitoring / Commitment	Description	Phase / Timing	Source
		• Vehicles and equipment will be operated in such a way that impulsive noise is minimized, where possible. • Regular inspections will take place to confirm that equipment and machinery used on site is operated in good working condition through regular maintenance. • For helicopter use during transmission line construction, minimum flight altitudes will be maintained unless the helicopters are engaged in construction tasks, landing or departure.		
7.15	Mitigation	Implement the mitigation measures for potential effects on vegetation communities and wetlands relevant to bat 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. The removal of woody vegetation will be limited to hazard trees and clearing to provide safe construction access and infrastructure needs; and, • During operation 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.	All	Final EIS/EA Section 6.11.4
7.16	Mitigation	Implement the mitigation measures surface water systems relevant to wildlife (Section 6.6) including: • During construction, operation and active closure, an integrated water management system will be operated to collect and control contact water from the stockpiles, CDF and plant site areas. Collected contact water that is not used in ore processing will be treated at the ETP and discharged to the southeast arm of Springpole Lake in accordance with permitting requirements. • During construction, operation and active closure, contact water collection ditches will be constructed and operated around the perimeter of key infrastructure, including the CDF and stockpiles, to collect overland flow and seepage and direct it to the integrated water management system. • Locating the CDF on favourable geologic conditions at the Project site to support long-term stability and effective seepage management. • Discouraging wildlife from inhabiting contact water ponds (including the CDF and CWSP ponds).	All	Final EIS/EA Sections 6.6.4, 6.7.4 and 6.8.4
7.17	Mitigation	Maintain existing hydroperiod conditions, outside the zone of influence for dewatering, by directing water from dewatering activities away from terrestrial habitats, where possible.	All	Final EIS/EA Section 6.12.4
7.18	Mitigation	Permits for specially protected species under the Fish and Wildlife Conservation Act may be required to remove dens, nests, and lodges.	Construction, Operations	Final EIS/EA Section 6.12.4
7.19	Mitigation	Undertake progressive revegetation in the mine site area, where practicable, during operation of the Project.	Operations	Final EIS/EA Section 6.12.4
7.20	Mitigation	Domestic solid waste products and similar materials will be properly secured, stored and disposed of at an offsite licensed facility,	All	Final EIS/EA Section 6.12.4
7.21	Monitoring	Breeding bird surveys will be conducted at a minimum of 40 locations (areas), consistent with a mix of areas surveyed in 2021 and 2022. This will include locations associated with the Project Area (10 areas), and the transmission line (10 areas) and road routes (10 areas) and reference areas (10 areas). For the FUP, two teams of two observers each (four observers total) will complete surveys at different breeding bird areas each day. At each location, between 8- and 12-point count locations will be visited. Depending on helicopter logistics, most of these locations will be surveyed twice, once on each of the two breeding bird site visits. Surveys will generally be completed within five hours after sunrise. Surveys will be conducted for 10 minutes at each station and all birds heard or observed will be recorded at distance intervals of 0 to 50 m, 50 to 100 m, > 100 m from the observer. In addition, birds will be recorded at duration intervals of 0 to 3 minutes, 3 to 5 minutes, and 5 to 10 minutes. Each bird will be recorded once and mapped on the field data sheets to limit duplication. Point count stations will be located a minimum of 300 m apart. Breeding activity notes and classification will follow the Ontario Breeding Bird Atlas Guide for Participants (OBBA 2001). Bird densities will be modelled from point count survey data following methods by (Sólymos et al. 2013), taking into consideration temporal, climatic and habitat covariates, following methodologies used during the baseline studies. The average density for each species will be modelled across target habitats, and compared with baseline values, taking into consideration the power to detect a change from the baseline condition.	All	Final EIS/EA Section 12.9.2
7.22	Monitoring	Autonomous recording units (ARUs) will be used going forward for FUP crepuscular bird surveys. ARU's will be placed in the same areas as those used for Breeding Bird Surveys, including areas where Eastern Whip-poor-will and Common Nighthawk were noted during baseline studies. The ARU type to be used will be the same as, or equivalent to, that used during baseline studies (i.e., Wildlife Acoustics brand Song Meter Micro Wildlife Recorders). Data from ARUs will be analyzed using an automated classifier to detect avian vocalizations within the recordings and classifying them to species. The BirdNET automated classifier will be leveraged for this task, with the using the BirdNET_GLOBAL_3K_V2.2_Model_ FP32.tflite. Data analysis will consist of estimating relative abundance from the level of singing activity from ARU recorders, using a stepwise model.	All	Final EIS/EA Section 12.9.2

Item #	Mitigation / Monitoring / Commitment	Description	Phase / Timing	Source
7.23	Monitoring	Methods for evaluating the continued use of suitable bat maternity habitat during the FUP will be the same as those employed during baseline studies.	All	Final EIS/EA Section 12.9.2
7.24	Monitoring	Follow-up aerial surveys will be carried out annually using the baseline study protocols.	All	Final EIS/EA Section 12.9.2
7.25	Monitoring	The same methodologies and set-up locations, as used for the baseline study, will be used to assess Project area use by Wolverine as part of the FUP. Further details on baseline set-up methodologies are provided in the baseline report.	All	Final EIS/EA Section 12.9.2
7.26	Monitoring	Subject to acceptance of the FMP by the federal and provincial governments, monitoring results will be provided to the parties of the FUP annually. Additional reporting mechanisms will be prescribed in provincial and federal environmental approvals.	All	Final EIS/EA Section 12.9.3
7.27	Monitoring	FMG will work with the Nations to conduct a follow-up baseline waterfowl survey during the fall migration season prior to construction.	Pre-construction	CLLSFN- 2025-2-130
7.28	Monitoring	FMG will continue to monitor Boreal Caribou in region and Indigenous Knowledge shared by the communities can be integrated into the ongoing development of the monitoring and compensation plans	Construction, Operation	CLLSFN-2025-2-34
7.29	Monitoring	A wildlife and wildlife management plan will be developed prior to construction that will include this information [*related to timing windows for Boreal Caribou, Wolverine, bats and SAR Birds]*. Once developed, the plan will be made available for review by MNR.	Pre-construction	MNR-89 SFN-S6.13-001
7.30	Commitment	FMG will consider candidate habitats for turtle overwintering in closure planning which will be advanced in consultation with the Environment Committee.	Closure	CLLSFN-2025-100
7.31	Commitment	FMG will implement a Wildlife Management and Monitoring Plan that will include mitigation measures for birds. FMG will provide this plan to MNR, as appropriate, during the permitting phase for review and input, in advance of construction activities where applicable; and the plan will be informed by applicable provincial policies, guidance documents, and best management practices	Pre-construction	MNR-62

Table 8: Mitigation, Monitoring and Commitments Related to Boreal Caribou

Item #	Mitigation / Monitoring / Commitment	Description	Phase / Timing	Source
8.1	Mitigation	Align the new transmission line route adjacent to the existing E1C transmission line corridor, to the extent possible, to reduce the creation of new linear corridors.	All	Final EIS/EA Section 6.13.4; Table 6.13-17 Tech Memo: Springpole Gold Project - Boreal Caribou Mitigation and Offsetting Commitments Summary (WSP 2026)
8.2	Mitigation	Development of a compact mine site to limit the areal extent of disturbance.	All	Final EIS/EA Section 6.13.4; Table 6.13-17
8.3	Mitigation	Do not disturb encountered Boreal Caribou.	All	Final EIS/EA Section 6.13.4
8.4	Mitigation	During construction of the mine access road and transmission line: • Minimize the area cleared with heavy machinery in Category 1 Boreal Caribou habitat to the extent possible recognizing the need for clear sightlines for safety along the mine access road; • Reduce predator sight lines by minimizing the removal of woody vegetation along the transmission line in Boreal Caribou location clusters and adjacent to Category 1 habitat (overwintering and calving) by limiting removal to hazard trees and only clearing for safe access and infrastructure needs; • Avoid clearing and construction activities in Category 1 Boreal Caribou nursery habitat during the calving and nursery period (May 1 to September 15); and • During construction and operation of the airstrip, avoid construction and overflights of Category 1 nursery habitats during the nursery period (May 1 to September 15). • Efforts will be made to re-supply the mine with bulk of deliveries aiming to be outside the calving period.	Construction	Final EIS/EA Section 6.13.4; Table 6.13-17
8.5	Mitigation	Ensure adequate water movement where an all-weather road crosses wetland complexes by using appropriate crossings, half-culverts on pilings, or other drainage techniques. Apply construction methods that reduce soil and peat compaction.	Construction	MECP (2020) Best Management Practices (BMPs) Tech Memo: Springpole Gold Project - Boreal Caribou Mitigation and Offsetting Commitments Summary (WSP 2026)
8.6	Mitigation	Minimize the disturbance in Category 1 and 2 Boreal Caribou habitats by using existing trails and roads for travel.	Construction	Final EIS/EA Section 6.13.4
8.7	Mitigation	Co-locate the transmission line, airstrip and mine access road within a shared infrastructure corridor, where feasible.	Construction	Final EIS/EA Section 6.13.4; Table 6.13-17
8.8	Mitigation	Implement mitigation for lighting to minimize sensory disturbance, including: • To prevent a direct line-of-sight from light, maintain light sources below natural barriers such as tree lines or artificial barriers such as berms; and, • Minimize light spill and glare using shielding on stationary light sources and direct lighting downwards where practical.	All	Final EIS/EA Section 6.13.4
8.9	Mitigation	Implement relevant mitigation measures for dust from Section 6.2.4, including: • 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: o Conveyor transfer (drop) points will be controlled via enclosure or water spray; o Crushed ore stockpile susceptible to dust generation will be enclosed, and emissions controlled by a baghouse; o A wet scrubber or equivalent will be used to control emissions in grinding (baghouse controlled); o Truck unloading at the primary crusher will be enclosed and emissions controlled by a baghouse; o Drill rigs will be equipped with a dust shroud on the drill, and a wet suppression (spray) system will be used; o Truck placement of mine rock onto the Co-Disposal Facility (CDF) will be controlled using water sprays and surface wetting as needed; o Travel surfaces will be maintained to minimize silt (fine material); o Crushing of ore materials and reclaim at stockpiles will be controlled by baghouses; o The vents from the lime silo will be controlled by a dust collector;	All	Final EIS/EA Section 6.13.4; Table 6.13-17

Item #	Mitigation / Monitoring / Commitment	Description	Phase / Timing	Source
		○ 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; • Dust emissions from roads and mineral stockpiles will be controlled through the application of water spray and supplemented by dust suppressants, if required; • Site roads will be maintained in good condition, with regular inspections and timely maintenance completed to minimize the silt loading on the roads; and, • Vehicle speeds will be limited.		
8.10	Mitigation	Implement the relevant mitigation measures for wildlife from Section 6.12.4, including: • During all phases, prohibit hunting and trapping by employees and contractors within the PDA and while working on site; • Provide wildlife (including Boreal Caribou and other applicable SAR) awareness training to Project employees and transport contractors; • Properly secure, store, and dispose of all domestic solid waste products and similar materials at an offsite licensed facility, particularly anything that is an attractant for scavenging wildlife. All domestic solid waste products will be transported to a landfill off-site and therefore mitigating the habitat sink effect of increased predator densities that can be created due to access to landfill sites; and • Document (and report as needed) observed wildlife, sign / tracks and wildlife-vehicle collisions and alter mitigation measures as appropriate.	All	Final EIS/EA Section 6.13.4
8.11	Mitigation	To prevent accidental wildlife entry and reduce the risk of injury or mortality to Boreal Caribou, install fencing of an appropriate height around specific high-risk features such as open pits, mine shafts, tailings ponds, settling ponds, and other deep or unstable excavations. Fencing will be applied where the physical characteristics of the feature create a clear hazard, and only during the periods when the hazard is present (e.g., active construction, active operation, or until closure stabilization). This targeted approach ensures fencing is used strictly as a safety measure rather than broadly across the site.	All	MECP (2020) BMPs; Tech Memo: Springpole Gold Project - Boreal Caribou Mitigation and Offsetting Commitments Summary (WSP 2026)
8.12	Mitigation	Implement relevant mitigation measures for noise from Section 6.3.4, including: • 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 light but in accordance with the applicable health and safety regulations; • Check that equipment and machinery used on site is maintained in good working conditions through regular maintenance and inspection; • Prohibit the use of engine brakes and require the engines to be stopped for vehicles on standby, depending on seasons and weather; • Operate vehicles and equipment such that impulsive noise is minimized, where possible; and, • For helicopter use during transmission line construction, maintain minimum flight altitudes unless engaged in construction tasks, landing or departure	All	Final EIS/EA Section 6.13.4; Table 6.13-17
8.13	Mitigation	Incorporate Boreal Caribou habitat features into the overall closure plan, where possible, including: • Revegetate suitable areas within the PDA using species that will support the development of mature coniferous refuge habitat for Boreal Caribou, and incorporate the restoration of lichen and lichen treatments in select areas; and, • Remove or otherwise regraded stockpiles (including surficial soil and ore) to facilitate Boreal Caribou access.	Closure	Final EIS/EA Section 6.13.4 CLLSFN-008
8.14	Mitigation	During the operation of the mine access road and transmission line: • Reduce Project-related traffic speed along the mine access road in sections traversing Category 1 habitat during seasonally sensitive periods, particularly along segments with identified crossing locations; • Project-related vehicles travelling on the mine access road must come to a stop if Boreal Caribou are encountered and provide them with the right-of-way and time to safely cross the roadway and into native cover without undue sensory disturbance; • Minimize vegetation management along the transmission line corridor within Category 1 habitat to that necessary for safe operation; and, • In areas where Boreal Caribou have been recorded crossing the existing transmission line, retain vegetation and undertake strategic vegetation treatments to reduce the potential for barriers to movement. • If Boreal Caribou are found to be crossing linear features created by the Project in new areas (outside of the currently identified cluster of movement locations), implement vegetation treatments to mitigate potential barrier effects in these new locations. • A controlled access gatehouse / checkpoint and signage are proposed to control unauthorized use of the 18-km mine access road leading to the mine site. An access management strategy will be developed with local Indigenous communities and the Ministry of Natural Resources (MNR) to provide access for traditional land and resource use activity along this newly accessible area. Efforts will be made to re-supply the mine with bulk of deliveries aiming to be outside the calving period. • Efforts will be made to re-supply the mine with bulk of deliveries outside the nursery period from May 1 to September 15th Traffic and delivery rates will be monitored monthly and included in the annual monitoring report.	Construction, Operations	Final EIS/EA Section 6.13.4; Table 6.13-17; MECP (2020) BMPs, Tech Memo: Springpole Gold Project - Boreal Caribou Mitigation and Offsetting Commitments Summary (WSP 2026)

Item #	Mitigation / Monitoring / Commitment	Description	Phase / Timing	Source
		• Limit snow plowing of access and maintenance roads to those necessary for current operations, maintenance, and emergency access only. Wing snowbanks to reduce height and minimize predator travel corridors		
8.15	Mitigation	In collaboration with Indigenous communities and MECP, FMG will design and implement a habitat restoration program for Boreal Caribou. FMG will have a Qualified Professional prepare a Caribou Habitat Restoration Plan ("the Onsite Restoration Plan") and submit this plan to MECP, within 2 years of the initiation of construction. This timeline allows for consultation and input from Indigenous partners to determine the appropriate end land use concept and targets to re-establish pre-mine ecosites to the extent possible given that the post-closure landscape will include permanent topographical alterations and ecotypes that are not currently present in the local area. The development of mature coniferous and refuge forest types preferred by Boreal Caribou will be the target restoration goal. The plan will also focus on avoiding the creation of vegetation types such as mixed or deciduous forest ecosystems that could attract Moose thereby potentially increasing a predation risk for Boreal Caribou. The Onsite Restoration Plan may include: • Targeted objectives to achieve a contiguous landscape of dense mature coniferous forest and refuge habitat for Boreal Caribou on the mine footprint, mine access road and along the transmission line. • The progressive restoration of the PDA footprint with areas suitable for enhanced Boreal Caribou habitat restoration. • Stockpiles shall be processed and removed before final closure of the Mine and the remaining footprint of these areas will be fully covered and revegetated to ensure the restoration of mature coniferous habitat for Boreal Caribou. • Any plateaus or ramps in the Mine footprint shall receive a full re-vegetation treatment focused on ensuring restoration of mature coniferous and refuge functions for Boreal Caribou. • The shorelines of any created waterbodies that are more than 1 metre in depth with a shoreline that is more than 1 metre in height shall be re-sloped to a grade of 4:1 at 200 metre intervals, to allow for egress of Boreal Caribou entering or leaving the water. • Stocking densities at minimum will be planting of Jack Pine or Black Spruce at a minimum density of 1000 stems per hectare and/or aerial seeding of Jack Pine and Black Spruce at 20,000 viable seeds per hectare. Lichen restoration or enhancement treatments will be undertaken in areas that will not support growth of Jack Pine or Black Spruce trees. • Progressive and enhanced onsite restoration of its Project footprint will be undertaken on a minimum of 10 ha/year throughout the life of the Mine so that Boreal Caribou habitat restoration is effectively accelerated at closure. • Remove infrastructure and other assets that are no longer required for development, operations, or maintenance to reduce long-term disturbance, prevent the establishment of deciduous browse species, and avoid creating additional predator travel corridors. Demolish and remove buildings and associated structures and dispose of demolition materials at approved facilities. • Restrict vehicular access on roads and trails that are no longer required for development, operations, or maintenance (e.g., using berms or removal of water crossings). Scarify the road or trail surface to alleviate soil or gravel compaction and support natural vegetative regeneration, reducing long-term habitat disturbance, fragmentation, and predator travel efficiency. • The creation of suitable Boreal Caribou calving habitat through the establishment of a small island in the open pit basin of Springpole Lake and revegetate the island with mature coniferous forest. Including preliminary design of this created habitat feature. Deliverable: Onsite Boreal Caribou Habitat Restoration Plan (integrated with the Closure Plan), draft for review to be submitted to MECP within 2 years of the initiation of construction.	All	Tech Memo: Springpole Gold Project - Boreal Caribou Mitigation and Offsetting Commitments Summary (WSP 2026); SFN-S6.13-042; MECP (2020) BMPs; FMG response to MECP-SARB review of Final EIS/EA.
8.16	Mitigation	To meet regulatory requirements, FMG is advancing various potential offsetting opportunities including: • Opportunities to undertake enhanced restoration of lands subject to recent forest fires. • Opportunities to undertake enhanced restoration on lands subject to forestry activities through partnership with the forestry industry. • Opportunities identified by Ontario pursuant to the provincial Woodland Caribou Recovery Strategy. For example, potential habitat restoration in the vicinity of the abandoned South Bay mine. • Partnership deferrals in other parts of the Churchill Range. • At closure, the Project includes the construction of a Boreal Caribou calving island (linked to the Project's fish habitat development area)	All	Final EIS/EA Section 6.13.4
8.17	Mitigation	Transmission line habitat management and movement barrier reduction: • Reduce predator sight lines by minimizing the removal of woody vegetation along the transmission line in areas known to be used by Boreal Caribou for crossing the existing transmission line as well as adjacent to Category 1 habitat (overwintering and nursery areas) by limiting removal to hazard trees and only clearing for safe access and infrastructure needs. • Create vegetation management areas, where vegetation is left along the transmission line corridor to facilitate safe Boreal Caribou crossing of the linear feature and prevent predator lines of sight. These vegetation management crossing areas will be installed every 500 m to 1 km along the transmission line.	All	Final EIS/EA Section 6.13.4; Table 6.13-17; MECP (2020) BMPs

Item #	Mitigation / Monitoring / Commitment	Description	Phase / Timing	Source
		• Use appropriate vegetation control measures to prevent the growth of deciduous shrubs and trees within the right-of-way, reducing browse availability for moose/deer and subsequently lowering predator attraction. • In areas where Boreal Caribou have been recorded crossing the existing transmission line, retain vegetation and undertake strategic vegetation treatments to reduce the potential for barriers to movement. • If Boreal Caribou are found to be crossing linear features created by the Project in new areas (outside of the currently identified cluster of movement locations), implement vegetation treatments to mitigate potential barrier effects in these new locations. • First Mining Gold (FMG) will design linear features to maintain connectivity across the Project footprint by incorporating breaks in long windrows (e.g., slash, rock, or snow berms) and ensuring unobstructed access routes across rights-of-way. These measures reduce potential barrier effects and support Boreal Caribou movement.		
8.18	Mitigation	FMG will coordinate with Forest Resource Licence Holders and MNR during the forest management planning process to ensure the Springpole Project is reflected in future forest harvest allocations. The Trout Forest Management Plan begins renewal in 2028, which aligns with the Project schedule and will allow the Springpole footprint to be incorporated into the next Forest Management Plan (FMP) allocation cycle. FMG will also participate in Annual Work Schedule reviews to confirm that forestry activities in the Trout Forest align with the 2031–2041 Forest Management Plan and account for the Springpole Project. Within 2 years of the initiation of construction, FMG will prepare and implement an Offsite Restoration Plan. FMG will submit this plan to MECP prior to commencing implementation of the Offsite Restoration Plan, and update the plan where needed under consultation with Indigenous partners and MECP. All Restoration actions in the Offsite Restoration Plan shall be completed within five (5) years of the Offsite Restoration Plan being approved by MECP. The Offsite Restoration and Compensation Plan will be prepared by a Qualified Professional and include details related to the restoration of disturbed habitat and/or forestry or mining deferrals to regulatory requirements. Offsite restoration activities will include limiting access to newly restored or deferred sites by: • Limiting vehicular traffic to the extent possible using physical access controls at linear disturbance access points and along portions of the linear disturbance to prevent or impede access by ATV/UTV, snowmobile, or other vehicles. Installation of signage and gates, for the purpose of eliminating sensory disturbance from human access and accelerating vegetation growth. • Implementing measures to reduce predator efficiency and access, such as ditches, berms, slash piles, or other actions that are likely to impede predator use and line of sight on roads. Installation of one or more trench barricades and rip-plow scarification where necessary to prevent or impede human and predator access, create microclimates that encourage diverse vegetation and promote growth with structural complexity equivalent to or greater than adjacent cover, and reduce soil compaction to accelerate vegetation growth. • Strategic planting of conifer seedlings at locations that will eventually reduce predator line-of-sight to less than 100 m. Restoration of habitat in 200-300 m segments to optimize local site conditions to ensure success. Mounding and planting at strategic locations for the purpose of creating microsites of seed and seedling habitat, impairing predator and human movement efficiency, and accelerating the re-establishment of natural vegetation. Stem bending and tree falling to impede predator and human travel efficiency and reduce lines of sight. Slash rollback and coarse woody debris to impede wolf travel efficiency, • Discourage public access, create microclimates to increase vegetation diversity and accelerate vegetation growth; conifer planting, using Boreal Caribou preferred native species suited to local ecosites to reduce predator line-of-sight, discourage browsing and mast production by overtopping deciduous species; cause soil acidification to discourage deciduous species; and establish conifer dominant upland communities of desired species composition; deciduous shrub and mast management to discourage preferential browsing by alternative prey (e.g., Moose, Beaver) and reduce predator occurrence (i.e., Black Bears foraging for mast; Wolf predation risk relative to prey abundance); seedling stocking at a density of at least 1,000 stems/ha or site preparation and aerial seeding of jack pine at 20,000 viable seeds per hectare; removal of culverts, bridges and roadbed segments. Deliverable: Offsite Boreal Caribou Habitat Restoration and Compensation Plan (draft for review) to be submitted to MECP within 2 years of the initiation of construction.	Program (post-mitigation)	Tech Memo: Springpole Gold Project - Boreal Caribou Mitigation and Offsetting Commitments Summary (WSP 2026); MECP (2020) BMPs; FMG response to MECP-SARB review of Final EIS/EA.
8.19	Monitoring	The areal extent of Boreal Caribou habitats that are removed or altered will be compared to EIS predictions relative to Category 1, 2 and 3 General Habitat Descriptions for Caribou habitats. Site lines along linear corridors will be documented.	All	Final EIS/EA Section 12.10.2
8.20	Monitoring	Follow-up winter aerial surveys will be carried out annually using the 2023 boundaries and methods. Observed Boreal Caribou and Moose encountered during the surveys will be classified with respect to sex and age categories using physical attributes and behaviour (within group association). Numbers of calves, adult females, adult males, and un-classified individuals will be recorded. Sign (e.g., number of track sets, and observations of Wolf will also be opportunistically recorded.	All	Final EIS/EA Section 12.10.2
8.21	Monitoring	Subject to acceptance of the FUP by the federal and provincial governments, monitoring results will be provided to the parties of the FUP annually. Additional reporting mechanisms may be prescribed in provincial and federal environmental approvals.	All	Final EIS/EA Section 12.10.3

Item #	Mitigation / Monitoring / Commitment	Description	Phase / Timing	Source
8.22	Monitoring	In collaboration with Indigenous communities and MECP, FMG will have a Qualified Professional prepare a Boreal Caribou Monitoring Plan and submit this plan to MECP within 12 months of the initiation of construction. The Monitoring Plan will determine / confirm: • Direct and indirect habitat losses associated with site preparation activities during the Construction Phase in the mine site area, and along the access road and transmission line, including indirect alterations due to edge effects and sensory disturbance from noise, light and dust; • Indirect habitat losses associated with the mine Operations Phase for the mine site area as well as the mine access road for the indirect alteration due to sensory disturbance from noise, light and dust; • Whether or not there has been a change in Boreal Caribou population dynamics; • Whether the change in range scale habitat condition is within EIS prediction; and • Whether or not offsite habitat restoration and/or compensatory measures), are performing effectively. In general, methods for measuring effects to Boreal Caribou will mirror those used to collect baseline data, with some adjustments for monitoring locations and frequencies including aerial surveys and satellite telemetry, vegetation and soil plots as well as satellite imagery to measure habitat restoration trajectories. Genetic mark-recapture will also be considered in consultation with MECP and Indigenous partners to further support population monitoring for Boreal Caribou. This Monitoring Plan will be updated within 12 months of the following habitat restoration plans approvals: • Onsite Boreal Caribou Habitat Restoration Plan; • Offsite Boreal Caribou Habitat Restoration and Compensation Plan. • The Monitoring Plan will include measure the success of onsite and offsite habitat restoration and compensatory actions including the following: • An outline of the frequency and duration of monitoring required to determine the effectiveness of habitat restoration and/or compensatory criteria for the selection of treatment and reference sites, as determined to be appropriate by the Qualified Professional. • Direct comparisons of selected parameters of the biota and abiotic environment of the treatment sites to the reference sites. • Assessment of ongoing habitat suitability for Boreal Caribou using measures derived from field-based vegetation metrics such as canopy species composition, tree height, forest age, lichen cover or abundance, and shrub or understory cover, to define and demonstrate establishment of a restoration trajectory in the reference sites. This will include a trajectory analysis of trends from collected data to monitor progress towards the desired or target objectives for restoration or habitat deferrals as well as the assessment of the use of these areas by Boreal Caribou over time. • Monitoring will also measure Boreal Caribou responses to mine activities. Range wide aerial surveys of Churchill, Berens and Kinloch ranges will be undertaken every 3 years between February 1 to March 15th through construction and operations and 10 years following active mine closure. Each range survey shall include sufficient transects flown at a 3 km spacing covering range boundaries. Winter aerial surveys shall be directed at determining and documenting the presence of Boreal Caribou, alternate prey (i.e., Moose), and predators (i.e., Wolves and Wolverine) within the range(s). Where Boreal Caribou are observed, group structure including age and sex of each Boreal Caribou will be measured enabling multi-year calf recruitment information. Sight ability correction factor enabling estimates of population size as well as identification and delineation of winter activity areas consisting of heavy tracks, slushing and/or cratering will also be recorded. FMG will analyse predator-prey dynamics and assess the extent to which predators use the linear corridors within the study area. If the monitoring and research results indicate that predators are using the linear corridors and/or increases in Boreal Caribou mortality rates are associated with the linear corridors, additional mitigation will be determined in consultation with MECP. Beginning in the first winter following the initiation of full construction, FMG will implement a telemetry program, collaring a minimum of 50 Boreal Caribou. every 6 years, until 10 years following the Active Mine Closure, undertaken by Qualified Professional(s). The telemetry program shall be conducted to evaluate; • Boreal Caribou responses to mine activities, • Levels of site fidelity of confirmed seasonal ranges such as calving and over wintering areas that may be affected by mining activities as well as determining the level of spatial and temporal variation in the use of calving and over wintering areas, and whether there is evidence of strong site fidelity to these annual and seasonal home ranges from year to year. • Collar mortality signal investigations to determine the source, season and location of any mortality events experienced by collared animals. Seasonal and spatial patterns in mortality rates relative to predator activity will also be quantified to determine whether mine activities have resulted in increased mortality rates.	All	Tech Memo: Springpole Gold Project - Boreal Caribou Mitigation and Offsetting Commitments Summary (WSP 2026)

Item #	Mitigation / Monitoring / Commitment	Description	Phase / Timing	Source
		• Changes in calf recruitment and group structure in the study area over time will also be quantified. Deliverable: Boreal Caribou Monitoring Plan to be submitted to MECP within 2 years of the initiation of construction.		
8.23	Commitment	FMG commits to ongoing collaboration with Indigenous communities, including workshops and feedback on mitigation measures related to Boreal Caribou.	All	Final EIS/EA Section 6.13.1.2
8.24	Commitment	FMG is committed to reducing impacts to Boreal Caribou and their habitats including adhering to timing restrictions on clearing and construction activities during the sensitive nursery period from May 1st to September 15th	Pre-construction, Construction	SFN-S6.13-007
8.25	Commitment	FMG is committed to creating habitats that function as Boreal Caribou habitat including being traversable and accessible by water so Boreal Caribou can access the island.	Closure	SFN-S6.13-028

Table 9: Mitigation, Monitoring and Commitments Related to Wolverine

Item #	Mitigation / Monitoring / Commitment	Description	Phase / Timing	Source
9.1	Mitigation	Any person who engages in Project activities will be provided education and awareness training by a Qualified Professional, prior to entering the site to perform any Project activities. Training will address existence of Protected Species on site; identification of Protected Species and their habitats; awareness of Wolverine on roads within site to avoid collisions; the care that should be taken to avoid Protected Species individuals and / or their habitat; appropriate actions to take if any Protected Species is encountered; and how to record impacts to the Protected Species.	All	Final EIS/EA Section 6.14.4
9.2	Mitigation	Development of a compact mine site to limit the footprint of disturbance.	Construction	Final EIS/EA Section 6.14.4
9.3	Mitigation	Limit the removal of moderate and high-quality Wolverine habitat within the PDA, as practicable.	All	Final EIS/EA Section 6.14.4
9.4	Mitigation	During construction of the mine access road and transmission line, implement the following mitigation: • Minimize the area cleared with heavy machinery for the construction of the mine access road, as practicable, recognizing the need for clear sightlines for safety. • Minimize the removal of woody vegetation along the transmission line by limiting removal to hazard trees and only clearing for safe access and infrastructure needs.	Construction	Final EIS/EA Section 6.14.4
9.5	Mitigation	During construction of the mine site area, the mine access road and the transmission line, implement the following mitigation: • Avoid the removal of vegetation during the nursery period for Wolverine (January 1 to April 30), when in moderate and high-quality habitat. • In the event of a Wolverine observation or encounter within the construction area, cease Project activities within the construction area and the surrounding 500 m until the individual is no longer present within 500 m of the construction area. • In the event a den site is observed or encountered within the construction area, cease all Project activities within 8 km of the den site until a Qualified Professional has assessed the den site. If the den site is deemed active by the Qualified Professional, implement additional Wolverine protective measures as determined in consultation with relevant government agencies.	Construction	Final EIS/EA Section 6.14.4
9.6	Mitigation	Implement mitigation for lighting to minimize sensory disturbance, including the following: • To prevent a direct line-of-sight from light, maintain light sources below natural barriers such as tree lines or artificial barriers such as berms. • Minimize light spill and glare using shielding on stationary light sources and direct lighting downwards where practicable.	All	Final EIS/EA Section 6.14.4
9.7	Mitigation	During operation of the transmission line, implement the following mitigation: • Minimize vegetation management along the transmission corridor to that necessary for safe operation. • Maintain natural vegetation structure and composition to the extent possible for Wolverine habitat connectivity, in areas along the transmission line identified as moderate or high-quality habitat for Wolverine.	Operations	Final EIS/EA Section 6.14.4
9.8	Mitigation	Restore disturbed Wolverine habitat, implement the following mitigation: • Remove any infrastructure and install physical barriers to prevent vehicular access. • Replant disturbed areas and monitor vegetation reestablishment; many of the offsetting measures targeted towards other species (e.g., Caribou) will benefit Wolverine and their habitats.	Closure	Final EIS/EA Section 6.14.4
9.9	Mitigation	During the operation of the mine access road, implement the following mitigation: • Minimize vegetation management along the transmission corridor to that necessary for safe operation. • Enforce reduced speed limits along Project-controlled roads within high-quality wildlife habitats, particularly along segments with known or recurrent wildlife crossings. • 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.	Operations	Final EIS/EA Section 6.14.4
9.10	Mitigation	Implementation of mitigation measures for potential effects on air quality relevant to Wolverine (Section 6.2.4) including: • Control dust emissions from roads and mineral stockpiles through the application of water spray and supplemented by dust suppressants, if required. • Maintain site roads in good condition, with regular inspections and timely maintenance completed to minimize the silt loading on the roads. • Limit vehicle speeds.	All	Final EIS/EA Section 6.14.4
9.11	Mitigation	Implementation of mitigation measures for potential effects on noise relevant to Wolverine (Section 6.3.4) including: • Select or design motorized equipment with mufflers / silencers to limit noise emissions. • Use reversing alarms that are dimmable with white noise and/or strobe light but in accordance with the applicable health and safety regulations. • Check that equipment and machinery used on site is maintained in good working conditions through regular maintenance and inspection. • Prohibit the use of engine brakes and require the engines to be stopped for vehicles on standby, depending on seasons and weather.	All	Final EIS/EA Section 6.14.4

Item #	Mitigation / Monitoring / Commitment	Description	Phase / Timing	Source
		• Operate vehicles and equipment such that impulsive noise is minimized, where possible. • For helicopter use during transmission line construction, maintain minimum flight altitudes unless engaged in construction tasks, landing or departure.		
9.12	Mitigation	Implementation of mitigation measures for potential effects on wildlife and wildlife habitat relevant to Wolverine (Section 6.12.4) including: • Provide any person who engages in Project activities with education and awareness training prior to entering the site to perform any Project activities. Training will address existence of Protected Species on site, identification of Protected Species and their habitats, awareness of Wolverine on roads within site to avoid collisions, the care that should be taken to avoid Protected Species individuals and / or their habitat, appropriate actions to take if any Protected Species is encountered; and how to record impacts to the Protected Species. • Log (and report as needed) observed wildlife, sign / tracks and wildlife-vehicle collisions and alter mitigation measures as appropriate. • Properly secure, store and dispose of all domestic solid waste products and similar materials at an offsite licensed facility, particularly anything that is an attractant for scavenging wildlife. All domestic solid waste products will be transported to a landfill off site and therefore mitigating the habitat sink effect of increased predator densities that can be created due to access to landfill sites.	All	Final EIS/EA Section 6.14.4
9.13	Mitigation	Prior to the construction phase of the Project, undertake pre-construction winter aerial surveys to map activity centres and potentially active wolverine natal or maternity dens within a 10 km buffer of the PDA.	Construction	Final EIS/EA Section 6.14.4

Table 10: Mitigation, Monitoring and Commitments Related to SAR Bats

Item #	Mitigation / Monitoring / Commitment	Description	Phase / Timing	Source
10.1	Mitigation	Avoid the removal of bat maternity habitat between April 15 and August 31, unless authorized under an *Endangered Species Act* (ESA) or other appropriate approval.	Construction	Final EIS/EA Section 6.15.4
10.2	Mitigation	Co-locate the transmission line, airstrip and mine access road within a shared infrastructure corridor, where feasible.	Construction	Final EIS/EA Section 6.15.4
10.3	Mitigation	Develop a compact mine site to limit the areal extent of disturbance.	Construction	Final EIS/EA Section 6.15.4
10.4	Mitigation	Avoid the removal / disturbance of foraging habitat within 2.6 km of candidate bat hibernacula, unless authorized under an ESA or other appropriate approval.	Construction, Operations	Final EIS/EA Section 6.15.4 CLLSFN-2025-090 SFN-S6.15-004
10.5	Mitigation	Follow appropriate timing windows for vegetation removals; in combination with timing windows for wildlife and wildlife habitat (6.12), Boreal Caribou (6.13), Wolverine (6.14), and SAR birds (6.16), vegetation removals should only occur between September 15 to January 14.	Construction	Final EIS/EA Section 6.15.4
10.6	Mitigation	Implement mitigation measures for lighting to minimize sensory disturbance, including: • To prevent a direct line-of-sight from light, maintain light sources below natural barriers such as tree lines or artificial barriers such as berms; and • Minimize light spill and glare using shielding on stationary light sources and direct lighting downwards where practicable.	All	Final EIS/EA Section 6.15.4
10.7	Mitigation	Implement the mitigation measures for potential effects on noise relevant to bats (Section 6.3.4), including: • Building dimensions, layout and orientation will be designed to shield noise sources, where possible. • Acoustical enclosures will be used in the process plant to limit overall noise emissions from key noise sources, such as the ball mills. • Generator intakes and exhausts in the process plant will use silencers. • Motorized equipment will be selected or designed with mufflers / silencers to limit noise emissions during all phases of the Project • 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 • The use of engine brakes will be prohibited. • Vehicles and equipment will be operated in such a way that impulsive noise is minimized, where possible, during all phases of the Project • Regular inspections will take place to confirm that equipment and machinery used on site is operated in good working condition through regular maintenance. • For helicopter use during transmission line construction, minimum flight altitudes will be maintained unless the helicopters are engaged in construction tasks, landing or departure.	All	Final EIS/EA Section 6.3.4
10.8	Mitigation	Implement the mitigation measures for potential effects on surface water relevant to bats (Section 6.6.4, Section 6.7.4 and 6.8.4), including. • During construction, operation and active closure, an ESC plan will be implemented to manage runoff water in disturbed areas. • During construction, operation and active closure, an integrated water management system will be designed to collect and control contact water. • 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. • Collected contact water that is not recycled in ore processing will be treated at the effluent treatment plant and discharged to the southeast arm of Springpole Lake in accordance with permitting requirements.	All	Final EIS/EA Sections 6.6.4, 6.7.4 and 6.8.4
10.9	Mitigation	Implementation of mitigation measures for potential effects on air quality relevant to bats (Section 6.2.4) including: • During construction, operation 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. • Dust emissions from roads and mineral stockpiles will be controlled through the application of water spray and supplemented by dust suppressants, if required; • Site roads will be maintained in good condition, with regular inspections and timely maintenance completed to minimize the silt loading on the roads; and, • Vehicle speeds will be limited.	All	Final EIS/EA Section 6.2.4
10.10	Mitigation	Implementation of mitigation measures for potential effects on vegetation communities and wetlands relevant to bats (Section 6.2.4) 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. The removal of woody vegetation will be limited to hazard trees and clearing to provide safe construction access and infrastructure needs;	All	Final EIS/EA Section 6.11.4

Item #	Mitigation / Monitoring / Commitment	Description	Phase / Timing	Source
		• During construction, operation and active closure phases, implement mitigation measures for wetlands; and, • During operation 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 including bats.		
10.11	Mitigation Monitoring	Implementation of mitigation measures for potential effects on wildlife and wildlife habitat relevant to bats (Section 6.12.4) including: • During construction, operation and closure phases of the Project, 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. Domestic solid waste products will be transported to a landfill off site, mitigating the habitat sink effect of increased predator densities that can be created due to access to landfill sites. • During construction of the Project, minimize the disturbance by using existing trails and roads for travel, where practical. • During the operation phase of the mine access road, enforce reduced speed limits along Project-controlled roads within high-quality wildlife habitats, particularly along segments with known or recurrent wildlife crossings; • During the operation phase of the mine access road, 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; and • During the operation phase of the transmission line, minimize vegetation management to that necessary for safe operation. • During construction, operation and closure phases, wildlife (including SAR) awareness training will be provided to Project employees. • During construction, operation and closure phases, log (and report as needed) observed wildlife, sign / tracks and wildlife–vehicle collisions and alter mitigation measures as appropriate.	All	Final EIS/EA Section 6.12.4
10.12	Mitigation	Maintain a 500 m radius of uncleared habitat around the entrance for confirmed bat hibernacula, unless otherwise authorized under an ESA approval.	Construction, Operations	Final EIS/EA Section 6.15.4
10.13	Mitigation	Undertake offsetting measures for bats such as establishing artificial hibernacula, as required by relevant ESA approvals.	All	Final EIS/EA Section 6.15.4

Table 11: Mitigation, Monitoring and Commitments Related to SAR Birds

Item #	Mitigation / Monitoring / Commitment	Description	Phase / Timing	Source
11.1	Mitigation	Avoid the removal of Category 1, 2 and 3 habitat for Eastern Whip-poor-will, unless authorized under an ESA or other appropriate approval.	Construction, Operations	Final EIS/EA Section 6.16.4
11.2	Mitigation	Avoid the removal of nests for Barn Swallow, Eastern Whip-poor-will or Lesser Yellowlegs, unless authorized under an ESA approval and / or a permit issued under the Migratory Bird Regulations.	Construction, Operations	Final EIS/EA Section 6.16.4
11.3	Mitigation	Co-locate the transmission line, airstrip and mine access road within a shared infrastructure corridor, where feasible.	Construction	Final EIS/EA Section 6.16.4
11.4	Mitigation	Comply with the requirements of the *Migratory Birds Convention Act* and Migratory Birds Regulations, if Barn Swallow, Eastern Whip-poor-will or Lesser Yellowlegs individuals are encountered during Project activities.	Construction, Operations	Final EIS/EA Section 6.16.4
11.5	Mitigation	Development of a compact mine site to limit the areal extent of disturbance.	Construction	Final EIS/EA Section 6.16.4
11.6	Mitigation	Implement mitigation measures for lighting to minimize sensory disturbance (Appendix J), including: • To prevent a direct line-of-sight from light, maintain light sources below natural barriers such as tree lines or artificial barriers such as berms; and, • Minimize light spill and glare using shielding on stationary light sources and direct lighting downwards where practicable.	All	Final EIS/EA Section 6.16.4
11.7	Mitigation	Follow appropriate timing windows for vegetation removals; in combination with timing windows for wildlife and wildlife habitat (6.12), Boreal Caribou (6.13), Wolverine (6.14), and bats (6.15), vegetation removals should only occur between September 15 to January 14.	Construction, Operations	Final EIS/EA Section 6.16.4
11.8	Mitigation	Implement the mitigation measures for potential effects on noise relevant to SAR birds (Section 6.3.4), including: • Building dimensions, layout and orientation will be designed to shield noise sources, where possible; • Acoustical enclosures will be used in the process plant to limit overall noise emissions from key noise sources, such as the ball mills; • Generator intakes and exhausts in the process plant will use silencers; • Motorized equipment will be selected or designed with mufflers / silencers to limit noise emissions during all phases of the Project; • 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; • The use of engine brakes will be prohibited; • Vehicles and equipment will be operated in such a way that impulsive noise is minimized, where possible, during all phases of the Project; • Regular inspections will take place to confirm that equipment and machinery used on site is operated in good working condition through regular maintenance; 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.	All	Final EIS/EA Section 6.3.4
11.9	Mitigation	Implement the mitigation measures for potential effects on surface water relevant to SAR birds (Section 6.6.4, Section 6.7.4 and 6.8.4), including: • During construction, operation and active closure, an erosion and ESC plan will be implemented to manage runoff water in disturbed area; • During construction, operation and active closure, an integrated water management system will be designed to collect and control contact water; • 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; • Collected contact water that is not recycled in ore processing will be treated at the effluent treatment plant and discharged to the southeast arm of Springpole Lake in accordance with permitting requirements; and, • Implement measures outlined in a spill prevention and contingency plan to be developed prior to construction.	All	Final EIS/EA Sections 6.6.4, 6.7.4 and 6.8.4
11.10	Mitigation	Implementation of mitigation measures for potential effects on air quality relevant to SAR birds (Section 6.2.4) including: • 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; • Dust emissions from roads and mineral stockpiles will be controlled through the application of water spray and supplemented by dust suppressants, if required; • Site roads will be maintained in good condition, with regular inspections and timely maintenance completed to minimize the silt loading on the roads; and, • Vehicle speeds will be limited.	All	Final EIS/EA Section 6.2.4
11.11	Mitigation	Implementation of mitigation measures for potential effects on vegetation communities and wetlands relevant to SAR birds (Section 6.11.4) including:	All	Final EIS/EA Section 6.11.4

Item #	Mitigation / Monitoring / Commitment	Description	Phase / Timing	Source
		• 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. The removal of woody vegetation will be limited to hazard trees and clearing to provide safe construction access and infrastructure needs; and, • 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.		
11.12	Mitigation	Implementation of mitigation measures for potential effects on wildlife and wildlife habitat relevant to SAR birds (Section 6.12.4) including: • During construction, operation and closure phases of the Project, 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. Domestic solid waste products will be transported to a landfill off site, mitigating the habitat sink effect of increased predator densities that can be created due to access to landfill sites; • Discouraging wildlife from inhabiting contact water ponds (including the CDF and CWSP ponds); • During the operation phase of the mine access road, enforce reduced speed limits along Project-controlled roads within high-quality wildlife habitats, particularly along segments with known or recurrent wildlife crossings; • During the operation phase of the mine access road, 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 construction, operation and closure phases, wildlife (including SAR) awareness training will be provided to Project employees; and, • During construction, operation and closure phases, log (and report as needed) observed wildlife, sign / tracks and wildlife–vehicle collisions and alter mitigation measures as appropriate.	All	Final EIS/EA Section 6.12.4
11.13	Mitigation	• Visual mitigation measures (e.g., bird diverters and/or similar measures) will be considered during detailed design as a mechanism to improve bird visibility of the transmission line at key areas where key habitat is known to occur. These measures are perhaps best considered as an adaptive management option should such an issue be identified during transmission line maintenance activities.	Pre-construction	IAAC Bir-02
11.14	Monitoring	Wildlife monitoring will occur, and adaptive management measures implemented, as required at the CDF and water storage ponds that are operational. Measures to deter wildlife interactions if required, such as that would be taken include: • Prevention of continued vegetation growth will be controlled using manual methods (e.g., pulling, cutting, tarping). • Monitoring water quality to verify that it does not pose a short term ecological health risk to migratory birds. • Use of air horns, bangers and/or automated auditory deterrents at certain times of the year (e.g., spring) and for certain durations (e.g., one month); • Installation of site-specific visual deterrents (e.g., posts with predator decoys, reflectors strung along or over sections of the pond); and/or • Strategic placement of fences or barriers along sections of the CDF will be considered. Water quality monitoring results will be used to further assess risk to wildlife and inform the need for adaptive measures.	Construction, Operation	IAAC Bir-01
11.15	Monitoring	Before the construction phase, aerial surveys to confirm stick nest locations in the PDA will be completed to identify exact locations in order to avoid impacts and/or obtain appropriate permits	Pre-construction	MNR-74
11.16	Commitment	FMG will implement a Wildlife Management and Monitoring Plan that will build on and further detail mitigation measures for birds. FMG will provide this plan to MNR, as appropriate, during the permitting phase for review and input, in advance of construction activities where applicable; and the plan will be informed by applicable provincial policies, guidance documents, and best management practices	Pre-construction	MNR-87

Table 12: Mitigation, Monitoring and Commitments Related to Commercial Land and Resource Use

Item #	Mitigation / Monitoring / Commitment	Description	Phase / Timing	Source
12.1	Mitigation	A controlled access gate is proposed to control unauthorized use of the mine access road.	All	Final EIS/EA Section 6.17.4
12.2	Mitigation	Development of a compact mine site to limit the amount of aggregate material required for construction.	Construction	Final EIS/EA Section 6.17.4
12.3	Mitigation	FMG will work with mineral claim holders and regulators to accommodate access to mineral claims by claim holders and to secure permission to construct the transmission line on mineral claims held by others.	All	Final EIS/EA Section 6.17.4
12.4	Mitigation	FMG will work with MNR and / or trapline license holders to support trapline harvesting enhancements.	Construction, Operations	Final EIS/EA Section 6.17.4
12.5	Mitigation	Implement the mitigation measures for reducing changes in the viewscape (Appendix U), including: • Development of a compact mine site. • Co-locating the transmission line, airstrip and mine access road within a shared infrastructure corridor, where feasible. • Preserving 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 toppled by wind. • All buildings and facilities will be deconstructed and removed, and disturbed areas will be stabilized.	All	Final EIS/EA Appendix U
12.6	Mitigation	Implement the mitigation measures for reducing sensory disturbance (noise [Section 6.3], light [Appendix J]) including: • Building dimensions, layout and orientation will be designed to shield noise sources, where possible. • Acoustical enclosures will be used in the process plant to limit overall noise emissions from key noise sources, such as the ball mills. • Generator intakes and exhausts in the process plant will use silencers. • Motorized equipment will be selected or designed with mufflers / silencers to limit noise emissions. • Reversing alarms will be dimmable with white noise and/or strobe lights, • The use of engine brakes will be prohibited. • Vehicles and equipment will be operated in such a way that impulsive noise is minimized, where possible. • To prevent a direct line-of-sight from light, maintain light sources below natural barriers such as tree lines or artificial barriers such as berms. • Minimize light spill and glare using shielding on stationary light sources and direct lighting downwards where practical.	All	Final EIS/EA Section 6.3.4, Appendix J
12.7	Mitigation	Install screens or use other measures at water intakes to prevent entrainment or impingement of fish as per the DFO Code of Practice (DFO 2020).	All	Final EIS/EA Section 6.17.4
12.8	Mitigation	Keeping the dewatering (discharge to the downstream environment) to within the framework 10% of instantaneous flow so that the activity is not harmful to fish and fish habitat and maintains downstream water quantity and flow within natural variation.	Construction	Final EIS/EA Section 6.17.4
12.9	Mitigation	Limit the aerial extent of the Project and overprinting of bait harvesting areas through the development of a compact mine site.	Construction	Final EIS/EA Section 6.17.4
12.10	Mitigation	Limit the loss and alteration of wildlife habitat through: • Development of a compact mine site. • Co-locating the transmission line, airstrip and mine access road within a shared infrastructure corridor, where feasible • Detailed engineering will be conducted to optimize the transmission line route	Construction	Final EIS/EA Section 6.17.4
12.11	Mitigation	Limit the removal of merchantable timber through: • Development of a compact mine site. • Co-locating the transmission line, airstrip and mine access road within a shared infrastructure corridor, where feasible • Detailed engineering will be conducted to optimize the transmission line route	Construction	Final EIS/EA Section 6.17.4
12.12	Mitigation	Maintain active engagement with Indigenous communities and outfitters regarding effects to commercial land and resource use, including engagement about access to resources and Project activities.	Construction	Final EIS/EA Section 6.17.4 SFN-S6.17-007
12.13	Mitigation	Maintain active engagement with trappers regarding effects to commercial land and resource use, including engagement about access to resources and Project activities.	Construction	Final EIS/EA Section 6.17.4 SFN-S6.17-005
12.14	Mitigation	FMG will work with local forestry companies to salvage valued harvestable timber and offering it to the forestry companies managing the two affected FMUs.	Construction	Final EIS/EA Section 6.17.4

Item #	Mitigation / Monitoring / Commitment	Description	Phase / Timing	Source
12.15	Commitment	FMG is committed to ongoing communication with Sustainable Forest License holders, including Dryden Fibre, regarding the timelines for construction and coordination with forestry activities and potential caribou habitat restoration and conservation opportunities.	All	Final EIS/EA Section 6.17.4 SFN-S7-008
12.16	Commitment	Should there be future public roads established in the area before construction, FMG will look at the option to further optimize the route. FMG will continue to engage with the outfitter as the Project progresses through engineering and permitting phases. FMG will work with the outfitter holding Land Use Permit #1205-1008550 and MNR should access to Christina Lake becomes an issue due to the Project,	All	Response to C. Widmeyer comments received on January 17, 2025
12.17	Commitment	FMG will work with the Forest Resource License Holders and MNR during the forest management planning process to ensure the Springpole Project is included in planning of future forest allocations and timber harvest planning.	All	SFN-S6.13-025

Table 13: Mitigation, Monitoring and Commitments Related to Outdoor Recreation

Item #	Mitigation / Monitoring / Commitment	Description	Phase / Timing	Source
13.1	Mitigation	Communicate Project activities affecting waterbodies / watercourses used for navigation to potentially affected local resource users.	All	Final EIS/EA Section 6.18.4
13.2	Mitigation	Conduct progressive reclamation and final reclamation to promote the reestablishment of wildlife and aquatic habitat.	Operations, Closure	Final EIS/EA Section 6.18.4
13.3	Mitigation	Implement mitigation for lighting and changes to viewscapes to minimize sensory disturbance, including: • To prevent a direct line-of-sight from light, maintain light sources below natural barriers such as tree lines or artificial barriers such as berms; • Minimize light spill and glare by through the use of shielding on stationary light sources and direct lighting downwards where practical; • Preserve a tree line as a buffer to minimize the amount of the mine site that can be seen from recreational areas.	All	Final EIS/EA Section 6.18.4
13.4	Mitigation	Implement the mitigation measures for potential effects on air quality (Section 6.2.4), including: • 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. • Dust emissions from roads and mineral stockpiles will be controlled through the application of water spray and supplemented by dust suppressants, if required; • Site roads will be maintained in good condition, with regular inspections and timely maintenance completed to minimize the silt loading on the roads; and, • Vehicle speeds will be limited.	All	Final EIS/EA Section 6.2.4
13.5	Mitigation	Implement the mitigation measures for potential effects on fish and fish habitat (Section 6.10.4), including: • Relocate fish from the work area prior to undertaking in-water works for the construction of Project infrastructure. • Undertake in-water construction activities outside of the fish spawning and egg incubation periods to reduce the potential for effect to fish. • Implement the measures outlined in the Fish Habitat Offsetting 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. • Prior to construction, develop a detailed blasting management plan for areas adjacent to fish habitat that meets DFO criteria or alternate values derived in consultation with DFO. • Install screens or use other measures at water intakes to prevent entrainment or impingement of fish as per the DFO Code of Practice (DFO 2020).	All	Final EIS/EA Section 6.10.4
13.6	Mitigation	Implement the mitigation measures for potential effects on noise (Section 6.3.4), including: • Building dimensions, layout and orientation will be designed to shield noise sources, where possible. • Acoustical enclosures will be used in the process plant to limit overall noise emissions from key noise sources, such as the ball mills. • Generator intakes and exhausts in the process plant will use silencers. • Motorized equipment will be selected or designed with mufflers / silencers to limit noise emissions during all phases of the Project • 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 • The use of engine brakes will be prohibited. • Vehicles and equipment will be operated in such a way that impulsive noise is minimized, where possible, during all phases of the Project • Regular inspections will take place to confirm that equipment and machinery used on site is operated in good working condition through regular maintenance. • For helicopter use during transmission line construction, minimum flight altitudes will be maintained unless the helicopters are engaged in construction tasks, landing or departure.	All	Final EIS/EA Section 6.3.4
13.7	Mitigation	Implement the mitigation measures for potential effects on wildlife and wildlife habitat (Section 6.11.4 and Section 6.12.4), including: • 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. • Minimize the removal of woody vegetation along the transmission line by limiting removal to hazard trees and only clearing for safe access and infrastructure needs. • 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; and	All	Final EIS/EA Section 6.12.4

Item #	Mitigation / Monitoring / Commitment	Description	Phase / Timing	Source
		• During construction, operation and closure phases, log (and report as needed) observed wildlife, sign / tracks and wildlife-vehicle collisions and alter mitigation measures as appropriate. • During construction, operation and closure phases, wildlife awareness training will be provided to Project employees. • 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. • During operations, minimize vegetation management along the transmission line corridor to that necessary for safe operation. • During the closure of the Project, consider the incorporation of wildlife habitat features into the overall closure plan.		
13.8	Mitigation	Implement the mitigation measures for the potential effects on surface water (Section 6.6.4, Section 6.7.4 and 6.8.4), including: • During construction, operation and active closure, an ESC plan will be implemented to manage runoff water in disturbed areas. • During construction, operation and active closure, an integrated water management system will be designed to collect and control contact water. • 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. • Collected contact water that is not recycled in ore processing will be treated at the ETP and discharged to the southeast arm of Springpole Lake in accordance with permitting requirements.	All	Final EIS/EA Sections 6.6.4, 6.7.4 and 6.8.4
13.9	Mitigation	Maintain alternate access to navigation routes that traverse the PDA through the re-establishment of historic portage routes.	Construction, Operations	Final EIS/EA Section 6.18.4
13.10	Mitigation	Minimize the Project footprint (areal extent).	Construction	Final EIS/EA Section 6.18.4
13.11	Mitigation	Place transmission line poles above the high water mark when adjacent to waterbodies.	Construction	Final EIS/EA Section 6.18.4
13.12	Mitigation	Post signage around the PDA to alert local resource users of the presence of Project facilities and activities.	All	Final EIS/EA Section 6.18.4
13.13	Mitigation	Prohibit hunting within the controlled access portion of the PDA by Project personnel while working or residing on site.	All	Final EIS/EA Section 6.18.4
13.14	Mitigation	Re-establish portage routes in a suitable location based on feedback from land and resource users.	Closure	Final EIS/EA Section 6.18.4 CLLSFN-012a

Table 14: Mitigation, Monitoring and Commitments Related to Local and Regional Economy

Item #	Mitigation / Monitoring / Commitment	Description	Phase / Timing	Source
14.1	Mitigation	Post job qualifications early and identify available training and training providers so local and Indigenous residents can acquire the necessary skills and qualify for potential Project employment.	Construction, Operations	Final EIS/EA Section 6.19.4
14.2	Mitigation	Advertise open job postings within the Indigenous communities as soon as possible.	All	Final EIS/EA Section 6.19.4
14.3	Mitigation	Communicate employment skills requirements to local training providers to plan appropriate Project-related training; participate in the development of training programs to inform needs.	Construction, Operations	Final EIS/EA Section 6.19.4
14.4	Mitigation	Communicate Project schedule, labour demand and potential sources with local municipalities for housing planning purposes.	Construction, Operations	Final EIS/EA Section 6.19.4
14.5	Mitigation	Conduct recruiting programs as well as regular and effective outreach and communications with Indigenous communities to support recruitment, including through the use of career fairs, information sessions, workshops, public notices, factsheets, community meetings and any other measures that may increase awareness of and access to information on employment opportunities at the Project—and associated education, training, skills and employment experience requirements and opportunities.	Construction, Operations	Final EIS/EA Section 6.19.4
14.6	Mitigation	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 through the following: • Consideration for individuals in addiction treatment and their ongoing treatment needs; • Transportation and logistics support to individuals accessing treatment programs; • Collaborate with proximate communities in securing funding for employment readiness programs, to be delivered by health care service providers and trainers to prepare community members for Springpole Project opportunities, with a focus on long-term operational phase employment; • Mandatory diversity, cultural and gender sensitivity training for managers, supervisors and contractors; • Onsite orientation for Indigenous cultural awareness content; • Financial wellness and literacy workshops; • Training and employment incentives for women and youth; and • The provision of welcoming and safe environments, including mine sites and accommodations complexes that comply with high standards of health and safety; measures taken to help ensure the security and safety of women in mine accommodation; support given to provide cultural spaces for smudging, prayer and other ceremonies; and the creation of washroom facilities for all genders.	All	Final EIS/EA Section 6.19.4 CLLSFN-009 CLLSFN-015 CLLSFN-016 CLLSFN-019 CLLSFN-037 CLLSFN-2025-120 CLLSFN- 2025-2-020 SFN-S10-002
14.7	Mitigation	Establish a skills inventory and local and Indigenous business inventory that are updated and retained until the active closure phase.	All	Final EIS/EA Section 6.19.4 CLLSFN-2025-124
14.8	Mitigation	Establish and maintain a process to track local and regional contracting, subcontracting and procurement opportunities.	All	Final EIS/EA Section 6.19.4
14.9	Mitigation	Give preference to contracting for goods and services from the businesses in the Indigenous communities and in local municipalities.	All	Final EIS/EA Section 6.19.4 CLLSFN-2025-125
14.10	Mitigation	Give preference to Indigenous communities and local municipalities in hiring Project employees.	All	Final EIS/EA Section 6.19.4
14.11	Mitigation	Post job qualifications early and identify available training and training providers so local and Indigenous residents can acquire the necessary skills and qualify for potential Project employment.	Construction, Operations	Final EIS/EA Section 6.19.4
14.12	Mitigation	Provide additional coaching and mentoring for advancement to senior, supervisory and/or management-level positions on the Project to employees who are members of Indigenous communities and have expressed an interest in career development, and who have demonstrated a likelihood to succeed in such development.	Construction, Operations	Final EIS/EA Section 6.19.4
14.13	Mitigation	Provide an opportunity to form one or more Human Resources Committees with proximate participating Indigenous communities.	All	Final EIS/EA Section 6.19.4
14.14	Mitigation	Provide bus transportation for employees to the worksite from a centralized location to facilitate the employment of local and regional workers.	All	Final EIS/EA Section 6.19.4
14.15	Mitigation	Provide job search assistance to employees.	Closure	Final EIS/EA Section 6.19.4
14.16	Mitigation	Provide onsite accommodations that are safe and welcoming for the Project workforce.	Construction, Operations	Final EIS/EA Section 6.19.4

Item #	Mitigation / Monitoring / Commitment	Description	Phase / Timing	Source
14.17	Mitigation	Share information about employment preparation and training with Indigenous communities, non-Indigenous organizations and educational institutions.	Construction, Operations	Final EIS/EA Section 6.19.4
14.18	Mitigation	Share information regarding available funding programs and provide support for applications, as feasible.	All	Final EIS/EA Section 6.19.4
14.19	Mitigation	Support processes and initiatives related to employment readiness, training and educational initiatives with Indigenous communities, such as skills assessment, career counselling, referrals to education upgrading, creation of training plans, career sessions at local schools and educational site trips.	Construction, Operations	Final EIS/EA Section 6.19.4
14.20	Mitigation	Support retraining programs to establish transferable skills for employees.	Operations, Closure	Final EIS/EA Section 6.19.4
14.21	Mitigation	Use a rotational workforce for the construction and operation of the Project to support the employment of local and regional workers.	Construction, Operations	Final EIS/EA Section 6.19.4
14.22	Mitigation	Work with local and Indigenous businesses to enhance the opportunity to participate in the supply of goods and services for construction and operations (e.g., facilitate workshops about opportunities available, collaborate with small businesses to prepare bids in response to requests for proposal, provide business education).	Construction, Operations	Final EIS/EA Section 6.19.4 SFN-S5-009
14.23	Mitigation	Work with local communities to develop training programs oriented to operational needs.	Construction, Operations	Final EIS/EA Section 6.19.4
14.24	Commitment	FMG will continue to prioritize SFN and other local First Nation business content associated with transportation and other opportunities with the Project.	All	Final EIS/EA Section 6.20.3
14.25	Commitment	FMG will continue to engage with the communities to see FMG can support the Nations in removing barriers to employment.	Construction	CLLSFN-2025-135
14.26	Commitment	FMG is committed to including ONS in the regional employment and training readiness initiatives for the Project.	All	ONS Cover Letter
14.27	Commitment	Should the need arise FMG will support retraining programs to establish transferable skills for employees, during the latter part of the operations phase and provide job search assistance to employees at the closure phase.	Operations, Closure	SFN-S6.19-002

Table 15: Mitigation, Monitoring and Commitments Related to Local and Regional Infrastructure and Services

Item #	Mitigation / Monitoring / Commitment	Description	Phase / Timing	Source
15.1	Mitigation	Communicate employment skill requirements to local education / training providers during construction and operations to facilitate planning for appropriate Project-related training.	Construction, Operations	Final EIS/EA Section 6.20.4
15.2	Mitigation	Communicate Project schedule, labour demand and potential sources with local municipalities for housing planning purposes.	Construction, Operations	Final EIS/EA Section 6.20.4
15.3	Mitigation	Communicate schedule for major equipment delivery and removal with relevant local communities to manage impacts on municipal traffic.	Construction, Operations	Final EIS/EA Section 6.20.4
15.4	Mitigation	Construct a helipad on site to support emergency transportation of personnel and to support field investigations. A small airstrip will be constructed to transport personnel on an infrequent basis. These would reduce road traffic to the PDA.	All	Final EIS/EA Section 6.20.4
15.5	Mitigation	Construct a water treatment and sewage treatment system at the Project site to minimize demands on municipal services.	All	Final EIS/EA Section 6.20.4
15.6	Mitigation	Construct and operate the Project with a rotational workforce which reduces the need for Project workers to move to the local communities for employment as well as potential impacts on roads from daily commuting.	Construction, Operations	Final EIS/EA Section 6.20.4
15.7	Mitigation	Control access to the mine site and employ onsite security staff to reduce potential demands on emergency services.	All	Final EIS/EA Section 6.20.4
15.8	Mitigation	Develop cooperative protocols with responsible parties to provide temporary workers access to emergency and medical services.	Construction, Closure	Final EIS/EA Section 6.20.4
15.9	Mitigation	Have Project-rescue vehicles and trained First Responders on site to reduce potential demands for emergency services.	All	Final EIS/EA Section 6.20.4
15.10	Mitigation	Implement a Health and Wellness Strategy for Project employees which will, in part, contribute to management of demands on infrastructure and services in the municipalities and Indigenous communities. The Health and Wellness Strategy priorities are to: • Establish and promote a workplace culture of positive employee health and well-being. • Invest in meaningful and proactive employee health and wellness initiatives. • Participate with health service providers towards addressing the major health & wellness challenges facing northern and Indigenous peoples. • Encourage and support employees to develop and maintain healthy lifestyles and habits, including related to mental health and wellbeing.	All	Final EIS/EA Section 6.20.4
15.11	Mitigation	Implement preferential hiring of employees from the local municipalities to provide local employment and labour income and to reduce potential in-migration and potential additional demands on infrastructure and services.	All	Final EIS/EA Section 6.20.4
15.12	Mitigation	Maintain communications with relevant agencies and organizations during construction and operations to facilitate management of Project-related implications for services and infrastructure.	Construction, Operations	Final EIS/EA Section 6.20.4
15.13	Mitigation	Provide bus transportation to the worksite for the employees from a centralized location(s) to reduce traffic and minimize daily commuting.	All	Final EIS/EA Section 6.20.4
15.14	Mitigation	Provide onsite accommodations for the Project workforce to minimize daily commuting from local communities.	Construction, Operations	Final EIS/EA Section 6.20.4
15.15	Mitigation	Provide power for the Project operations through a connection to the Wataynikaneyap 230 kV line to reduce demand on local municipal utilities.	Construction, Operations	Final EIS/EA Section 6.20.4
15.16	Mitigation	Support education and training programs for workers.	All	Final EIS/EA Section 6.20.4
15.17	Mitigation	Support re-training of employees to establish transferable skills to reduce adverse impacts on employment levels at closure.	Operations, Closure	Final EIS/EA Section 6.20.4
15.18	Commitment	FMG plans to work with local and Indigenous communities on Project readiness to help support improvement to community services and infrastructure.	All	SFN-S2-053
15.19	Commitment	FMG will provide the opportunity to engage with SFN on plans for managing transportation along the access road prior to construction.	Construction	SFN-S6.20-002
15.20	Commitment	FMG will continue to work with the Indigenous communities to identify and plan for any Project-related changes expected on community resources.	Construction	CLLSFN-2025-136
15.21	Commitment	If a demolition landfill is pursued by the Project in the future, FMG will engage MNR in the siting process through engagement on the Mine Closure Plan.	All	MNR-58

Table 16: Mitigation, Monitoring and Commitments Related to Traditional Land and Resource Use

Item #	Mitigation / Monitoring / Commitment	Description	Phase / Timing	Source
16.1	Mitigation	Local Indigenous communities and identified PORs will be advised ahead of transmission line construction work periods and as the construction work proceeds.	Construction	Final EIS/EA Section 6.3.4
16.2	Mitigation	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.	Construction	Final EIS/EA Section 6.3.4
16.3	Mitigation	Achieve fish habitat offsetting objectives (Appendix F).	All	Final EIS/EA Section 6.21.4
16.4	Mitigation	Achieve overall benefit requirements for Caribou (Section 6.13).	All	Final EIS/EA Section 6.21.4
16.5	Mitigation	Building dimensions, layout and orientation will be designed to shield noise sources, where possible.	Construction, Operations	Final EIS/EA Section 6.21.4
16.6	Mitigation	Continue to participate in the Environmental Committee(s) at a rate commensurate with activity in the PDA.	Closure	Final EIS/EA Section 6.21.4
16.7	Mitigation	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.	Construction	Final EIS/EA Section 6.21.4
16.8	Mitigation	Engage Indigenous environmental monitors from local communities in the implementation of mitigation and monitoring measures.	All	Final EIS/EA Section 6.21.4
16.9	Mitigation	Facilitate the development and implementation of community-based monitoring programs to supplement (not duplicate) regulatory monitoring requirements.	All	Final EIS/EA Section 6.21.4 IAAC-IP-03
16.10	Mitigation	Hunting and fishing at the Project will be prohibited by employees and contractors while at site.	All	Final EIS/EA Section 6.21.4
16.11	Mitigation	Implement the mitigation measures for: air quality including for dust (Section 6.3.4), noise and vibration (Section 6.3), 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), wildlife and wildlife habitat (Section 6.12.4), archaeology (Section 6.23) and cultural heritage (Section 6.24).	All	Final EIS/EA Sections 6.21.4
16.12	Mitigation	Maintain Project designs such that no new public access points are developed on Springpole Lake	All	Final EIS/EA Section 6.21.4
16.13	Mitigation	Maintain regular communication with trapline holders SL197 and SL 200 regarding activities and opportunities to facilitate their land use activities	Operations, Closure	Final EIS/EA Section 6.21.4
16.14	Mitigation	Maintain treed buffers between Project infrastructure and waterbodies to reduce visual disturbance	All	Final EIS/EA Section 6.21.4
16.15	Mitigation	Develop and implement a Lake Sturgeon reintroduction and restoration program harmonizing with the interest of local Indigenous communities and MNR.	Operations	Final EIS/EA Section 6.21.4
16.16	Mitigation	Develop an access management strategy with local Indigenous communities and MNR to manage access along the mine access road, with the purpose of supporting Traditional Land and Resource Use (TLRU) access and minimizing new public access.	All	Final EIS/EA Section 6.21.4 CLLSFN- 2025-2-005 SFN-S6.13-013 SFN-S6.14-001 SFN-S6.21-20
16.17	Mitigation	Establish Environment Committee(s) and offer opportunities to participate to members of proximate Indigenous communities during the construction, operation and closure of the Project. The Environmental Committee aims to: • Facilitate communications and meaningful engagement during construction, operation and closure of the Project; • Facilitate the use of Traditional knowledge in Project-related activities during construction, operation and closure of the Project; and, • Share and evaluate environmental information, review Project approvals and environmental management and monitoring plans, participate in adaptive management and identify mitigation measures, address emerging issues and areas of interest identified by communities.	All	Final EIS/EA Section 6.21.4 CLLSFN-001 CLLSFN-004 CLLSFN-010 CLLSFN-013 CLLSFN-018 CLLSFN-2025-059 CLLSFN-2025-061 MON-7 SFN-Geochem-2 SFN-S2-60 SFN-S6.21-017

Item #	Mitigation / Monitoring / Commitment	Description	Phase / Timing	Source
16.18	Mitigation	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.	All	Final EIS/EA Section 6.21.4 SFN-S6.23-002
16.19	Mitigation	Prohibit fishing and hunting within the controlled access portion of the PDA by Project personnel while working or residing on site.	All	Final EIS/EA Section 6.21.4
16.20	Mitigation	Support community land-based traditional cultural activities.	All	Final EIS/EA Section 6.21.4
16.21	Mitigation	Support reasonable community-based engagement and cultural activities.	All	Final EIS/EA Section 6.21.4
16.22	Mitigation	Support reasonable requests and work schedule flexibility for Indigenous employees for time off to pursue traditional land use activities.	All	Final EIS/EA Section 6.21.4 SFN-S6.21-005
16.23	Mitigation	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	All	Final EIS/EA Section 6.21.4
16.24	Mitigation	Undertake revegetation in the mine site area, where practical, and include input from Indigenous communities and TLRU planning documents.	Construction, Operations	Final EIS/EA Section 6.21.4
16.25	Mitigation	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.	Construction	Final EIS/EA Section 6.21.4 CLLSFN-007 CLLSFN-2025-063
16.26	Mitigation	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.	Construction	Final EIS/EA Section 6.21.4
16.27	Mitigation	Work with MNR and trapline license holders to determine alternative options for trapline losses during construction and operation phases.	Construction, Operations	Final EIS/EA Section 6.21.4
16.28	Commitment	FMG is committed to fostering cultural awareness across the company and providing opportunities for local Indigenous communities to share TLRU knowledge for incorporation into Project planning.	All	Final EIS/EA Section 6.21.4 CLLSFN- 2025-2-015 SFN-S10-010
16.29	Commitment	Where new Traditional Knowledge information is received during life of mine, FMG will review the results of the final EIS/EA, including related to key EA milestones such as baseline studies, alternatives assessment, environmental effects assessment including mitigation and monitoring, and other conclusions or commitments to confirm if refinements are required.	All	CLLSFN-2025-017 MON-4
16.30	Commitment	If requested and safe to carry out, the Nations will have the ability to develop initiatives that promote cultural inclusion, including potential for community-led workshops or outdoor knowledge sharing sessions at the Springpole site.	All	CLLSFN-2025-017
16.31	Commitment	FMG will work with local Indigenous communities through the environmental committee(s) to develop and deliver a cultural awareness training module.	All	SFN-S2-52
16.32	Commitment	FMG will share plans and invites all information that may be relevant on access management as those plans are developed	Construction	NWOMC-147
16.33	Commitment	FMG has committed to providing funding for a Traditional Land Use and Socio-Economic Study for the community. The information shared by ONS post-EA through the study can inform the Project's more detailed planning stage prior to construction. FMG is committed to working with ONS to align on the scope, budget and timing for the study. The studies can be undertaken during the permitting process and that the socio-economic study be undertaken following the completion of the Project's Feasibility Study, post EA approval.	All	ONS Cover letter
16.34	Commitment	FMG aims to address the request by CLFN to establish the treated effluent discharge in closer proximity to the mine site on the Birch Lake side. The specific location of the discharge will be refined during detailed engineering in consideration of regulatory advice and ongoing consultation during permitting. As part of the post-EA review process, FMG will undertake additional data collection in this area as required for permitting.	Pre-construction	FMG response to review of final EIS/EA

Table 17: Mitigation, Monitoring and Commitments Related to Archaeology

Item #	Mitigation / Monitoring / Commitment	Description	Phase / Timing	Source
17.1	Mitigation	Should previously undocumented archaeological resources be discovered, there may be a new archaeological site and subject to section 48(2) of the *Ontario Heritage Act*. A Chance Find Procedure (Appendix S-6) will be implemented and the site will be secured. Any alteration of the site will cease immediately and a licensed archaeologist will carry out an archaeological assessment in compliance with the *Ontario Heritage Act* and the *Standards and Guidelines for Consultant Archaeologists* (MCM 2011 or as amended).	All	Final EIS/EA Section 6.22.4
17.2	Mitigation	If human remains are encountered, all activities will cease immediately and the local police and coroner will be contacted, consistent with the requirements of the *Funeral, Burial and Cremation Services Act*. If the coroner does not suspect foul play in the disposition of the remains, in accordance with Ontario Regulation 30/11 the coroner shall notify the Registrar, Ontario Ministry of Public and Business Service Delivery and Procurement, which administers provisions of that Act related to burial sites. In situations where human remains are associated with archaeological resources, the MCM will also be notified to ensure that the archaeological site is not subject to unlicensed alterations which would be a contravention of the *Ontario Heritage Act*.	All	Final EIS/EA Section 6.22.4
17.3	Mitigation	Key construction and operation staff will be trained to recognize archaeological resources in the event that chance finds are made during Project construction and operation. Staff training will also include a brief history of the potential and documented historical use and occupation of the PDA and local study area.	Construction, Operations	Final EIS/EA Section 6.22.4
17.4	Mitigation	Prior to construction, an Environment Committee(s) will be established and opportunities to participate offered to members of proximate Indigenous communities during the construction, operation and closure of the Project. The Environment Committee(s) will aim to: • Facilitate communications and meaningful engagement during construction, operation and closure of the Project; • Facilitate the use of Traditional knowledge in Project-related activities during construction, operation and closure of the Project; and, • Share and evaluate land use information, including information on archaeological resources, review Project approvals and environmental management and monitoring plans, and identify mitigation measure, if required	All	Final EIS/EA Section 6.22.4
17.5	Monitoring	FMG will carry out the following monitoring program for the conservation of archaeological resources: • Enlist the services of a trained archaeologist during the conduct of major construction works to support FMG as needed, where there is a reasonable potential for encountering as yet undocumented archaeological or cultural heritage sites; • Enlist the services of Elders or other cultural advisors in the event that archaeological resources are encountered (in addition to meeting all Regulatory requirements).	All	Final EIS/EA Section 12.11.2
17.6	Commitment	FMG commits to engaging a licensed archaeologist to carry out a marine archaeological assessment(s) as early as possible during detail design and prior to any ground disturbance for the dewatering of the open pit basin of Springpole Lake (including the construction of two dikes) and for the installation of the ETP discharge line. The licensed archaeologist will submit the marine archaeological assessment(s) to MCM for review as early as possible during detail design and prior to any ground disturbing activities related to the dewatering of the open pit basin or installation of the ETP discharge line until it receives MCM's written confirmation that the archaeological assessment report(s) has/have been entered into the Ontario Public Register of Archaeological Reports and that there are no further concerns for impacts to archaeological resources.	Pre-Construction	MCM-003
17.7	Commitment	FMG commits to engaging a licensed archaeologist to carrying out a Stage 2 archaeological assessment of the areas recommended by the Stage 1 archaeological assessment under Project Information Form (PIF) number P236-0163-2021. The licensed archaeologist will submit the Stage 2 archaeological assessment (and any further stages, if recommended) to MCM as early as possible during detail design and prior to any ground disturbing areas activities. The Stage 2 archaeological assessment will be submitted for review and comment to MCM and Indigenous communities. FMG commits to following the recommendations of the archaeological assessment and will not proceed with any ground disturbing activities until it receives MCM's written confirmation that the archaeological assessment report(s) has/have been entered into the Ontario Public Register of Archaeological Reports and that there are no further concerns for impacts to archaeological resources.	Pre-Construction	MCM-003 CLLSFN-011, CLLSFN-2025-2-031 SFN-S6.23-006
17.8	Commitment	FMG would be pleased to collaborate with the communities on an additional targeted [*archaeology]* study, artifact recovery if encountered, and refining the Chance Find Procedure.	Pre-Construction	CLLSFN-2025-2-024, CLLSFN-2025-2-028 CLLSFN-2025-2-031 CLLSFN-2025-2-036
17.9	Commitment	Should previously undocumented archaeological resources be discovered and the resulting additional archaeological assessment(s) be carried out, FMG commits to engaging with the appropriate Indigenous communities during the archaeological assessment fieldwork.	All	MCM-MMC-008
17.10	Commitment	FMG has committed to the following to address the overprinting of the majority of the portage (Marten or Waabizheshi Agaasademon Onigam) by the open pit: • With the Nations, further archaeological assessments be conducted, prior to ground disturbance at key locations identified by the Nations. Supplemental Stage 1 (desktop review) will be completed. Then supplemental Stage 2 (fieldwork) in high potential areas recognized by the Nations & Stage 3 for follow up as determined by Stage 2.	All	FMG letter to IAAC on June 9, 2026

Item #	Mitigation / Monitoring / Commitment	Description	Phase / Timing	Source
		• Heritage Impact Assessment shall be completed, directed by the Nations, for Marten Portage, prior to ground disturbance at the portage. • Cat Lake and Lac Seul community monitors will be trained and be on site monitoring all pre-clearing and ground clearing work at the Project. • Refinement and implementation of the Chance Find Procedure in collaboration with the Nations. • Recovering any archaeological resources encountered with a licenced archaeologist and in collaboration with the Nations. • A Nation led plan to document and commemorate the portage. • A Nation led plan to re-establish an alternate portage to facilitate access • A Nation led plan to re-establish the portage at mine closure		

Table 18: Mitigation, Monitoring and Commitments Related to Built Heritage Resources and Cultural Heritage Landscapes

Item #	Mitigation / Monitoring / Commitment	Description	Phase / Timing	Source
18.1	Mitigation	If a potential built heritage resource or cultural heritage landscape may be directly impacted, the property will be evaluated in a Cultural Heritage Evaluation Report. If that report determines that the property has cultural heritage value or interest, a Heritage Impact Assessment will be prepared to determine specific mitigation measures to be implemented, such as documentation, salvaging or applying buffer zones, as appropriate.	Construction	Final EIS/EA Section 6.23.4
18.2	Mitigation	Known or potential heritage resources or cultural heritage landscapes in the local study area – as identified in the Cultural Heritage Report: Existing Conditions and Preliminary Impact Assessment (dated April 2022, prepared by Wood Canada Ltd.) and the Cultural Heritage Report for CHR-1 (dated October 2024 and prepared by WSP) – will be noted on applicable Project maps to identify the property(ies) to Project personnel.	Construction	Final EIS/EA Section 6.23.4
18.3	Monitoring	FMG will carry out the following monitoring program for protection of built heritage resources and cultural heritage landscapes: • Follow the recommendations of the Heritage Impact Assessment for CHR-1; • Maintain a record of all built heritage resources and cultural heritage landscapes identified in the vicinity of planned Project developments (as documented in the Cultural Heritage Report and Cultural Heritage Evaluation Reports prepared for the Project), such that direct or indirect impacts to such resources can be avoided during construction, recognizing and respecting confidentiality limitations; • Maintain an active dialogue with Indigenous community representatives, having knowledge of specific areas prior to and during major construction activities, to provide guidance to supervisory staff on the likely or possible occurrence of as yet undocumented built heritage resources and cultural heritage landscapes; • Enlist the services of Elders or other cultural advisors in the event that cultural heritage landscapes are encountered (in addition to meeting all Regulatory requirements).	Construction	Final EIS/EA Section 12.11.1
18.4	Commitment	FMG commits to engaging a qualified person to prepare a Heritage Impact Assessment (HIA) for CHR-1. The HIA will be completed as early as possible during detail design and prior to any ground disturbing activities in that area. The HIA will be submitted for review and comment to MCM, Indigenous communities, and any interested parties. FMG commits to following the recommendations of the HIA.	Pre-construction	MCM-MMC-012
18.5	Commitment	FMG has committed to the following to address the overprinting of the majority of the portage (Marten or Waabizheshi Agaasademon Onigam) by the open pit: • With the Nations, further archaeological assessments be conducted, prior to ground disturbance at key locations identified by the Nations. Supplemental Stage 1 (desktop review) will be completed. Then supplemental Stage 2 (fieldwork) in high potential areas recognized by the Nations & Stage 3 for follow up as determined by Stage 2. • Heritage Impact Assessment shall be completed, directed by the Nations, for Marten Portage, prior to ground disturbance at the portage. • Cat Lake and Lac Seul community monitors will be trained and be on site monitoring all pre-clearing and ground clearing work at the Project. • Refinement and implementation of the Chance Find Procedure in collaboration with the Nations. • Recovering any archaeological resources encountered with a licenced archaeologist and in collaboration with the Nations. • A Nation led plan to document and commemorate the portage. • A Nation led plan to re-establish an alternate portage to facilitate access • A Nation led plan to re-establish the portage at mine closure.	All	FMG letter to IAAC on June 9, 2026

Table 19: Mitigation, Monitoring and Commitments Related to Human and Ecological Health

Item #	Mitigation / Monitoring / Commitment	Description	Phase / Timing	Source
19.1	Mitigation	Implement the mitigation measures for the potential effects on air quality (Section 6.2), including the following specific to dust: • Dust emissions from roads and mineral stockpiles will be controlled through the application of water spray and supplemented by dust suppressants if required. • Site roads will be maintained in good condition, with regular inspections and timely maintenance completed to minimize the silt loading on the roads. • Vehicle speeds will be limited. • 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. • During operations, the process plant emission sources will be designed to allow good atmospheric dispersion. Dust control measures such as enclosures and shrouds, along with dust control equipment such as dust collectors, baghouse 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. • Routine maintenance of all pollution control equipment, diesel-fired engines (vehicle, equipment and standby power generation)	All	Final EIS/EA Section 6.24.4
19.2	Mitigation	Implement the mitigation measures for the potential effects on surface water (Section 6.6, 6.7, 6.8 and 6.9), including the following specific to water quality: • An integrated water management system will be designed to collect and control all contact water from the stockpiles, CDF and plant site areas. Collected contact water that is not recycled in ore processing will be treated at the ETP) and discharged to the southeast arm of Springpole Lake in accordance with permitting requirements. • An ESC plan will be implemented to manage runoff water around disturbed areas. The ESC plan will be prepared prior to the construction phase with the purpose of minimizing site erosion and protecting surface water from sedimentation. The ESC plan will provide further details on measures to minimize slope length and grade, ditching and diversion berms, contact water management ponds, use of natural vegetation buffers and runoff controls. • 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. • During operations and active closure, effluent will be discharged at a location where sufficient flow exists to reduce the potential for erosion and promote assimilation at the discharge location. A diffuser or other means could be used to encourage greater mixing and attenuation of the effluent plume at the discharge location, if required. Consistent with MECP Policy B-1-5, the mixing zone size will be minimized to the extent practical. • During operations and active closure, the ETP 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. Best available technologies that are economical achievable will be considered for the ETP to meet protection requirements. The ETP will be refined with ongoing Project planning and engineering design, and as discharge criteria are finalized during the approvals process.	All	Final EIS/EA Section 6.24.4
19.3	Mitigation	Implement mitigation measures for potential effects on country foods, including the following: • Mechanical vegetation removal practices will be used, when possible; and • Discouraging wildlife from inhabiting contact water ponds (including the CDF and CWSP ponds).	All	Final EIS/EA Section 6.24.4
19.4	Monitoring	FMG is committed to monitoring country foods in collaboration with the Nations and others. The Country Foods Monitoring program species will be selected in collaboration with proximate Indigenous communities to identify appropriate and feasible species to monitor relevant for human consumers. It is anticipated that the program will predominantly focus on fish consumption but can also include plants and small mammals similar to baseline programs. The Country Foods Monitoring Program is expected to occur every 3 years and will include a communication plan, outlining how follow-up monitoring results and analyses would be shared with the communities and how their feedback would be considered. It is anticipated the Environment Committees with local Indigenous communities will play a key role in this regard. The program will also include information on the steps that would be taken in the event of an exceedance of established benchmarks.	All	CLFN/LSFN-B4-001, CLLSFN- 2025-2-133 IAAC HH-01
19.5	Monitoring	Receiving water quality will be compared to federal and provincial protection of aquatic life criteria which are more stringent than drinking water quality standards. While the aquatic protection guidelines that FMG is monitoring water quality are more protective than human drinking water criteria, FMG will compare water monitoring results to both aquatic protection and drinking water criteria for transparency and ease of understanding. Exceedances will be reported to MECP and shared with the STPN, discussed in reporting, investigated and addressed through adaptive management	All	IAAC IP-03

Table 20: Mitigation, Monitoring and Commitments Related to Effects on Indigenous People

Item #	Mitigation / Monitoring / Commitment	Description	Phase / Timing	Source
20.1	Mitigation	All buildings and facilities will be deconstructed and removed, and disturbed areas will be stabilized.	Closure	Final EIS/EA Section 6.26.4
20.2	Mitigation	Building dimensions, layout and orientation will be designed to shield noise sources, where possible.	Construction	Final EIS/EA Section 6.26.4
20.3	Mitigation	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.	Construction, Operations	Final EIS/EA Section 6.26.4
20.4	Mitigation	Implement the mitigation measures relevant to Indigenous health conditions for air quality (Section 6.2.4), noise and vibration (Section 6.2.3), 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), wildlife and wildlife habitat (Section 6.12.4), archaeology (Section 6.22.4) and cultural heritage (Section 6.23.4).	All	Final EIS/EA Sections 6.2.4, 6.3.4, 6.6.4, 6.7.4, 6.8.4, 6.9.4, 6.10.4, 6.11.4, 6.12.4
20.5	Mitigation	Support community land-based cultural activities.	All	Final EIS/EA Section 6.26.4
20.6	Mitigation	Engage Indigenous environmental monitors from local communities in the implementation of mitigation and monitoring measures.	All	Final EIS/EA Section 6.26.4 SFN-S2-14
20.7	Mitigation	Undertake revegetation in the mine site area, where practical, and include input from Indigenous communities and TLRU planning documents.	Operations, Closure	Final EIS/EA Section 6.26.4
20.8	Mitigation	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.	All	Appendix Q-3 CLLSFN-009
20.9	Mitigation	Facilitate the development and implementation of a community-based monitoring program to supplement (not duplicate) regulatory monitoring requirements.	All	Final EIS/EA Section 6.26.4
20.10	Mitigation	Give preference to contracting for goods and services from the businesses in the Indigenous communities and local municipalities.	All	Final EIS/EA Section 6.26.4
20.11	Mitigation	Give preference to hiring employees for the Project to Indigenous communities and local municipalities.	All	Final EIS/EA Section 6.26.4
20.12	Mitigation	Hunting and fishing at the Project will be prohibited by employees and contractors while at site.	All	Final EIS/EA Section 6.26.4
20.13	Mitigation	Local Indigenous communities and identified points of reception will be advised ahead of transmission line construction work periods and as the construction work proceeds.	Construction	Final EIS/EA Section 6.26.4
20.14	Mitigation	Maintain Project designs such that no new public access points are developed on Springpole Lake.	All	Final EIS/EA Section 6.26.4
20.15	Mitigation	Maintain regular communication with trapline holders SL197 and SL 200 regarding activities and opportunities to facilitate their land use activities.	Construction, Operations	Final EIS/EA Section 6.26.4
20.16	Mitigation	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.	Construction, Operations	Final EIS/EA Section 6.26.4
20.17	Mitigation	Develop an access management strategy with local Indigenous communities to manage access in the along the mine access road, north of the Birch River crossing, with the purpose of supporting TLRU access and minimizing new public access.	Construction, Operations	Final EIS/EA Section 6.26.4
20.18	Mitigation	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.	Construction, Operations	Final EIS/EA Section 6.26.4 CLLSFN-012a
20.19	Mitigation	Provide opportunities to Indigenous communities that reported traditional land and resource use in the local study area to elaborate on site-specific information with the goal to refine mitigation measures, if required.	Construction	Final EIS/EA Section 6.26.4
20.20	Mitigation	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 Traditional knowledge in Project-related activities during construction, operation and closure of the Project; and, • Share and evaluate environmental information, review Project approvals and environmental management and monitoring plans, participate in adaptive management and identify mitigation measures, address emerging issues and areas of interest identified by communities.	All	Final EIS/EA Section 6.26.4 IAAC IP-03 IAAC IP-05 SFN-S2-015 SFN-S2-034

Item #	Mitigation / Monitoring / Commitment	Description	Phase / Timing	Source
20.21	Mitigation	Provide onsite accommodations that are safe and welcoming for the Project workforce.	Construction, Operations	Final EIS/EA Section 6.26.4
20.22	Mitigation	Support reasonable requests and work schedule flexibility for Indigenous employees for time off to pursue traditional land use activities.	All	Final EIS/EA Section 6.26.4
20.23	Mitigation	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.	Construction	Final EIS/EA Section 6.26.4
20.24	Mitigation	Utilize a rotational workforce to support the employment of local and regional workers.	Construction, Operations	Final EIS/EA Section 6.26.4
20.25	Mitigation	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.	Construction	Final EIS/EA Section 6.26.4
20.26	Mitigation	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.	Construction	Final EIS/EA Section 6.26.4 CLLSFN-010
20.27	Commitment	Continue to work collaboratively with Slate Falls Nation during the environmental assessment process, and throughout the life of the mine and strives to obtain SFN's support.	All	SFN-S2-011
20.28	Commitment	FMG will provide opportunities for communities to be involved in the development of various management plans to support the permitting phase. It is expected this could take place through the proposed Environment Committee.	Construction	SFN-S5-008 CLLSFN-B1-2 SFN-S6.1-001
20.29	Commitment	FMG has committed to advancing a Socioeconomic Management Plan to monitor positive and adverse Project effects on socioeconomic conditions during operations. FMG will engage with SFN on the plan.	Operations	Final EIS/EA Section 6.19.4 SFN-S6.1-005 SFN-S6.19-003
20.30	Commitment	FMG will continue to provide opportunities for CLFN and LSFN to provide input and collaborate on the development of the Employee Health and Wellness Strategy. FMG will continue to work with the Nations to provide capacity building opportunities and community identified initiatives as the Project progresses.	All	CLLSFN-B4-2 CLLSFN-2025-128 CLLSFN-2025-2-015
20.31	Commitment	As requested by the communities, FMG will work with the Nations to develop a process where Indigenous workers can bring issues to an Indigenous employee liaison who can support them with sharing and managing workplace issues.	All	CLLSFN- 2025-2-016
20.32	Commitment	FMG will work with communities during closure planning of the CDF to consider if the Nations wish to repurpose the surface area for green energy development.	Closure	CLLSFN-010
20.33	Commitment	FMG will continue to provide opportunities to visit the site as requested by the communities.	All	CLLSFN-023
20.34	Commitment	Where FMG is the proponent of the transmission line we would undertake to obtain the consent of SFN for its construction and operation adjacent the E1C across the SFN reserve.	Construction	SFN-G-002
20.35	Commitment	FMG has committed to the following to address the overprinting of the majority of the portage (Marten or Waabizheshi Agaasademon Onigam) by the open pit: • With the Nations, further archaeological assessments be conducted, prior to ground disturbance at key locations identified by the Nations. Supplemental Stage 1 (desktop review) will be completed. Then supplemental Stage 2 (fieldwork) in high potential areas recognized by the Nations & Stage 3 for follow up as determined by Stage 2. • Heritage Impact Assessment shall be completed, directed by the Nations, for Marten Portage, prior to ground disturbance at the portage. • Cat Lake and Lac Seul community monitors will be trained and be on site monitoring all pre-clearing and ground clearing work at the Project. • Refinement and implementation of the Chance Find Procedure in collaboration with the Nations. • Recovering any archaeological resources encountered with a licenced archaeologist and in collaboration with the Nations. • A Nation led plan to document and commemorate the portage. • A Nation led plan to re-establish an alternate portage to facilitate access • A Nation led plan to re-establish the portage at mine closure.	All	FMG letter to IAAC on June 9, 2026

Table 21: Mitigation, Monitoring and Commitments Related to Other Topics

Item #	Mitigation / Monitoring / Commitment	Description	Phase / Timing	Source
21.1	Mitigation	Measures to reduce the potential for malfunctions or accidents are achieved by following key principles: • Develop and apply procedures and training aimed at safe operation of the Project and that prevent or avoid the upset conditions that might lead to a malfunction or accident; • Provide expert review and advice on key Project infrastructure including tailings and mine rock management and associated water management; and • Provide training in operational procedures and environmental emergency response procedures, including safety measures to prevent malfunctions or accidents. • Emergency procedures implemented in the event of accidents and malfunctions are designed to be comprehensive and protective of all aspects of the environment, including traditional land use. These procedures provide that immediate actions are taken to contain to minimize potential effects to the environment. This approach not only addresses the immediate safety and environmental concerns but also helps to mitigate potential effects to areas used for traditional practices. An emergency response plan will be developed prior to construction and will be further refined during the permitting phase, and will include an opportunity for collaboration. The purpose of the emergency response plan will be to facilitate prompt and efficient response actions for addressing emergencies; identify responsibilities and reporting procedures for emergencies; provide protocols to follow should an emergency occur; and provide information on available resources, facilities and trained personal in the event of an emergency.	All	SFN-S9-002
21.2	Commitment	Mine rock management testing protocol will be developed with the Operating, Maintenance and Surveillance Manual for the CDF during detailed engineering.	Construction	MEM-16
21.3	Commitment	FMG will offer to engage with the Nations on the development of the Certified Closure Plan that will be filed under the *Mining Act* prior to construction. Closure design enhancement will continue to be evaluated during life of mine through the regulatory process and opportunities will be provided to the Nations to participate in updates.	Pre-construction	CLLSFN-2025-2-011 CLLSFN- 2025-2-049 SFN-S5-004 SFN-S5-037 SFN-S5-044 SFN-S5-048 SFN-S5-072 SFN-6.13-004 SFN-S6.13-014 SFN-S6.25-005 SFN-6.26-019 SFN-S7-011 SFN-S7-016 SFN-S8-013
21.4	Commitment	FMG will acquire, through purchase or lease, the shoreline reserves required for Project infrastructure.	Pre-construction	MNR-9
21.5	Commitment	FMG will continue to engage with MNR regarding LRIA requirements for the dikes and water management facilities during the permitting and approvals phase.	Pre-construction	MNR-11
21.6	Commitment	FMG will provide the opportunity for MNR to review the environmental management and monitoring details through applicable permit applications. Many of the programs are expected to be consistent with the extensive baseline monitoring programs carried out over several years which will facilitate data comparison.	Pre-construction	MNR-132
21.7	Commitment	The MON environment committee will provide a forum for detailed engineering information sharing with advanced failure mode analysis during permitting, emergency response and preparedness planning details as required through the CDF's Operational, Maintenance and Surveillance Manual development.	All	MON-30
21.8	Commitment	FMG will offer to engage with communities on the development of the Certified Closure Plan that will be filed under the *Mining Act* prior to construction.	Closure	CLLSFN-003 SFN-S5-037
21.9	Commitment	An emergency response plan will be developed prior to construction and will be further refined during the permitting phase, and will include the opportunity for collaboration on development and implementation with SFN.	Construction	SFN-S9-005
21.10	Commitment	Emergency and spill response procedures will be established and are expected to include the following: medical response, notification, containment of spill, removal of spill, treatment of affected environment, monitoring of environment and learning for continual improvement. Material will be stored on site in accordance with regulations including secondary containment as required. Transportation will take place through certified contractors who specialize in material handling, prevention and response. These plans will be developed during the post-EA approval stage based on the detailed designs and provided to SFN for review and input.	All	SFN-S2-065 MON-32

Item #	Mitigation / Monitoring / Commitment	Description	Phase / Timing	Source
21.11	Commitment	A Spill Response and Contingency Plan will be established prior to construction and SFN will be provided with an opportunity to review and comment on the plan and procedures.	Pre-construction	SFN-S9-015
21.12	Commitment	Spill and Contingency plan will be developed prior to construction with specific details on methods, frequency, and the criteria monitoring. The Plan will be reviewed by the MON environment committee	Pre-construction	MON-33
21.13	Commitment	FMG will continue to keep NWOMC informed of the timelines and any changes as the project progresses.	All	NWOMC-56 NWOMEC 79
21.14	Commitment	FMG proposes to establish regular quarterly meetings with representatives from ONS to discuss environmental management and monitoring. These meetings will provide an opportunity to share information with ONS on an ongoing basis; and to receive feedback from ONS on aspects related to environmental management and monitoring.	All	ONS Cover Letter
21.15	Commitment	FMG will notify Ontario Parks prior to starting construction of the transmission line and will offer to meet to discuss construction details and timing. FMG commits to continue to engage with Ontario Parks, as requested, throughout the construction phase.	Construction	MECP Ontario Parks_3
21.16	Commitment	As part of Project readiness FMG will work with local authorities to share information about planned activities and timing including road use.	All	SFN-S6.20-003
21.17	Commitment	FMG will work with Dryden Fibre to develop appropriate agreements for any shared infrastructure that may be required [in relation to the Wenasaga Road].	All	Provincial EA ToR Commitment
21.18	Commitment	FMG will include information on how seismic activities will be monitored in the Emergency Response Plan .	Construction	Provincial EA ToR Commitment
21.19	Commitment	FMG will design the domestic sewage treatment system and obtain the necessary permits in accordance with provincial requirements.	Construction	Provincial EA ToR Commitment
21.20	Commitment	There will also be an Operation, Maintenance and Surveillance (OMS) Manual developed for the tailings facility as the project progresses.	Operation	Provincial EA ToR Commitment
21.21	Commitment	Prior to construction, the process to develop a regulatory Closure Plan for the mine site will be completed as required by the Mining Act, and will be filed with the Ministry of Energy, Northern Development and Mines. Financial assurance for the full cost of closure must be provided to the Government of Ontario, prior to mine construction	Pre-construction	Provincial EA ToR Commitment
21.22	Commitment	The mine access road will be decommissioned upon mine closure when it is no longer required to access the site (e.g. for monitoring).The commitment to decommission the road upon mine closure will be captured in the Certified Mine Closure Plan.	Pre-construction	MNR-100
21.23	Commitment	For the transmission line, all temporary construction infrastructure will undergo decommissioning as part of the construction/early operation phase. Access will still be required for maintenance and will be identified during the final design phase. FMG will obtain the required work permits for the access.	Pre-construction, Construction	MNR-118, MNR-159
21.24	Commitment	First Mining is committed to ensuring that MNR has appropriate opportunities to review and provide input on these plans. To this end, we confirm our commitment to implement the suite of environmental management, mitigation, and monitoring plans identified by MNR, including; • Wildlife Management & Monitoring Plan (which will include wildlife mitigation measures) • Vegetation & Wetlands Management Plan (which will include Invasive Species Management Plan) • Access Management Strategy • Erosion & Sediment Control Plan (ESCP) • Closure Plan (which will *include Road Decommissioning Plan, Revegetation Plan & Post Revegetation Monitoring Plan)* FMG will provide these plans to MNR, as appropriate, during the permitting phase for review and input, in advance of construction activities where applicable; and these plans will be informed by applicable provincial policies, guidance documents, and best management practices. With respect to closure planning, First Mining commits to including MNR in closure planning discussions as the Project advances, including during the Certified Closure Plan process under the Mining Act.	Pre-construction	MNR-185