



**FIRST MINING  
GOLD**



## **APPENDIX B**

### **ENVIRONMENTAL IMPACT STATEMENT GUIDELINES, APPROVED TERMS OF REFERENCE, AND ASSOCIATED CONCORDANCE AND COMMITMENTS TABLES**

- B-1 General EIS Guidelines
- B-2 Final EIS Table of Concordance (EIS Guidelines)
- B-3 Approved Terms of Reference (ToR)**
- B-4 Approved ToR Commitments / Consultation Table of Concordance
- B-5 Table of Concordance for the ToR



**FIRST MINING  
GOLD**

**First Mining Gold Corp.  
Springpole Gold Project  
Final Approved  
TERMS OF REFERENCE**

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## List of Abbreviations and Definitions

**Access Corridor Project:** The Undertaking to develop a land-based access corridor to the Springpole Gold Project Site. Refer to press release regarding the completion of Class EA for this undertaking: <https://www.globenewswire.com/news-release/2014/05/07/1355132/0/en/Gold-Canyon-Fulfills-Environmental-Assessment-for-Access-Corridor.html>

**Acid generation:** Acid generation is a natural process that is essentially oxidation of sulphides, particularly pyrite and pyrrhotite. On exposure to oxygen and water these sulphides produce oxidation products - sulphuric acid, metal sulphates and hydroxides, and surface waters become acidic if enough acid-neutralizing minerals such as calcite or dolomite are not present. The acidic water from metal mines frequently carries with it elevated concentrations of heavy metals such as zinc, copper and nickel and high levels of dissolved sulphates of aluminum iron and magnesium. Severe acid mine drainage can contain over 100 g/L dissolved salts.

**Agency:** Impact Assessment Agency of Canada, formerly the Canadian Environmental Assessment Agency.

**AP:** Acid Potential.

**APV:** Aquatic Protection Values. MOE (2011b) provides scientifically defensible Aquatic Protection Values which represent metal concentrations in surface water (with no dilution applied) below which no adverse toxicological effects are expected. Aquatic Protection Values are protective of freshwater aquatic organisms.

**ARD:** Acid rock drainage.

**Baseline:** The environmental conditions prior to initiating construction of the Designated Project as described in the Environmental Impact Statement.

**BMP:** Best Management Practice.

**CALA:** Canadian Association for Laboratory Accreditation.

**CEAA 2012:** *Canadian Environmental Assessment Act, 2012.*

**Construction Aggregate:** This includes the following categories of material: glacial deposits (overburden) originating from within the Project footprint; material imported from off-site sources approved pursuant to the *Aggregate Resources Act*; development rock from the open pits and quarried rock that is verified to not pose a chemical stability risk using government approved criteria.

**Consultation Plans:** The Indigenous, Public and Government Consultation Plans.

**Contact Water:** Water which has come into contact with any mine site components.

**Decommissioning:** The phase of the Undertaking during which the Proponent permanently ceases commercial production and commences the removal from service of any components of

the Undertaking, and that continues until the Proponent completes the removal from service of any of these components of the Undertaking.

**Deposit:** Mineralized deposits at Springpole Property. Currently, these are known to comprise the East Zone, Main Zone, East Extension Zone, Camp Zone and the Portage Zone. Exploration and resource definition work is currently in progress and this on-going work may expand these known zones and identify new zones. For the purpose of this document, this term is used to define the known zones and future potential zones.

**DFO:** Fisheries and Oceans Canada.

**DO:** Dissolved oxygen (in water).

**EA:** “Environmental Assessment” is a study which assesses the potential environmental effects (positive or negative) of a proposal. Key components of an environmental assessment include consultation with government agencies and the public; consideration and evaluation of alternatives; and the management of potential environmental effects. Conducting an environmental assessment promotes good environmental planning before decisions are made about proceeding with a proposal. If not otherwise defined in this document, EA refers to the provincial (Ontario) EA document that will be submitted by FMG.

**EAA:** Ontario *Environmental Assessment Act*.

**EAB:** Environmental Assessment Branch of the Ministry of the Environment, Conservation and Parks.

**ECCC:** Environment and Climate Change Canada.

**ECA:** Environmental Compliance Approval, as defined and issued by the Ministry of the Environment, Conservation and Parks.

**EEM:** Environmental Effects Monitoring, a requirement under the federal *Metal and Diamond Mining Effluent Regulations*.

**Effluent:** “Effluent” as defined in subsection 1(1) of the *Metal and Diamond Mining Effluent Regulations*.

**EIS:** Environmental Impact Statement.

**ENDM:** Ontario Ministry of Energy, Northern Development and Mines.

**Environment:** The components of the Earth, including: air, land or water; plant and animal life, including human life; the social, economic and cultural conditions that influence the life of humans or a community; any building, structure, machine or other device or thing made by humans; any solid, liquid, gas, odor, heat, sound, vibration or radiation resulting directly or indirectly from human activities; or any part or combination of the foregoing and the interrelationships between two or more of them.

**Environmental Effects:** The effect that a proposed undertaking or its alternatives has or could potentially have on the environment, either positive or negative, direct or indirect, short- or long-term.

**Exploration:** Exploration, or mineral exploration, is the process of finding ore (i.e., commercially viable concentrations of minerals) to extract for a profit.

**Fish:** “Fish” as defined in subsection 2(1) of the *Fisheries Act*.

**Fish Habitat:** “Fish habitat” as defined in subsection 2(1) of the *Fisheries Act*.

**Fisheries and Oceans Canada:** The Department of Fisheries and Oceans as established under subsection 2(1) of the *Department of Fisheries and Oceans Act*.

**FMG:** First Mining Gold Corp.

**FMP:** Forest Management Plan

**FMP Approved Road:** This term is used to refer to the existing Wenesaga Road as well as the extension to the road corridor that is proposed for construction in the 2014-2019 Trout Lake Forest FMP. This term also refers to further extensions that may be constructed according to post-2019 FMPs and have been publicly presented as part of the forest management planning process (refer to Figures for convenience).

**Follow-up Program:** “Follow-up program” as defined in subsection 2(1) of the *Canadian Environmental Assessment Act, 2012*.

**FRI:** Forest Resource Inventory.

**GCU:** Gold Canyon Resources Inc.

**GHG:** Greenhouse gas(es).

**GIS:** Geographic Information System.

**GRT:** Government Review Team.

**Heritage Value:** The aesthetic, historic, scientific, cultural, social or spiritual importance or significance for past, present or future generations.

**HHERA:** Human Health and Ecological Risk Assessment.

**Indigenous Communities:** For the purposes of this document, is inclusive of the following Indigenous communities: Cat Lake First Nation, Lac Seul First Nation, Ojibway Nation of Saugeen, Pikangikum First Nation, Slate Falls Nation, Wabauskang First Nation, Métis Nation of Ontario Regional 1 Consultation Committee, and Mishkeegogamang First Nation.

**LOM:** Life of Mine.

**LSA:** Local Study Area.

**Migratory Bird:** “Migratory bird” as defined in subsection 2(1) of the *Migratory Birds Convention Act, 1994*.

**Mitigation Measures:** Mitigation measures are means to prevent, reduce or control adverse environmental effects of a project, and include restitution for any damage to the environment caused by those effects through replacement, restoration, compensation or any other means.

**Mine:** As defined pursuant to the Ontario *Mining Act*.

**Mine Rock:** Refers to the rock that will be mined to access the ore and does not contain economic concentrations of gold and silver. Also termed waste rock.

**Mine Site Development Area (MSDA):** Encompasses the anticipated footprint of the Undertaking and includes but is not limited to, the footprint of the process plant, shops and other buildings, tailing management facility, mine rock storage areas, ore stockpile and crusher, open pits, haul roads, and access and other supporting infrastructure within the care and control of First Mining Gold, along with a buffer area.

**ML:** Metal leaching, used to refer to rock that poses a potential risk of leaching metals.

**MDMER:** Metal and Diamond Mining Effluent Regulations under the federal *Fisheries Act*.

**MNO:** Métis Nation of Ontario.

**MNRF:** Ontario Ministry of Natural Resources and Forestry.

**MOE:** Ontario Ministry of the Environment (now MECP).

**MOECC:** Ontario Ministry of the Environment and Climate Change (now MECP).

**MOEE:** Ministry of the Environment and Energy (now MECP).

**MECP:** Ontario Ministry of the Environment, Conservation and Parks.

**MOH:** Ontario Ministry of Health.

**MPMO:** Major Projects Management Office.

**MRSA:** Mine rock storage area.

**MHSTCI:** Ontario Ministry of Heritage, Sport, Tourism, and Culture Industries.

**MTO:** Ontario Ministry of Transportation.

**NAG:** Non-acid generating. NAG may be used in reference to ore, mine rock, tailings and quarry rock (excavated rock from a quarry area within the tailings management facility and/or mine rock pile footprints).

**NAN:** Nishnawbe Aski Nation

**NGO:** Non-governmental organization.

**NPV:** Net Potential Value.

**NRCan:** Natural Resources Canada.

**ODWS:** Ontario Drinking Water Standards.

**OFAT:** Ontario Flow Assessment Tool, used herein to refer to an online hydrologic database from MNRF:

<http://www.gisapplication.lrc.gov.on.ca/OFAT/Index.html?site=OFAT&viewer=OFAT&locale=en-US>

**PAG:** Potentially acid generating. PAG may be used in reference to ore, mine rock, tailings and quarry rock (excavated rock from a quarry area).

**PDEA:** Pre-Development and Exploration Agreement.

**PEA:** Preliminary economic assessment. This is the first engineering evaluation of the economic viability of a mineral deposit. If positive, next steps typically include refinements to this economic evaluation such as a pre-feasibility study and a feasibility study. The updated PEA for the Springpole Gold Project is available at:

[https://www.firstminingfinance.com/resources/reports/2CF019-000\\_Springpole\\_PEA\\_Update\\_20171026.pdf](https://www.firstminingfinance.com/resources/reports/2CF019-000_Springpole_PEA_Update_20171026.pdf)

**POC:** Parameters of Concern.

**Project:** Refers to the Undertaking and can be used interchangeably.

**Project Site or Springpole Site:** This is the location of the majority of the on-site components of the Undertaking. This is generally shown in Figure 4.1.1.

**Property:** Springpole Property, as defined in Figure 1.2.1. The Property is comprised of the patents and the adjoining mining claims held by FMG. FMG is in the process of leasing of selected mining claims within the Property in accordance with Section 81 of the *Mining Act*.

**Proponent:** First Mining Gold and its successors or assigns.

**PSQG:** Provincial Sediment Quality Guidelines.

**PTTW:** Permit to Take Water, issued pursuant to Section 34 of the *Ontario Water Resources Act*.

**PWQO:** “Provincial Water Quality Objectives” for the protection of aquatic life in Ontario, as defined in MOE (1994).

**RoC:** Record of Consultation, a living document submitted with the proposed Terms of Reference that describes the consultation carried out during the preparation of the Terms of Reference.

**RSA:** Regional Study Area.

**SAR:** Species at Risk.

**SFL:** Sustainable Forest License, used in reference to the Trout Lake Forest Management Area.

**Shoreline Buffer:** This term refers to the Area of Concern, as defined in MNR (1988) and more recently in MNR (2010). This is a setback where no development will occur.

**Site:** The Project or Springpole Site unless otherwise identified.

**Starter Pit:** The open pit that is situated east of the main pit and on land, as shown in Figure 4.1.1.

**STPN:** Shared Territory Protocol Nations of Cat Lake, Slate Falls and Lac Seul First Nations.

**TK:** Traditional Knowledge (also referred to previously as Traditional Ecological Knowledge; TEK).

**TLU:** Traditional Land Use.

**TMF:** “Tailings Management Facility” for storing tailings. Tailings are the fine materials left over after the crushing, grinding, and extraction of valuable minerals from slurried ore. The TMF manages both the solids fraction and the water fraction of tailings slurry.

**ToR:** Terms of Reference (i.e., this document).

**Undertaking:** As defined in the EAA as,

- (a) An enterprise or activity or a proposal, plan or program in respect of an enterprise or activity by or on behalf of Her Majesty in right of Ontario, by a public body or public bodies or by a municipality or municipalities.
- (b) A major commercial or business enterprise or activity or a proposal, plan or program in respect of a major commercial or business enterprise or activity of a person or persons other than a person or persons referred to in clause (a) that is designated by the regulations.
- (c) An enterprise or activity or a proposal, plan or program in respect of an enterprise or activity of a person or persons, other than a person or persons referred to in clause (a), if an agreement is entered into under section 3.0.1 in respect of the enterprise, activity, proposal, plan or program (“enterprise”).

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**VC:** Valued Component can be any biophysical, socio-economic or socio-cultural aspect of the environment. VCs must be selected because it is not practical or reasonable to gather baseline data and conduct effects analysis for environmental components that may be affected by a project.

**Waste Rock:** Refers to the rock that will be mined to access the ore and does not contain economic concentrations of gold and silver. Can be used interchangeably with the term Mine Rock.

**Water Frequented by Fish:** “Water frequented by fish” as defined in subsection 34(1) of the *Fisheries Act*.

**Wetland:** Land saturated with water long enough to promote the formation of water altered soils, growth of water-tolerant vegetation and various kinds of biological activity that is adapted to the wet environment.

**WSC:** Water Survey of Canada.

### LIST OF UNITS

Distance		Flow Rate	
µm	micron (micrometre)	bV/h	bed volumes per hour
cm	centimetre	m <sup>3</sup> /s	cubic metre per second
km	kilometre	tpd	tonnes per day
m	metre	Power	
mm	millimetre	kW	kilowatt
		MW	megawatt
		W	watt
Elements and Compounds		Energy	
Au	gold	kWh	kilowatt hour
Ag	silver		
CN	cyanide	Electric Potential	
Cu	copper	kV	kilovolt
Fe	iron	V	volt
NaCN	sodium cyanide	Time	
S	sulphur	d	day
		hr	hour
Mass/Concentration		s	second
g	gram	yr or a	year / annum
mg	milligram		
kg	kilogram	Density	
ug	microgram		
kt	kilotonne	t/m <sup>3</sup>	tonne per cubic metre
µg/L	microgram/L	Cost	
Moz	million ounces		
Mt	million tonnes	\$	dollar
oz	troy ounce	\$M	million dollars
t	tonne (metric ton)	\$/t	dollar per tonne
g/t	gram per tonne	Other	
		%	percent
Area		tmm	Total material mined = ore + waste material
m <sup>2</sup>	square metre		
ha	hectare		
Volume			
m <sup>3</sup>	cubic metre	kWh/Mt	kilowatt hour per million tonne

## **1 INTRODUCTION**

### **1.1 Overview and Background**

First Mining Gold Corp. (FMG) proposes to develop, operate and eventually decommission a bulk tonnage open pit mine and mill with supporting infrastructure. This Undertaking, known as the Springpole Gold Project, is located in a remote area of northwestern Ontario, approximately 110 km northeast of the Municipality of Red Lake. There is currently no permanent land access to the Springpole site. The location of the Undertaking is illustrated in Figure 1.1.1 and the current camp is illustrated in Figure 1.1.2 and 1.1.3.

The primary site of the Undertaking, the Springpole site (i.e., defined as the area occupied by the future mine and mill) is centered between Springpole Lake and Birch Lake, and is situated within the Birch-Uchi Greenstone Belt. The geographical coordinates are 51° 23' 44.3" N and 92° 17' 37.4" W (UTM Zone 15U 549,183 Easting 5,693,578 Northing) with an average elevation of 395 m above sea level.

### **1.2 Land Tenure**

FMG acquired 100% of the Springpole Gold Project in 2015 when it completed the acquisition of Gold Canyon Resources Inc. (GCU). When the Springpole Gold Project was acquired from GCU, the land tenure (Property) consisted of 30 patented mining claims, 300 unpatented, contiguous mining claims, and six (6) leased unpatented mining claims, totaling an area of approximately 32,448 hectares (ha). The Property boundary is illustrated in Figure 1.2.1.

FMG has submitted a “Notice of Intent to Lease” to the Ministry of Energy, Northern Development and Mines (ENDM) with plans to convert some of its mining claims to leases. Additional information will be provided in the Environmental Impact Statement / Environmental Assessment (EIS / EA) to support this land tenure process.

FMG understands as per Policy 4.02.01 Application Review and Land Disposition Process - Appendix A, conditions may apply to obtaining tenure on Designated Inland Lake Trout Lakes. FMG will engage in discussions with MNRF prior to an application for Crown land on a Designated Inland Lake Trout Lake as specific conditions may apply.

### **1.3 Identification of the Proponent**

FMG is a publicly-traded Canadian mining company focused on the development of the Undertaking in northwestern Ontario. The contact information for FMG is as follows:

Name of Proponent:	First Mining Gold Corp.
Proponent Address:	2070 – 1188 West Georgia Street Vancouver, BC Canada V6E 4A2 Telephone: 1-844-306-8827

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Website: [www.firstmininggold.com](http://www.firstmininggold.com)

Chief Executive Officer: Mr. Dan Wilton  
Chief Executive Officer and Director

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Environmental Assessment (EA): Stephen Lines  
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#### **1.4 Outline of the Terms of Reference**

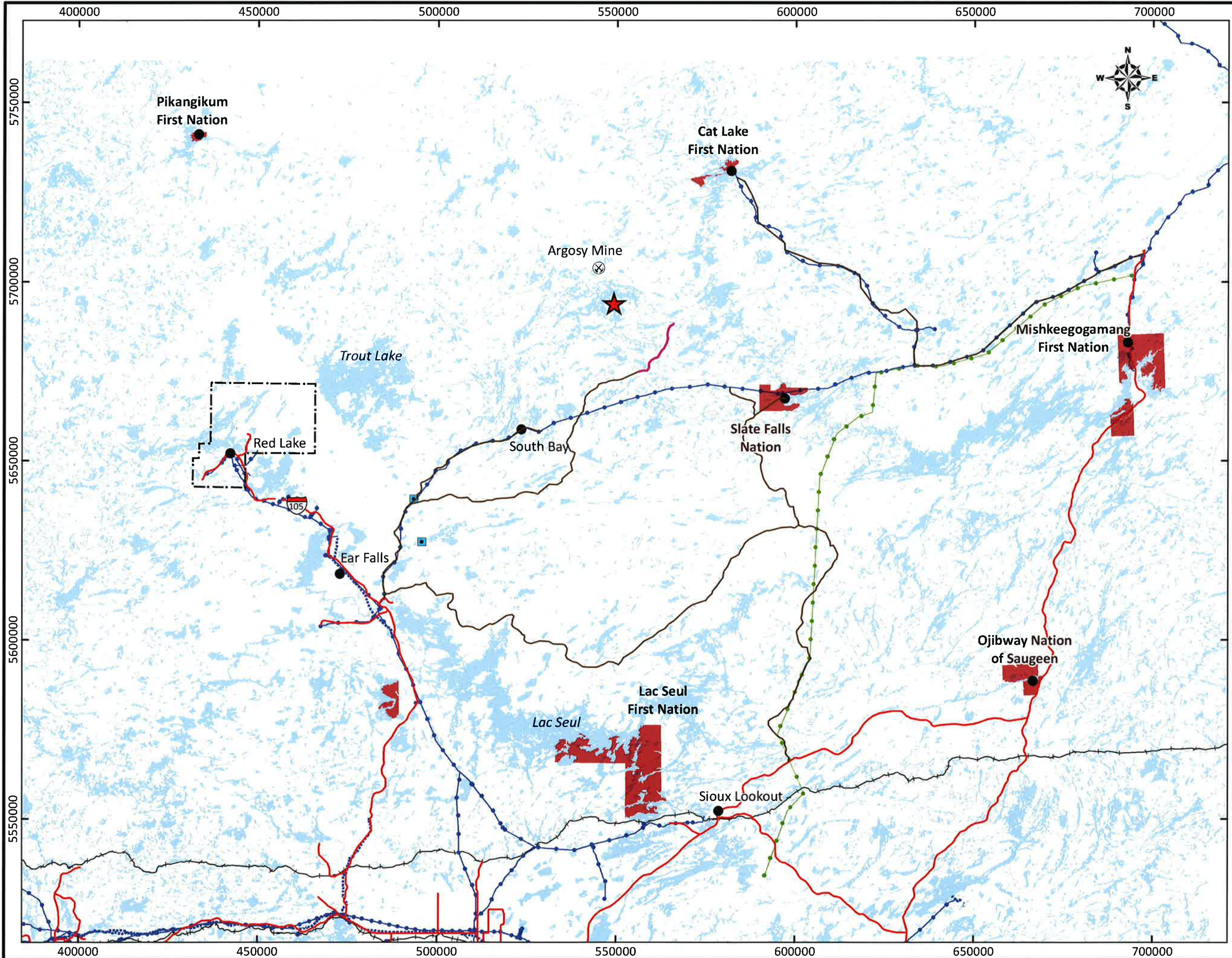
The purpose of this Terms of Reference (ToR) is to provide a framework for the preparation of a provincial EA. This document has been prepared in accordance with the *Ontario Environmental Assessment Act* (EAA) and with the Code of Practice: *Preparing and Reviewing Terms of Reference for Environmental Assessments in Ontario* (MOE 2014a). As such, this ToR contains the following information:

- Identification of the proponent (Section 1);
- Indication of how the EA will be prepared (Section 2);
- Purpose of the undertaking (Section 3);
- Description of and rationale for the undertaking (Section 4);
- Description of and rationale for alternatives (Section 5);
- Description of the existing environment (Section 6);
- Description of environmental effects (Section 7);
- Commitments, monitoring, and follow-up (Section 8);
- Consultation plan for the EA (Section 9);
- Flexibility to accommodate new circumstances (Section 10); and
- Other approvals required (Section 11).

FMG has issued draft versions of this proposed ToR for comment to obtain feedback. FMG appreciates the comments provided on previous versions of this document. Where appropriate, based on the Code of Practice and the intent of the ToR to provide a framework for the preparation of the provincial EA, responses to the comments have been incorporated herein.

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FMG has tracked feedback provided on the ToR and the Undertaking, and will consider all comments in the future EIS / EA, and environmental approval applications should the provincial EA be approved.



**Property Reference**



- Project Location
- Town/Community
- Hydroelectric Station
- Past Producing Mine
- Wenesaga Road Extension
- Logging Road
- Highway
- Electricity Transmission Line
- Natural Gas Pipeline
- Planned Watay Power Transmission Line
- Red Lake Municipality Boundary

\* Source: Grand Council Treaty 3 Website



**Springpole Gold Project**  
**Property Location Map**  
**Figure 1.1.1**

Kenora District, Ontario

April 2021 WGS84, UTM zone15

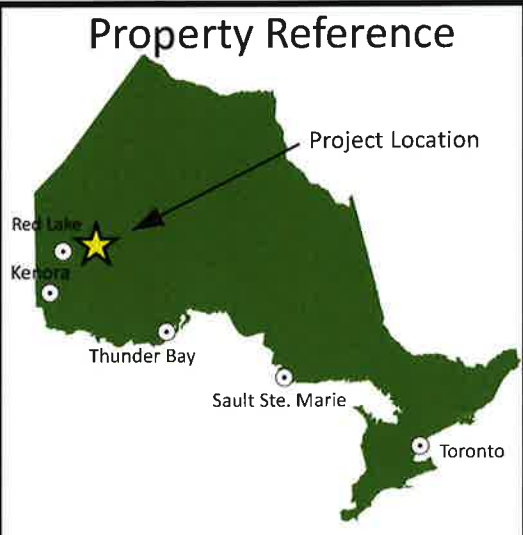
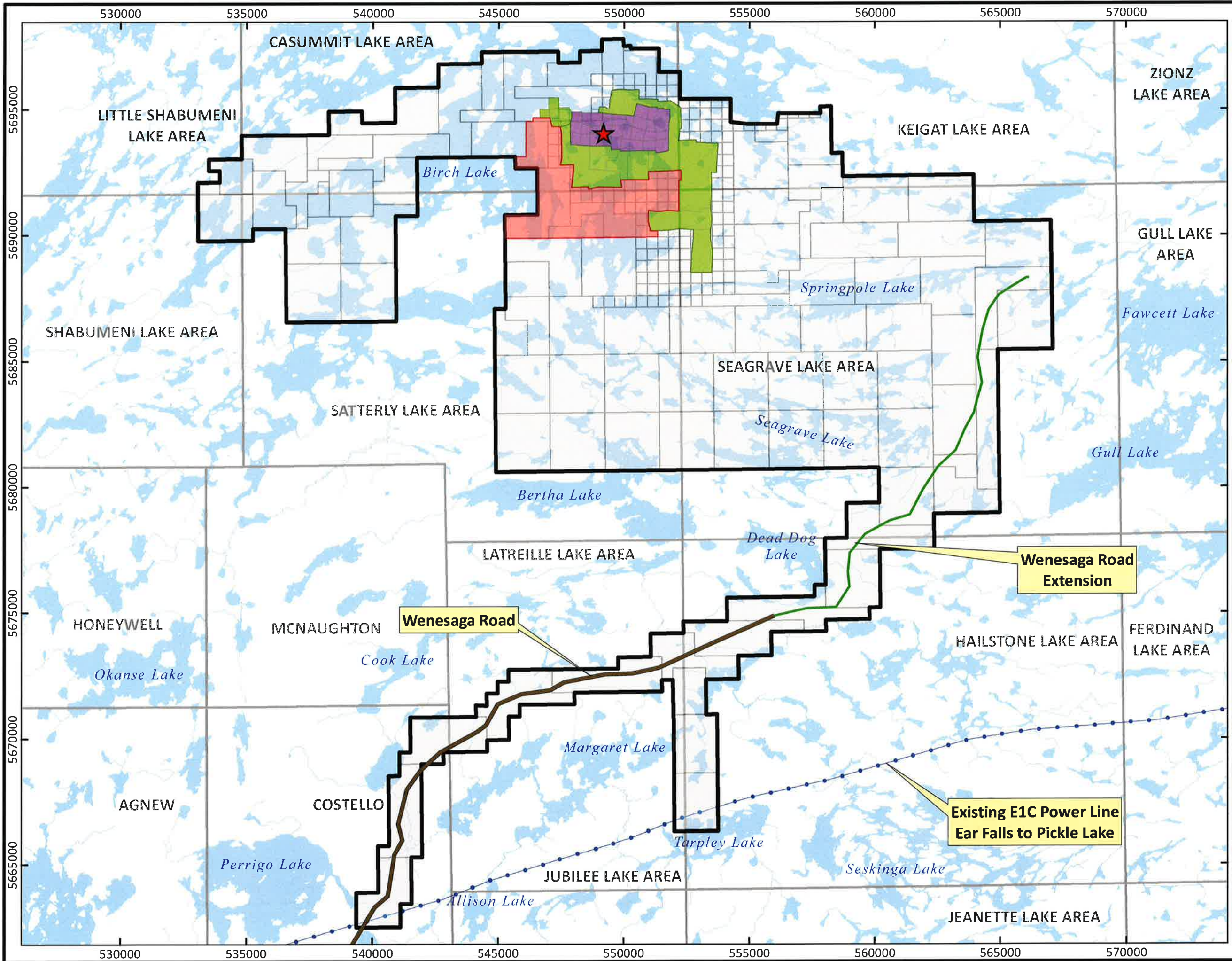


**Figure 1.1.2: Aerial View of the Campsite (Summer)**



**Figure 1.1.3: Aerial View of the Campsite (Winter)**





-  Project Location
-  Wenesaga Road Extension
-  Logging Road
-  Existing Power Line
-  Township Boundary
-  Springpole Property Boundary
-  Patent
-  Mining Lease
-  Mining Claim
-  Proposed Phase 2 Lease

 **FIRST MINING GOLD**

**Springpole Gold Project**  
 Land Tenure  
 Figure 1.2.1  
 Kenora District, Ontario

April 2021 WGS84, UTM zone15

0  Kilometers 5

## 2 IDENTIFICATION OF HOW THE ENVIRONMENTAL ASSESSMENT WILL BE PREPARED

### 2.1 Provincial Environmental Assessment Requirements

An EA is a planning and decision-making process used to promote environmentally responsible decision-making. In Ontario, this process is defined and is subject to the authority of the EAA. The purpose of the Act is “*the betterment of the people of the whole or any part of Ontario by providing for the protection, conservation and wise management in Ontario of the environment*”. Pursuant to the EAA, “environment” is broadly defined to include “*the natural, social, economic, cultural and built environments*”. The EAA promotes responsible environmental decision-making and ensures that interested persons have an opportunity to comment on undertakings that may affect them.

There are two types of EAs in Ontario:

- Individual EAs; and
- Streamlined EAs.

In Ontario, mining development projects that are carried out by private sector proponents are required to meet the requirements of the Ontario EAA, as well as other applicable regulatory requirements. While the Province does not require assessment of mining projects in their entirety, several potential aspects / components of the Undertaking were anticipated to potentially require completion of provincial EA process(es), including:

- Ontario Regulation 101/07
  - On-site non-hazardous landfill site with a total waste disposal greater than 40,000 m<sup>3</sup>;
- Class EA for Resource Stewardship and Facility Development Projects
  - Disposition of Crown resources, potentially related to work on Crown lands (such as work on streambeds / shorelands), aggregate resources, forestry / tree cutting, and to support issuance of permits issued by Ministry of Natural Resources and Forestry (MNRF) such as under the *Lakes and Rivers Improvement Act*;
- Class EA for activities of the ENDM under the *Mining Act*
  - Addition of lands to existing leases
  - Rehabilitation;
- Class EA per Electricity Projects Regulation
  - Environmental Screening Process for Electricity Projects, Ontario Regulation 116/01 for diesel power generation of between 1 and 5 MW (Note that an individual EA would be required if a determination is made that 5 MW or more diesel power is required);

- Class EA for Minor Transmission Facilities
  - Construction and operation of a 115 kV transmission line, and associated substation. (Note that an individual EA would be required if a determination is made that a 230 kV transmission line is required.)

During the EA process, FMG will review the components of the Undertaking, including the final project design and proposed alternative methods, to determine whether additional EA requirements may apply to the Undertaking.

As per Section 3.0.1 of the EAA, proponents can submit a request for a Voluntary Agreement to the Ministry of Environment and Climate Change (MOECC now referred to as Ministry of the Environment, Conservation and Parks; MECP) to have the EAA apply to the Undertaking. FMG has elected to proceed with one individual EA process pursuant to the EAA that will encompass all the Class EA requirements for all aspects of the Project.

FMG met with the “provincial regulatory agencies” to discuss the application for a Voluntary Agreement. A technical memo (provided in Appendix A) was sent to the Minister stating that FMG will be following the EAA. The Minister concurred with the request and on April 18, 2018, FMG entered into a Voluntary Agreement (provided in Appendix A) with the MOECC (now referred to as MECP) to complete the requirements of a provincial individual EA and to satisfy the conditions of Section 6(2)(c) and 6.1(3) of the EAA (refer to Appendix A for the Voluntary Agreement). The provincial individual EA will integrate the EAA needs into one single, comprehensive EA process / document.

The decision by FMG to enter into a Voluntary Agreement to complete an individual EA for the Undertaking was based on several factors, including:

- The evolution of planning and identification of additional infrastructure for the Undertaking and increased certainty of carrying out one individual EA process that will encompass all the Class EA requirements for all aspects of the Project.
- Improved transparency and clarity through the integration and coordination of provincial and federal EA requirements.
- Nature of the Undertaking, such that the potential provincial EA requirements and public interest warranted an individual EA.
- Consultation with regulatory agencies, historical knowledge from previous owners and based on feedback from Indigenous communities and stakeholders, including as described in the Record of Consultation (RoC).

A copy of the Voluntary Agreement was shared with communities interested in the Project. The Ministry also sent a letter to the interested communities to inform them that FMG has entered into an agreement with MECP, and that FMG is required to undertake consultation regarding the Undertaking. The Ministry also provided a list of communities to consult with.

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An individual EA will be prepared by FMG to satisfy the applicable EAA requirements for all components of the undertaking that are subject to the EAA or that have been designated subject to the EAA by way of a Voluntary Agreement. These requirements will be addressed through the preparation of an EA that will include as a minimum:

- a) The purpose of the Undertaking;
- b) A description of and a statement of the rationale for:
  - i) The Undertaking
  - ii) The alternative methods of carrying out the Undertaking; and
- c) A description of:
  - i) The environment that will be affected or that might reasonably be expected to be affected, directly or indirectly.
  - ii) The effects that will be caused or that might reasonably be expected to be caused to the environment.
  - iii) The actions necessary or that may reasonably be expected to be necessary to prevent, change, mitigate or remedy the effects upon or the effects that might reasonably be expected upon the environment by the Undertaking, and the alternative methods of carrying out the Undertaking.
- d) An evaluation of the advantages and disadvantages to the environment of the Undertaking, the alternative methods of carrying out the Undertaking.
- e) A description of any consultation about the undertaking by the proponent and the results of the consultation.

As outlined in Section 5.2.2 of the Code of Practice, defining that the EA will be prepared in accordance with 6(2)(c) and 6.1(3) requires additional information that differentiates the elements of the EA from that of the generic elements of 6.1(2). The Preliminary Economic Assessment (PEA) has deemed the open pit the only practical alternative to the Undertaking, therefore, with respect to subsections 6.1 (2) (b) (iii), (c), and (d) of the EAA, “alternatives to the Undertaking” will not be considered. Open pit mining is the only alternative, there are no other alternatives to the undertaking; however, all other requirements under subsections 6.1(2)(b)(iii), (c) and (d) will be considered during the EA process.

The ToR describes how FMG intends to undertake the EA; however, it provides flexibility to address new circumstances that may be identified as the EA study progresses.

## 2.2 Federal Environmental Assessment Requirements

The Springpole Gold Project is also subject to a federal EA under the *Canadian Environmental Assessment Act, 2012* (CEAA 2012). Designated Projects included in the *Regulations Designating Physical Activities* are subject to CEAA 2012. The Canadian Environmental Assessment Agency (now the Impact Assessment Agency of Canada) determined that the Project will be considered a Designated Project, as per the *Regulations Designating Physical Activities*:

- The construction, operation, decommissioning and abandonment of a new metal mill with an ore input capacity of 4,000 tpd or more (Section 16(b)); and
- The construction, operation, decommissioning and abandonment of a new rare earth element mine or gold mine, other than a placer mine, with an ore production capacity of 600 tpd or more (Section 16(c)).

FMG prepared and submitted a Project Description for review and comment by the Agency in February 2018. The Project Description was prepared to meet the requirements of the Agency's Guide to Preparing a Project Description of a Designated Project under the *Canadian Environmental Assessment Act, 2012* and the *Prescribed Information for the Description of a Designated Project Regulations*. CEAA reviewed the Project Description and determined that a federal EA would be required under CEAA 2012. The federal EIS Guidelines were provided by the Agency on June 19, 2018, which outline the nature, scope and extent of the information required in the federal EIS. As per Section 19(1) of CEAA 2012, the federal EA of a Designated Project must consider the following factors:

- a) Environmental effects of the Project, including the environmental effects of malfunctions or accidents that may occur in connection with the Project and any cumulative environmental effects that are likely to result from the Project in combination with other physical activities that have been or will be carried out;
- b) The significance of effects referred to in (a);
- c) Comments from the public that are received in accordance with the Act;
- d) Mitigation measures that are technically and economically feasible and that would mitigate any significant adverse environmental effects of the Project;
- e) The requirements of the follow-up program in respect of the Project;
- f) The purpose of the Project;
- g) Alternative means of carrying out the Project that are technically and economically feasible and the environmental effects of any such alternatives;
- h) Any change to the Project that may be caused by the environment;
- i) The results of any relevant study conducted by a committee established under Sections 73 or 74; and

j) Any other matter relevant to the EA that the responsible authority required to be considered.

### **2.3 Coordinated Provincial and Federal Environmental Assessment Process**

There are specific overlapping and similarities in requirements between the provincial EA under the EAA and a federal EA under CEAA 2012. This includes, but is not limited to, requirements for consultation and engagement, environmental baseline studies, effects assessment, mitigation, monitoring, and follow up. FMG intends to work with the MECP and the Agency to integrate the provincial and federal EA processes to meet the needs of each Act, while minimizing duplication of effort.

A cooperation agreement is in place between the Province of Ontario and Government of Canada: the Canada-Ontario Agreement on Environmental Assessment Cooperation (2004), which will facilitate this approach to completing the different EA requirements.

The proposed coordinated approach will facilitate greater efficiency, foster cooperation between the parties, and result in a single body of documentation that satisfies both federal and provincial EA requirements.

The agreement states that the federal and provincial governments will coordinate the EA process whenever projects are subject to review by both jurisdictions. The agreement maintains the current level of environmental standards and the legislative and decision-making responsibilities of both governments at the time of developing the ToR.

FMG intends to prepare a single EA document (the EIS / EA) to meet both the provincial requirements as defined in the ToR when approved, and federal EA requirements per the EIS Guidelines. Concordance tables will be provided in the EIS / EA to demonstrate how the document meets both of these requirements. After FMG issues the EIS / EA, the provincial and federal EA review and approval processes will continue in a parallel manner to the extent practical, according to each jurisdictions regulatory requirements.

The coordinated EA process is summarized by the following steps:

1. Pre-EA Planning, including signing of the provincial Voluntary Agreement, development of the provincial ToR;
2. Commencement of the EA;
3. Issuance of federal EIS Guidelines;
4. Approval of the provincial ToR;
5. Preparation and submission of the EIS / EA by FMG;
6. Review of EIS / EA by regulatory agencies, Indigenous communities and stakeholders;
7. EA decisions from provincial Minister of MECP and federal Minister of Environment and Climate Change; and

## 8. Monitoring and follow-up.

Figure 2.3.1 illustrates how the provincial and federal EA processes are proposed to be integrated.

The federal EA process commenced on February 23, 2018 with the submittal of a Project Description to the Agency. The information within the Project Description put forth by FMG is considered preliminary. FMG recognizes that the EA planning and decision-making process is dynamic. In preparation of the EIS / EA, and through the EA process, FMG will be sensitive to changing conditions and new information, and will provide flexibility in the EA to deal with changing circumstances. This approach will be applied in parallel for both EA processes when considering and evaluating alternatives, the outcome of which is to ensure that the most appropriate means of addressing the identified problem or opportunity is selected. This approach, if carried out effectively, will result in the identification of a preferred alternative which has a rational justification for environmental approval.

FMG will make reasonable attempts to coordinate consultation activities required by both the provincial and federal EA process, in order to maximize opportunities for Indigenous communities and stakeholders to be effectively engaged (as outlined in Appendix E). FMG will disseminate federal and provincial EA information simultaneously as reasonable to minimize duplication and unnecessary delays.

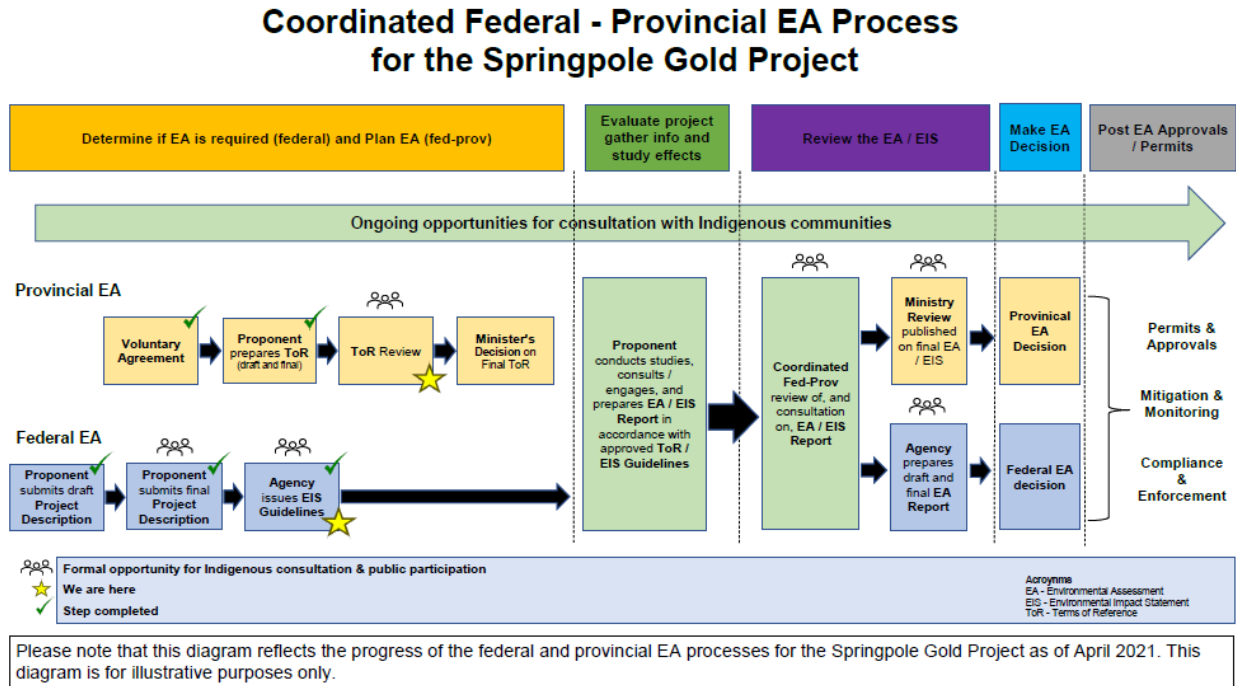
The coordinated EA process must be flexible to address the difference in timing between the two legislative requirements. In the event that there are unforeseen changes in the plan that is material and different from what has been described in the Project Description, FMG will work with both the Agency and MECP to address their requirements, and will explore feasible alternative methods to ensure project options are feasible and not limited. FMG will ensure the content of the EIS / EA will satisfy the requirements of both the approved ToR and the EIS Guidelines, and will serve as the basis for review by the relevant federal and provincial agencies.

For the coordinated provincial-federal EA approach, FMG will continue to work with both the Agency and the MECP to refine, as appropriate, a path forward that aligns key aspects of the assessment process that will satisfy the requirements of both the federal and provincial EA processes, to the extent reasonable. The coordinated approach will also minimize duplication and improve efficiency including sharing of comments received during comment periods, coordinating Indigenous consultation and engagement to the extent practical, using common documents that meet the requirements of both governments, and potentially establishing common working groups to facilitate the review process. Based on FMG's preliminary assessment, there are procedural aspects that may be aligned for both the federal and provincial EA processes, some of which have already been completed or are underway. These may include the following:

- Coordination of timelines;
- Environmental baseline studies (biophysical and socio-economic);
- Community consultation and engagement, activities and methodologies;
- Technical meetings;

- 
- Assessment of potential effects, mitigation, and significance of residual effects (biophysical and human environment);
  - EIS / EA preparation; and
  - Environmental management plans and reporting.

**Figure 2.3.1: Coordinated Provincial and Federal EA Process Integration**



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### **3 PURPOSE OF THE UNDERTAKING**

The purpose of the Undertaking is to extract ore by open pit mining for processing on site, to produce doré (gold and silver) bars to sell on the market, and provide a return on investment to FMG shareholders.

This deposit that will be developed in a responsible manner, which respects Indigenous communities, regional stakeholders, and environmental protection best practices provides an opportunity for FMG to provide a reasonable rate of return on investment to shareholders and bring benefits to the local and regional economy. The Undertaking has the potential to increase local and regional revenue and business profits, from which future investments can be made in social services, community infrastructure, business development, training and employment.

This description of the purpose of the Undertaking is a preliminary statement and is subject to refinement upon the discovery of new information, including through the EA process. FMG is committed to refining the statement if required; this commitment is included in the Table of Commitments found in Section 8 of this document.

## **4 DESCRIPTION OF AND RATIONALE FOR THE UNDERTAKING**

A preliminary description of the proposed Undertaking is provided below based on currently available technical and economic assessments, and is pending the results of the EA and ongoing consultation and engagement. Additional information is provided in appendices; however, the final description and rationale for the proposed undertaking will be further developed and included in the EIS / EA once alternatives have been fully considered and evaluated. A commitment to refine the description and rationale for the undertaking is included in the Table of Commitments in Section 8. The final description and rationale for the preferred Undertaking will be further developed and provided in the EIS / EA.

### **4.1 Description of the Undertaking**

The proposed Undertaking, as set out in the Voluntary Agreement with the Province, involves the development, construction, operation, and closure of an open pit gold and silver mine, and associated ancillary facilities and activities. The current conceptual general arrangement and mine site plan includes: an open pit mine and adjacent dewatered basin, on-site ore process plant, tailings management facility (TMF), mine rock storage areas (MRSA), related buildings and infrastructure, as well as aggregate operations, an access road and transmission line. A conceptual site plan for the Undertaking is presented in Figure 4.1.1 which is subject to change based on ongoing engineering and consultation activities.

This description includes key components for the Undertaking based on preliminary engineering designs, and feedback received from consultation and engagement to date. The description of the proposed Undertaking should be considered preliminary and is conceptual in nature. It is expected to evolve during the preparation of the EIS / EA, as the provincial EA process will be concurrent with ongoing environmental and engineering studies. Further studies may provide input into alternative methods for key components which will be examined during the EA process. The EIS / EA will identify and assess alternatives for all major components of the proposed Undertaking such that the justifications for the preferred option / approaches are clearly presented. The final description of the proposed Undertaking and rationale (provided in Section 4.3) will be updated and included in the EIS / EA.

The open pit area of the mine is comprised of three distinct geological domains: Eastern Extension, Camp Zone and Portage Zone, as shown in Figure 4.1.2. Two open pits (one open pit, that is started with a small satellite pit) are currently proposed have a combined surface area of approximately 140 ha. The preliminary mine development plan includes mining of approximately 150 Mt of mineralized material and 320 Mt of mine rock from the open pits, and an approximate 12-year production life, including stockpile reclamation and processing. The mill throughput capacity is anticipated to be approximately 30,000 tpd, subject to additional engineering studies.

Approximately 158 ha of the north basin of Springpole Lake will need to be dewatered to allow for the development of the open pit mine. This is the area required to safely develop the proposed open pit mine based on preliminary engineering. This area represents approximately 6% of the surface area of Springpole Lake. Based on preliminary engineering to date, FMG anticipates that two coffer dams with a combined length of approximately 940 m will be required to be constructed in Springpole Lake to allow a portion of the lake to be temporarily dewatered for mining to occur

safely. There are numerous historic mining sector precedents and other modern projects at the permitting stage that involve the construction of coffer dams and/or diversion or removal of waterbodies (fish habitat). Once mining is complete, the intent is to fill the open pits and reconnect with the lake once all environmental regulatory requirements are met; in effect, expanding on the lake area.

Dewatering of the portion of the lake to support mining activities will be completed in accordance with all regulatory requirements, including for the water taking and removal of fish. While the lake is being dewatered, associated sediment may be stored in settling ponds or sediment ponds for future use in reclamation of the mine site. Ongoing dewatering of the open pits will be required over the life of the mine. This mine water will be managed within the site water management and treatment system.

In order to access the ore, additional waste / mine rock will need to be removed. This rock will be stored in MRSAs anticipated to be located adjacent to the open pit limit, as generally shown in Figure 4.1.1. The MRSAs have a total surface area of approximately 450 ha. Given the deposit configuration and extraction sequence, backfilling of mine rock into previously mined areas within the open pits is not planned. Should backfilling of the open pits with mine waste be proposed in the EIS / EA, FMG will show how this activity would impact pit water quality over the life of the proposed mine, including post-closure, and identify associated mitigation measures. FMG anticipates geochemical data would be incorporated into a model that could be used to identify potential adverse impacts to receptors in the area.

Mined ore will be transported, likely by truck, to an on-site process plant for processing. Processing methods will be discussed in the EIS / EA, and this may include conventional ore processing methods of crushing and grinding, followed by whole feed leaching with cyanide, detoxification, electrowinning, and refining. A temporary pile of run-of-mine coarse ore (low, medium and high grade) covering approximately 30 ha may be developed to support continuous feed of ore into the process plant.

Tailings resulting from the processing of ore are proposed to be stored in a TMF. The conceptual location of the facility is shown in Figure 4.1.1. An alternative assessment will be completed during the EA process to assess potential locations for the TMF. A key objective of the Undertaking is to reuse as much of the on-site water as practicable, including recycling water from TMF for ore processing. Additional fresh water may be required for potable water and ore processing. Water for communal purposes will be disinfected prior to use and water that is intended for consumption will be treated.

A perimeter runoff and seepage collection system will collect contact storm water / seepage discharges from the site, in accordance with *Metal and Diamond Mining Effluent Regulation* (MDMER) and other regulatory requirements. FMG anticipates that contact water will be collected and recycled for re-use on-site, or treated if needed to ensure that the effluent is protective of receiving water aquatic life prior to release. Also, it is anticipated that excess site contact waters will be discharged to the environment after appropriate treatment.

As part of the proposed development of the Springpole site, including the open pit, TMF, and MRSAs, drainage management is anticipated to be required. The management of drainage will

be reviewed as engineering studies advance and the preferred location of the MRSAs and TMF are selected.

Other on-site infrastructure is expected to include a maintenance garage, warehouses and administration buildings. A camp designed to accommodate 450 to 500 people along with appropriate related infrastructure is also anticipated to be established. Solid waste produced by the Undertaking will be collected and managed in accordance with regulatory requirements, including potentially in a landfill at the Springpole site. All hazardous waste will be transferred to licensed storage / disposal facilities off site. A domestic sewage treatment facility will be established to manage on-site requirements in accordance with regulatory requirements.

Habitat compensation will be required for waterbodies affected and is an important part of the Undertaking. FMG is evaluating potential fishery offset measures through consideration of guidance laid out in the DFO (2019) document titled Policy for Applying Measures to Offset Adverse Effects on Fish and Fish Habitat Under the *Fisheries Act*. FMG intends to explore potential collaborations with other communities, that might have fish enhancement projects that are inline with fishery offset and compensation plan, with a goal to enhance the productivity of recreational fisheries. FMG is also evaluating MNRF policy as it relates to lakes in the Trout Lake area. Fish will be removed prior to displacement of aquatic habitat, including from the dewatered portion of Springpole Lake and the small ponds within the TMF and MRSA footprints. Removed fish will be released in accordance with guidance and approvals obtained from the MNRF and DFO, and in consideration of input from consultation with Indigenous communities.

It is anticipated that timber harvesting is required and will be done primarily during winter months to minimize impacts to the avian community and potential bat maternal and roosting habitat. FMG will collaborate with the forestry company that holds the Sustainable Forest License (SFL) for the Trout Lake Forest as needed. The Undertaking is also expected to include the following off-site infrastructure / operations: an access road, aggregate operation(s) and a transmission line.

A Class EA for a winter operational access corridor to the mine exploration site was approved in 2014 (Access Corridor Project). Two options were considered (eastern and western routes), with the eastern route identified as the preferred option. The extension of Wenesaga all-weather access road to the Birch River crossing is under the care and control of Domtar / EACOM. The construction of the Wenesaga road extension by Domtar / EACOM is substantially completed. FMG will work with Domtar / EACOM to develop appropriate agreements for any shared infrastructure that may be required.

A two-lane access road is proposed that will extend approximately 15 km from the mine site to the existing end of the Wenesaga road extension at the Birch River crossing. The planned road segment from the Birch River crossing to the mine site at Springpole Lake will be an all-weather access road. FMG is aware of the local interest in improving community road access and will collaborate with communities and government on their initiatives outside of the EA process to determine where synergies can be found.

An assessment of potential aggregate deposits local to the Undertaking site will be completed, and development of one or more aggregate operations to support the construction of the Undertaking may be established. Aggregate will be required to build the access road to the Springpole site, as well as potentially for general site construction, and the construction of the on-

site haul roads, coffer dams, and similar. Aggregate use by Indigenous communities may also be considered as per input from consultation activities included in the RoC (Record of Consultation), submitted under separate cover.

Power is required both for construction of the Undertaking and during operations. An on-site diesel generating station is the current source of power on site which may be expanded upon to support the construction phase until the transmission line is energized. Diesel power generation may continue at the site. Future power needs and power supply alternatives will be addressed during the EA process. FMG is considering the construction of a transmission line to connect the site to the regional hydroelectric grid. The nearest connection location is approximately 30 km away, however other connection options may be located approximately 90 km away. The location of connection will be determined in association with the Independent Electricity System Operator, which will determine the potential power sources and how the power will be delivered to the site.

In summary, the key components of the Undertaking located on the Springpole site are expected to include, but are not limited to:

- Open pits;
- Cofferdams and dewatering infrastructure;
- MRSA;
- Ore stockpiles;
- Mill feed storage area and crushing plant;
- Ore process plant;
- TMF;
- Water management and treatment facilities;
- On-site haul roads, access roads and parking areas;
- Office building and assay lab;
- Mine maintenance, shop and warehouse;
- On-site power generation, distribution lines, substation and transformers;
- Laydown and storage areas;
- Chemical and fuel storage, and fuel distribution;
- Explosives storage and manufacturing;

- Water supply and distribution system;
- Accommodations / camp;
- Domestic sewage treatment facility; and
- Landfill and solid waste handling facility.

The key components of the Undertaking located off of the Springpole site are expected to include, but are not limited to:

- Access road;
- Aggregate operations (quarries and pits);
- Power transmission line; and
- Clearing of trees.

Further detail regarding these components and associated activities, will be provided in the EIS / EA, and future environmental approval applications as appropriate.

## 4.2 Project Phases

This section provides preliminary information related to the proposed construction, operation (production), and closure (rehabilitation) phases of the Undertaking, derived primarily from the PEA conducted by SRK (SRK 2017, 2019). FMG is committed to refining the phases and schedule during the EA process, if required. This commitment is included in the Table of Commitments in Section 8. FMG will develop a mine plan that will include sequencing of construction activities and will be presented in the EIS / EA. The planned development schedule and Project phases based on current knowledge is presented in Table 4.2.1. Environmental management, monitoring and reporting will occur during all of the phases exceeding or consistent with, applicable regulatory requirements.

**Table 4.2.1: Preliminary Project Development and Production Schedule**

Year of Development	Project Phase	Activities
Year -2 and -1	Construction	Construction Phase of Project, including the installation of coffer dams in the Springpole Lake and pit dewatering area.
Years 1 to 11	Operation	Ore is extracted from the open pits for processing. Process plant is commissioned and operated to produce gold and silver bars for sale. Water, emissions and wastes will be managed to comply with regulatory requirements.
Years 11 and 12		Processing of reclaim ore from the stockpile to feed process plant.
Years 13 to 18	Closure	Decommissioning and reclamation / closure of the Undertaking.
Years 18+		Post-closure environmental monitoring.

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The guiding principles that have been developed to date to shape the future of the Project are summarized below.

- Minimize direct footprint;
- Proactively and collaboratively identify values (e.g., biophysical and socio-cultural) as well as special sites and adopt a progressive, transparent approach to site planning that avoids or minimizes impacts to these areas to the extent reasonable;
- Implement a precautionary approach to development that utilizes best available technology that is economically achievable to reduce potential environment, health, and safety risks;
- Minimize freshwater consumption, manage contact water, maximize water recycling, and minimize effluent discharge as reasonable;
- Prepare an adaptive strategy to manage potential environmental effects that may be identified through ongoing monitoring and consultation programs that are carried out during the life of the Project;
- Achieve a net overall economic benefit to the region, taking into consideration the potential adverse environmental effects that would be minimized through mitigation measures;
- Work with local Indigenous communities to understand and address concerns and identify opportunities to participate in the Project.
- Design for closure.

#### **4.2.1 Construction Phase**

Construction would begin once the provincial and federal EA processes are completed / approved, and initial approvals are received. The timeframe to complete the required site preparation and construction of the surface infrastructure to start open pit mining activities is approximately two years. Primary construction phase activities are expected to include:

- Site access road construction;
- Development of temporary construction camps and staging areas (primarily on site, but potentially off site for development of the transmission line and access road);
- Site preparation activities including clearing, grubbing, and bulk earthworks;
- Aggregate resource development and operation;
- On-site haul and access road construction;
- Dewatering of the north basin of Springpole Lake;

- Cofferdam construction;
- Construction of buildings and on-site infrastructure;
- Construction of a power transmission line from the existing Ontario power grid to the Springpole site;
- Construction of the starter dams for the TMF;
- Establishment and operation of water and waste, management and treatment facilities; and
- Environmental monitoring.

FMG will use best management practices (BMPs) and provincial guidelines for the construction where appropriate, such as the MNR guideline for forestry road construction and the following specifications:

- Ontario Provincial Standard Specification (OPSS 805) – Construction Specifications for Temporary Erosion and Sediment Control Measures;
- Ontario Provincial Standard Specification (OPSS 182) – General specifications for Environmental Protection for Construction in Waterbodies and on Waterbody Banks; and
- Ontario Provincial Standard Specification (OPSS 518) – Construction Specifications for Control of Water from Dewatering Operations.

FMG anticipates a perimeter storm water and seepage collection system (diversion ditches, sumps, and ponds) will be established to manage contact surface water in accordance with MDMER requirements. A more comprehensive design for the site wide system will be presented in the EIS / EA. Effectiveness monitoring will be identified and committed to in the EIS / EA.

#### **4.2.2 Operation Phase**

The operations phase is anticipated to last 12 years based on current information, and will include the following primary activities, along with other related activities:

- Commissioning and operation of the process plant;
- Development and operation of open pit mines;
- Management of mine rock, overburden, and tailings in designated facilities;
- Operation of water and waste, management and treatment facilities;
- Environmental monitoring to ensure regulatory requirements are met; and
- Progressive rehabilitation activities.

### 4.2.3 Closure Phase

The closure phase is anticipated to include an active closure phase and a post closure maintenance / monitoring phase following a timeframe to be described in the EIS / EA and subsequent environmental approvals. Activities to be completed during the active closure phase if not completed progressively during operation as appropriate, are anticipated to include:

- Removal of assets that can be salvaged for re-sale or re-use;
- Demolition and recycling and/or disposal of remaining materials;
- Removal and disposal of demolition-related wastes in approved facilities;
- Open pits will be allowed to fill, and once the water quality meets all regulatory requirements, the coffer dams will be breached in an appropriate manner, and the pit area will again form part of Springpole Lake; and
- Reclamation of impacted areas, such as by re-grading, placement of an appropriate cover to facilitate revegetation if needed, and revegetation (active or passive).

Monitoring and follow-up activities to be completed during the active closure phase and post-closure period as applicable, include:

- Chemical stability monitoring (e.g., surface water and groundwater quality monitoring);
- Biological monitoring programs (e.g., fisheries and other terrestrial aspects including revegetation success); and
- Physical stability monitoring program (e.g., mine rock pile, tailings facility, etc.).

Reclamation and closure of the Undertaking will be done in accordance with Ontario Regulation 240/00: Mine Development and Closure under Part VII of the *Mining Act*. A comprehensive closure plan will be developed during the environmental approvals process for the Undertaking, and will provide a more detailed plan to rehabilitate the Undertaking. It will also include a cost estimate for the financial assurance required to be provided in the prescribed manner to the Crown, to ensure the performance of the closure plan activities.

A description of conceptual closure strategy will be provided with EIS / EA and will include both progressive and final rehabilitation measures. Where available, feedback gained through ongoing consultation and engagement activities will be incorporated into the conceptual closure during permitting.

### 4.3 Rationale for the Undertaking

FMG is a publicly traded company that proposed to develop the Undertaking (the Springpole Gold Project) to provide a reasonable return on investment for shareholders. The justification for the proposed Undertaking is the high demand for gold in the global marketplace as well as the

demand for silver. If approved by the provincial Minister of the MECP, the Undertaking will produce gold and silver in doré bars for sale. The Undertaking will also provide substantial economical benefits to the local, provincial and federal economies.

FMG has considered alternatives compared to the proposed Undertaking which include underground mining or a combination of open pit and underground mining. Open pit mining is typically used for large low-grade deposits and deposits where the ore distribution is uniform over a large area, and this is in alignment with the ore grade of the proposed Undertaking. Underground mining is typically used for deep-lying, high-grade, vein or seem-type deposits or where the setting has limited access. For the most part, a combination of open pit and underground mining is used when open pit resources are mined until it may be no longer economically feasible and there is an available high-grade underground deposit that is economical to extract. The development of an underground mine was not considered economically viable for the Undertaking due to the large amount of resource at surface, distribution of the ore body, and cost of infrastructure. Development of an underground mine was assessed through the 2019 PEA and it was deemed not economically feasible. In addition, geotechnical and economical considerations found the underground option to be unstable and structurally unsuitable. Therefore, open pit mining is the only economical option for the Undertaking. The PEA was completed and includes an additional summary of the findings of an independent mineral resource estimate for the Undertaking. Even though open pit mining is the only practical alternative to the Undertaking, it must still be feasible. To address this, FMG is completing additional engineering.

The Undertaking includes a prospective gold deposit that contains 4.9 million ounces of gold and 25.3 million ounces of silver (SRK 2017, 2019). Development of this deposit in a responsible manner that respects Indigenous communities, regional stakeholders, and environmental protection is aligned with recent provincial government mandates, as follows. Ontario recognizes the importance of mineral development opportunities to northern Ontario. On October 29, 2019, a statement from Minister Rickford on the Mining Working Group and Meet the Miners Day at Queen's Park highlighted the following:

- Ontario is Canada's number 1 mineral producer, generating \$10.1 billion worth of minerals in the past year while creating more than 26,000 direct and 50,000 indirect jobs across Ontario;
- Created an expert Mining Working Group committed to improving the competitiveness of Ontario's mining industry, reducing red tape, and creating jobs and prosperity for people across the province; and
- Government proposed the *Better for People, Smarter for Business Act, 2019* that will in turn make "changes to the *Mining Act* to help speed up approvals, reduce confusion, and create more business.

The preliminary design of the Undertaking, which will be better defined through further engineering and consultation and engagement, indicates that there would be approximately 650 construction phase jobs, and about approximately 350 permanent full-time jobs during the operations phase. The employment created would likely represent in the order of a 10% increase in the current total primary and manufacturing industry employment level in the Red Lake / Ear

Falls region and, to a lesser extent, in more distant communities including Sioux Lookout, Dryden, and Kenora. The most proximal municipalities of Ear Falls and Red Lake have expressed support for the Undertaking in the past.

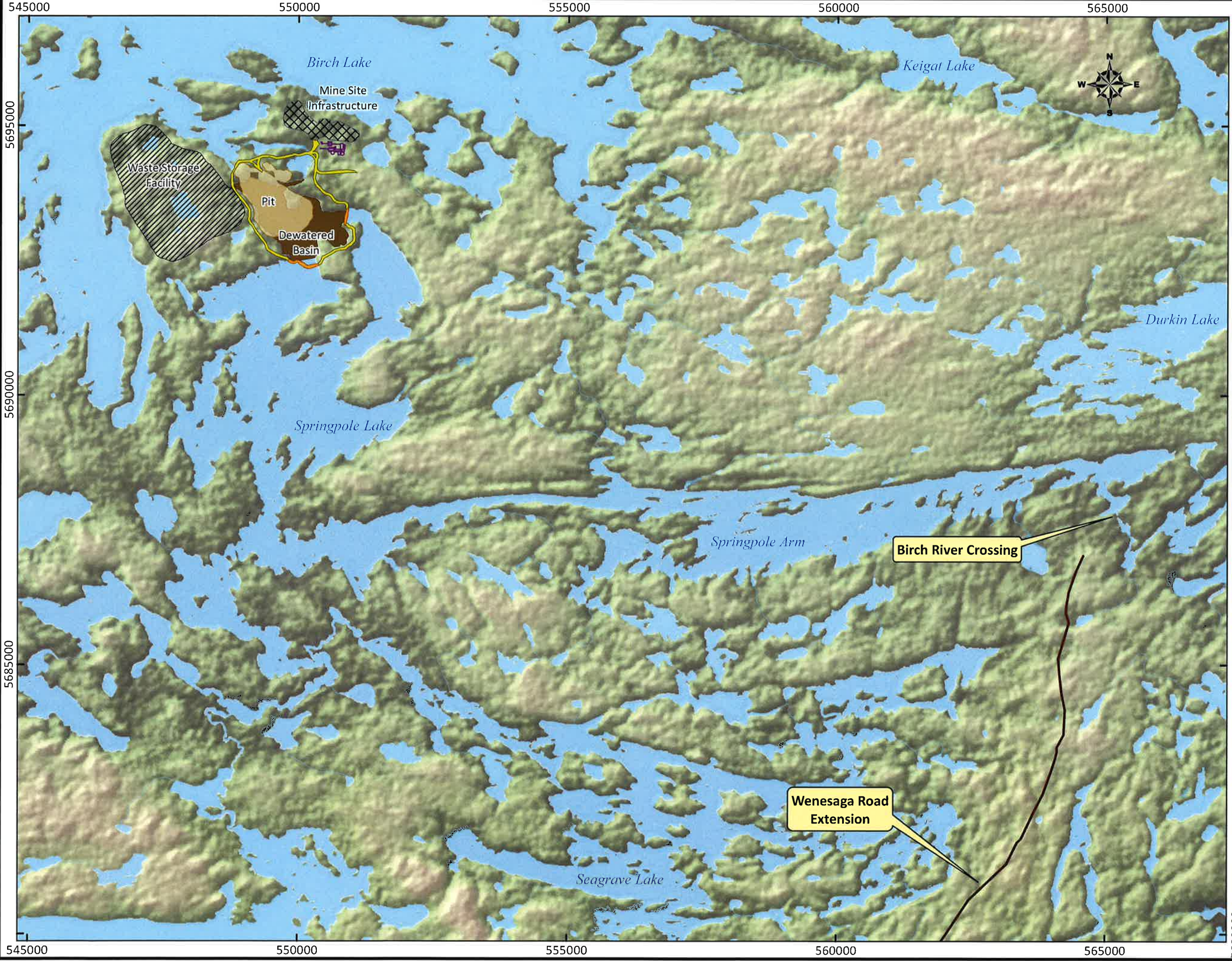
Development of the Undertaking as a producing gold and silver mine would be of significant benefit to the local economy and provincial / federal taxation base. The capital cost for the Undertaking as currently envisioned, would be on the order of \$805 million (AGP, 2021). The provincial and federal governments would be principal beneficiaries through new revenues generated through employee income taxes and other employee-related government-mandated contributions. These senior levels of government would also enjoy additional revenues through value-added sales, corporate income, capital, and other taxes levied on the corporation. Preliminary workforce requirements can be seen in Appendix C.

In 2019, the Undertaking was assessed to contribute approximately \$1.28 billion into the local economy over the life of the mine (SRK, 2019):

- Annual direct payroll to be in excess of \$36,000,000;
- Combined federal and provincial tax revenue to be in excess of \$12,600,000;
- Providing regional and local businesses revenues and business profits from which future investments in social services, community infrastructure, and business development and capacity building can be made;
- Providing for regional economic growth;
- Future overall benefits associated with training and employment opportunities; and
- Supplemental tax revenues related to payroll and municipal tax levies.

Additional induced benefits from the Undertaking are expected to include charitable donations, infrastructure upgrades, and contributions to the local and Indigenous communities through business opportunities that are commonplace with large scale resource development projects once a revenue stream is achieved.

Supporting documents, including those appended to the proposed ToR and the RoC, provide additional information regarding the conceptual design and the rationale behind the Undertaking. FMG recognizes and expects that the preliminary design of the Undertaking described in the ToR may evolve during the preparation of the EIS / EA, including through the assessment of potential alternatives and ongoing consultation and engagement activities.



**Property Reference**



- Haul Road
- Plant Site and Shops
- Cofferdam
- Pit Boundary
- Waste Rock/Tailings
- Stockpile
- Dewatered Basin of Lake

*\*Temporary Road would only be built if proximal aggregate deposit is developed*  
 Mine Layout from Springpole PEA (SRK, 2019)  
 Conceptual components to be refined during the EA.



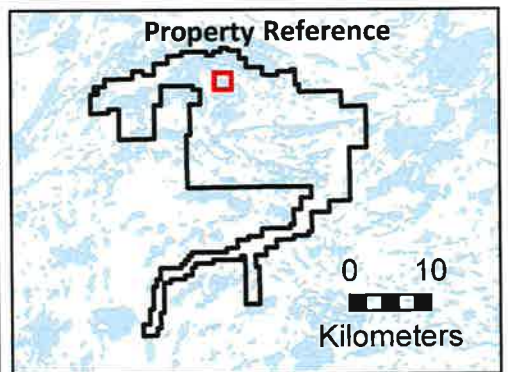
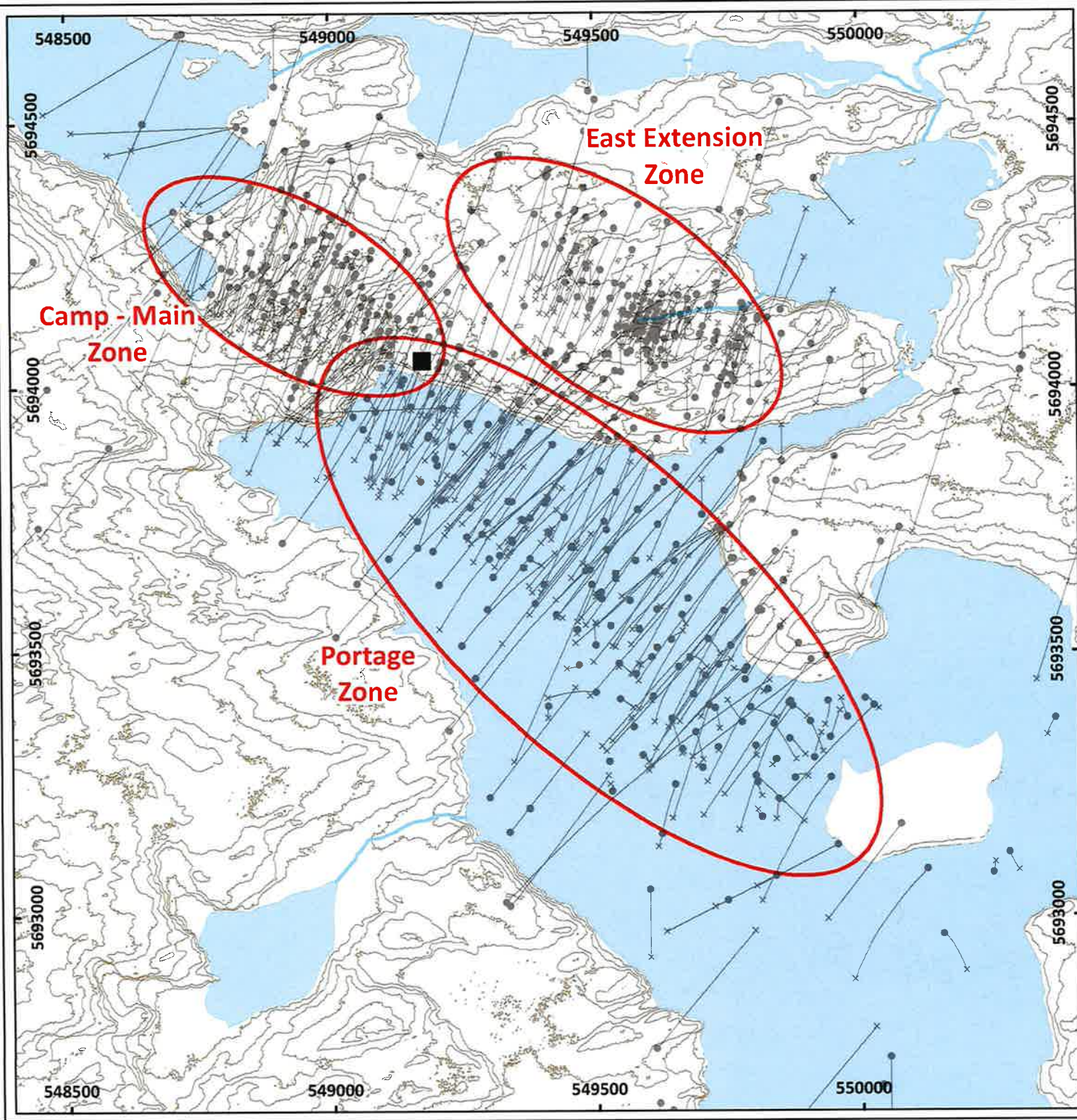
**Springpole Gold Project**  
 Conceptual General Arrangement

**Figure 4.1.1**

Kenora District, Ontario

April 2021 NAD83, UTM zone15





- Camp Location
- Drill Hole Collar
- Drill Hole Trace
- Topographic Contour (2m Int)
- Water Course
- Water Body
- Springpole Property Boundary

**FIRST MINING GOLD**

**Springpole Gold Project**  
 Geological Domains for  
 Springpole Gold Project  
 Figure 4.1.2

Kenora District, Ontario

April 2021 WGS84, UTM zone15

0 Meters 500

## **5 DESCRIPTION OF AND RATIONALE FOR ALTERNATIVES**

The EAA makes reference to both “alternatives to” a proposed undertaking, and “alternate methods” of carrying out a proposed undertaking. In accordance with MECP’s Code of Practice: Preparing and Reviewing Terms of Reference for Environmental Assessments in Ontario (January 2014), a reasonable range of alternatives will be identified in the environmental assessment, based on consideration of the following questions, and a comparative evaluation will be completed per the methodology described in the sections below to assess each of the alternative methods:

- Do they provide a viable solution to the problem or opportunity to be addressed?
- Are they proven technologies and is technically feasible at the scale required?
- Are they consistent with other relevant planning objectives, policies and decisions?
- Are they consistent with Provincial government priority initiatives (for example, waste diversion, energy efficiency, source water protection, reducing greenhouse gas emissions)?
- Could potential effects to any sensitive environmental features be mitigated, such as significant wetlands, Species at Risk (SAR), archaeological resources, built heritage etc.?
- Are they practical, financially realistic and economically viable?
- Are they within FMG’s ability to implement?
- Can they be implemented within the defined study area?
- Are they appropriate for FMG to undertake the study?
- Are they able to meet the purpose of the EAA?

With respect to alternatives to the Undertaking, engineering studies have deemed the Undertaking is only feasible as an open pit mine, and therefore the only alternatives comparison will be to the Undertaking not proceeding for completeness. Note that this alternative does not meet the purpose of the Undertaking listed above.

### **5.1 Alternatives Assessment and Evaluation Methodology**

#### **5.1.1 Performance Objectives**

The assessment of alternative methods will be carried out to identify and evaluate potential environmental effects, advantages, and disadvantages of each alternative method of carrying out the Project, including measures to mitigate potential adverse effects and net effects. A comparative evaluation of a reasonable range of alternative methods will be conducted, and the advantages and disadvantages of each method will be assessed within the environmental

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assessment based on performance objectives, evaluation criteria and indicators, to define the preferred alternative.

Performance objectives are meaningful attributes that are essential for the Undertaking success, and provide a basis for distinguishing between individual alternatives. The following performance objectives (or a subset thereof, as appropriate, for any given alternative) will be used in the evaluations of alternatives:

- Cost-effectiveness;
- Technical applicability and/or system integrity and reliability;
- Ability to service the site effectively;
- Potential effects to the physical and biological environments;
- Potential effects to the human environment, including Aboriginal and Treaty Rights, cultural heritage resources (including archaeological, built heritage and cultural heritage landscape resources) and traditional land use; and
- Amenability to reclamation.

For each performance objectives, a series of evaluation criteria will be selected to better describe and assess each alternative. Consideration will also be given to potential benefits in the evaluation of the alternatives.

### **5.1.2 Evaluation Criteria and Indicators**

Proposed criteria and indicators for the assessment of alternatives are described in the subsections that follow. These preliminary criteria and indicators presented in this ToR will be refined/modified through the EA process, following further analysis and to incorporate input from government agencies (including MECP), the various stakeholders and Indigenous communities. First Mining Gold Corp. will describe in its summary of consultations how comments and concerns were considered and, in the event that input is not incorporated in the EA process, First Mining Gold Corp. will provide justification for its decision.

Potential data sources for the assessment of alternatives indicators are provided below. Further data sources will be added during EA development with justification, if it is determined in consultation with government agencies that they are required to adequately assess the alternative methods.

- Baseline studies carried out for the Undertaking;
- Existing and updated / future engineering studies;

- Expert knowledge from specialists, including engineers and scientists involved with other similar projects;
- Provincial and federal guidelines, reports, websites and other similar sources;
- Statistic Canada Census and non-statistical data;
- Property owners, business owners, municipal agencies, tourism associations and other stakeholders; and
- Indigenous communities.

### 5.1.2.1 Cost-Effectiveness

Cost-effectiveness relates to overall Undertaking costs, including capital, operation, maintenance, and closure / reclamation costs. Each aspect of the Undertaking has cost implications and thus cost-effectiveness is a performance objective common to all aspects. The evaluation criteria and indicators are presented in Table 5.1.2.1.

**Table 5.1.2.1: Cost-effectiveness Evaluation Criteria and Indicators**

Criteria	Indicators for the Assessment of Alternatives
Springpole Gold Project financing	Investor attractiveness or risk
Return on investment	Provides a competitive or acceptable return on investment
Financial Risk	Provides, or is associated with, a preferred, manageable or acceptable financial risk

Performance will be determined as follows:

- **Preferred:** Facilitates a competitive return on investment and present manageable or acceptable financial risk;
- **Partially Preferred:** Facilitates an acceptable return on investment and present manageable or acceptable financial risk; or
- **Not Preferred:** Cannot be financially supported by the Springpole Gold Project as it does not facilitate an acceptable return on investment and does not present manageable or acceptable financial risk to the Project.

### 5.1.2.2 Technical Applicability and/or System Integrity and Reliability

Technical applicability and system integrity and reliability are used interchangeably, as appropriate to the issue, to describe the suitability or expected performance of a given alternative. The evaluation criteria and indicators are presented in Table 5.1.2.2.

**Table 5.1.2.2: Technical Applicability and/or System Integrity and Reliability Evaluation Criteria and Indicators**

Criteria	Indicators for the Assessment of Alternatives
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Available Technology	<ul style="list-style-type: none"> <li>• Used elsewhere in similar circumstances, and is predictably effective with contingencies if and as required</li> <li>• New technology supported by pilot plant or strong theoretical investigations or testing, with contingencies if and as required.</li> </ul>
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Performance will be determined as follows:

- **Preferred:** Predictably effective with contingencies if the alternative does not perform as expected;
- **Partially Preferred:** Appears effective based on theoretical considerations; contingencies are available if the alternative fails to perform as expected; or
- **Not Preferred:** Effectiveness appears dubious or relies on unproven technologies.

### 5.1.2.3 Ability to Service the Site Effectively

This performance objective is relevant for those aspects of the Undertaking dealing with the provision of consumables or access to the site. The reliable (guaranteed) supply of consumables, such as fuel, is critical to the uninterrupted operation of the mine. The evaluation criteria and indicators are presented in Table 5.1.2.3.

**Table 5.1.2.3: Ability to Service the Site Effectively Evaluation Criteria and Indicators**

Criteria	Indicators for the Assessment of Alternatives
Service	Provides a guaranteed supply to the site with manageable potential for supply disruption, and/or contingencies available.
Accessibility	Accessible land base or infrastructure needed to support component development and operation

Performance will be determined as follows:

- **Preferred:** Provides a guaranteed access / supply to the site with a low risk of interruption;
- **Partially Preferred:** Provides the required access / supply to the site with contingencies in the event of disruptions; or
- **Not Preferred:** Cannot reliably provide sufficient access / supply, or involves an unacceptable level of risk without contingencies.

### 5.1.2.4 Effects to the Physical and Biological Environment

Physical and biological environment environments referred to in this performance objective is a broad term used to describe the air, bedrock, overburden, water (surface and ground) and biological organisms / communities. The assessment of alternatives within the EA will also consider potential positive effects. Greenhouse gas generation and climate change will be considered, where applicable. The evaluation criteria and indicators are presented in Table 5.1.2.4.

**Table 5.1.2.4: Effects to the Physical and Biological Environment Evaluation Criteria and Indicators**

<b>Criteria</b>	<b>Indicators for the Assessment of Alternatives</b>
Effect on air quality and climate	<ul style="list-style-type: none"> <li>• Attainment or maintenance of air quality point of impingement standards, or scientifically defensible alternatives</li> <li>• Emission rates or greenhouse gases</li> </ul>
Effect on fish and aquatic habitat	<ul style="list-style-type: none"> <li>• Attainment or maintenance of surface water quality guidelines for the protection of aquatic life, or where pre-Project water quality does not meet Provincial Water Quality Objectives, it shall not be degraded further</li> <li>• Maintenance or provision of fish habitat</li> <li>• Maintenance of fish population</li> <li>• Maintenance of water flows or conditions suitable for fish passage</li> <li>• Maintenance of groundwater flows, levels or quality</li> </ul>
Effect on wetlands	<ul style="list-style-type: none"> <li>• Attainment or maintenance of water quality guidelines for the protection of aquatic life, or where pre-Project water quality does not meet the Provincial Water Quality Objectives, it shall not be degraded further</li> <li>• Area, type and quality (functionality) of wetlands that would be displaced or altered</li> <li>• Maintenance of wetland connectivity</li> </ul>
Effect on terrestrial species and habitat	<ul style="list-style-type: none"> <li>• Area, type and quality (functionality) of terrestrial habitat that would be displaced or altered</li> <li>• Potential for noise (or other harm and harassment) related disturbance</li> <li>• Maintenance or provision of plant dispersion and wildlife movement corridors</li> <li>• Maintenance of wildlife population</li> </ul>
Effect on SAR	<ul style="list-style-type: none"> <li>• Sensitivity level of involved species (endangered, Threatened, Special Concern)</li> <li>• Area, type and quality of SAR territories or habitat that would be displaced</li> <li>• Potential for noise (or other harm and harassment) related disturbance</li> <li>• Maintenance or provision of wildlife movement corridors</li> </ul>

Performance will be determined as follows:

- **Preferred:** Minimizes adverse effects to the physical and biological environments without additional mitigation;
- **Partially Preferred:** Minimizes adverse effects to the physical and biological environments with additional mitigation; or
- **Not Preferred:** Likely to cause significant adverse effects to the physical and biological environments that cannot reasonably be mitigated.

### 5.1.2.5 Effects to the Human Environment

The potential for negative human environment effects will be evaluated where appropriate for the alternatives for the various aspects of the Undertaking. Human environment criteria include a wide range of community, economic, social, land use, Aboriginal and Treaty Rights, and cultural heritage indicators as noted in Table 5.1.2.5. FMG acknowledges that there are Provincial Standards and Guidelines for Conservation of Provincial Heritage Properties that could apply should the Springpole Gold Project involve properties that the Government of Ontario owns or controls that have cultural heritage value or interest. The assessment of alternatives within the

EA will also consider potential positive effects. The evaluation criteria and indicators are presented in Table 5.1.2.5.

**Table 5.1.2.5: Effects to the Human Environment Evaluation Criteria and Indicators**

<b>Criteria</b>	<b>Indicators for the Assessment of Alternatives</b>
Effect on local residents and recreational users	<ul style="list-style-type: none"> <li>• Maintenance of property values</li> <li>• Maintenance or improvement of income opportunities</li> <li>• Maintenance or provision of local access</li> <li>• Attainment of provincial noise guidelines, and/or background sound levels if already above the guidelines</li> <li>• Non-interference with water well supply systems</li> <li>• Non-interference with surface water drinking supply</li> <li>• Potential for general disturbance and adverse affects on aesthetics</li> <li>• Potential for adverse health and safety effects</li> </ul>
Effect on infrastructure	<ul style="list-style-type: none"> <li>• Maintenance or provision of local and regional access</li> <li>• Maintenance and reliability of power supply systems</li> <li>• Maintenance and reliability of pipeline systems</li> </ul>
Public health and safety	<ul style="list-style-type: none"> <li>• Attainment or maintenance of air quality point of impingement standards, or scientifically defensible alternatives</li> <li>• Maintenance or attainment of the quality of drinking water supply systems</li> <li>• Managing the potential for adverse electromagnetic exposure</li> <li>• Maintaining safe road traffic conditions that are within the domain of FMG control</li> <li>• Maintenance or provision of health services</li> </ul>
Effect on local businesses and economy	<ul style="list-style-type: none"> <li>• Maintenance or improvement of local business and economic opportunities (including commercial bait harvesters and trappers)</li> <li>• Continued access to areas used for natural resource harvesting by tourism operators</li> </ul>
Effect on tourism and recreation	<ul style="list-style-type: none"> <li>• Maintenance or improvement of tourism and recreational opportunities</li> </ul>
Regional economy	<ul style="list-style-type: none"> <li>• Maintenance or improvement of the regional economy.</li> </ul>
Effect on government services	<ul style="list-style-type: none"> <li>• Maintenance or improvement on the capacity of existing health, education and family support services</li> </ul>
Effect on resource management objectives	<ul style="list-style-type: none"> <li>• Consistency with established and planned resource management objectives such as Bear Management Areas and Sustainable Forest Management units</li> </ul>
Excessive waste materials	<ul style="list-style-type: none"> <li>• Limiting the generation of unnecessary waste materials</li> <li>• Potential for material to be recycled / reused.</li> </ul>
Effect on heritage resources including archaeology, built heritage and cultural heritage landscapes	<ul style="list-style-type: none"> <li>• Alteration that is not sympathetic or is incompatible, with the historic fabric and appearance of cultural heritage resources</li> <li>• Isolation of a built heritage resource or heritage attribute from its surrounding environment, context or a significant relationship</li> <li>• Direct or indirect obstruction of significant views or vistas within, from or of built heritage resources or cultural heritage landscapes; shadows that materially alter the heritage resource</li> </ul>
Effect on archaeological resources	<ul style="list-style-type: none"> <li>• Avoidance of damage to known archaeological resources</li> <li>• Land disturbances (such as a change in grade that alters soils and drainage patters that adversely affect an archaeological resource)</li> </ul>
Effects on First Nation reserves and communities	<ul style="list-style-type: none"> <li>• Maintenance or improvement of First Nation reserve and community conditions (subject to the limitations of Company capacity and community members' personal choice)</li> </ul>

Criteria	Indicators for the Assessment of Alternatives
Effect on spiritual, ceremonial, and cultural heritage, and archaeological sites	<ul style="list-style-type: none"> <li>Avoidance of damage or disturbance to known spiritual, ceremonial, cultural heritage and archaeological sites; or implement other forms protection / preservation supported by local First Nations and Métis</li> </ul>
Effects on traditional land use	<ul style="list-style-type: none"> <li>Maintain access to traditional lands for current traditional land uses, except as otherwise agreed to with local First Nations and Métis</li> </ul>
Effects on Aboriginal and Treaty Rights	<ul style="list-style-type: none"> <li>Avoid infringement of Aboriginal and Treaty Rights, except as otherwise agreed to with local First Nations and Métis</li> </ul>

Performance will be determined as follows:

- **Preferred:** Minimizes adverse effects to the human environment without additional mitigation and provides positive effects;
- **Partially Preferred:** Minimizes adverse effects to the human environment with additional mitigation; or
- **Not Preferred:** Likely to cause significant adverse human environment effects that cannot reasonably be mitigated.

#### 5.1.2.6 Amenability to Reclamation

This performance objective relates to the decommissioning or reclamation of the Undertaking and associated infrastructure (if any). The evaluation criteria and indicators are presented in Table 5.1.2.6.

**Table 5.1.2.6: Amenability to Reclamation Evaluation Criteria and Indicators**

Criteria	Indicators for the Assessment of Alternatives
Effect on public safety and security	<ul style="list-style-type: none"> <li>Avoidance of safety and security risks to the general public</li> </ul>
Effect on environmental health and sustainability	<ul style="list-style-type: none"> <li>Attainment or maintenance of air quality point of impingement standards, or scientifically defensible alternatives</li> <li>Attainment or maintenance of water quality guidelines for the protection of aquatic life, or where pre-Project water quality does not meet the Provincial Water Quality Objectives, it shall not be degraded further</li> <li>Restoration of passive drainage systems</li> <li>Provision of habitats for vegetation and wildlife species, including SAR</li> </ul>
Effect on land use	<ul style="list-style-type: none"> <li>Provide opportunities for productive land uses following the completion of mining activities</li> <li>Provide for an aesthetically pleasing site</li> </ul>

Performance will be determined as follows:

- **Preferred:** Causes disturbance to the physical, biological and human environments that requires limited reclamation;

- **Partially Preferred:** Causes disturbance to the physical, biological and human environments that requires moderate to extensive reclamation; or
- **Not Preferred:** Mitigation of disturbance to the physical, biological and human environments is not practical or feasible.

### 5.1.3 Identification of the Preferred Alternative

The alternatives are given an overall or summary evaluation, taking all of the performance objectives into consideration. There are two general approaches to summary evaluations in EA processes.

The approach of giving numerical values to individual performance objectives to determine the preferred alternative, based on application of the appropriate criteria and summing of values to arrive at an overall index value is not preferred. This approach typically requires some form of weighting to take into account the varying importance of the different performance objectives. Weighting factors have to be carefully justified and are often open to interpretation. In addition, the numerical approach may result in two or more very different alternatives that have the same, or very similar, overall index values; when intuitively it is clear that one alternative better meets environmental, and health and safety requirements; and is technically superior to the other. Numerical evaluations may not be readily transparent during Indigenous and public review and consultation processes.

The second approach and proposed for the Springpole Gold Project EA, is to rely on a comparative evaluation of the overall advantages and disadvantages of a method as demonstrated through the performance descriptions (that is whether an alternative is preferred, acceptable or unacceptable for each performance objective).

This methodology has also been utilized for a number of other mining-related undertakings which were subject to the EAA, that were reviewed by provincial and federal government agencies, other stakeholders and Indigenous groups at the time.

The alternative which receives the greatest number of preferred ratings is not necessarily the best, or most preferred, overall alternative. The relative importance of the individual performance objectives needs to be considered as well. It may be that one or two performance objectives are more important and override all other objectives, so long as a minimum rating of acceptable is attained for the less important objectives and the relative importance assigned to performance objectives is supported by provincial and federal regulatory agencies. The final evaluation of alternatives is therefore a reasoned process, in which the basis for the final selection of alternatives is easily understood at all levels.

The evaluation of alternatives will be undertaken in consideration of comments received and the results of consultation and discussion with the general public, Indigenous communities, and government reviewers. Information collected during this engagement will help to determine the choice of alternatives considered and the relative importance of the individual performance objectives.

The EA will also consider an evaluation of the advantages and disadvantages to the environment of the undertaking and the alternatives methods of the undertaking, as required by the EAA.

Consideration of each alternative method will be evaluated after potential impacts have been determined and mitigation measures have been applied. Identifying any requirements associated with effectively managing the key components will be considered during the evaluation of alternative methods.

A comparative methodology will be applied at a sufficient level of detail to identify advantages and disadvantages of each alternative method. The potential effects associated with each alternative method will be compared to establish the relative advantages and disadvantages of each option.

The results will be recorded in a summary table and conclusions for each criterion will be established based on the advantages and disadvantages of the alternative methods. The preferred alternative method will be the one with the preferred balance of advantages and disadvantages. The summary table will include a clear rationale for the conclusions and decisions made regarding the selection of preferred alternatives. The evaluation process will be clear, logical and traceable, allowing anyone reviewing the EA to come to the same conclusions without any additional assumptions.

## **5.2 Alternative Methods for the Undertaking**

### **5.2.1 Identification of Alternatives**

The EIS / EA will identify and assess alternatives for major components of the proposed Undertaking such that the justifications for the preferred option / approaches are clearly presented. A reasonable range of alternative methods will be considered during the EA process, and viable alternatives will be brought forward for assessment in the EIS / EA. FMG will explore reasonable alternative methods to ensure project options are not limited in the event of an unforeseen change in plan.

The assessment of alternatives will be carried out at a level sufficient to distinguish the relative merits of the different alternatives methods. A comparative evaluation of feasible alternative methods will be conducted. The advantages and disadvantages of each method will be assessed within the EA based on a series of performance objectives, evaluation criteria and indicators, to define the preferred alternative based on a reasoned process and presented in the EIS / EA along with supporting rationale.

There is the potential that other alternatives may arise through ongoing engineering studies, or the EA process and related consultation / engagement activities. FMG will prepare the EA in accordance with Sections 6(2)(c) and 6.1(3) of the EAA.

Alternatives for the Undertaking have been considered with respect to the following Project components:

- Mine water management;
- Mine rock and overburden management;

- Ore processing;
- Process effluent and tailings management;
- Water supply;
- Water discharge;
- Watercourse realignments;
- Process Plant and related site infrastructure ;
- Explosive siting and storage;
- Solid waste management and domestic sewage treatment;
- Aggregate supply;
- Power supply and routing;
- Site access and access road routing;
- Mine closure; and
- Fish habitat loss and offsetting / compensation.

In its environmental assessment, First Mining Gold Corp. will identify and assess a “do nothing” alternative. The “do nothing” alternative will be considered in the context of a benchmark against which the potential effects of alternative methods will be evaluated and compared to determine the advantages and disadvantages of the alternatives. The “do nothing” alternative will also be compared against the project to assess the overall advantages and disadvantages of proceeding with the preferred undertaking.

Additionally, an assessment will be carried out to compare three Project alternatives:

- The "do nothing" scenario to the Project;
- Delay the Project until circumstances are more favourable; and
- Proceed with the Project in the near term, as planned by FMG.

The Undertaking is defined in the Voluntary Agreement as the development of an open pit mine and associated facilities. FMG has determined that an open pit mine is the only viable “alternative to” the Undertaking. With respect to subsections 6.1(2)(b)(iii), (c) and (d) of the EAA “alternatives to the Undertaking” will not be considered, as development of the open pit mine is the only viable alternative that will address the opportunity identified. FMG has fully considered alternatives to the proposed Undertaking which include underground mining or a combination of open pit and

underground mining. Open pit mining is typically used for large low-grade deposits and deposits where the ore distribution is uniform over a large area; this aligns well with the geologic setting of the proposed Undertaking. Underground mining is typically used for deep-lying, high-grade, vein or seam-type deposits. For the most part, a combination of open pit and underground mining is used when open pit resources are mined until it may no longer be economically feasible and there is an available high-grade underground deposit that is economical to extract. It was determined through the 2019 PEA (SRK 2019) that open pit mining is the only feasible option for the Undertaking. The rationale for this included lower grade ore, with inconsistent zones of mineralization in a rock mass material that has weak, friability characteristics. Further rationale for the decision to proceed with the open pit can be found in the Technical Memo supporting the letter requesting a Voluntary Agreement in Appendix A.

In terms of access roads, two preliminary alternatives for a winter operational access road were studied in 2014, including a western corridor and an eastern corridor. Additional alternatives for road access (from the Birch River crossing to the mine site) may be identified within the study area through ongoing consultation and engagement activities. Alternatives will be assessed during the EA process and included in the EIS / EA.

For mineral waste storage (tailings, overburden and mine rock), FMG is required to undertake a comprehensive assessment of mineral waste management alternatives consistent with the alternative assessment requirements associated with the MDMER and in accordance with the *Guidelines for the Assessment of Alternatives for Mine Waste Disposal* (Government of Canada 2016).

### **5.2.2 Mine Water Management**

The Undertaking will require the management of water from several different areas, including from the open pit(s). FMG also has an overall goal of striving to recycle and re-use water as practical to limit the quantity of fresh water needed to support the Undertaking. Mine water from the open pits is expected to contain suspended solids from general mining and earthmoving activities, ammonia residues from ammonia-based explosives, and potentially residual hydrocarbons from heavy equipment operation. In-pit sump(s) are anticipated to be used for preliminary suspended solids removal. Residual ammonia is anticipated to be managed with BMPs and effluent aging. Additional mine water treatment alternatives (including a water treatment plant) will be assessed during the EA process, and will ensure adequate retention times and treatment is available.

FMG will identify the Parameters of Concern (POCs) for mine water management, and from this will explore feasible alternative treatment methods where applicable.

FMG will consider on-site mine water management over the life of the mine to determine the preferred alternative in due consideration of the site water balance and hydrological modelling for inclusion in the EIS / EA.

### **5.2.3 Mine Rock and Overburden Management**

Determining the location and method of mine rock (waste rock) disposal is one of the key decisions for metal mines in Canada. Other mineral waste to be managed at the Springpole site will include overburden and other rock materials excavated in order to create foundations for

surface facilities. Identifying suitable mineral waste (waste rock and overburden) disposal locations requires careful considerations of key factors including:

- Minimizing aquatic and terrestrial habitat disturbance and loss;
- Preventing and minimizing potential metal leaching (ML) and acid rock drainage (ARD);
- Minimizing haul distances; and
- Finding a sufficiently large area to contain the material in a stable configuration.

Quantitative evidence on how mine rock will be used and managed to avoid potential effects associated with ML/ARD, including identification of feasible mitigation measures, will be considered during the EA process. Further considerations include the development of a conceptual approach for mine rock management to be included in the EIS / EA.

The Undertaking is expected to generate approximately 6 Mt of overburden and 310 Mt of mine rock. Geochemical assessment will be conducted to determine the risk of ML/ARD associated with mine rock, and support the management of mine rock and design of associated facilities. Geochemically suitable mine rock is expected to be re-used as a construction material, mainly for the TMF dam and road construction / maintenance. The remainder of the mine rock and overburden will be stockpiled for permanent disposal at the site with a portion of the overburden used in progressive and final rehabilitation activities. The MRSAs are currently expected to serve as storage for mine rock and overburden material.

FMG will assess alternative methods for management of overburden and mine rock that will not be utilized for construction activities, and will assess feasible alternatives in the EIS / EA. If needed based on the preferred alternatives selected, FMG will conduct a detailed alternative assessment, as required by the MDMER for overprinting of waters frequented by fish in accordance with the Guidelines for the Assessment of Alternatives for Mine Waste Disposal (Government of Canada 2016).

#### **5.2.4 Ore Processing**

Processing will be required to extract the gold from the ore and refine the gold into gold doré bars. Ore processing follows a defined method including crushing and conveying, stockpile reclaiming, followed by in plant processing. On-site processing is typical for large scale, low-grade operations such as this Undertaking. Off-site processing may have substantial environmental implications related to ore transport.

A reasonable range of alternative methods for ore processing will be considered and assessed in the environmental assessment, including alternatives for on-site and off-site ore processing facilities.

### **5.2.5 Process Effluent and Tailings Management**

Process effluent and tailings are by-products of gold processing, which may contain residual reagents and will require further treatment. FMG will consider and assess a reasonable range of potential treatment methods for the process effluent during the EA process.

An estimated 140 Mt of tailings (solid rejects from the processing of ore) will be produced over the expected life of mine (LOM). The tailings slurry, inclusive of process effluent may be treated in the process plant to destroy cyanide and to render any associated dissolved heavy metals into a solid phase, before being permanently stored in the TMF. A reasonable range of alternatives for the TMF location as well as tailing management alternatives will be assessed during the EA process and detailed in the EIS / EA. Optimization of the selected siting areas / management methodology will be conducted in parallel to the EA process in response to the needs of the Undertaking as well as feedback gathered during consultation during the EA process.

### **5.2.6 Water Supply**

Contact water will derive from open pit dewatering, runoff collected from the various stockpile areas, water recycled from the TMF and fresh water withdrawn from an adjacent waterbody. There are many benefits to recycling and re-using this water, rather than utilizing entirely fresh water. Nonetheless, a freshwater supply will still be required for potential seasonal water deficits, initial start-up and ongoing process plant needs, and potable water uses. This freshwater demand is still being developed as part of the overall site water balance.

The location of the process freshwater intake is not yet defined. A water intake from adjacent waterbody is currently envisaged, which would allow for a reliable source of water from this water body and relatively short distance from the ore process plant, which will be the main water consumer. Alternative water supply sources that will be considered in the EIS / EA include groundwater, alternative surface water sources, and a combination of open pit mine water and surface water sources.

### **5.2.7 Water Discharge**

FMG anticipates that it will manage the contact site water including reusing water as reasonable. Nonetheless, it is expected that there will be a requirement to discharge excess water to the environment once regulatory requirements are met, on a continuous or seasonal basis. Therefore, FMG will undertake an assessment to determine the quantity and quality of excess site contact waters that will require discharging to the environment, and appropriate location(s) for effluent discharge.

The assessment of alternatives to treat waste water prior to discharge to the environment will be considered during the EA process. Such discharge will meet applicable federal and provincial effluent discharge requirements. FMG will propose effluent limits that are receiver based and consider the sensitivity of the receiver, available assimilative capacity of the receiver and baseline water quality, and be consistent with the MECP *Deriving Receiving Water Based Point Source Effluent Requirements for Ontario Waters*. A detailed evaluation of alternative discharge points and configurations will be undertaken as part of the EA process. Consideration will be given to minimizing erosion, maximizing mixing, minimizing the extent of the mixing zone (MOE 1994), as

well as the risk of chemo-stratification and potential changes to the photic zone. Preliminary discharge location(s) may change as more information is developed through the EA process.

### **5.2.8 Process Plant and related Site Infrastructure**

Options for locating the majority of site infrastructure are dictated by the positioning of the open pits, TMF, MRSAs, geographic constraints (such as avoidance of watercourses as practical), and land tenure. There are, as a result, comparatively few alternatives for the siting of most of the required infrastructure components, given the preference to limit the overall site footprint as practical.

Buildings and yard areas planned for the Undertaking include:

- Primary crusher, screen, secondary crusher, and run-of-mine ore stockpile, with associated conveying system;
- Process plant;
- Maintenance garage, warehouse(s), and administration complex;
- Accommodations complex;
- Fuel and lube bay; and
- General laydown areas and temporary storage facilities.

The ore processing, maintenance, and administrative complexes are currently proposed to be in one centralized area, far enough away from the open pit perimeter to protect workers and facilities from any potential blast (fly) rock. These facilities will be supported by related transport, piping, and power infrastructure as needed. The preliminary layout has been developed to ensure efficient operating conditions with the least travel distances between facilities, particularly with respect to ore and mine rock haulage and tailings pumping. Alternative locations for the process plant will be assessed during the EA process to ensure it is in line with the technical, environmental, social and economic attributes. For each alternative location for the process plant, related infrastructure will be oriented to support the process plant.

Workers will need to be accommodated during the construction and operation phases. Options for worker accommodations, may include an on-site construction camp and/or a single camp facility for both the construction and the operation phases. These and other reasonable alternatives will be assessed in the EIS / EA.

The positioning of connectors (mine site roads, pipelines, and the on-site electrical distribution system) is essentially constrained by the location of facilities they are intended to service.

### **5.2.9 Explosives Siting and Storage**

FMG anticipates the supply of explosives required for site development and operation will be carried out under a contractor-provided service, with explosives preparation and use anticipated

to be under the care and control of a contractor. Explosives needed for development will be prepared in a dedicated explosive manufacturing facility. The positioning of the explosives facilities is prescribed by the NSC CAN/BNQ 2910-510 Explosives – Quantity Distances and is dependent in part on the location of other site facilities. Manufacturing, storage and handling of explosives is highly regulated. For these reasons, limited practical alternatives are available, but they will be assessed during the EA process.

## **5.2.10 Solid Waste Management and Domestic Sewage Treatment**

### **5.2.10.1 Non-Hazardous Solid Waste**

Non-hazardous solid waste will be produced during the Undertaking and will require reuse, recycling or disposal. A range of reasonable alternative methods will be considered for the predicted waste streams and volumes and evaluated in the EIS / EA.

### **5.2.10.2 Hazardous Solid Waste**

Hazardous solid and liquid waste will be generated and will be stored temporarily on site and shipped to an off-site licensed facility.

Hydrocarbon contaminated soils could potentially be remediated on-site using approved methodologies which have demonstrated effectiveness. A range of reasonable alternatives will be considered during the EA process and presented in the EIS / EA.

### **5.2.10.3 Domestic Sewage**

Domestic sewage will be generated during the Undertaking and will require treatment. The option to re-use treated sewage as process water may also be considered. A reasonable range of alternatives for the domestic sewage treatment will be identified and assessed in the EIS / EA. Regardless, FMG will design the treatment system and obtain the necessary permits in accordance with provincial requirements.

## **5.2.11 Quarries and Aggregate Supply**

Most of the aggregate required to develop the Undertaking is anticipated to be non-PAG mine rock produced incidental to ore extraction. However, experience with other projects in this geographic area has shown that it can be difficult to generate aggregate for concrete and other strictly defined applications from mine rock. It may therefore be necessary to investigate and develop additional aggregate source(s); therefore, alternative aggregate supply sources will be identified and assessed during the EA process and could include the following options alone or in combination:

- Mine rock;
- Dedicated aggregate pits; and/or
- Commercial aggregate pits that may be in the vicinity, such as located along the Wenesaga Road.

Consideration of these alternative sources will allow for operation flexibility in terms of timing availability and quality of materials.

Should aggregate pit(s) be developed under the care and control of FMG, appropriate approvals will be obtained, and the EIS / EA will consider potential environmental impacts associated with proposed aggregate extraction, including identification of feasible mitigation measures.

### **5.2.12 Power Supply**

Development and operation of a remote mine requires a reliable power source, including to ensure the safety of workers. The mine and process plant will be the main power consumers. It is anticipated based on other mining projects of a similar scale and remoteness, that grid power may be the preferred alternative for the operation phase, while diesel power has been proven to be an effective method to support mine construction prior to additional grid power being brought to site, and can also serve effectively as emergency power for critical site functions. A reasonable range of power supply alternative methods will be considered and assessed in the environmental assessment, including alternatives for transmission line corridors and routings if grid power is selected as a preferred power supply. FMG will consider carbon and greenhouse gas emissions when assessing alternatives during the EA process, as appropriate.

### **5.2.13 Site Access**

A Class EA for a winter operational access corridor to the mine exploration site was approved in 2014 (Access Corridor Project) and a preferred access corridor was selected. In addition, the extension of the Wenesaga all-weather access road (approved under the Forest Management Plan) to the Birch River crossing has been substantially completed by Domtar/EACOM.

The Undertaking will require a means for bringing in processing equipment, mining equipment, supplies, and personnel to the mine site. Whether the winter operational access road is also required or useful during early construction to mobilize mine construction equipment to site is uncertain at this time. Although temporary use of the winter operational access road may be considered in the EA to facilitate early construction, it would not prevent FMG's current use of winter road access for exploration-related purposes. Despite this, an all-weather two-lane access road is proposed that will extend approximately 15 km from the Wenesaga road extension to the mine site. An all-weather two-lane access road is proposed as part of the undertaking. In its environmental assessment, First Mining Gold Corp. will identify and assess a reasonable range of alternative access road locations and alignments for the proposed two-lane all-season access road to the project site, including alternative access corridors from the west and from the east. For each access road and alignment alternative, First Mining Gold Corp. will assess proposed aggregate sources, as well as any aggregate source alternatives and the potential environmental effects of extracting and transporting aggregate from any source. The assessment will include the consideration of the duration and frequency of the use of the access alternatives. Options to avoid impacts to species at risk and species at risk habitat shall be considered.

### **5.2.14 Mine Closure**

FMG is committed to the progressive rehabilitation of the Undertaking as practical over the life of the mine. During the closure phase after mining and processing is terminated, final rehabilitation

will occur. The EIS / EA will include an assessment of reasonable closure alternatives for the Undertaking.

The EIS / EA will assess alternative closure methods consistent with provincial regulatory requirements, and may consider the following components / alternatives and others as appropriate:

- Open pit mine (natural filling and enhanced filling);
- Water management system (leave in place, partial or full removal);
- Stockpiles (stabilization and covering / revegetation, use in backfill and engineered covers);
- TMF (permanent water fill, covering and revegetation);
- Buildings and linear infrastructure (decommission and rehabilitate or maintain select structures to support post-closure monitoring); and
- Drainage channels (stabilize and leave in place or removal).

It should be noted that when the Undertaking proceeds to the permitting phase, a detailed, certified Closure Plan (including financial assurance) is required under Ontario Regulation 240/00 of the *Mining Act* which will be submitted by the proponent for review by applicable government agencies and Indigenous communities, and will be consulted upon with the general public.

### **5.2.15 Fish Habitat Loss and Offsetting / Compensation**

The Project may require the removal of small water bodies within the TMF and mine rock pile footprints, as well as the temporary dewatering of the north basin of Springpole Lake during the operational phase of the Project. FMG will evaluate several fish habitat offsetting / compensation options through discussions with Indigenous communities, Fisheries and Oceans Canada and Environment and Climate Change Canada in order to define a base case that will be acceptable to *Fisheries Act* policies. A reasonable range of alternatives for fish habitat offsetting / compensation options will be identified and assessed in the EIS / EA.

## 6 DESCRIPTION OF EXISTING ENVIRONMENT

The description of the existing environment is a summary based primarily on studies that have been undertaken or are on-going as part of environmental baseline work. These studies are preliminary and will require a data gap analysis upon acceptance of the ToR and commencement of the EA process. A list of the baseline studies which have been used to inform the description of the environment are provided in Appendix G. Baseline data collection is ongoing. A more detailed description of the existing environment will be provided in the EIS / EA. The commitment to update the description of the environment is included in Table 8.1.1. The description of the environment is provided for the natural, social, economic, cultural and built environments. FMG intends to use or may potentially use other existing studies to supplement the description of natural, social, economic, cultural and built environments during the EA process.

### 6.1 Overview and Study Areas

Preliminary study areas were identified to guide the spatial extent of the preliminary baseline studies partially completed to date. The final study areas may vary in the EIS / EA. For the EIS / EA, three spatial extents have been identified on a preliminary basis, as follows, to be used in assessing the potential effects of the Undertaking:

- **Mine Site Development Area (MSDA):** Encompasses the anticipated footprint of the Undertaking and includes but is not limited to, the process plant, shops and other buildings, TMF, MRSAs, ore stockpile and crusher, open pit, access, haul roads and other supporting infrastructure. The potential MSDA including a buffer area can be seen in Figure 6.1.1.
- **Local Study Areas (LSA):** This study area extends beyond the MSDA and was defined at a preliminary level by applying a 10 km buffer around the anticipated footprint. The LSA will be further defined in the EIS / EA, and will be ecologically relevant to the valued component being assessed. The preliminary LSA buffer can be seen in Figure 6.1.1.
- **Regional Study Areas (RSA):** The RSA will extend beyond the LSA to include the maximum geographical extent in which impacts from the Undertaking are anticipated to be identifiable. From a socioeconomic perspective, the maximum extent of this area would include identified communities potentially affected by the Undertaking and from a biophysical perspective the maximum extent would be largely defined by caribou. However, the study areas are preliminary and may be subject to change during the EA process. The commitment to update the study area is included in Table 8.1.1 and rationale for the RSAs, will be included in the EIS / EA.

### 6.2 General Site Description and Current Land Use

The Springpole site is currently accessible by floatplane direct to Springpole Lake during late spring, summer, and early fall. In winter, the site is accessed by a wheel plane to an ice strip which is constructed on Springpole Lake. During lake ice freeze-up in the fall and breakup in spring, the site is only accessible by helicopter. There is currently no all-season road to the site. The closest all-season forestry access roads to the Springpole site are the Joyce Road to the northwest and the Wenesaga Road to the south.

All fuel, food, and material supplies are currently flown in from either Red Lake, Ontario, Sioux Lookout, Ontario, and/or Winnipeg, Manitoba, with flight distances of 110 km, 150 km, and 370 km, respectively. Businesses in Red Lake, a long-established mining community 110 km to the southwest, provide most of the camp's supply needs. The nearest emergency medical facilities are at the Margaret Cochenour Hospital in Red Lake. The nearest major city is Winnipeg, Manitoba, which is approximately 370 km southwest of Springpole Lake.

Baseline environmental work has been ongoing for the proposed Undertaking since 2011. Further details and copies of reports will be included with the EIS / EA as supporting documentation. The only development on the Property at this time is the exploration camp on the north shore of Springpole Lake. Additional photos of the camp site and water crossing locations are provided in Figures C through F in Appendix B. The Property is considered a greenfield site and has only been subject to preliminary exploration activities.

### **6.2.1 Land Tenure**

FMG acquired 100% of the Springpole Gold Project in 2015 when it completed the acquisition of Gold Canyon Resources Inc. (GCU). When the Springpole Gold Project was acquired from GCU, the Springpole Property consisted of 30 patented mining claims, 300 unpatented, contiguous mining claims and 6 leased unpatented mining claims, totaling an area of approximately 32,448 ha. Further detail is provided in Appendix D. The Property boundary is illustrated in Figure 1.2.1.

FMG understands as per Appendix A of Policy 4.02.01 Application Review and Land Disposition Process, restrictions may apply to obtaining tenure on Designated Inland Lake Trout Lakes. FMG will engage in discussions with MNRF prior to an application for Crown land on a Designated Inland Lake Trout Lake as specific conditions may apply.

FMG plans to initiate the process to secure tenure using the provisions of the *Public Lands Act* (i.e., Land Use Permit, easement or sale) for Crown shoreline reserves around Springpole Lake where development is planned.

### **6.2.2 General Area**

The Undertaking is located within the Trout Lake Forest Management area and is subject to the Trout Lake Forest Management Plan (FMP), pursuant to the *Crown Forest Sustainability Act* that is administered by MNRF. The region hosts remote tourism outposts and seasonal camps, particularly on Birch Lake which is situated upstream of the proposed Undertaking. Other remote tourism lakes in the general vicinity of the proposed Undertaking include Seagrave Lake, Bertha Lake, Deaddog Lake, Gull Lake, Fawcett Lake and Christina Lake (refer to Figure 6.2.2).

Distance from Springpole site to the nearest protected areas are provided below. These protected areas and Areas of Natural or Scientific Interest in the region are shown in Figure 6.2.1.

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### Protected Areas:

- Trout Lake Provincial Park: 79.4 km;
- St. Raphael Provincial Park: 97 km;
- Conservation Reserves:
  - Gull-Christina: 21.2 km
  - Broken Mouth River: 42.5 km
  - Trout Lake: 58.0 km
  - Harth Lake: 57.3 km
  - Whitemud River: 66.5 km
  - Bruce Lake: 88.9 km
  - Lac Seul Islands: 88.2 km; and
- Dedicated Protected Areas:
  - Beekahncheekahmeeng deebahncheekayweehn eenahohnahnuhn: 21.4 km
  - Kahnahmaykoosayseekahk: 119.9 km.

The Wataynikaneyap Transmission Line project has finalized their EA. Cat Lake First Nation and Slate Falls Nation prepared a joint land use plan in 2011 with support from MNRF (Cat Lake First Nation *et al.* 2011).

The Standards and Guidelines for Conservation of Provincial Heritage Properties, as per Ontario Regulation 157/10, will set out the criteria and process for identifying provincial heritage properties and set the standards for their protection, maintenance, use and disposal.

### **6.2.3 Proximity to Municipalities**

The Undertaking lies approximately 110 km northeast of the Municipality of Red Lake in northwest Ontario, Canada (Figure 1.1.1). The Town of Ear Falls is 105 km southwest of the Property and the Municipality of Sioux Lookout is situated 150 km southeast of the Property, as shown in Figure 1.1.1.

### **6.2.4 Proximity to any Permanent, Seasonal or Temporary Residences**

Seasonal residences are present on Birch Lake, which is upstream of the Project, and south of the Project footprint on Johnson Island (refer to Figure 6.2.2).

### **6.2.5 Proximity to Permanent or Seasonal Commercial Operations**

Although there are no nearby permanent or seasonal commercial operations, there are a number of tourism businesses operating in the region, including: KaBeelo Lodge, Fort Frances Northern Wilderness Outfitters, Hidden Bay Lodge, KayAir Service, True North Outpost and Camps, Green Airways, Birch Lake Lodge, and Red Pine Lodge and Outposts.

### **6.2.6 Proximity to any Indigenous Traditional Lands, Sites of Cultural Significance or Traditional Land Uses**

The Project is located in Treaty #9 with portions of the potential transmission route within Treaty #3 boundaries, as generally presented in Figure 6.4.1. The Project boundaries are also overlain by registered trap lines that FMG understands are held by a family from Cat Lake First Nation. In addition, it has been noted that there are existing portage routes between Birch Lake and Springpole Lake (immediately west of the existing Springpole camp location) and other areas adjacent to the Undertaking.

Some information of cultural significance has been identified through preliminary consultation, however, information on traditional lands and sites of cultural significance will be updated through the Traditional Knowledge / Traditional Land Use (TK/TLU) study and will include direct consultation with Indigenous communities or designated Land Use Planning Committees. As appropriate, this information will be used to support the preparation of the EIS / EA, and will be detailed only in accordance with any agreements with knowledge holders.

### **6.2.7 Proximity to Federal Lands**

Distances from the Springpole site to the closest Reserve lands of the engaged First Nations are below.

- Lac Seul First Nation (Reserve): 120 km;
- Cat Lake First Nation (Reserve): 40 km;
- Wabauskang First Nation (Reserve): 125 km;
- Slate Falls Nation (Reserve): 45 km;
- Mishkeegogamang First Nation (Reserve): 148 km;
- Pikangikum First Nation (Reserve): 128 km; and
- Ojibway Nation of Saugeen (Reserve): 170 km.

There are no other federal lands within 100 km of the Project.

## **6.2.8 Proximity to Surface Waters**

The mineral deposit proposed to be extracted in part by the Undertaking overlies and surrounds the northern headwater portion of Springpole Lake. Birch Lake is north of the Springpole site and is positioned upstream of Springpole Lake, as it drains into Springpole Arm (refer to Figure 6.3.3).

Both Springpole and Birch Lakes are part of the Albany River system. Their water flows eastward into the Cat River and then northward into Hudson Bay via the Albany River. Land areas are generally of low relief and are separated by a series of interconnected, shallow lakes.

## **6.3 Description of the Natural Environment**

### **6.3.1 Physiography**

The region is underlain by glaciated terrain characteristic of a large part of the Canadian Shield. Land areas are generally of low relief with less than 30 m of local elevation. Tree cover generally consists of mature spruce, jack pine, balsam, birch, and poplar with black spruce and muskeg swamps occupy low-lying areas. Bedrock outcrops are limited and small, as bedrock is generally covered by a thick layer of moss or muskeg at a minimum. Glacial till is generally less than 1 m in thickness and land areas.

### **6.3.2 Geology**

The regional geology is part of the northern margin of the Birch-Uri Greenstone belt. The northern margin of the Birch-Uchi greenstone belt forms a pattern of sub-regional scale cusps of supracrustal strata alternating with batholiths. Basaltic units are prominent around the periphery of the greenstone belt and may be part of the Woman assemblage, but the accuracy of this stratigraphic assignment is unknown. Regional geology is presented in Figure 6.3.1. The mineral deposit at the Springpole site has been extensively studied during past programs with property geology presented in Zabev (2004) and Armstrong et al. (2006).

The following subsections summarize the geology interpreted from field observations and petrographic analysis of drill cores from the 2009 re-logging program, and from drill core produced during the 2010 and 2011 programs.

#### **Trachyte Porphyry Intrusive**

- A polyphase alkali, trachyte intrusive displaying autolithic breccia textures lies at the heart of the Project. The intrusive is comprised of a system of multiple phases of trachyte believed to be part of the roof zone of a larger syenite intrusive, as fragments displaying phaneritic textures were observed from deeper drill cores in the southeast portion of the Portage zone. Early intrusive phases consist of megacrystic feldspar phenocrysts, up to 5 cm long, of albite and orthoclase feldspar in an aphanitic groundmass. Successive phases show progressively finer grained porphyritic texture while the final intrusive phases are aphanitic.

- Pervasive alteration and metamorphism have reduced the original porphyry intrusive to a complex alteration assemblage dominated by sericite, biotite, pyrite, calcite / dolomite, and quartz. Primary igneous textures are remarkably well preserved in places and give indications to the possible genesis of the initial phase of gold mineralization. Within the country rocks to the north and east are trachyte and lamprophyre dykes and sills that source from the trachyte- or syenite-porphyry intrusive system.

### **Confederation Age Volcanic and Siliciclastic Rocks**

- The country rocks pre-date the alkali intrusive and are composed of a complex sequence of altered and metamorphosed intermediate andesitic volcanic rocks and associated volcanoclastics, siliciclastic sedimentary rocks, chemical sediments including banded iron formation, and coarse pebble conglomerates. Devaney (2001) indicates that the sediments are likely of the Confederation assemblage dating at around 2,740 Ma, representing the proximal portions of a mixed volcanic-sedimentary basin.

### **Timiskaming-type Conglomerates**

- Barron (1996) states pebble conglomerate outcrops between Springpole Lake and Birch Lake contain clasts of the trachyte porphyry, suggesting that the Timiskaming-type conglomerates postdate intrusion. Devaney (2001) suggests these arcuate form conglomerates represent late orogenic, deformed, dextral sense strike-slip (pull-apart) basins of Timiskaming-type late Archean, post Confederation assemblage age rocks.

### **6.3.3 Geochemistry**

In terms of ARD and metal leaching, FMG will undertake a geochemical characterization program that includes geochemical analyses, the potential for ML/ARD. The program will also include the assessment of all the major lithologies as applicable, overburden, mine rock, low-grade ore and tailings. Some of the program goals will be to predict time to onset and potential impacts to water quality during the entire life of the proposed mine, including post-closure, and it will identify feasible mitigation measures. Some of the programs undertaken in the past and present are described below.

#### **Historical Geochemistry Assessment Program**

An initial assessment of ARD potential included the selection and static testing of 184 samples of rock in the vicinity of the open pits. Findings are summarized below:

- Based on defensible interpretation criteria, approximately 64% of samples were expected to remain net acid neutralizing indefinitely; and
- Approximately 36% of samples (including both ore-grade and waste-grade samples, mostly from the Portage Zone) were theoretically predicted to eventually become acidic after some lag time that required kinetic testing to be further evaluated.

Two representative composite ore samples were carefully selected for metallurgical testing, and were subjected to static tests followed by kinetic testing in two humidity cells that were run for 168 weeks. The data and findings of the metallurgical testing are summarized below:

- Neither sample turned acidic during the 168-week test, with pH ranging from 7 to 8;
- Semi-quantitative estimates of sulphide and neutralization depletion times for the two samples suggest the samples will ultimately turn acidic after more than 60 and 100 years, respectively; and
- Under neutral pH conditions, metal leaching was low to negligible.

### **Current Geochemistry Assessment Program**

A comprehensive program for geochemistry assessment of the mine rock and tailings commenced in late 2019 and is continuing. The geochemistry program includes the following program phases:

- Phase 1: geochemistry gap assessment;
- Phase 2: Phase 1A geochemical characterization, static testing of mine rock, pit walls and ore;
- Phase 2: Phase 1B geochemical characterization, leachate extraction testing of mine rock and pit walls;
- Phase 2: Phase 1C geochemical characterization and kinetic testing of mine rock, pit walls and ore (42 weeks);
- Phase 3: Phase 2A geochemical characterization, static testing and leachate extraction testing of tailings; and
- Phase 3: Phase 2B geochemical characterization and kinetic testing (42 weeks).

Geochemistry sampling and testing program includes the following:

- Sampling (drill core n=474), assay pulps / rejects (n=153) and metallurgical tailings (n=1) from Portage, Main and East Extension Zones;
- Static testing (acid-base accounting, total elemental solid content) on full sample set (siderite-corrected Sobek Neutralization Potential ~10%);
- Mineralogical analysis and particle size analysis on sample subset (n=10);
- Leachate extraction (shake flask extraction and net acid generation) tests on sample subset (n=10); and

- Laboratory humidity cell tests on sample subset (n=10).

Additional programs may be developed depending on the results of the ongoing work. Characterization of mine rock, pit walls, ore and ore stockpiles, and tailings for ARD/ML will be detailed in the EIS / EA.

#### **6.3.4 Climate**

The Red Lake Airport Station which is the closest ECCC weather station to Springpole site, has average temperatures that normally range from a low in February of -19.6°C to a high in July of between 18.1°C and 23.3°C. The average annual precipitation for the year is 640.2 mm, with the expected minimum precipitation being 18.6 mm in February, and the expected maximum being 97.7 mm in June. At the Red Lake weather station, monthly wind speeds for the area are generally stable throughout the year, averaging approximately 9.4 to 12.8 km/h. The prevailing winds are generally from the northwest, which would direct air and noise emissions away from the nearest receptors located to the northwest and northeast of the Undertaking.

Long-term regional weather stations closest to the Springpole site that may be used to characterize the historical weather in the vicinity of the Project are listed below:

- The Red Lake Airport Station is located approximately 110 km southwest of the Project Site and provides historic weather data dating back to 1953. Hourly temperature, dew point, relative humidity, wind direction, wind speed, visibility, pressure and weather is available.
- The Pickle Lake Airport Station is approximately 145 km southeast of the Project Site and provides historic weather data dating back to 1953. Hourly temperature, dew point, relative humidity, wind direction and pressure are available.

An automated weather station was previously installed on-site adjacent to the existing exploration camp location to monitor local climatic patterns and monitor hydrological conditions. In 2020, FMG reinstated a new weather station at the site to monitor local climate patterns and inform the ongoing hydrological data collection program. FMG will consult MECP before this data is used for atmospheric and hydrological modelling.

##### **6.3.4.1 Precipitation**

Monthly mean precipitation will be collected from the weather station on site, historical data and any stations surrounding the Springpole site. The mean annual precipitation for the Springpole site was determined to be 704 mm, the average run-off distribution (range 3.5% to 15.1%), and the precipitation distribution (3.4% to 14.8%). The 1 in 25 years 24-hour storm rainfall was estimated to be 80 mm based on Atlas of Canada extreme rainfall statistics (Hogg and Carr 1985).

##### **6.3.4.2 Lake Evaporation**

Lake evaporation was calculated using the WREVAP version 1.0 evaporation estimating software. Monthly mean calculated lake evaporation, mean monthly precipitation, and daily bright sunshine hours were obtained for five weather stations surrounding the Springpole site from Canadian

Climate Normals 1951 to 1980 (Environment Canada 1982a,c). This data was inserted into the WREVAP software to obtain the calculated evaporation in mm and the monthly evaporation distribution for each of the surrounding stations presented in Figure 6.3.2. The average annual evaporation is 546 mm.

### 6.3.5 Air Quality

The Springpole site is in a remote area of northwestern Ontario. There are no adjoining anthropogenic sources of industrial air emissions. Potential nearby sources of air emissions include forest fires, combustion products from heating oil and propane that are used for residential and recreational purposes at the numerous tourist lodges in the region, and periodic timber harvesting activities in the Trout Lake Forest.

There are no historic records for air quality in the area immediately surrounding the Springpole site. As part of the EA process and baseline data collection program, the need for these site-specific surveys will be addressed. These data, if collected, will be included in the EIS / EA submission(s) to regulatory agencies.

The nearest ambient air quality station is located in Thunder Bay. The National Air Pollution Surveillance Network and the MECP have the following air quality monitoring stations listed below in Table 6.3.1.

**Table 6.3.1: Summary of Existing Air Quality Monitoring Stations**

Station Name	Coordinates	Land Use	Distance from Site	Parameters	Years of Data
Thunder Bay	48.3794 -89.2902	Residential	400 km SE	NO <sub>2</sub> , PM <sub>2.5</sub> , O <sub>3</sub>	2007 to 2020

Baseline air quality can be conservatively estimated at the Project using existing monitoring stations found in Thunder Bay; however, air quality data from the existing monitoring station in Thunder Bay may not be representative of background levels for the study area. Baseline air quality for the Project will be appropriate and representative for the study area and surrounding region and will be estimated using on-site air monitoring program. Additionally, FMG is completing atmospheric studies that will determine concentrations of air quality parameters in the local study area; this data may be used for air dispersion modelling and will be included in the EIS / EA as appropriate. FMG will consult MECP regarding the proposed ambient air monitoring program. An on-site ambient air monitoring program is anticipated to be conducted to measure the following parameters or similar:

- Total Suspended Particulate:
  - Particulate less than 2.5 microns (PM<sub>2.5</sub>)
  - Particulate less than 10 microns (PM<sub>10</sub>)
  - Metals;

- Diesel particulate matter;
- Carbon monoxide;
- Sulphur oxides;
- Nitrogen oxides; and
- Volatile organic compounds.

Baseline air quality studies are being carried out in support of the EA. Additional air quality studies may be completed to supplement programs in 2021, based on the extensive experience of our technical experts with other mining projects. Where necessary, FMG will engage with regulatory agencies on these additional studies. Supporting technical documents will be provided with the EIS / EA and include a description of the baseline methodology, results of the studies and will be used to assess and/or verify the potential impacts of the project.

### **6.3.6 Noise, Vibration and Light**

The Undertaking is located in a remote area of northwestern Ontario far from typical anthropogenic noise, vibration and light sources. Studies are underway to measure baseline noise, vibration and light characteristics. The baseline data gathered will characterize baseline conditions and support prediction of environmental effects for the Undertaking. The information collected will be reported in the EIS / EA, and utilized to assess potential environmental effects of the Undertaking.

#### **6.3.6.1 Noise**

Existing noise sources in the area are largely limited to air traffic and recreational activities (e.g., float planes and boat motors). As such, it is anticipated that the baseline noise levels are generally below the MECP nighttime limits for rural areas (40 dBA), ignoring higher levels associated with such natural events as wind, storm events, birds chirping and similar.

An increase in noise levels in the vicinity of the Project Site during all phases of the Project is expected. Noise mitigation measures may be required to minimize potential impacts to wildlife and other nearby local resource users (e.g., outfitters).

The following noise study tools will be considered to further describe the environment in the EIS / EA as appropriate:

- Noise Limits: compliance with the MECP noise limits, such as in:
  - *Publication NPC-115, Construction Equipment*
  - *Publication NPC-118, Motorized Conveyances*

- *Publication NPC-300, Environmental Noise Guideline, Stationary and Transportation Sources – Approval and Planning, Publication NPC-300, August, 2013;*
- Noise Screening: as appropriate will be prepared in accordance with:
  - *Primary Noise Screening Method Guide, <https://www.ontario.ca/page/primary-noise-screening-method-guide>*
  - *Secondary Noise Screening Method Guide, <https://www.ontario.ca/page/secondary-noise-screening-method-guide>; and*
- Noise Reports: will be prepared in accordance as relevant with:
  - *Publication NPC-233, Information to be Submitted for Approval of Stationary Sources of Sound, October, 1995*
  - *Basic Comprehensive Certificates of Approval (Air), User Guide, Appendix A - Supporting Information for an Acoustic Assessment Report or Vibration Assessment Report Required by a Basic Comprehensive C of A prepared by the EAB, Version 2.1, April 2011.*

Noise evaluation of the undertaking will consider all significant noise sources, both existing and proposed, from the proposed operation and construction of the facility under assessment as described in the Project Description (Section 4.1). In its environmental assessment, First Mining Gold Corp. will assess and include potential off-site noise sources associated with the undertaking as described in the ToR including, but not limited to, proposed access routes and transmission lines.

#### **6.3.6.2 Vibration**

The following vibrational study items will be considered when preparing the EIS / EA as applicable:

- Vibration Limits: such as the MECP vibration limits in:
  - Draft technical publication *NPC-207, Impulse Vibration in Residential Buildings*, November, 1983, supplementing the Model Municipal Noise Control By-Law, Final Report, August 1978, as amended; and
  - *Publication NPC-119, Blasting, Model Municipal Noise Control By-Law, Final Report*, August 1978.

#### **6.3.6.3 Light**

Light pollution associated with artificial lighting may result in disturbance to some nocturnal and/or crepuscular SAR that forage at night. FMG understand there may be potential effects associated with artificial lighting throughout each component of the Undertaking. Light assessment and mitigation will be completed during the EA process and included in the EIS / EA.

### **6.3.7 Sediment Quality**

Sediment quality samples were previously collected in 2011 and 2012 within Birch Lake, Springpole Lake and Seagraves Lake to characterize baseline sediment quality within the profundal and sublittoral zones (DST 2012, 2013). All three lakes had similar trends and were characterized as having total organic concentrations, Total Kjeldahl Nitrogen and total phosphorous levels above the Provincial Sediment Quality Guidelines (PSQG) (MOE 2011a). In addition, concentrations of arsenic, chromium, iron, manganese and nickel were also observed to be above the PSQGs.

Additional sediment quality sampling and analysis (e.g., total metals, particle size and total organic carbon content) for key sites likely to receive mine effluents will be assessed during the EA process. Collection in the vicinity of the proposed effluent discharge location will follow the sampling methodologies outlined in the *Metal Mining Technical Guidance for Environmental Effects Monitoring* document (Environment Canada 2012).

### **6.3.8 Hydrology and Surface Water Quality**

#### **6.3.8.1 Hydrology**

Surface water hydrology is a key component of the physical and biological environment and is linked to ecosystem components. The Project is located predominantly within the Springpole Lake watershed which flows southeast via the Birch River system to the Albany River and ultimately drains to James Bay. The surface area of Springpole Lake is 2,478 ha. The main tributary to the lake is the Birch River, which flows through the east-west section of the lake, referred to as Springpole Arm (Figure 6.3.3). Birch River connects Birch Lake and Springpole Lake via a series of smaller lakes. Birch Lake has a surface area of 10,858 ha. The area of the Birch River watershed upstream from Springpole Lake is approximately 1,054 km<sup>2</sup> based on MNRF's OFAT website tool.

The local watersheds will be defined during the baseline data for the Undertaking. This is planned to be completed by ground truthing topography (and watershed divide) via surveying or LIDAR or another proposed equivalent method.

The on-site hydrology data will be compared to the Water Survey of Canada (WSC) hydrometric station located at WSC Station 04GA002 (Cat River below Wesleyan Lake), approximately 55 km southeast of the Project Site. This station provides a long-term data record that can be utilized to produce synthetic data for the Undertaking. The applicability of this WSC Station, or a suitable alternative, to the Undertaking will be rationalized in the EIS / EA.

The Undertaking could impact surface water hydrology by altering stream flows, channel morphology, and glaciers. Such effects may occur during the all phases of the Undertaking. Alteration of surface water hydrology could potentially affect receptor VCs that have linkages with surface water hydrology.

Periodically between 2011 and 2018, automated gauging stations were established in the watersheds in the local area (Figures 6.3.4 and 6.3.5). Manual flow measurements were taken

periodically throughout the year and related to stage data (measured using on-site benchmarks and data logs). The manual flow measurements and stage recordings will be used to produce rating curves.

Hydrological data collection is planned to continue into 2020 to further establish baseline hydrological conditions in areas potentially impacted by the Undertaking as outlined in Table 6.8.1. A water balance modelling and effects assessment plan will be developed to estimate effects of the Undertaking on watercourses and will be included in the EIS / EA.

Baseline hydrology studies have been carried out in support of the EA. Additional hydrology studies may be completed to supplement programs in 2021, based on the extensive experience of our technical experts with other mining projects. Where necessary, FMG will engage with regulatory agencies on these additional studies. Supporting technical documents will be provided with the EIS / EA and include a description of the baseline methodology, results of the studies and will be used to assess and/or verify the potential impacts of the project.

### **6.3.8.2 Surface Water Quality**

Seasonal surface water quality has been / will be collected and analytical results (e.g., water temperature, turbidity, pH, dissolved oxygen profiles, metals, major ions, and nutrients) will be assessed for representative tributaries and water bodies, including all watercourses / waterbodies anticipated to receive mine effluents or runoff.

Surface water monitoring has occurred on Springpole, Seagrave and Birch lakes in the past, as well as several small unnamed ponds within the potential footprint of the Undertaking. Sampling began in winter 2011 and has continued since that time at various stations and frequencies.

Results from this sampling program have been compared against the Ontario Provincial Water Quality Objectives (PWQOs) for the protection of aquatic life. To date, surface water generally meet PWQOs for the parameters analyzed with baseline water quality conditions being typical of lakes in northern Ontario.

The PWQOs are chemical and physical indicators that have been conservatively set to establish a measurable level of water quality that is protective of all aquatic life and life cycle stages. Surface water generally met PWQOs with conditions that are typical of oligotrophic lakes in northwestern Ontario including limited nutrient availability, low turbidity, and enough dissolved oxygen concentrations to support fish populations in the hypolimnion. Surface water stations are shown in Figure 6.3.7. Long-term sampling and data collection began in winter 2011 and have consistently continued at the same surface water locations to date. Supporting documentation regarding the water program will be provided in the EIS / EA. Such information as sampling methodologies, surface water sampling locations, analytical results and will be provided.

### 6.3.9 Hydrogeology and Groundwater Quality

#### 6.3.9.1 Hydrogeology

The hydrogeology of the region is predominantly controlled by the exposed bedrock or the overlying cover of native clay soil. Shallow groundwater flow is assumed to be like surface drainage, primarily originating at the height of land and flowing radially downslope.

Baseline studies are being developed to inform the EA process on soil type, mineralogy, geochemistry, gradation, hydraulic characteristics (e.g., water level, conductivity, gradient, flow direction, flow velocity, seasonal fluctuations), for all areas of the proposed Undertaking. From experience in other areas of the Canadian Shield, bedrock is typically scoured with deposits of glacial till varying in thickness from 1 m up to 10 m in pockets. Soft lake sediments may vary in thickness between 1 m to 10 m.

Hydrogeological investigation started in 2013 for the Undertaking, and have focused on the open pit area and surrounding open pit area within the local area. The area has been investigated by SRK (2013), North Rock (2017) and Fracflow (2019). Packer tests were completed and hydrogeological observations were collected by SRK and Fracflow to help determine hydraulic conductivities and bulk hydraulics conductivities for the open pit area.

**2013:** SRK completed 20 packer tests in seven geotechnical core holes drilled within the proposed pit footprint and collected hydrogeological observations.

**2017:** North Rock Environmental completed rising head tests at wells DDH1, DDH2, SP11-064, SP11-102, BL-235, and BL08-385 for future assessment of the hydraulic conductivity of the aquifer. Tests were completed by measuring rising static water level in each well over time, immediately following the rapid removal of water from the well casing.

**2019:** Fracflow completed the hydrogeological investigations that focused on utilizing existing exploration boreholes for the subsurface fracture geometry mapping, borehole permeability tests, groundwater sampling and piezometer construction since there were no available data on subsurface fracture geometry, groundwater chemistry and rock mass permeability.

- For physical hydrogeology and fracture geometry, total groundwater levels were measured in 50 open boreholes, and air lift tests were completed in 30 boreholes. Acoustic Televiewer (AT) surveys were completed in 21, and inclined exploration samples were collected from 10 exploration boreholes at different sampling depths in those boreholes and from four shallow monitoring wells. Two-level piezometers were constructed in four boreholes in the proposed mine rock area and five piezometers and drive points were installed in the TMF. Ground Penetrating Radar surveys were conducted in selected areas of the proposed mine rock area.
- For aqueous geochemistry, groundwater samples were collected from 10 exploration boreholes at depths, or lengths along the borehole, of 32 m to 420 m. Groundwater samples were also collected from four shallow monitoring wells, one well located at the camp site and three monitoring wells located in the preliminary TMF location. Parameters

in the background condition that exceeded Ontario Drinking Water Standards (ODWS) were hardness, total antimony, total arsenic, total beryllium, total cadmium, total iron, total lead, total manganese, total vanadium and total zinc.

- The hydraulic conductivity data that were computed from the air-lift tests and the borehole packer injection tests gave mean hydraulic conductivity values with standard deviations that showed that the areas of the bedrock has moderate permeability.

The bulk conductivity of the bedrock unit is required to effectively predict groundwater seepage into the open pits, which is significant input to the site wide water balance. Additional field work may be completed to assess the heterogeneity and anisotropy and to help inform the hydrogeological modelling work in support of the EIS / EA and future environmental approvals. FMG will develop programs to predict pit water quality for the LOM, closure and post-closure and assess pit filling in terms of associated environmental effects, and mitigation measures. Additional components of the program that will be considered to provide further description of the environment may include:

- Estimation of the zone of influence of the proposed water takings, with predicted impact to surface water features and/or groundwater users;
- Prediction of seepage water quality to assess potential impacts to receivers from the proposed mine facilities;
- Modelling of scenarios based on upper and lower boundary scenarios for filling the open pits;
- Sensitivity analysis for operations, closure and post-closure phases; and
- Potential for impact via subsurface transport.

A technical hydrogeological report by a subject matter expert will be included as supporting documentation in the EA. The report will detail but not be limited to methodologies, groundwater sampling locations, analytical results, frequency and water quality modelling including sensitivity analysis for operations, closure and post-closure phases.

Prediction of groundwater flow paths, seepage rates, potential receptors, subsurface travel times, etc. is anticipated to be provided in the EIS / EA and its supporting documentation

### **6.3.9.2 Groundwater Quality**

Overburden monitoring wells were installed in 2013 using a Pionjar 120 Percussion Drill, in accordance with Ontario Regulation 903. Soil samples were collected from boreholes and analyzed for metal content. Wells were developed and sampled following installation. Boreholes generally identified clayey silt soils below an organic horizon.

In 2017, sampling was completed at these five overburden groundwater monitoring wells (MW1 to MW5) and at six exploration boreholes (DDH1, DDH2, BL-235, BL08-235, SP11-102, and

SP11-064) shown in Figure 6.3.8. Samples were analyzed by a Canadian Accredited Laboratory Agency (CALA). Groundwater quality was compared to and met the following criteria in the baseline condition:

- MECP Table 8 criteria (criteria for Generic Site Conditions for Use within 30 m of a Water Body in a Potable Groundwater Condition, as per Ontario Regulation 153/04).
- MECP Aquatic Protection Values (APV).

Additional groundwater monitoring wells will be installed in 2020 as part of the baseline groundwater monitoring program. It is expected that the groundwater monitoring program will evolve during the EA process as preferred alternatives are defined and groundwater will be collected up-gradient, cross-gradient, down-gradient, from all relevant facilities, including potential seepage areas and areas where there is potential for groundwater-surface water interaction. Also, groundwater monitoring wells will be installed at the potential compliance points and within the footprint of the planned operation with an aim of having most wells remain in-place during all phases of the Project.

FMG will update its monitoring program to include other criteria and guidelines to ensure that baseline groundwater quality studies provide adequate information. Results will be compared against such criteria and guidelines as the following, recognizing that they do not apply to the baseline groundwater condition:

- ODWS (Ontario Regulation 169/03); and
- *Guideline B-7, Incorporation of the reasonable use concept into MOEE groundwater management activities.*

Baseline hydrogeology studies have been carried out in support of the EA. Additional hydrogeology studies may be completed to supplement programs in 2021, based on the extensive experience of our technical experts with other mining projects. Where necessary, FMG will engage with regulatory agencies on these additional studies. Supporting technical documents will be provided with the EIS / EA and include a description of the baseline methodology, results of the studies and will be used to assess and/or verify the potential impacts of the project. Groundwater sampling methodologies, sampling locations and results of groundwater quality analyses will be provided in the EIS / EA and its supporting documentation.

## **6.3.10 Aquatic Environment**

### **6.3.10.1 Fish and Fish Habitat**

FMG has continued the aquatic resources programs that GCU initiated to provide the necessary data to inform any future consultation, planning, EA or permitting for the Undertaking. A primary focus of the environmental monitoring program has been a fish habitat and community assessment, including habitat mapping, the identification of critical habitats (e.g., spawning locations), and delineating the spatial extent of fish habitat during high water periods.

In general terms, the purpose of the fisheries assessment program has been to describe the fish community and assess fish habitat. Also, where deemed necessary through ongoing consultation with regulatory agencies and in accordance with applicable policy and guidelines: the distribution, abundance, and characterization of fish by species and life stage. These data can also be used to identify potential Project related impacts and develop strategies to eliminate or mitigate impacts through proactive design. Additionally, it can aid development of appropriate long-term monitoring plans to assess the effectiveness of design or mitigation measures should the Project advance to development, operation, and closure phases. More specifically, the objectives of the sampling programs to date have been to:

- Document and map the type, extent, and utilization of fish habitat within the local area;
- Collect baseline data sets for the selected waterbodies that meet the requirements of Section 27.1 of the *Metal and Diamond Mining Effluent Regulations*, the development of fisheries offsetting plans and to meet the requirements of the final EIS Guidelines issued for the Springpole Gold Project;
- Confirm and characterize the fish community composition and relative abundance of species within the selected waterbodies;
- Describe the habitat by homogenous section, including the length of the section, width of the channel from the high-water mark (bankfull width), water depths, type of substrate (sediments), aquatic and riparian vegetation, habitat types and functions, cover components, and photos;
- Describe natural obstacles (e.g., falls, beaver dam) or existing structures (e.g., water crossings) that hinder the free passage of fish;
- Describe primary and secondary productivity of aquatic resources (e.g., benthic communities, feeder species, aquatic plants) in terms of abundance and distribution in affected water bodies with a characterisation of season variability; and
- Characterize fish populations on the basis of species and life stage, abundance, distribution and movements, including information on the surveys carried out and the source of data available (e.g., location of sampling stations, catch methods, date of catches, species, catch-per-unit effort).

Lakes typical of Fisheries Management Zone 4 (where Springpole Lake is located) are characterized by intermediate mean depths and medium mean surface area (Cano and Parker 2007). Many lakes in Zone 4 have stained water and intermediate morphoedaphic index scores. These stained lakes represent one of two general fish community types found in the region: a cool-water community and a cold-water community.

Cool-water communities are most often found in more productive, shallow waters and are characterized by fish species with optimum growth occurring between 15°C and 25°C. Common sport fish in cool-water communities include Walleye (*Sander vitreus*), Northern Pike (*Esox*

*lucius*), Smallmouth Bass (*Micropterus dolomieu*), and Muskellunge (*Esox masquinongy*). Springpole Lake is representative of a cold-water fish community.

Cold-water communities are found in clear, cold, deep oligotrophic lakes and support fish species with optimal growth temperatures below 15°C. Lake Trout (*Salvelinus namaycush*), and Lake Whitefish (*Coregonus culpeaformis*) are common sport fish in cold-water lakes. The fish community structure can be diverse in cold-water lakes and may contain species that are more commonly associated with cool-water lakes such as Walleye and Northern Pike, both of which occur in Springpole Lake. Springpole Lake and Birch Lake are designated inland lake trout lakes. Due to lake trout's high sensitivity to disturbance, FMG will implement good management practises to protect lake trout populations in Springpole Lake. Springpole Lake is identified for management in Inland Ontario Lakes Designated for Lake Trout Management (MNR 2015).

Some tools used as part of the fisheries investigations to help describe the environment have included:

- Sonar investigations of the north basin to characterize depth, bottom hardness, and substrate;
- Approximately 60 bottom (Ponar) grabs to field truth the bottom hardness information from sonar;
- Preparation of a side-scan sonar mosaic of the north basin;
- Oblique aerial photographs of the near shore / shoreline around the north basin to assist in the characterization of habitat;
- Netting using extra-large mesh gillnets during the summers of 2012 and 2013 throughout Springpole Lake to capture Lake Sturgeon. The net gangs, 100 m in length were comprised of four 25 m panels of 8, 9, 10, and 12 inch stretched mesh. Each 200 m strap consisted of two separate gangs connected by a bridal;
- Seining in near-shore areas;
- Acoustic tagging of Walleye and Lake Trout in 2012, and ongoing monitoring of movements using fixed location receivers;
- Spawning surveys, using underwater lights at night, for lake trout and lake whitefish in the autumn;
- Spawning surveys for Northern Pike and Walleye in spring;
- Habitat and fish community characterization of smaller lakes, ponds, and creeks in the surrounding area that are likely to be affected by mining operations;

- Water quality investigations including depth, temperature, and dissolved oxygen (DO) profiles at selected locations and laboratory analyses of water samples from Springpole and other nearby lakes;
- Aquatic toxicity testing; and
- Fish tissue analysis.

Waterbodies and watercourses surveyed to date can be organized in to one of three categories based on the size or type of aquatic system:

- Large waterbodies, including: Springpole Lake, Birch Lake, and Seagrave Lake which range in surface area from 1,300 to 10,900 ha. These large lakes are all cold- water lakes and support similar fish communities, including: Walleye, Northern Pike, Yellow, Perch, Lake Trout, and Lake Whitefish, among other non-game species. Fish caught in larger waterbodies is presented in Table 6.3.2 and lakes are shown below in Figure 6.3.9.
- Small unnamed lakes within and around the local area, all of which are less than 20 ha in surface area. Some of these small lakes support fish populations but species diversity is limited. Common species in small waterbodies sampled to date include: Yellow Perch, Northern Pike, Brook Stickleback, and Finescale Dace. Fish caught in smaller waterbodies is presented in Table 6.3.3 and lakes are shown below in Figure 6.3.10. The small waterbodies presented are preliminary and additional waterbodies in the study area available for critical mine infrastructure will be assessed as part of the EA.
- Small tributary water courses flowing in to Springpole Lake. Many of these are ephemeral and of those that have year-round flow, only some support accessible fish habitat. Species common in these small tributaries are generally representative of the baitfish community in the connected lakes and ponds. However, some may be utilized seasonally by larger bodied fish. These small tributaries are shown below in Figure 6.3.11.

Aquatic SAR have not been identified in the study area. As stated above, the study area for Lake Sturgeon consisted of Springpole Lake and sections of the Birch River, extending upstream from Springpole Lake to the outflow of Satterly Lake and downstream to the entrance of Gull Lake. There were zero catches of Lake Sturgeon and all baseline studies and reports for the aquatic environment will be appended and included in the EIS / EA.

**Table 6.3.2: Fish Catch in Lakes**

Species	Lake		
	Springpole	Birch	Seagrave
Area (ha)	2,477	10,858	1,330
Lake Trout	X	X	X
Lake Whitefish	X	X	X
Walleye	X	X	X
Northern Pike	X	X	X
Yellow Perch	X	X	X
Rock Bass	X	X	Inferred
White Sucker	X	X	-

Species	Lake		
	Springpole	Birch	Seagrave
Burbot	X	X	X
Lake Herring	X	X	X
Shorthead Redhorse	X	X	Inferred
Greater Redhorse	-	X	-
Bluntnose Minnow	X	X	Inferred
Common Shiner	X	X	Inferred
Johnny Darter	X	X	Inferred
Mimic Shiner	X	X	Inferred
Mottled Sculpin	-	X	-
Lake Chub	-	X	-
River Darter	X	-	Inferred
Spottail Shiner	X	X	Inferred
Fathead Minnow	X	-	Inferred
Logperch	X	X	Inferred
Longnose Dace	-	-	-
Trout-Perch	X	X	Inferred
Blacknose Shiner	X	X	Inferred
Emerald Shiner	-	X	-
Iowa Darter	X	X	Inferred
Slimy Sculpin	-	X	-
Spoonhead Sculpin	-	X	-
Brook Stickleback	X	-	Inferred

**Table 6.3.3: Fish Catch in Small Waterbodies**

Small Waterbody (refer to Figure 6.3.10)	Northern Pike	White Sucker	Yellow Perch	Brook Stickleback	Iowa Darter	Finescale Dace	Fathead Minnow	Northern Redbelly Dace	Spottail Shiner
Unnamed Lake L-1	X	X	X						
Unnamed Lake L-2	X	X	X						x
Unnamed Lake L-3				X		X		X	
Unnamed Lake L-4					No catch				
Unnamed Lake L-5				X	X	X	X		
Unnamed Lake L-6					No catch				
Unnamed Lake L-10	X		X						
Unnamed Lake L-11	X		X						
Unnamed Lake L-12				X	X				
Unnamed Lake L-13				X	X				
Unnamed Lake L-14	X		X						

Habitat attributes for lakes that are category one are described below. FMG understands that further investigations regarding substrate and vegetation are required for Birch Lake and Seagrave Lake. Furthermore, FMG intends on conducting further studies to further describe the environment for category two and three waterbodies and water crossing during the EA process.

## **Birch Lake**

Birch Lake has an irregular shape and is much larger, at 11,823 ha, than Springpole or Seagrave lakes. Its main tributary is the Shabumeni River at the extreme western end of the lake. The available bathymetry, sourced from MNR lake survey data, indicates its maximum depth is 37 m and its average depth is 7.4 m. Like Springpole Lake, it has a predominantly rocky shoreline and clear cold water. The east end of the lake is deeper and more open than to the west, which is characterized by narrow channels and comparatively shallow water. Exit Bay (15 U 543960 5686513), near the outflow of the Birch River also has a large area of deep water where depths range up to 30 m. The outflow at Exit Bay is the beginning of the Birch River which connects Birch and Springpole lakes and then continues downstream to the Cat River System. Deep basins are expected to provide good summertime refuge for cool water species.

## **Springpole Lake**

Springpole Lake has a surface area of 2,861.3 ha, and is the second largest of the three lakes described herein. The lake is predominantly rocky, has a very heterogeneous shoreline, and contains numerous islands and rocky shoals. There are a number of small tributary streams flowing into Springpole Lake. The Birch River is the largest tributary, and enters at the southwest end of Springpole Lake through a short section of rapids below Cromarty Lake (15U 548646 5687018). The outflow of Springpole Lake is also through the Birch River, at the east end, into Gull Lake (15U 565192, 5687848).

## **Seagrave Lake**

Seagrave Lake (15U, 556343 5683174) is upstream of Springpole Lake and connected to the Birch River between Birch and Springpole Lakes via Seagrave Creek (15U, 550273 5685133). There are no barriers to fish movement in Seagrave Creek. Among the three large lakes, it has the smallest surface area, at 1,930.8 ha, but is the deepest among them with a maximum depth of 41.5 m. The mean depth of 6.4 m in Seagrave Lake is similar to Springpole (6.3 m). Seagrave has four deep basins that have generally east-west orientations and are connected by narrow channels.

First Mining Gold Corp. will consult with the Ministry of the Environment, Conservation and Parks as well as other government agencies on baseline studies to determine the geographic extent of studies and evaluations needed to assess the potential impact of the project on fish populations and management objectives. During the environmental assessment, First Mining Gold Corp. will conduct the appropriate studies to determine the availability and viability of proposed avoidance and mitigation strategies to address any potential impacts to fisheries including studies beyond the boundary of the northern basin of Springpole Lake.

### **6.3.10.2 Fish Usability**

Baseline information on fish usability is required for health and socio-economic conditions as country foods (also known as traditional foods) are regularly consumed. Country foods includes food that is trapped, fished, hunted, harvested, or grown for subsistence or medicinal purposes

outside of the commercial food chain. Traditional Knowledge Studies will be reviewed to support the selection of fish species targeted for fish tissue sampling.

Previous fish tissue sampling has been completed on Walleye and will be continued to be collected as reasonable on large-bodied fish species (e.g., Walleye, Yellow Perch and Northern Pike) within the vicinity of the proposed discharge location to establish baseline conditions. The study will target three large sportfish species that are most prevalent in the area of discharge. Tissue analyses will be conducted in accordance with the Metal Mining Technical Guidance for Environmental Effects Monitoring document (Environment Canada 2012).

As precursor to an Environmental Effects Monitoring (EEM) program, it is important to develop a general knowledge of ambient contaminant levels in the environment prior to mine development. One of the parameters of concern in the environment is mercury, due in large part to human health concerns when fish with elevated mercury levels are consumed. Additional parameters that were analysed in fish tissue included arsenic, lead and selenium. The results of monitoring of metal content in fish tissue will be presented in the EIS / EA.

### **6.3.10.3 Benthic Communities**

Studies were completed (DST 2012, 2013) to assess the benthic community within Birch Lake, Springpole Lake, Seagraves Lake, and the smaller unnamed watercourses and water bodies that may be impacted by the Undertaking. These studies and the planned ongoing baseline studies will provide baseline benthic community data to which future studies can be compared against.

As stipulated in Table 6.8.1, additional benthic community data will be collected in the vicinity of the proposed effluent discharge location following the sampling methodologies outlined in the *Metal Mining Technical Guidance for Environmental Effects Monitoring* document (Environment Canada 2012).

### **6.3.11 Terrestrial Environment**

Desktop and field baseline work has been ongoing in the local area since 2011. The terrestrial baseline LSA and RSA is generally presented in Figure 6.3.12. Study areas will be further rationalized during the EA process and any data gaps will be filled. Baseline studies were completed (DST 2012, 2013; KBM 2019) and summarized all the terrestrial work done to 2019, and all of these will be appended in the EIS / EA as part of the terrestrial technical report. It is anticipated that additional baseline studies will be completed during the preparation of the EIS / EA to expand on the existing information base, and will include additional information collected in response to comments received during 2020.

#### **6.3.11.1 Species at Risk**

Species at Risk (SAR) considerations for the EIS / EA data analysis, and metrics to be collected and additional data gaps to be fulfilled are given below and in Table 6.3.5. FMG will provide additional information in the EIS / EA for each SAR that have the potential to occur in the area of the Project, including, but not limited to:

- 
- Scientific name;
  - Common name;
  - Species Status under *Species at Risk Act* (SARA; federal);
  - Species Status under *Endangered Species Act* (ESA; provincial);
  - Conservation Ranking (i.e., N-Rank, S-Rank); and
  - Information Source(s) used to identify potential occurrence within the area of the Undertaking.

FMG understands that relevant metrics and evaluators for SAR should be considered in order to fully assess potential effects. FMG will include a complete list of appropriate indicators for these species identified, including Caribou (Boreal population), and this information will be provided in the EIS / EA.

Baseline programs to assess SAR will be carried out to support the conclusions in the EIS / EA. This program will evolve over time based on the input received from regulatory agencies during the EA process. Additional studies may be completed to supplement programs in 2021, based on the extensive experience of our technical experts with other mining projects. Where necessary, FMG will engage with regulatory agencies on these additional studies. Technical support documents that will be included in the EIS / EA with a description of the study methodology, and results that will be used to assess the potential impacts of the Project.

Table 6.3.5 provides a preliminary list of the SAR baseline considerations and metrics anticipated to be included (or similar) in the EIS / EA. All project components will be assessed for potential impacts to SAR and their habitat.

**Table 6.3.5: Preliminary Species at Risk Baseline Considerations**

<b>Species at Risk (SAR)</b>		
Migratory Birds	SAR targeted:	Canada Warbler, Olive-sided Flycatcher, Bank Swallow, Barn Swallow, Evening Grosbeak
	Baseline consideration for the EIS / EA:	Baseline data will provide information in sufficient detail to enable the identification of how the Project could affect migratory birds and an analysis of those effects. As a minimum, the EIS / EA will include a description of: a) birds and their habitats that are found or likely to be found in the study area; b) abundance, distribution, and life stages of migratory and non-migratory birds (including waterfowl, raptors, shorebirds, marsh birds and other land birds) likely to be affected in the Project area; c) year-round migratory bird use of the area.
	Metrics to be collected:	Number of species observed will be summarized by point count, ecosite, and habitat category. Nesting Surveys.
	Data Analysis:	Data will be used to determine densities by habitat type for each species. These density estimates can then be used to estimate the number of individuals of each species that are present in the Wildlife LSA, and how many individuals might be displaced by the Project.
Nightjars	SAR targeted:	Eastern Whip-poor-will, Common Nighthawk
	Baseline consideration for the EIS / EA:	Baseline data will provide information in sufficient detail to enable the identification of how the Project could affect nightjars and an analysis of those effects. As a minimum, the EIS / EA will include a description of: a) nightjars and their habitats that are found or are likely to be found in the study area; b) abundance, distribution, and life stages likely to be affected in the Project area; c) year-round nightjar use of the area.
	Metrics to be collected:	Species presence / absence and survey location / ecosite will be summarized. Habitat assessments, breeding surveys
	Data Analysis:	EWPW survey data will simply be summarized / descriptive statistics.
Marsh Bird Monitoring	SAR targeted:	Yellow Rail, Least Bittern, Rusty Blackbird, Short-eared Owl, Black Tern
	Baseline consideration for the EIS / EA:	Baseline data will provide information in sufficient detail to enable the identification of how the Project could affect marsh birds and an analysis of those effects. As a minimum, the EIS / EA will include a description of: a) marsh birds and their habitats that are found or are likely to be found in the study area; b) abundance, distribution, and life stages of marsh birds likely to be affected in the Project area; c) year-round marsh bird use of the area.
	Metrics to be collected:	Species observed (targeting focal marsh bird species) will be summarized by survey location, ecosite, and habitat category.
	Data Analysis:	Marsh bird survey data will simply be summarized / descriptive statistics.
Waterfowl	SAR targeted:	Horned Grebe, American White Pelican, Black Tern, Bald Eagle
	Baseline consideration for the EIS / EA:	Baseline data will provide information in sufficient detail to enable the identification of how the Project could affect waterfowl and an analysis of those effects. As a minimum, the EIS / EA will include a description of: a) waterfowl and their habitats that are found or are likely to be found in the study area; b) abundance, distribution, and life stages of waterfowl likely to be affected in the Project area; c) year-round waterfowl use of the area.
	Metrics to be collected:	Species observed will be summarized by location, abundance (occupancy), and habitat category. Habitat assessments.
	Data Analysis:	The waterfowl / beaver survey data will simply be summarized / descriptive statistics.
Caribou (Boreal population)	SAR targeted:	Caribou (Boreal population)
	Baseline consideration for the EIS / EA:	Baseline data will provide information on Caribou (Boreal population), including abundance, distribution and diversity and their habitats. Baseline data will also provide, information on residences, seasonal movements, movement corridors, habitat requirements, key habitat areas, identified critical habitat and/or recovery habitat (where applicable), and general life history that may occur in the Project area, or be affected by the Project.

<b>Species at Risk (SAR)</b>		
	Metrics to be collected:	Observations of individuals or signs (i.e., tracks). Aerial / ground surveys.
	Data Analysis:	Observations will be spatially plotted to illustrate their locations relative to the Project, summarized / descriptive statistics, and to determine animal densities where reasonable.
Vegetation	SAR targeted:	SAR and provincially rare plants
	Baseline consideration for the EIS / EA:	Baseline data will provide characterization of soils in the excavation area, in terrestrial and riparian environments, with a description of their past use; characterization of the shoreline, banks, current and future flood risk areas, and wetlands (fens, marshes, etc.), including the location and extent of wetlands likely to be affected by project activities according to their size, type (class and form), the description of their ecological function (ecological, hydrological, wildlife, socioeconomic, etc.) and species composition; and plant and animal species (abundance, distribution and diversity) and their habitats, with a focus on SAR or with special status that are of social, economic, cultural or scientific significance as well as invasive alien species and species used for traditional purposes by Indigenous communities.
	Metrics to be collected:	The field surveys serve to ground-truth the Forest Resource Inventory ecosite classifications for the Project. Field data will be compared to ecosite indicators.
	Data Analysis:	Vegetation survey data will be summarized to create a master list of plant species present in the vegetation LSA.
Wetlands	SAR targeted:	SAR and provincially rare plants
	Baseline consideration for the EIS / EA:	Baseline data will provide characterization of soils in the excavation area, in terrestrial and riparian environments, with a description of their past use; characterization of the shoreline, banks, current and future flood risk areas, and wetlands (fens, marshes, etc.), including the location and extent of wetlands likely to be affected by project activities according to their size, type (class and form), the description of their ecological function (ecological, hydrological, wildlife, socioeconomic, etc.) and species composition; and plant and animal species (abundance, distribution and diversity) and their habitats, with a focus on SAR or with special status that are of social, economic, cultural or scientific significance as well as invasive alien species and species used for traditional purposes by Indigenous communities.
	Metrics to be collected:	Surveyed wetlands will be scored following OWES (Ontario Wetland Evaluation System) to determine if provincially significant wetlands are present in the study area. Wetland type and boundary delineation; vegetation community distribution, structure and diversity; soil / substrate type; special features, wildlife, traditional use.
	Data Analysis:	All data collected during the wetland surveys will contribute to the OWES scoring of the wetlands, as described to the left.
Bats	SAR targeted:	Little Brown Myotis, Northern Myotis, Tri-colored Bat
	Baseline consideration for the EIS / EA:	Baseline data will provide information on bat species, including (abundance, distribution and diversity and their habitats. Baseline data will also provide, information on residences, seasonal movements, movement corridors, habitat requirements, key habitat areas, identified critical habitat and/or recovery habitat (where applicable) and general life history that may occur in the Project area, or be affected by the Project. Additional bat hibernaculum screening. If warranted, bat roost habitat assessments and bat acoustic surveys may be conducted.
	Metrics to be collected:	Recordings will be analysed using Kaleidoscope Pro (Wildlife Acoustics, 2019) or similar. Presence / absence, relative abundance and diversity will be summarized.
	Data Analysis:	Bat survey data will be used to identify which species are present in the Wildlife LSA and to estimate their relative abundance.
Wildlife	SAR targeted:	Wolverine

<b>Species at Risk (SAR)</b>		
	Baseline consideration for the EIS / EA:	Baseline data will provide information on wildlife species, including abundance, distribution and diversity and their habitats, with a focus on SAR that will be directly or indirectly affected. Baseline data will also provide, information on residences, seasonal movements, movement corridors, habitat requirements, key habitat areas, identified critical habitat and/or recovery habitat (where applicable) and general life history that may occur in the Project area, or be affected by the Project.
	Metrics to be collected:	All wildlife observations will be catalogued and summarized. Presence / absence, relative abundance and diversity will be summarized. Aerial surveys.
	Data Analysis:	Wildlife camera observations and other data sources will be summarized / descriptive statistics.

To properly characterize the natural environment of the study area, a number of data sources were consulted, including: environmental baseline data collected in 2011/2012, correspondence with Red Lake MNR, Natural Heritage Information Center, SAR Ontario database, Ontario Breeding Bird Atlas, MNR Natural Resources Values Information System, Trout Lake Forest Management Plan, and digital Forest Resource Inventory (FRI) data for the Trout Lake forest. FRI data was not available for the entire study area. Wildlife habitat modelling for selected species was completed using the Ontario Landscape Tool for the portions of the study area that had FRI data. The Ontario Landscape Tool uses Landscape Scripting Language, which is a proprietary tool for Geographic Information Systems (GIS) developed by the MNR. The planning ranges for the Caribou (Boreal population) can be seen in Figure 6.3.12. These habitat planning ranges were downloaded from Land Information Ontario. Field work was undertaken in 2011/2012, with a supplemental ungulate aerial survey in winter 2013.

### 6.3.11.2 Wildlife and Avifauna SAR

Findings from previous studies (DST 2012) related to SAR are summarized below. Current and additional baselines studies will be appended in the EIS / EA as supporting documentation. These studies will include but not be limited to information on survey methodologies, dates, and extent.

#### Eastern Whip-poor-will

- Eastern Whip-poor-will have been documented to the north and west of the Springpole site. No birds were observed during Whip-poor-will surveys; they were also not observed during the baseline terrestrial field program, and do not appear to be present locally.
- During studies, it was found that there is potential suitable habitat locally; however, no Whip-poor-wills were found during any of the surveys to date. Additional studies were done in 2019 and the results will be included in the EIS / EA.
- Should Whip-poor-will be observed in the future in proposed development areas, additional field surveys will be conducted utilizing an appropriate methodology, such as the DRAFT Survey Protocol for Eastern Whip-poor-will (*Caprimulgus vociferus*) in Ontario (MNR 2014), or modified to consider the remoteness of the area and challenge of access.

- General habitat we be identified and quantified as described in <https://www.ontario.ca/page/eastern-whip-poor-will-general-habitat-description>, and will be included in the EIS / EA.

### **Wolverine**

- Tracks of one individual was observed on Springpole Lake in February 2011.
- Winter use has been confirmed through track observations, no known denning sites.
- Limited information is available.

### **Northern Myotis / Little Brown Myotis**

- Five out of the six monitoring locations where ultrasonic recorders were deployed detected Northern Myotis; and four of the six locations recording Little Brown Myotis. Ultrasonic recorders only indicate presence / absence as opposed to quantity.
- Some of the Ecosites identified by the Ecological Land Classification (MNR 2009b) system are suitable habitats for these species and are present locally, therefore, there is a potential that individuals are using some trees as roost trees in the local area.

### **Bat Hibernacula**

- The likelihood of encountering bat hibernacula locally was assessed through a desktop mapping exercise. The results of the mapping were then reviewed by several people with expert knowledge of the local area as a means of refining the accuracy of the exercise. As a result, there is potential suitable habitat and they occur along the north shore of Springpole Arm (where no activities are proposed for the Undertaking).
- The details and results of the study will be included and appended in the EIS / EA.

### **Caribou (Boreal population)**

The Undertaking is located within the Churchill Caribou (Boreal population) Range (Figure 6.3.12).

- Caribou (Boreal population) prefer large contiguous intact conifer dominated stands, islands and peninsulas. This habitat is present in the Springpole site surrounding area, and is a significant subrange habitat feature.
- Historically, Caribou (Boreal population) calving areas have been delineated surrounding the Springpole site area.
- The LSA contains known wintering areas, calving / nursery areas, and summering areas. There are potential corridors or travel routes leading from wintering areas surrounding Springpole Lake to calving areas located on Birch Lake and smaller lakes to the south.

- The subrange habitat features will be updated to reflect the current habitat conditions based on “The Mapping Product for Caribou General Habitat Description provided by MNRF in 2018”, and will be included in the EIS / EA. FMG understands that where impacts cannot be avoided, an ESA authorization will be required.

FMG is anticipating to create an overall benefit for Caribou (Boreal population) and potentially for other SAR that are identified as present. Measures to support the overall benefit may include one or more of the following:

- Rehabilitation of linear (e.g., roads, trails, utility corridors) and historical developments;
- Public education regarding the relevant SAR to increase awareness and conservation efforts in the region;
- Conduct and/or fund monitoring programs to increase the understanding about the relevant SAR, which would facilitate the refinement and implementation of management plans; and
- Habitat enhancement and/or creation (e.g., planting appropriate vegetation and targeted silvicultural prescriptions; vehicle and equipment management to reduce likelihood of collisions; management of off-road vehicles to reduce likelihood of disturbance to ground nests; set-aside areas for habitat creation or preservation; etc.) at the Property or elsewhere in the region off of FMG-controlled lands.

FMG will conduct a radio satellite collaring program for Caribou (Boreal population) in order to support longer term permitting requirements and contribute towards monitoring the impacts of the Undertaking on Caribou (Boreal population) movement and habitat selection / use. This could be used to inform the effectiveness of mitigation measures.

FMG understands there could be a requirement for an ESA authorization that may be required under s.17(2)(c) of the ESA, which will be determined through the Activity Review and Assessment process undertaken through that legislative framework.

### **6.3.11.3 Habitats of Seasonal Concentrations of Animals**

Findings from studies conducted to date for significant wildlife habitat are summarized below:

- Winter deer yards: There are no known winter deer yards within the study area.
- Late winter moose habitat: Late winter moose habitat (Figure 6.3.15) is abundant throughout the study area and may be directly impacted by the Undertaking. However, moose populations in this portion of the Trout Lake Forest are inherently low (0 to 0.2 per km<sup>2</sup>) and the wildlife management objectives in this area focus on Caribou (Boreal population) (MNRF 2009b).
- Colonial bird nesting sites: The only colonial nesting birds located within the study area were Bonaparte’s gulls.

- **Waterfowl stopover and staging areas:** There are no known waterfowl stopover and staging areas within the study area.
- **Waterfowl nesting sites:** A ring-necked duck nest was located near the Springpole site. There are no species of waterfowl considered to be “at risk” in Canada or Ontario, however, ring-necked ducks are high priority for conservation planning (NAWMP 2004). Potential nest sites for ring-necked duck are not considered rare within the study area (grassy sites within 200 m of water (MNR 2010)). There is no evidence of nest fidelity in ring-necked ducks, nor does this site support large concentrations of nesting waterfowl, other species of conservation concern, or a variety of waterfowl species.
- **Shorebird migratory stopover areas, Landbird Migratory stopover areas, Raptor winter-feeding and roosting areas, Turkey vulture summer roosting areas, Reptile hibernacula, Bat hibernacula:** None of the features are known to occur within the study area.

#### 6.3.11.4 Rare Vegetation Communities or Specialized Habitats for Wildlife

- **Old-growth or mature forest stands:** MNR’s Significant Wildlife Habitat Technical Guide indicates that forest stands that are 120-year-old or older (“old growth”), can be significant. The more significant “old growth” stands are those comprised of rare species or on rare ecosites (i.e., black ash or cedar swamps on very rich sites). None of these stands have been found to occur within the study area.
- **Moose calving areas:** There are several moose calving sites located within the study area, outside of the Springpole site.
- **Moose aquatic feeding areas:** Two feeding areas occur within the study area but are outside the Undertaking footprint.
- **Mineral licks:** A mineral lick has been identified within the study area; it is located on an island in Springpole Lake south of the open pit.
- **Mink, otter, marten, and fisher denning sites:** There are no known mink, otter, or fisher denning sites within the study area.

#### 6.3.11.5 Habitats of Species of Conservation Concern

No habitats of the provincially rare species listed below were located during field investigations (DST 2013) using guidance from MNR (2000):

- Bobcat;
- Yellow-Headed Blackbird;
- Northern Mockingbird;
- Black-billed Magpie;

- Red-Headed Woodpecker;
- Great Gray Owl;
- Black Tern;
- Foster's Tern;
- Prairie Heath Aster;
- Prairie Golden Aster;
- Gray-Stemmed Goldenrod;
- Inland Rush;
- Fir Clubmoss;
- Mountain Parsley;
- Mudwort; and
- Prairie Spikemoss.

Additional habitat and values maps can be seen in Figures A and B, provided in Appendix B.

#### **6.3.11.6 Vegetation Communities and Soil**

The Undertaking is located within the Lac Seul Upland, which extends eastward from Lake Winnipeg in Manitoba to the Albany River in northwestern Ontario. Forest composition on the local area is typical of the Lac Seul Upland. Dominant tree species include trembling aspen (*Populus tremuloides*), black spruce (*Picea mariana*), white birch (*Betula papyrifera*), balsam fir (*Abies balsamea*), white spruce (*Picea glauca*), and jack pine (*Pinus banksiana*). The composition and abundance of understory ground cover species is typical of mesic mixed wood boreal sites and lacks microhabitats likely to harbor rare vascular plant species. A variety of common, early successional graminoids and herbaceous ground cover plants are prevalent on areas of the Property where mature timber has been removed or where the canopy is open, and the ground is exposed to light. Natural re-vegetation and succession has been observed to be rapid in the local areas of historical exploration.

Soils for the local area are described in several Ontario Geological Survey publications and Northern Ontario Engineering Terrain studies:

- Based on Ministry of Northern Development and Mines Quaternary Geology of Ontario, West Central Sheet, Map 2554 (Scale 1:1,000,000), subsurface conditions in the region consist of undifferentiated till of predominantly sand to silty sand.

- Based on Ministry of Northern Development and Mines Bedrock Geology of Ontario, West Central Sheet, Map 2542 (Scale 1:1,000,000), bedrock geology at the site consists of mafic metavolcanic rocks, metasedimentary rocks, and minor iron formation.

There is generally low to moderate relief in the vicinity of the Project, with generally dry uplands and poorly drained lowland valleys with thick accumulations of organic soils. Glacial till is generally less than 1 m in thickness. In this region, soils are predominately grey wooded, podzols on well-drained sites, and peats and gleysols in poorly drained areas. During the installation of groundwater monitoring wells in 2013, deposits of clay soils were identified in the vicinity of the local area and along the shoreline of Springpole Lake (excluding Springpole Arm). Soil from these boreholes was sampled by Pinchin Environmental and analyzed by a CALA accredited laboratory for baseline metal concentrations.

Ecological Land Classification communities present at the site and local environs are listed below:

- Deciduous Forests;
- Mixedwood Forests;
- Coniferous Forests;
- Deciduous Swamp;
- Mixedwood Swamps; and
- Coniferous Swamps.

A field campaign was undertaken in 2012 to evaluate vegetation and soils in the vicinity of the Project Site. Findings are summarized below:

- Provincial Ecosite B049 is the most common ecosite in the forest (38% of stands).
- The Upland habitat areas constituted 71% of the vegetation survey plots, while riparian areas and wetlands were 19.4% and 9.7%, respectively (Figure 6.3.13).

The vegetation and soil baseline studies to date did not discover any unexpected land conditions or soil characteristics.

- The potential for metal leaching is low and the nutrient content of the soils is moderate.
- Schreber's moss (*Pleurozium schreberi* (Brid.) Mitt.) is the dominant ground cover in upland sites assessed within the study area.
- Riparian sites assessed within the study area are dominated by shrubs.
- Riparian areas had the maximum species richness and upland areas had the maximum species evenness.

- None of the provincially significant species listed in the Natural Heritage Information Centre database were encountered during the field surveys.

## 6.4 Description of the Social Environment

### 6.4.1 Indigenous Communities

As seen in Figure 1.1.1, the Indigenous communities near the region are Cat Lake First Nation, Slate Falls Nation, Lac Seul First Nation, Mishkeegogamang First Nation, Ojibway Nation of Saugeen, Pikangikum First Nation, Wabauskang First Nation, and Métis Nation of Ontario – Region 1. The descriptions that follow are based on published information.

**Slate Falls Nation:** Slate Falls Nation is a small semi-remote community of 187 people. The population stayed constant between 2011 and 2016, increasing by one person (a 0.5% population increase). This is a young community; the median age is 25.1 years and the population aged 15 and over is 64.9%. Median incomes were not reported. The labour participation rate is 38.5% for males and 60.0% for females and the overall unemployment rate is 0.0% for both males and females. There are no individuals working in the mining industry and the total labour force population (15 years old and over) across all industries is 55. Of the total population 15 years old and over, 20.0% have a high school, trades certificate or university / college diploma.

Slate Falls Nation is an Ojibwe First Nation Reserve in Ontario. Their cultural affiliation is Ojibwe and has a customary electoral governance system with one Chief and two Councillors every two years. They are also affiliated with Windigo First Nations Council, which is a member of the Nishnawbe Aski Nation (NAN) Tribal Council Treaty #9.

**Cat Lake First Nation:** Cat Lake First Nation is a remote community of 565 people. The population increased 15.5% from 2011. This is a young community; the median age of 22.3 years and the percentage of the population 15 years and over is 65.5%. The median earnings per individual is \$15,584, with males earning \$11,808 and females earning \$24,320 (nearly double their male counterparts). The labour participation rate is 35.9% for males and 28.6% for females and the overall unemployment rate is 35.7% for males and 20.0% for females. There are no known individuals working in the mining industry and the total labour force population (15 years old and over) across all industries is 120. Of the total population 15 years old and over, 13.5% have a high school, trades certificate or university / college diploma or degree.

Cat Lake First Nation is an Ojibwe First Nation Reserve in Ontario. Their cultural affiliation is Ojibwe and has a customary electoral governance system with one Chief, one Deputy Chief, and four Councillors every two years. They are also affiliated with Windigo First Nations Council, which is a member of the NAN Tribal Council Treaty #9.

**Lac Seul First Nation:** Lac Seul First Nation is a road accessible community of 974 persons. The population increased by 11.7% from 2011 to 2016. The median age as of 2016 is 26.5 years and the percentage of the population aged 15 years and over is 68.0%. The median earnings per individual is \$17,675, with males earning \$14,176 and females earning \$19,200. The labour participation rate is 64.8% for males and 53.2% for females and the overall unemployment rate is 45.7% for males and 24.2% for females. The number of individuals working in the mining industry

is 10 while the total labour force population (15 years old and over) across all industries is 395. Of the total population 15 years old and over, 50.4% have a high school, trades certificate or university / college diploma or degree.

Lac Seul First Nation is an Ojibwe First Nation Reserve in Ontario. Their cultural affiliation is Ojibwe and has a customary electoral governance system with one Chief, eight Councillors every two years. Though Lac Seul First Nation is a treaty signatory to Treaty #3, the First Nation is a member of the Independent First Nations Alliance, a regional tribal council and a member of the Nishnawbe Aski Nation.

**Mishkeegogamang First Nation:** Mishkeegogamang First Nation is a community of 670 people and is a young community, as the median age as of 2016 is 20.1 years. The median earnings per individual is \$15,552, the labour participation rate is 40.7% and the overall unemployment rate is 24.2%. The number of individuals working in the mining industry is 10 while the total labour force population (15 years old and over) across all industries is 165. Of the total population 15 years old and over, 15.0% have a high school diploma or trades certificate.

Mishkeegogamang First Nation is an Ojibwe First Nation Reserve in Ontario. Their cultural affiliation is Ojibwe and has a customary electoral governance system with one Chief, and five Councillors every two years. They are their own Independent First Nation and not part of a Tribal Council and signatory to Treaty #3.

**Ojibway Nation of Saugeen:** Ojibway Nation of Saugeen is a small community of 90 people. The population decreased 10.0% from 2011. The median age as of 2016 is 25.0 years and the percentage of the population aged 15 years and over is 66.7%. Median incomes were not reported. The labour participation rate is 66.7% for both males and females and the overall unemployment rate is 0.0% for both males and females. There are no individuals working in the mining industry and the total labour force population (15 years old and over) across all industries is 40. Of the total population 15 years old and over, 36.4% have a high school, trades certificate or university / college diploma.

Ojibway Nation of Saugeen is an Ojibwe First Nation Reserve in Ontario. Their cultural affiliation is Ojibwe and has a hereditary governance system with one Chief, and three Councillors who are appointed by the Chief. They are unaffiliated with and Tribal Council and are signatory to Treaty #3.

**Pikangikum First Nation:** According to the Independent First Nations Alliance website, the population is 2,330 (on Reserve: 2084; Off Reserve: 91). Pikangikum First Nation is an Ojibwe First Nation Reserve in Ontario. Their cultural affiliation is Ojibwe and has a customary electoral governance with one Chief, one Deputy Chief, and nine Councillors. They are affiliated with the Independent First Nations alliance, which is a member of the Nishnawbe Aski Nation Treaty #5.

**Wabauskang First Nation:** Wabauskang First Nation is a small community of 70 people. The population decreased 6.7% from 2011. The median age as of 2016 is 33.5 years and the percentage of the population aged 15 years and over is 69.2%. Median incomes were not reported. The labour participation rate is 66.7% for males and 80.0% for females and the overall unemployment rate is 0.0% for males (double their female counterparts) and 50.0% for females.

There are no known individuals working in the mining industry and the total labour force population (15 years old and over) across all industries is 40. Of the total population 15 years old and over, 60.0% have a high school, trades certificate or university / college diploma or degree.

Wabauskang First Nation is an Ojibwe First Nation Reserve in Ontario. Their cultural affiliation is Ojibwe and has a hereditary governance system with one Chief, and three Councillors who are appointed by the Chief. They are affiliated with Bimose Tribal Council which is a member of the Grand Council Treaty #3.

**Métis Nation of Ontario:** In 1993, the Métis Nation of Ontario (MNO) was established to represent the rights and interests of Métis people and communities in Ontario. As recognized by the government, the Métis represented by the MNO have an inherent and constitutionally protected right to self-determination and self-government. There are presently over 15,000 registered Métis citizens and approximately 30 Chartered Community Councils across the province which represent Métis citizens at the local level. The MNO has a democratic, province-wide governance structure where every four years Métis citizens have the opportunity to choose their provincial and regional leadership by voting in a province-wide ballot box elections.

Through the MNO, Ontario Métis have established a governance structure that represents the Métis citizens and rights-bearing Métis communities at the local, regional and provincial levels. In addition, MNO Community Councils have been established throughout the province and get their mandate from the MNO through signed community Charter agreements. Northwestern Ontario Métis Community citizens are also signatories to Treaty #3. Pursuant to the Regional Consultation Protocol executed between the MNO and its Community Councils, the Region 1 Consultation Committee has been expressly tasked with engaging with government and other entities in relation to the collectively-held Aboriginal and Treaty rights protected by Section 35 of the *Constitution Act, 1982* in the MNO's Treaty #3, Lake of the Woods / Lac Seul and Rainy Lake / Rainy River Traditional territories.

## 6.4.2 Municipalities

The Undertaking is located within the Kenora District of Northwestern Ontario. The closest communities to the Site include the: City of Kenora, City of Dryden, Municipality of Red Lake, Municipality of Sioux Lookout, Township of Pickle Lake, and Township of Ear Falls. Figure 6.4.1 shows the settlements in the region. The below statistics were taken from Statistics Canada (2016).

**City of Kenora:** The total population of Kenora is 15,096, a slight decrease of 1.6% from 2011 to 2016. The median age is 44.9 years, which is nearly the same as in 2011, which had a median age of 44.4 years. The percentage of the population aged 15 years and over is 84.0%. The median earnings per individual is \$39,471, with males earning \$46,773 and females earning \$33,135. The labour participation rate is 66.3% for males and 64.3% for females and the overall unemployment rate is 8.9% for males and 5.4% for females. The number of individuals working in the mining industry is 70 while the total labour force population (15 years old and over) across all industries is 8,080. Of the total population 15 years old and over, 80.1% have a high school, trades certificate or university / college diploma or degree.

**City of Dryden:** The total population of Dryden is 7,749, a slight increase of 1.7% from 2011 to 2016. The median age is 46.2 years and the percentage of the population aged 15 and over is 84.8%, nearly the same as it was in 2011 at 84.2%. The median earnings per individual is \$37,312, with males earning \$47,216 and females earning \$29,786. The labour participation rate is 67.2% for males and 57.0% for females and the overall unemployment rate is 8.7% for males and 6.8% for females. The number of individuals working in the mining industry is 70 while the total labour force population (15 years old and over) across all industries is 3,975. Of the total population 15 years old and over, 78.1% have a high school, trades certificate or university / college diploma or degree.

**Municipality of Sioux Lookout:** The total population of Sioux Lookout is 5,272, an increase of 4.7% from 2011 to 2016. The median age as of 2016 is 35.9 years and the percentage of the population aged 15 years and over is 80.0%. The median earnings per individual is \$43,173, with males earning \$44,710 and females earning \$41,643. The pay gap between men and women is the smallest in Sioux Lookout in comparison with the other neighbouring communities around Springpole. The labour participation rate is 73.5% for males and 69.2% for females and the overall unemployment rate is 8.4% for males and 3.7% for females. The number of individuals working in the mining industry is 45 while the total labour force population (15 years old and over) across all industries is 2,970. Of the total population 15 years old and over, 80.2% have a high school, trades certificate or university / college diploma or degree.

**Municipality of Red Lake:** The total population of Red Lake is 4,107, a decrease of 12.1% from 2011 to 2016. The median age is 38.0 years, which is nearly the same as in 2011, which had a median age of 38.1 years. The percentage of the population aged 15 years and over is 82.1% which is also the same as it was in 2011. The median earnings per individual is \$48,613, with males earning \$67,755 and females earning \$36,070. The labour participation rate is 75.1% for males and 70.8% for females and the overall unemployment rate is 5.5% for males and 4.8% for females. The number of individuals working in the mining industry is 795 while the total labour force population (15 years old and over) across all industries is 2,415. Of the total population 15 years old and over, 75.5% have a high school, trades certificate or university / college diploma or degree.

**Township of Ear Falls:** The total population of Ear Falls is 995, a decrease of 3.0% from 2011 to 2016. The median age of the population increased slightly to 41.0 years from 39.2 years in 2011 and the percentage of the population aged 15 years and over is 80.9%. The median earnings per individual is \$40,320, with males earning \$59,392 and females earning \$28,672. The labour participation rate is 76.3% for males and 76.4% for females and the overall unemployment rate is 3.4% for males and 10.9% for females. The number of individuals working in the mining industry is 95 while the total labour force population (15 years old and over) across all industries is 565. Of the total population 15 years old and over, 70.7% have a high school, trades certificate or university / college diploma or degree.

**Township of Pickle Lake:** The total population of Pickle Lake is 388, a decrease of 8.7% from 2011 to 2016. The median age as of 2016 is 32.0 years and the percentage of the population aged 15 years and over is 78.2%. The median earnings per individual is \$35,541, with males earning \$40,640 and females earning \$29,440. The labour participation rate is 89.7% for males and 73.1% for females and the overall unemployment rate is 0.0% for males and 21.1% for

females, indicating 100% employment for men who want to work. The number of individuals working in the mining industry is 0 while the total labour force population (15 years old and over) across all industries is 225. Of the total population 15 years old and over, 70.9% have a high school, trades certificate or university / college diploma or degree.

### **6.4.3 Community Infrastructure and Services**

The highway network across northwestern Ontario provides a key transportation corridor for goods and people travelling east and west. For the Project, the major corridors are Highway 17, Highway 599 to Pickle Lake, Highway 72 to Sioux Lookout, and Highway 105 to Ear Falls and Red Lake. Although Pickle Lake and Sioux Lookout do not provide direct road access to Red Lake, they are important hubs for air traffic north to Indigenous communities and for mineral exploration activities.

The northern line of the Canadian National Railway connects Winnipeg, Kenora, Quibell on Red Lake Road, Savant Lake, Nakina, and Sudbury.

The airports of Dryden, Kenora, Sioux Lookout, and Pickle Lake provide means of accessing the more remote parts of northern Ontario, and traffic at these airports provides an indication of the amount of economic activity in the area. The Dryden airport (YHD) is located 4.3 km northeast of Dryden, Ontario; the Kenora airport (YQK) is located 9.3 km east of Kenora, Ontario; the Red Lake airport (YRL) is located 5.6 km north of the community of Red Lake, Ontario; the Pickle Lake airport (YPL) is located 1.3 km southwest of the community of Pickle Lake, Ontario, and; the Sioux Lookout airport (YXL) is located 4.3 km north of Sioux Lookout and also acts as a hub for passengers and patients for the Meno-Ya-Win Health Centre from 29 northern communities and 17 nursing stations as well as a mid-point for sportsmen and cargo to the communities and fishing and hunting areas further north. Due to its valuable services to the northern communities, this airport acts as a major transfer point between the southern and northern communities.

Both Red Lake and Sioux Lookout have the highest number of movements out of all five regional airports, which reflects tourism and the impact of the mining sector on Pickle Lake, Red Lake, and Sioux Lookout (when compared to Kenora or Dryden). Aircraft have been utilized out of both Sioux Lookout and Red Lake for the Project, which will continue for the next decade. As activity at the exploration site increases, so will the aircraft movements at these airports.

The major hospitals in the region are located in Kenora, Sioux Lookout, Dryden, and Red Lake. Kenora Hospital is a full service 84 bed facility; Red Lake Margaret Cochenour Memorial Hospital is a fully accredited 18 bed facility and provides services to approximately 5,000 residents in Red Lake, Balmertown, Cochenour, Ear Falls and other surrounding communities; Dryden Hospital is a full service 41 bed facility; and Memo Ya Win Health Centre is located in Sioux Lookout and is a full service 41 bed facility that serves approximately 30,000 outpatients annually and employs approximately 380 staff.

There are four school boards that service the area: The Public-School Board, Keewatin-Patricia District School Board, Kenora Catholic District School Board and the Northwest Catholic District School Board. The public board has 17 elementary schools and seven (7) secondary schools including adult educational services. These schools are located across the northwest and include

the elementary and secondary schools in Red Lake (Golden Learning Centre Public School, Madsen Public School, and Red Lake District High School). The Catholic Board has five (5) schools of which four (4) are in Kenora and one (1) in Red Lake (St. John's Separate School). The Northwest Catholic District School Board has six (6) schools in Dryden, Sioux Lookout, Straton, Atikokan, and Fort Frances.

## **6.5 Description of the Economic Environment**

The Undertaking is located within the Red Lake Mining District, Casummit Lake area, within the Trout Lake Forest Management Unit, and south of the lands that are subject to the Cat Lake First Nation and Slate Falls Nation Land Use Plan (Cat Lake First Nation et al. 2011). The Property is not subject to Ontario's *Far North Act*.

The lands within and adjoining the LSA are generally used for wilderness / recreation and natural resource extraction (i.e., mineral development, forestry). The Crown Land Use Atlas indicates that the area is designated as a General Use Area (G2514) (MNRF 2019). The LSA lies within MNRF EcoDistricts 3S-2 and 3S-4 and within the Upper Albany River-Cat Lake watershed.

Domtar currently holds the SFL for the Trout Lake Forest and is active in the region. The completed approved extension of the Wenesaga Road would connect with the southeast portion of the LSA (Figure 1.1.1.).

There are numerous tourism businesses operating in the area of the Wenesaga Road extension, including KaBeelo Lodge, Fort Frances Northern Wilderness Outfitters, Hidden Bay Lodge, KayAir Service, True North Outpost and Camps, Green Airways, Birch Lake Lodge, and Red Pine Lodge and Outposts. There are also several private residents on Birch Lake and Springpole Lake.

## **6.6 Description of the Cultural Environment**

### **6.6.1 Archeology and Cultural Heritage**

Assessment work led by a licensed professional archaeologist (Horizon Archaeology) and completed in accordance with the guidelines from the MTCS, has identified archaeological sites in the LSA. Large setbacks from these sensitive sites have been maintained in the preliminary site plan. An objective of the on-going consultation process with the engaged Indigenous communities will identify any additional sites so that they can be considered for preservation in the Project planning process.

The identification and protection of Indigenous values and sensitive sites has been a priority for GCU and now FMG. In addition to maintaining an open-door policy and providing regular notice and updates regarding its activities, extensive collaborative assessment work was completed in 2012 and is summarized below.

The MHSTCI Archaeological Database indicated that there is an archaeological site located on the south shore of the east arm of Springpole Lake and two other archaeological sites are located along the southern shore of Birch Lake.

MHSTCI records show four archaeological assessments on the Springpole site. Two Stage 1 and two Stage 2 reports have been prepared for specific parts of the property. The Stage 1 reports are referenced in the Stage 2 reports completed on the property. Both Stage 1 reports were prepared, however, none of the reports were ever registered with the predecessor of MHSTCI, MTCS.

Two Stage 2 reports have been completed and submitted to the predecessor of MHSTCI (MTCS). The reports have been reviewed and accepted into the Register. Although two reports are noted in the MTCS database, one report is unavailable for an unspecified reason.

Archaeological work is ongoing for the Project with additional Stage 2 – 4 assessments on archaeological resources having been identified for completion in advance of development which will be considered during the EA process as appropriate. Indigenous communities will be invited to participate in future studies.

FMG has developed a Chance Find Procedure and has integrated it into the site-specific orientation that all site personnel receive prior to commencing work.

A cultural heritage report, including existing conditions and preliminary impact assessment, will be undertaken for the entire study area during the planning phase to inform the EA process and will be summarized in the EIS / EA.

## **6.7 Description of the Built Environment**

Seasonal residences are present on Birch Lake, as well as on Johnson Island (refer to Figure 6.2.2).

Tourism businesses operating in the region include KaBeelo Lodge, Fort Frances Northern Wilderness Outfitters, Hidden Bay Lodge, KayAir Service, True North Outpost and Camps, Green Airways, Birch Lake Lodge and Red Pine Lodge and Outposts.

Domtar currently holds the SFL for the Trout Lake Forest and is active in the region. The planned extension of the Wenesaga Road, as described in the 2014-2019 Trout Lake FMP, connects with the southeast portion of the Property (refer to Figure 1.1.1). This portion of the Wenesaga Road and the planned extension is within the vast 2011 wildfire area.

A cultural heritage report including built heritage resources and cultural heritage landscapes will be completed during the planning phase to inform the EA process and will be summarized in the EIS / EA.

## **6.8 Ongoing and Future Studies**

Baseline studies and technical data reports are currently underway. A more detailed description of the environment will be provided in the EIS / EA. An overview of the previous studies is provided in Table 6.8.1.

FMG will provide opportunity for Indigenous participation in future field studies as practical, including as identified in Table 6.8.1. Reviewing of reports will be available to all communities during ongoing consultation as part of the EA process or upon request for review by members of Communities of Interest.

**Table 6.8.1: Previous Baseline Studies**

Study Topic	Information to be Collected	Previous Baseline Studies
Climate	Precipitation, Evaporation, Pressure, Wind Speed and Direction	x
Vegetation and Wetlands	Field surveys for classification and extent	x
Acid Rock Drainage and Metal Leaching (ARD/ML)	Geochemical analysis and rate predictions	x
Soil Survey	Characterization of soils	x
Wildlife Surveys (refer to the SAR in <b>Table 6.3.5</b> )	Plant and animal surveys for species abundance, distribution and diversity	x
Fish and Aquatic Habitat	Tagging, surveying and tissue analysis	x
Bathymetric Survey	Water depth using bathymetry instrumentation	x
Benthic Invertebrate Community Survey	Community abundance, distribution and movements	x
Hydrogeology	Flow regimes, bulk hydraulic conductivity, interactions, chemistry, site characterization	x
Surface Water Quality Monitoring	Surface water chemistry	x
Hydrology	Modelling, streamflows, water levels, climate	x
Groundwater Quality Monitoring	Groundwater chemistry	x
Atmospheric Assessments, Noise, Vibration and Light	Modelling using atmospheric parameters, climate	x
Air Quality	Particulate and air quality analysis	x
Archaeological Resources	Evidence of past human activity	x
Built Heritage Resources and Cultural Heritage Landscapes	Cultural and historical land use	x
Socioeconomic Assessment	Collection and analysis of complicated social and economic processes	x
Visual aesthetics assessment	Public and Indigenous surveys	x
TK/TLU	Ability to practise culture and lifestyle, and value of land	x
Non-Traditional Land Use	Open house consultation and surveys	x

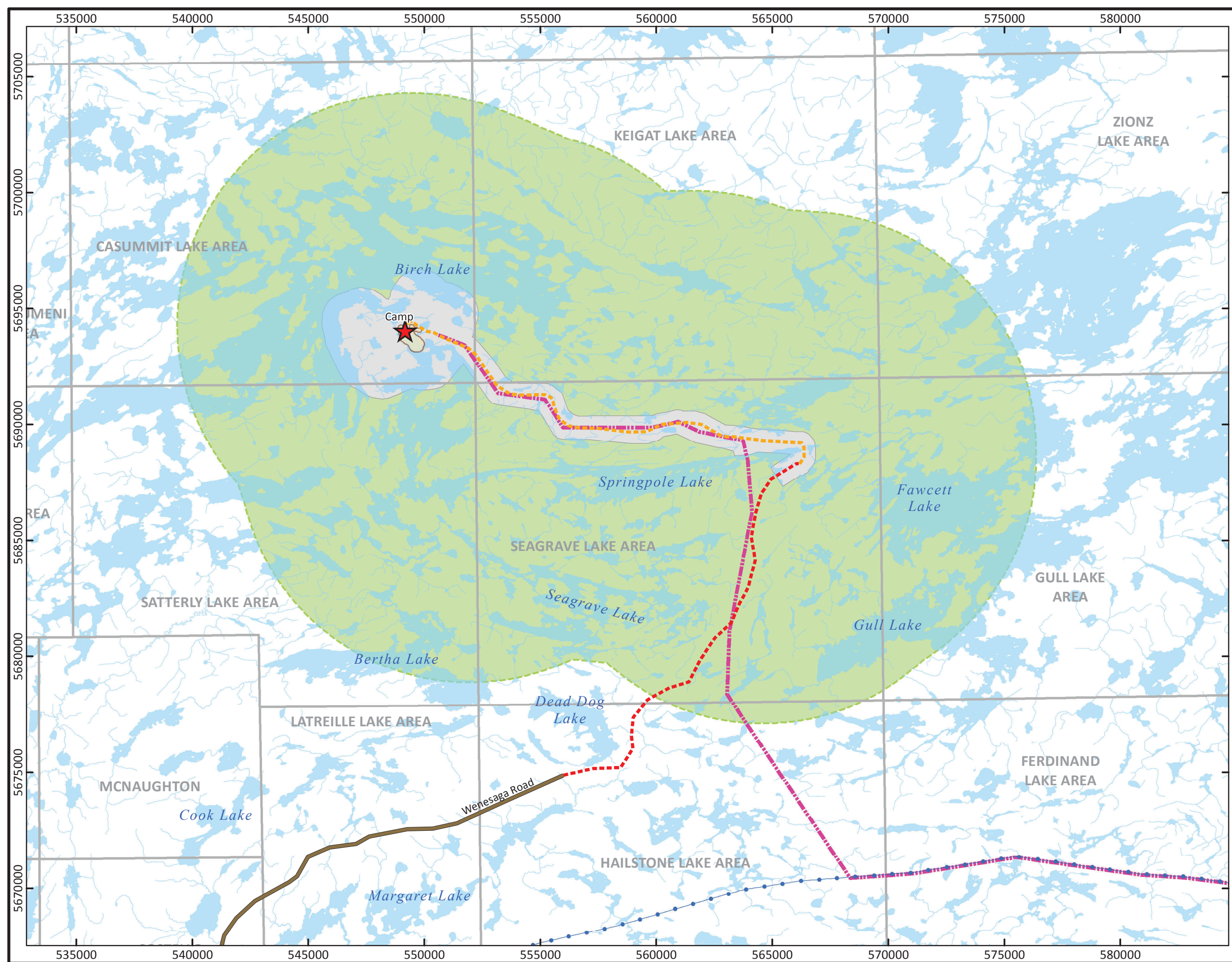
Baseline studies for the Undertaking have been ongoing since 2011. Where necessary, FMG have identified additional studies to supplement programs in 2021. Additional studies may be identified during the course of the environmental assessment process through consultation with Indigenous communities, government agencies and interested persons; if additional studies are required through consultation with MECP, these studies will be used to further inform the environmental assessment.

Baseline study methods will be circulated for review and comment to government and Indigenous communities. Opportunities to review and provide input on the programs and results will be provided during the environmental assessment, which will be considered going forward as ongoing fieldwork programs are refined into monitoring programs

Given the current limitations imposed by the COVID-19 pandemic, different approaches to consulting throughout the EA process may need to be considered by FMG, if this is of interest to communities. FMG will continue to discuss opportunities to consult with Indigenous communities during the EA process as the pandemic vaccination process advances. These opportunities will be dependent upon the capacity and interest of the Indigenous community and may include sharing baseline reports, criteria / indicators, preliminary alternative assessments, preliminary Technical Support Documents, or portions of the EIS / EA. First Mining Gold Corp. will prepare a draft EIS/EA report including supporting studies for review by interested persons, Indigenous communities and the government review team. The draft EIS/EA report will be circulated for a comment period lasting a minimum of six weeks. Notice of the comment period on the draft EIS/EA report will be provided. Comments will be considered and responses demonstrating how comments/concerns would be addressed in the final EIS/EA will be provided by First Mining Gold Corp. prior to submission of the final environmental assessment..

Technical support documents will be provided with the EIS / EA and include a description of the baseline methodology, results of the studies and will be used to assess and/or verify the potential impacts of the project. The resulting technical support documents developed for the EIS / EA are anticipated to address the following aspects:

- Atmospheric Environment;
- Terrestrial Environment, including vegetation and wildlife;
- Aquatic Environment, including fish and aquatic habitat;
- SAR;
- Geochemistry (ARD/ML);
- Groundwater;
- Surface Water;
- Socioeconomic Conditions;
- TK/TLU;
- Archaeology; and
- Heritage Resources.



**Property Reference**

Project Location

Red Lake  
Kenora  
Thunder Bay  
Sault Ste. Marie  
Toronto

N  
W E  
S

- Project Location
- Wenesaga Road
- Wenesaga Road Extension
- All-Weather Access Road
- Existing Power Line
- Transmission Line
- Township Boundary
- Open Pit
- Preliminary Mine Site Development Area
- Preliminary Mine Site Local Study Area

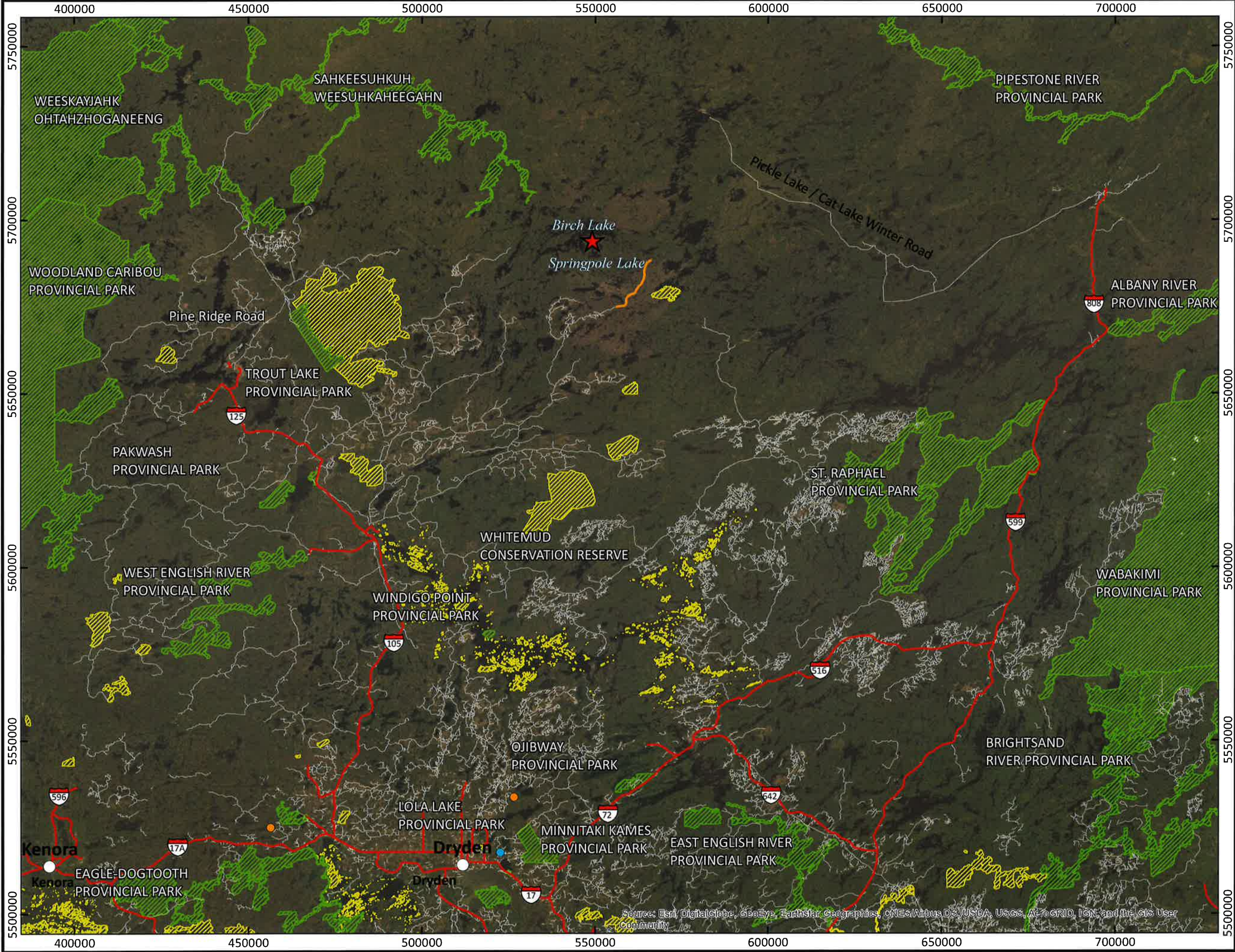
*Study areas for other off-site infrastructure are described in Section 6.1*

**FIRST MINING GOLD**

**Springpole Gold Project**  
Preliminary Mine Site  
Study Areas  
Figure 6.1.1  
Kenora District, Ontario

April 2021 WGS84, UTM zone15

0 Kilometers 10



### Property Reference

Red Lake  
Kenora  
Thunder Bay  
Sault Ste. Marie  
Toronto

Project Location

- Project Location
- Wenesaga Road Extension
- City / Town / Community
- Road
- Highway
- Significant Valley
- Significant Woodland
- Conservation Reserve
- Provincial Park - Regulated

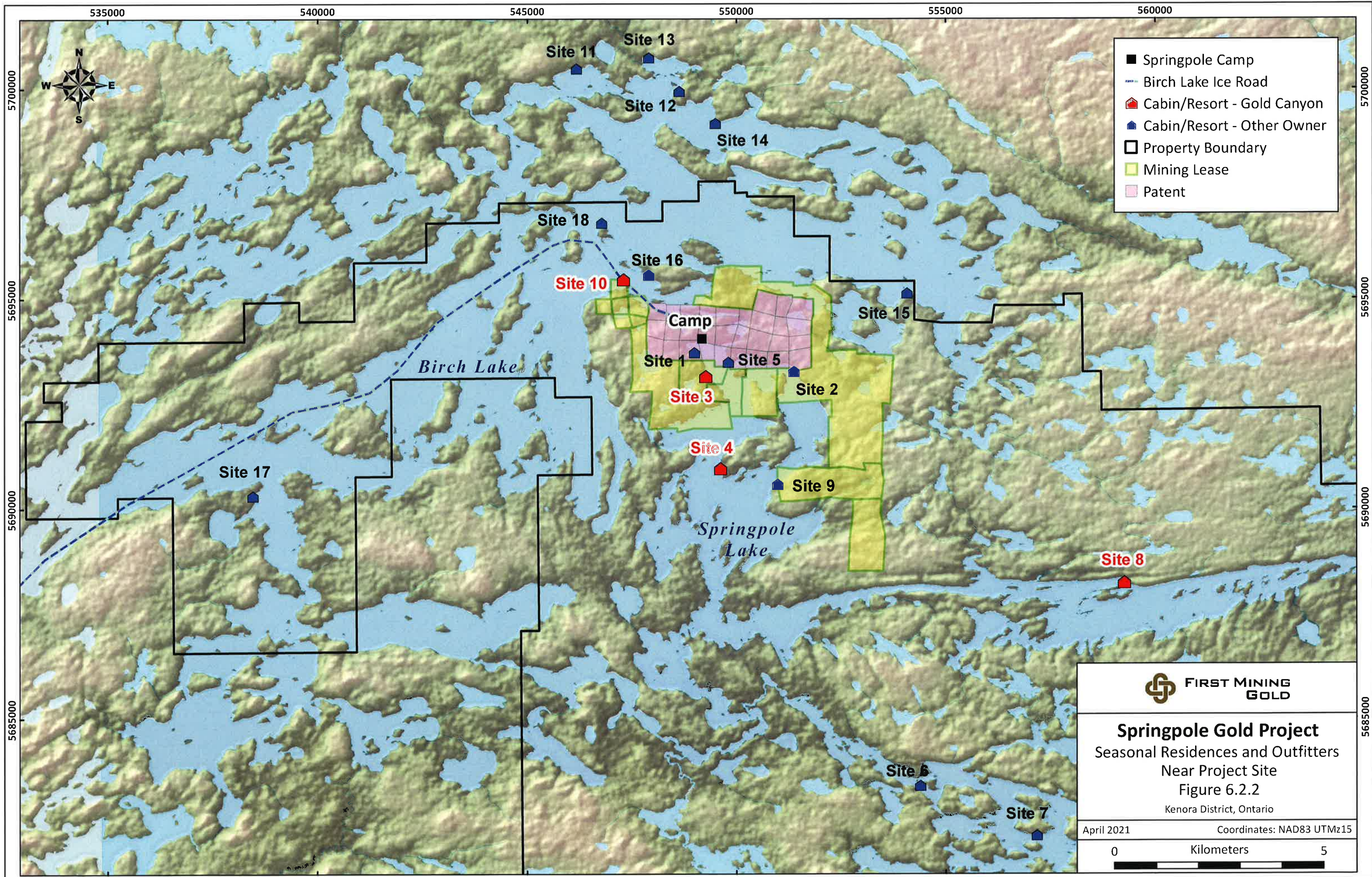
**FIRST MINING GOLD**


**Springpole Gold Project**  
Protected Areas  
Figure 6.2.1  
Kenora District, Ontario

April 2021 NAD83, UTM zone15

0 Kilometers 50

Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

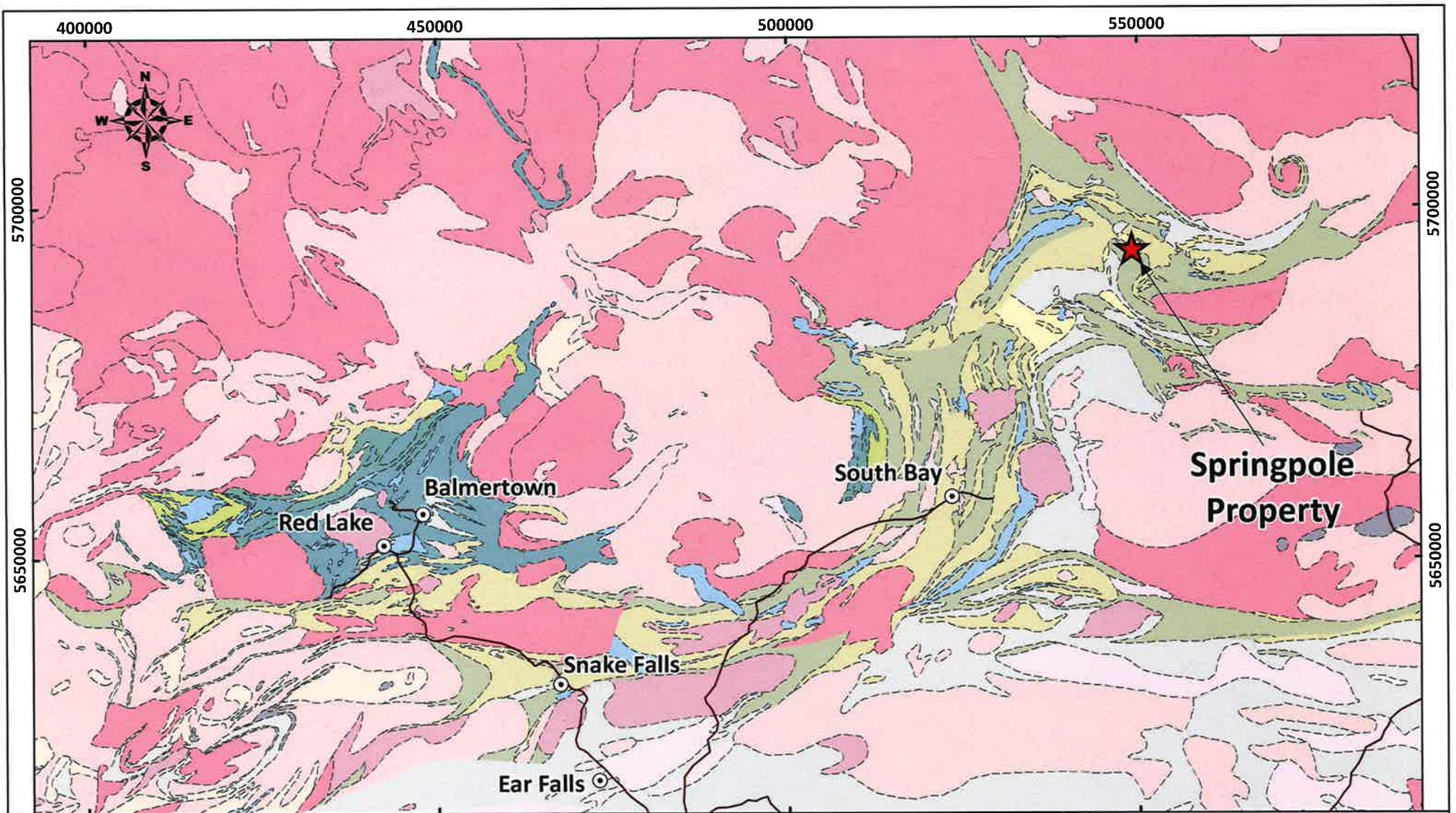



**FIRST MINING GOLD**

**Springpole Gold Project**  
 Seasonal Residences and Outfitters  
 Near Project Site  
 Figure 6.2.2  
 Kenora District, Ontario

April 2021 Coordinates: NAD83 UTMz15

0 Kilometers 5



**Intrusive Contact**

**NEOARCHEAN**

□ Hornblende - nepheline syenite suite

**NEO TO MESOARCHEAN**

- Massive granodiorite to granite
- Diorite-monzodiorite-granodiorite suite
- Muscovite-bearing granitic rocks
- Foliated tonalite suite
- Gneissic tonalite suite
- Mafic and ultramafic rocks

**Supracrustal Rocks**

**NEOARCHEAN**

■ Coarse clastic metasedimentary rocks

**NEO TO MESOARCHEAN**

- Migmatized supracrustal rocks
- Metasedimentary rocks
- Felsic to intermediate metavolcanic rocks
- Mafic to intermediate metavolcanic rocks
- Mafic metavolcanic and metasedimentary rocks
- Felsic to intermediate metavolcanic rocks
- Metasedimentary rocks

★ Project Location

○ Town / Community

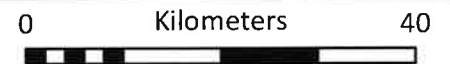
— Road



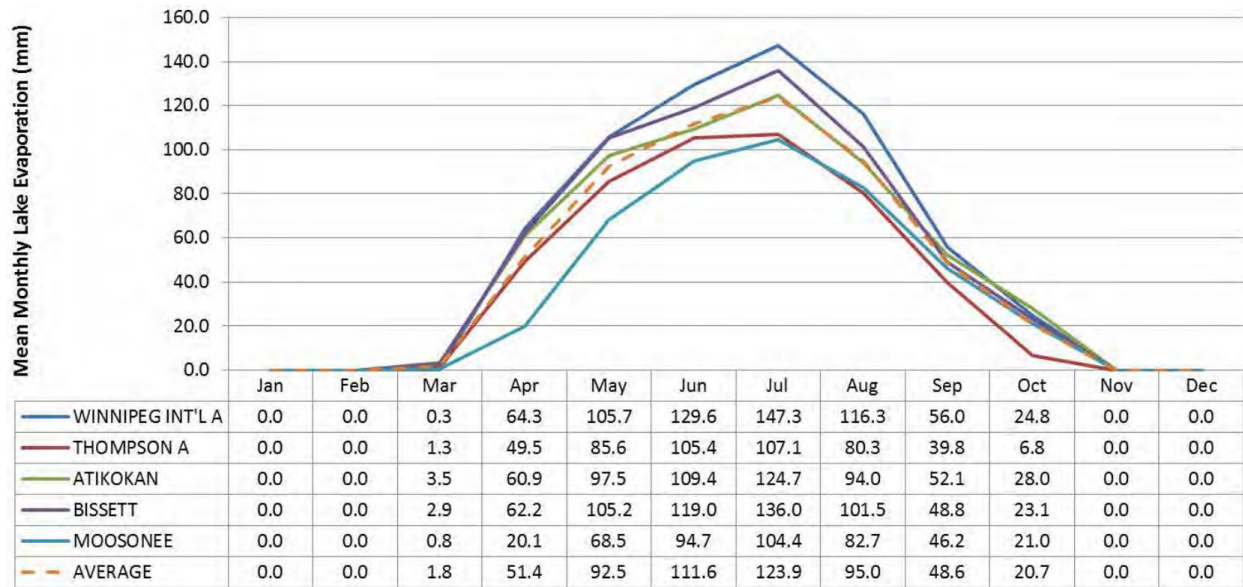
**Springpole Gold Project**  
**Regional Geology Map**  
 Figure 6.3.1

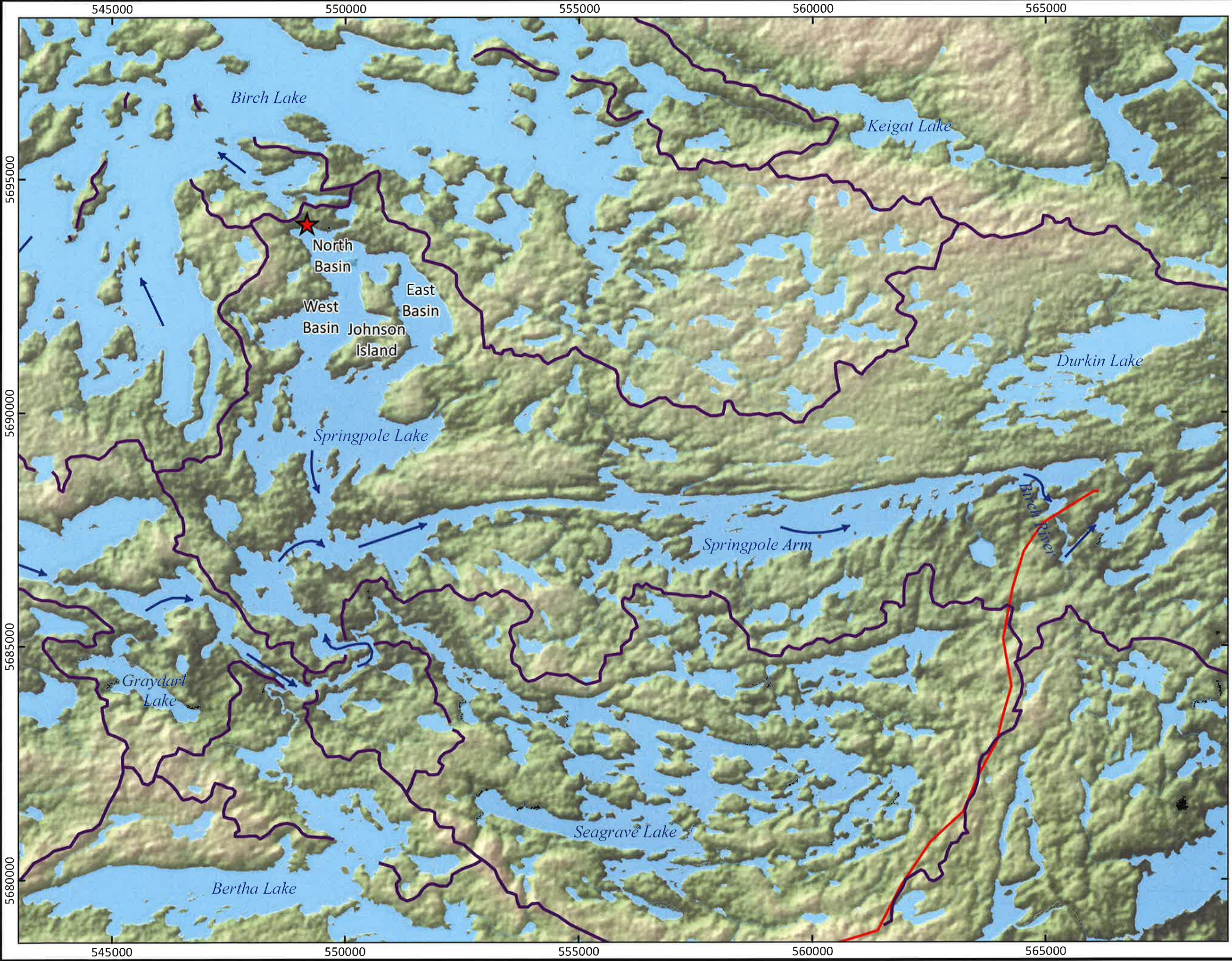
Kenora District, Ontario

April 2021 NAD83 UTMz15 Scale 1 : 750,000







**Figure 6.3.2: Mean Monthly Lake Evaporation for Stations around the Springpole Site**





Property Reference

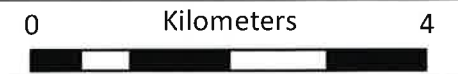


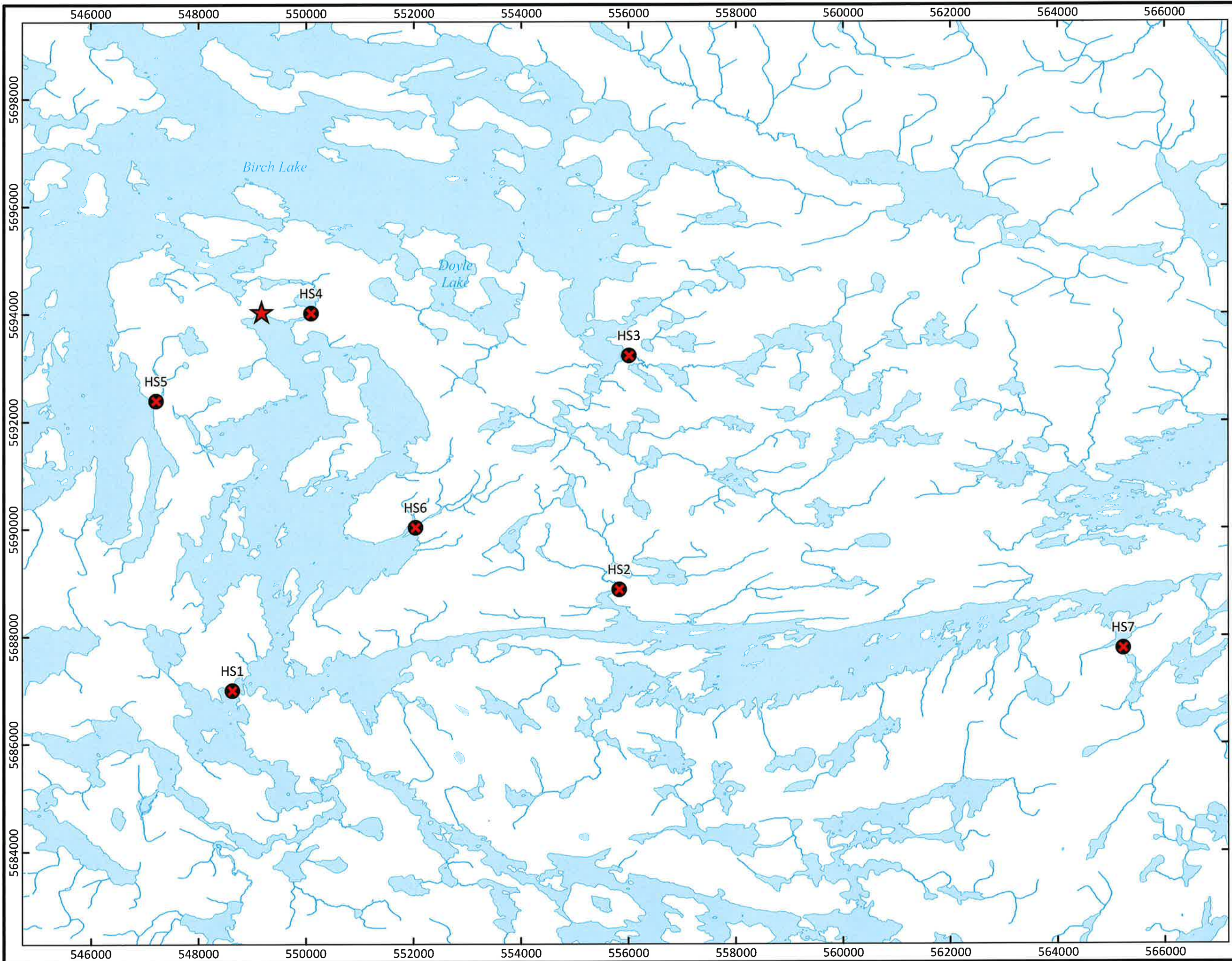
-  Project Location
-  FMP Approved All Weather Wenesaga Road Extension
-  Watershed Boundary
-  Water Flow



**Springpole Gold Project**  
 Proximity to Surface Waters  
 Figure 6.3.3  
 Kenora District, Ontario




April 2021 NAD83, UTM zone15





Property Reference



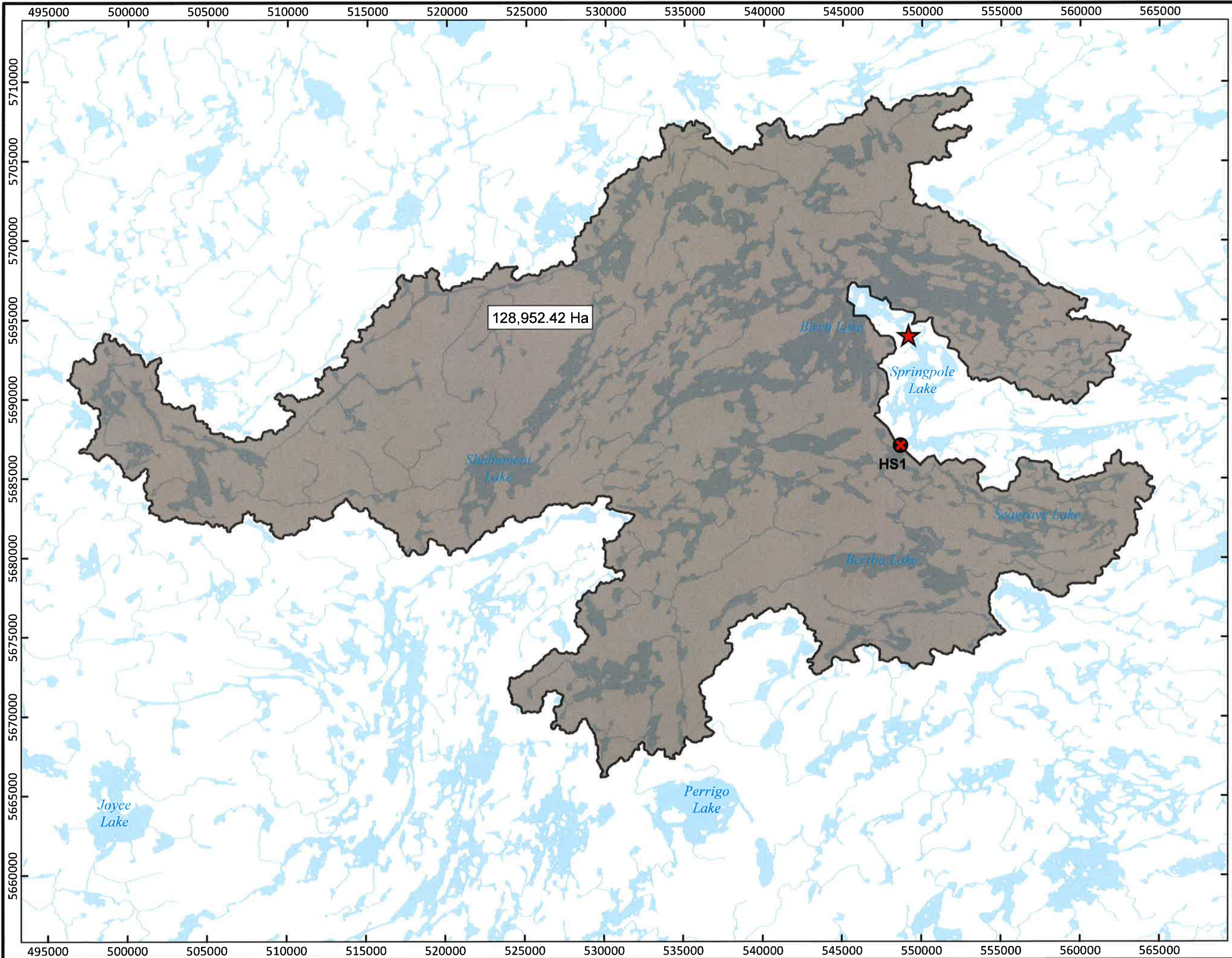
-  Project Location
-  Hydrological Sampling Location
-  Water Body



**Springpole Gold Project**  
 Local Gauging Stations  
 Figure 6.3.4  
 Kenora District, Ontario





April 2021 NAD83, UTM zone15





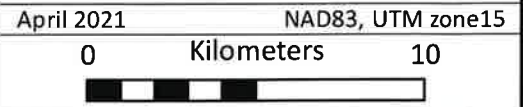
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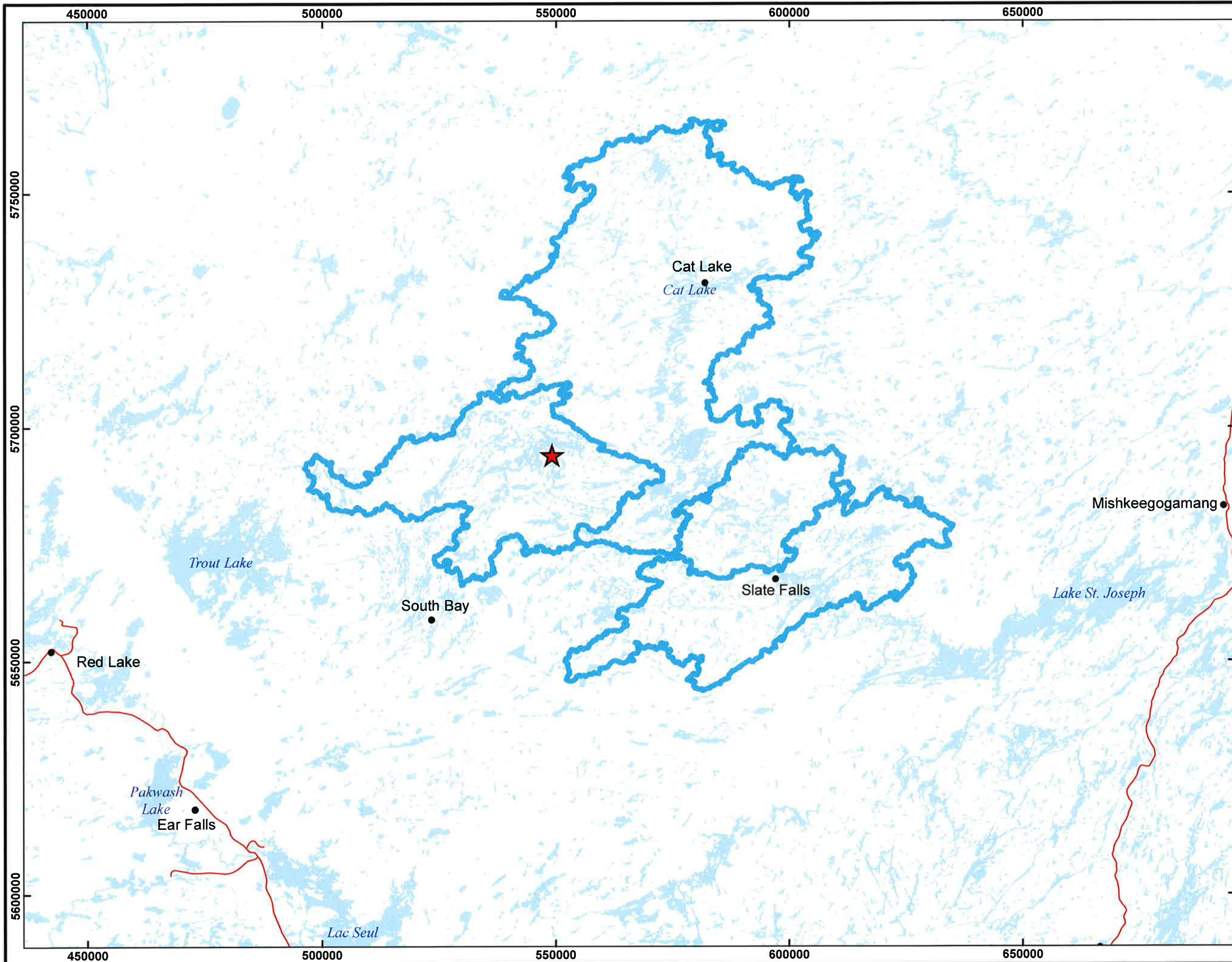


-  Project Location
-  Hydrological Sampling Location
-  HS1 - Hydrostation Basin
-  Water Body



**Springpole Gold Project**  
 Regional Gauging Stations  
 Figure 6.3.5  
 Kenora District, Ontario





Property Reference

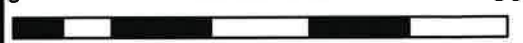


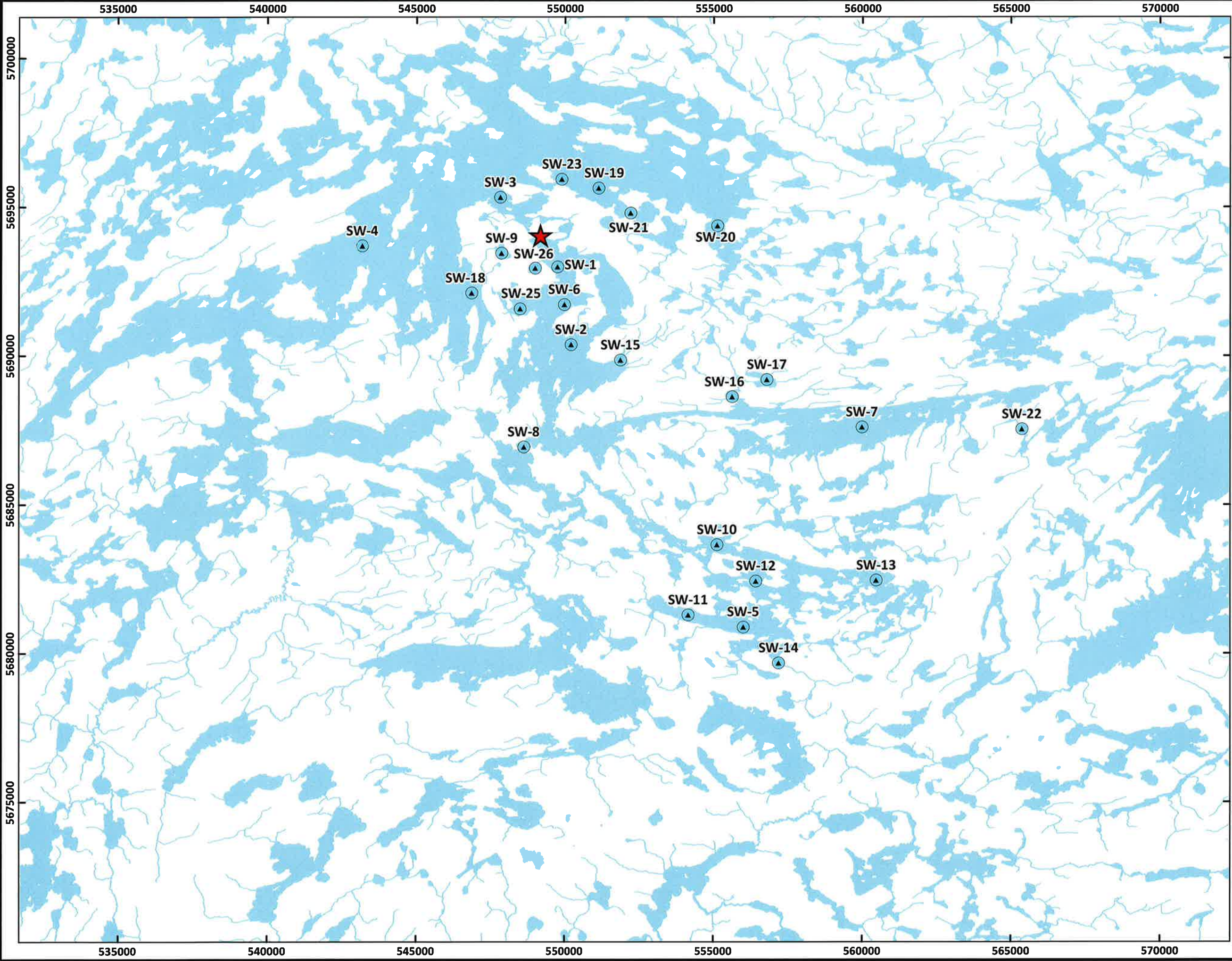
-  Project Location
-  Town / Community
-  Road
-  Watershed Boundary
-  Water Body



**Springpole Gold Project**  
 Watershed Locations  
 Figure 6.3.6  
 Kenora District, Ontario



April 2021 NAD83, UTM zone15  
 0 Kilometers 50





Property Reference



-  Project Location
-  Surface Water Station

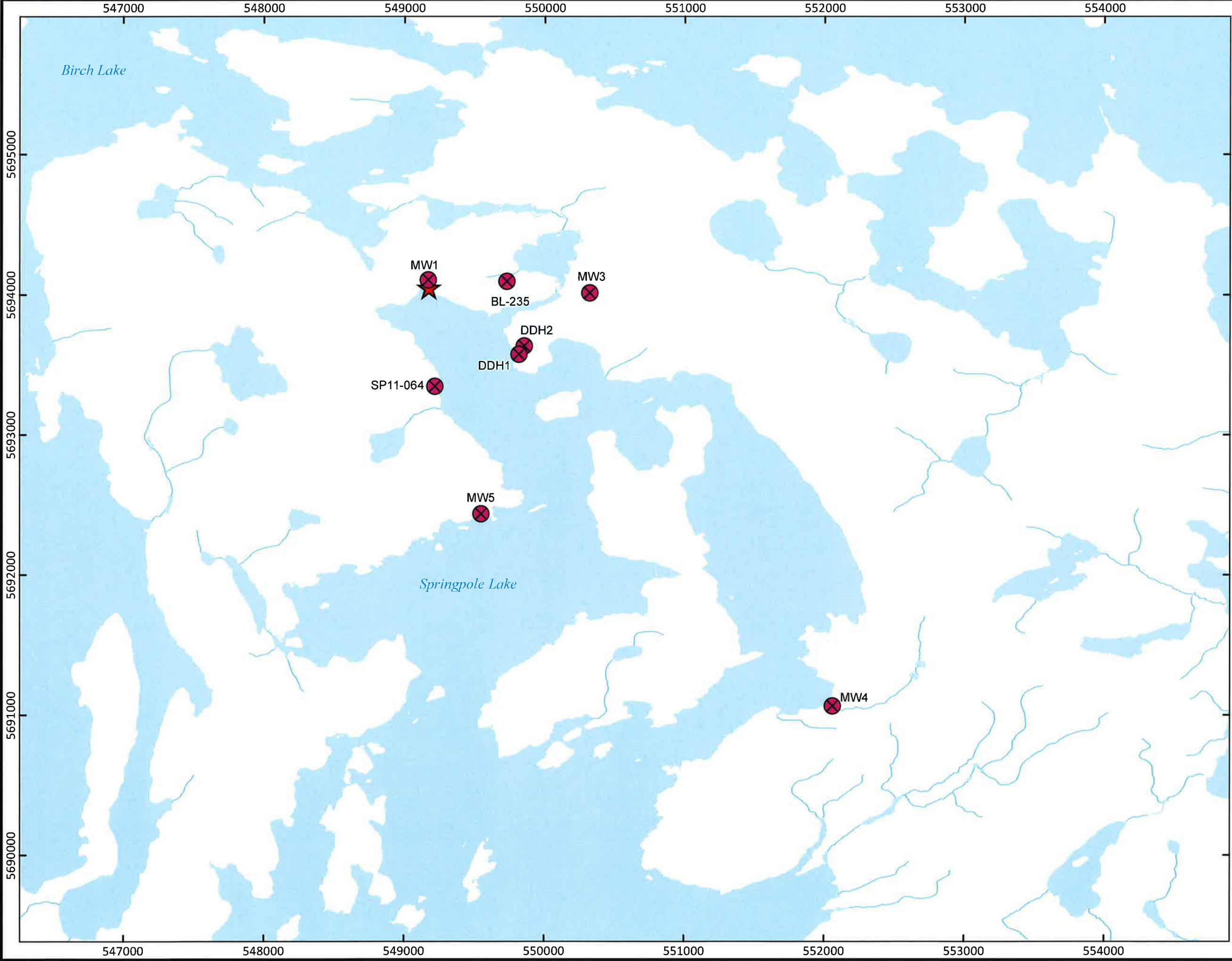


**Springpole Gold Project**  
 Surface Water Monitoring Stations  
 Figure 6.3.7

Kenora District, Ontario



April 2021 NAD83, UTM zone15





**Property Reference**



-  Project Location
-  Groundwater Monitoring Station

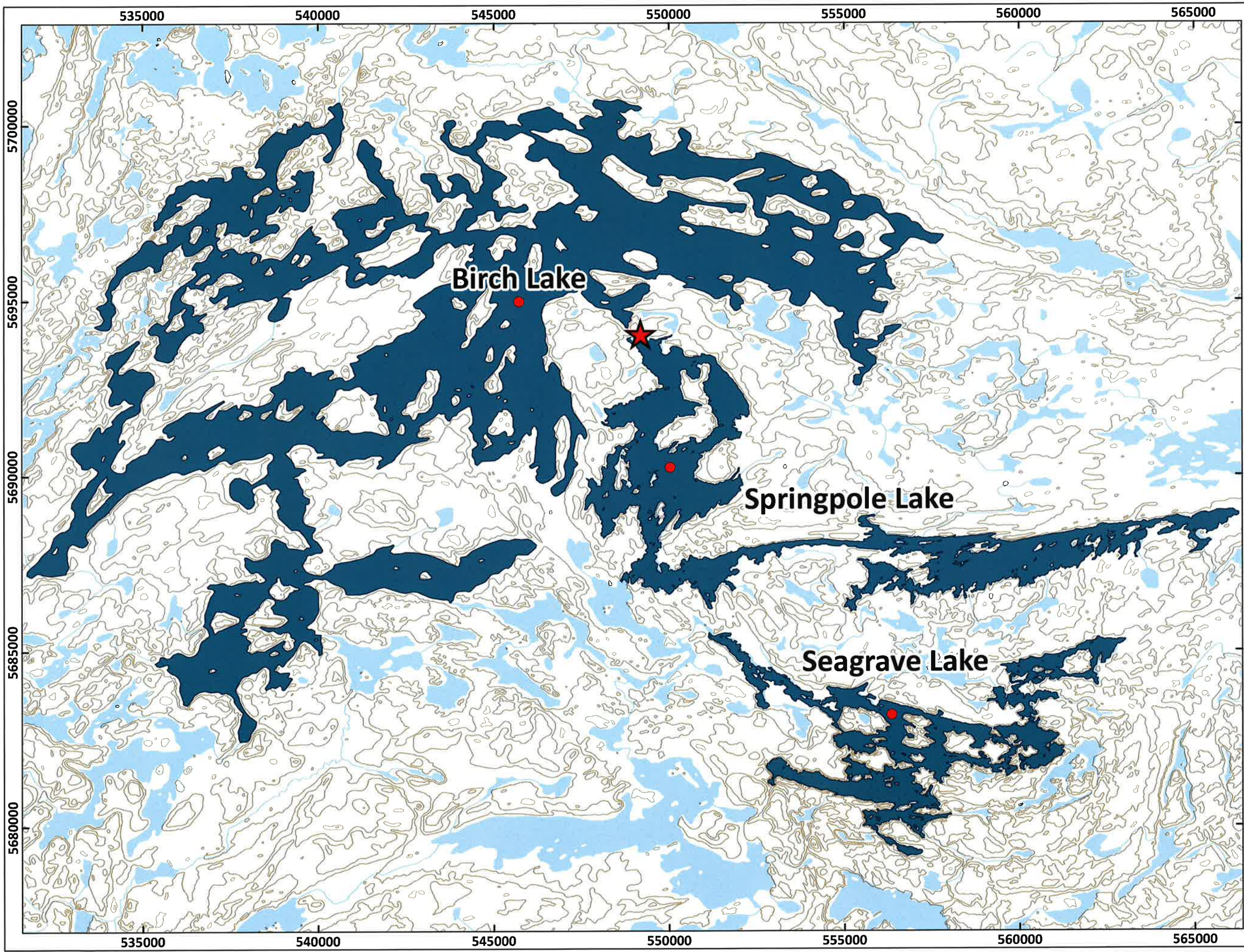


**Springpole Gold Project**  
Ground Water Monitoring Stations  
**Figure 6.3.8**

Kenora District, Ontario

April 2021 NAD83, UTM zone 15





**Property Reference**

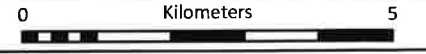


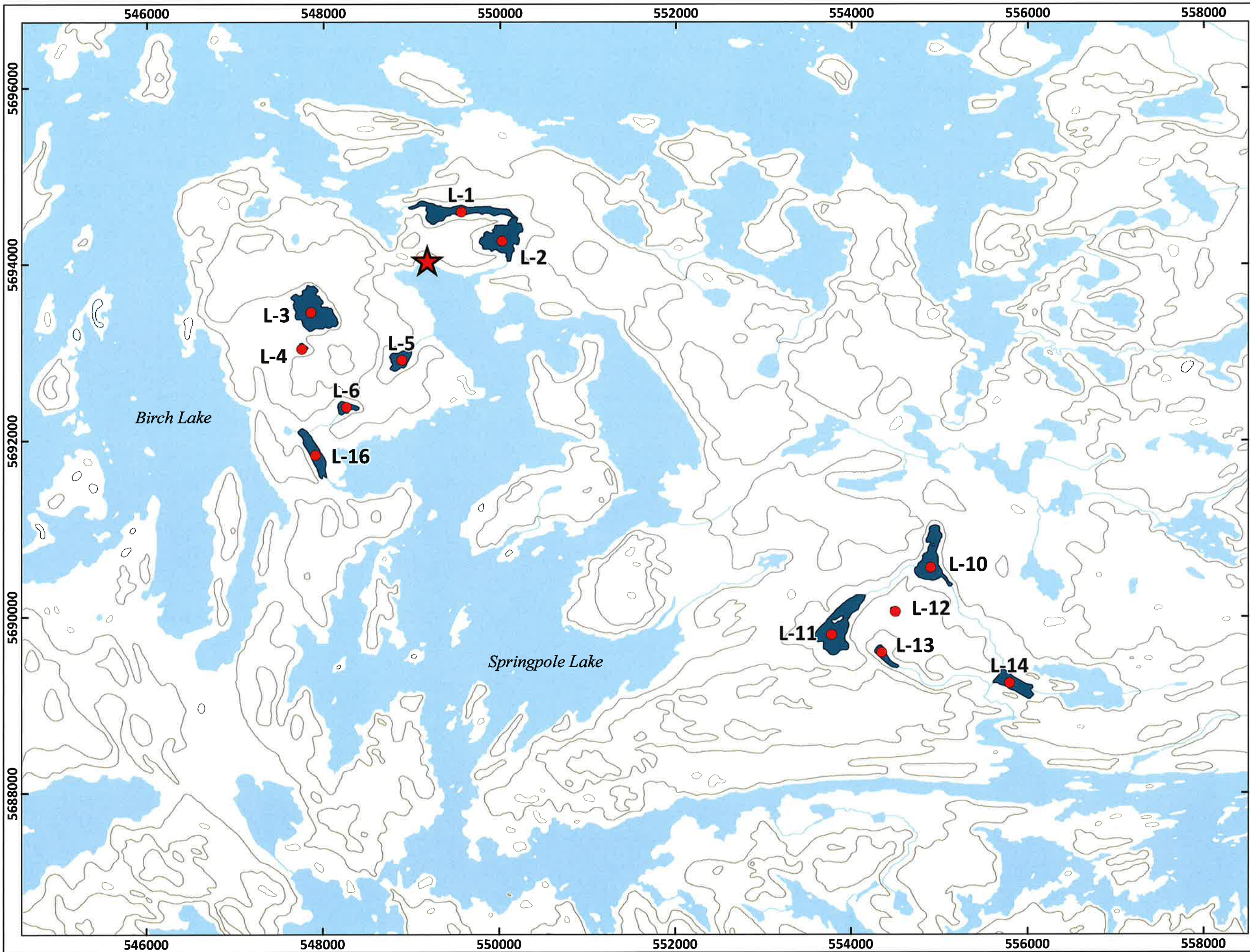
-  Camp Location
-  Water Course
-  Water Body
-  Topographic Contour (10m Int)
-  Water Body
-  Large Water Body



**Springpole Gold Project**  
 Regional Context for  
 Fisheries Assessment  
 Figure 6.3.9  
 Kenora District, Ontario

April 2021 WGS84, UTM zone15





### Property Reference

Red Lake  
Kenora  
Thunder Bay  
Sault Ste. Marie  
Toronto

Project Location

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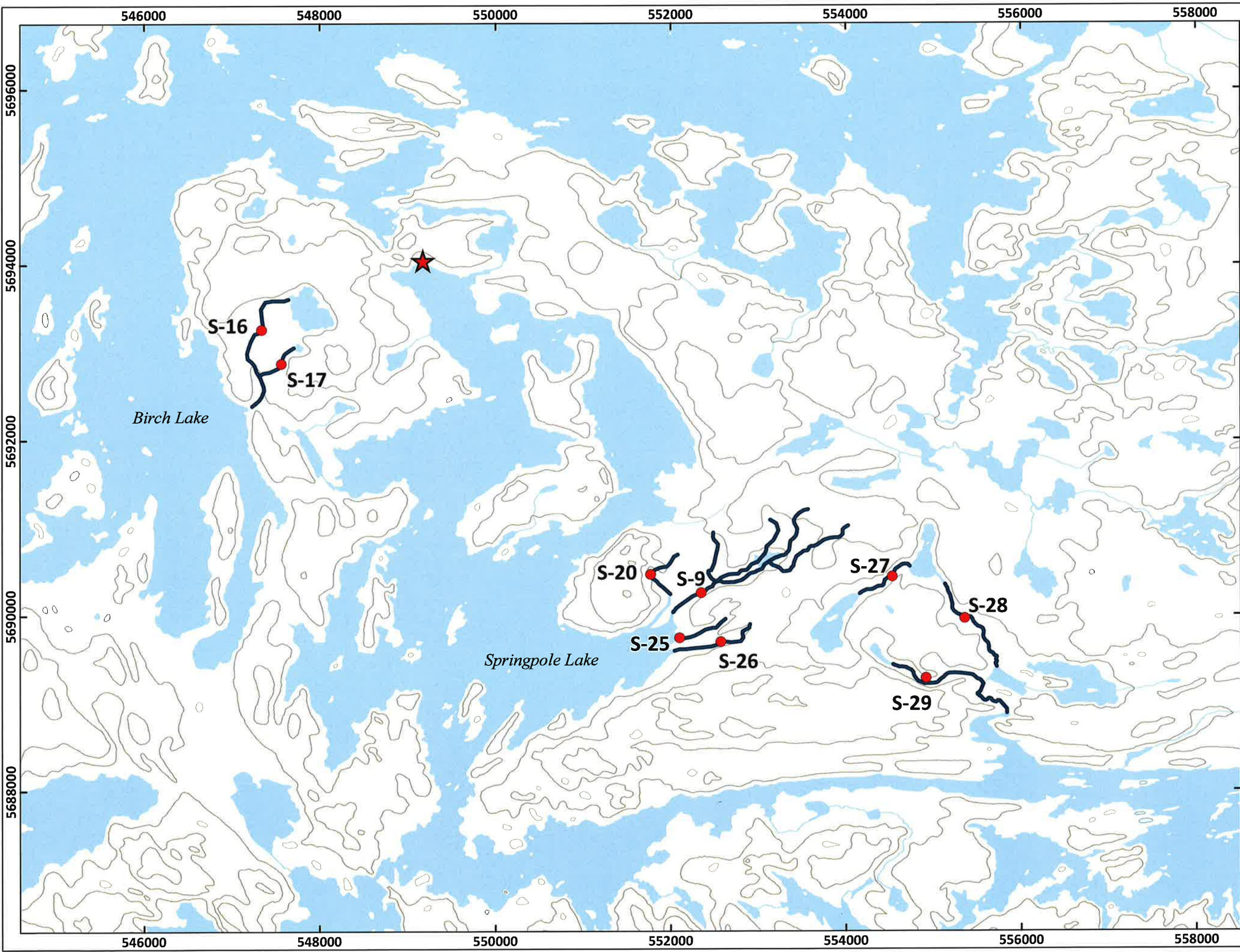
- ★ Project Location
- Water Course
- Water Body
- Topographic Contour (10m Int)
- Water Body
- Small Water Body

**FIRST MINING GOLD**

**Springpole Gold Project**  
Small Water Bodies  
Figure 6.3.10  
Kenora District, Ontario






April 2021 WGS84, UTM zone15

0 Kilometers 2



Property Reference



-  Project Location
-  Water Course
-  Water Body
-  Topographic Contour (10m Int)
-  Water Body



**Springpole Gold Project**  
**Small Water Course**  
**Figure 6.3.11**  
 Kenora District, Ontario

April 2021 WGS84, UTM zone15





Property Reference

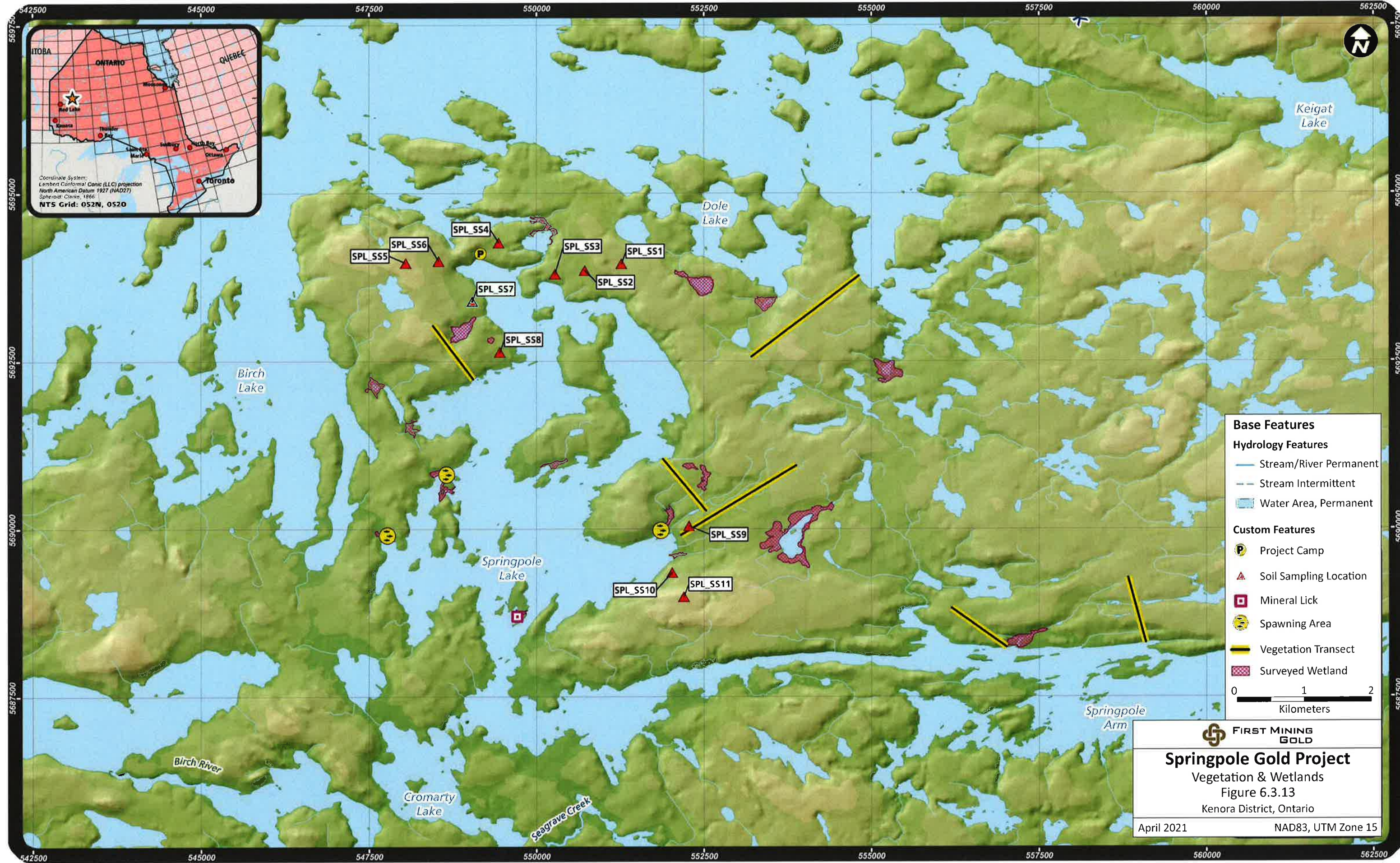


-  Project Location
-  City / Town
-  Highway
-  Lake
-  Caribou Range
-  Springpole Property



**Springpole Gold Project**  
 Project Location within  
 Provincial Caribou Ranges  
 Figure 6.3.12  
 Kenora District, Ontario





ONTARIO QUEBEC  
 Red Lake  
 Thunder Bay  
 Sault Ste. Marie  
 Ottawa  
 Toronto  
 Birch River  
 Birch Lake  
 Cromarty Lake  
 Seagrave Creek  
 Springpole Lake  
 Dole Lake  
 Keigat Lake  
 Springpole Arm

Coordinate System:  
 Lambert Conformal Conic (LLC) projection  
 North American Datum 1927 (NAD27)  
 Spheroid: Clarke, 1866  
 NTS Grid: 052N, 052O

**Base Features**

**Hydrology Features**

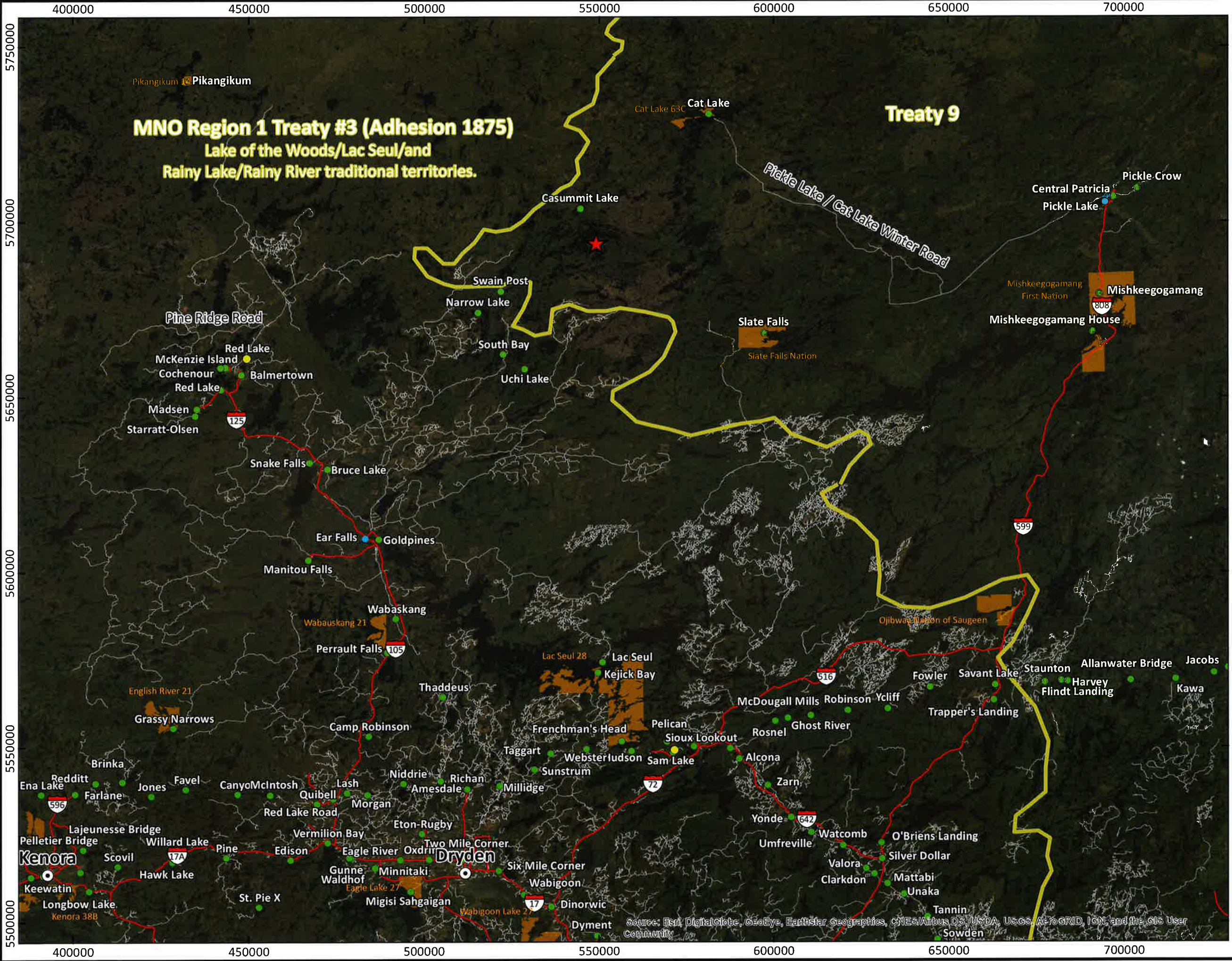
- Stream/River Permanent
- Stream Intermittent
- Water Area, Permanent

**Custom Features**

- Project Camp
- Soil Sampling Location
- Mineral Lick
- Spawning Area
- Vegetation Transect
- Surveyed Wetland

0 1 2  
Kilometers

**FIRST MINING GOLD**  
**Springpole Gold Project**  
 Vegetation & Wetlands  
 Figure 6.3.13  
 Kenora District, Ontario  
 April 2021 NAD83, UTM Zone 15



Property Reference



- ★ Project Location
- City
- Town
- Municipality
- Unincorporated Place
- Highway
- Road



**Springpole Gold Project**  
Settlements  
Figure 6.4.1  
Kenora District, Ontario

April 2021 NAD83, UTM zone15



Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

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## **7 DESCRIPTION OF POTENTIAL ENVIRONMENTAL EFFECTS**

### **7.1 Effects Assessment Approach**

The effects assessment methodology is summarized briefly below, subject to revision and clarification in the EIS / EA as needed. FMG propose a stepwise approach to assessing the potential effects of the Undertaking on the environment:

- Identify Valued Components (VCs) for each discipline with full consideration for consultation to date;
- Identify spatial and temporal boundaries for the Effects Assessment as needed;
- Identify potential interactions (effects) between the Undertaking and each VC during each project development phase (construction, operation and closure);
- Identify mitigation measures to reduce or eliminate potential effects;
- Identify and assess the significance of net effects;
- Identify and assess the significance of potential cumulative effects; and
- Identify monitoring approaches for adverse effects.

#### **7.1.1 Valued Components (VCs)**

The EA will focus on the assessment of potential adverse environmental effects of the Undertaking on the identified VCs. VCs are components of the environment associated with the Undertaking that are of special value or interest to Indigenous communities, regulatory agencies, the Proponent, stakeholders, and/or the public. FMG understands the definition of the environment in Ontario's EAA includes the natural, social, economic, cultural, and built environments. The EA must consider the environment in this context to meet the requirements of the EAA.

FMG welcomed feedback from interested parties regarding components of the environment that are of importance to them during the preparation of the ToR. Through ongoing consultation activities, FMG gathered additional input from Indigenous communities, non-Indigenous stakeholders, and other interested parties on a preliminary list of VCs. The list has subsequently been refined to develop the VCs that are proposed to be used in the EIS / EA.

The list of proposed VCs is provided in Table 7.1.1, along with a brief rationale for each VC and related criteria. The list of VCs has been developed based on the following inputs:

- Regulatory guidance and requirements;
- Issues raised by regulatory agencies, Indigenous communities, stakeholders, and the public through consultation to date (GCU and FMG);

- Existing environmental conditions in the region where the Undertaking is located and interconnections between the biophysical and socio-economic environment; and
- Experience and lessons learned from similar mining projects in Ontario.

During the EA process, potential adverse environmental effects to these VCs will be described for each phase of the Undertaking. Further refinement of the VCs may occur during the EA process and this evolution will be presented in the EIS / EA, as appropriate.

**Table 7.1.1: Preliminary Potential Valued Components and Rationale**

Potential Valued Component	Rationale	Criteria
Air Quality	Potential related effects on atmospheric environment for the purposes of this assessment include changes to air quality. Air quality has been selected as a VC in consideration of regulatory requirements, the potential sensitivity of human health to air quality, potential effects on enjoyment of properties off site, and the potential deposition of air contaminants in soil, vegetation, and water as pathways to humans and wildlife.	Effects on air quality
GHGs	Greenhouse gases has been selected as a VC in consideration of government priorities.	Effects on GHG emissions
Other Atmospheric Environment	Related acoustic and light emissions are anticipated to be addressed as factors potentially affecting other VCs (Wildlife and Wildlife Habitat, SAR, Traditional Land Use, and Outdoor Recreation VCs), but could be assessed as stand alone VCs.	-
Surface Water Systems	This potential VC is critical to the function of human and non-human biota. Surface water supports industrial, commercial and recreational uses, has cultural value, and is subject to regulated discharge limits (water quality criteria). It may be separated further, for example by individual surface water systems.	Effects on surface waters
Groundwater	The Undertaking will require extraction of significant amount of groundwater and may have potential adverse effects to the local groundwater regime.	Effects on groundwater
Wildlife and Wildlife Habitat	This potential VC may interact with Undertaking activities, and are considered by the proponent, the public, Indigenous communities, the scientific community, and government agencies to have importance. SAR such as Caribou (Boreal population) Boreal and wolverine may be considered uniquely, per SAR VC below.	Effects on wildlife species and habitat
Vegetation Communities and Wetlands	This potential VC encompasses the vegetated state of the natural environment. These communities are classified as ecosite community types. This VC has a role in supporting biodiversity and traditional use by Indigenous communities, as well as their contributions to ecosystem functions at a local and regional landscape.	Effects on vegetation communities and wetlands
Fish and Fish Habitat	Fish and fish habitat have been selected as a VC for assessment because fish and their habitats are key indicators of fishery sustainability and productivity. Fish habitat means waters on which fish depend directly or indirectly to carry out their life processes. These include spawning, nursery, rearing, migration, and feeding areas. SAR such as Lake Sturgeon may be considered uniquely, per SAR VC below.	Effects on fish and fish habitat
SAR: Lake Sturgeon	Indigenous community members believe that Lake Sturgeon are present in the area and are concerned with potential Project effects	Effects on SAR

Potential Valued Component	Rationale	Criteria
	to the species; to date, Lake Sturgeon have not been identified through extensive field studies.	
SAR: Caribou (Boreal population)	Caribou (Boreal) are classed as Threatened, both provincial and federal. The Project is located within the Churchill Caribou Range. The Project area contains known wintering areas, calving / nursery areas, and summering areas. There are potential corridors or travel routes leading from wintering areas surrounding Springpole Lake to calving areas located on Birch Lake and smaller lakes to the south.	Effects on SAR
SAR: Wolverine	Wolverine are classed Special Concern (federal) and Threatened (provincial). The tracks of one individual were observed on Springpole Lake in February 2011, and winter use has been confirmed through track observations, although there are no known denning sites.	Effects on SAR
SAR: Bats	Little Brown and Northern Myotis are classified as Endangered, both provincially and federally, and have been identified as present. Suitable maternal bat roosting habitat may or may not be present but is suspected.	Effects on SAR
SAR: Bird Species	Several SAR birds have been observed and/or have suitable habitat on/near the Project site, including Bald Eagle (provincial, Special Concern), Olive-sided Flycatcher (federal and provincial, Special Concern), Canada Warbler (federal, Threatened; provincial, Special Concern) and Common Nighthawk (federal and provincial, Special Concern).	Effects on SAR
Local and Regional Economy	This potential VC includes local and regional economy, employment, and business. Employment and businesses support the economic livelihoods of local and Indigenous residents, and provide associated social benefits related to employment and income.	Effects on local and regional economy
Regional Infrastructure and Services	This potential VC includes housing and temporary accommodations, health and emergency services, recreation and entertainment services and infrastructure, provincial and municipal services and infrastructure, energy and communications infrastructure (utilities), and roads.	Effects on infrastructure and services
Archaeology and Cultural Heritage Resources	Heritage resources are human and natural resources created by activities from the past that remain to inform present and future societies of that past. Heritage resources include archaeological, architectural, historical, built heritage resources, cultural heritage landscapes and paleontological resources. Heritage resources have been selected as a VC to meet regulatory requirements and in recognition of the interest of provincial and federal agencies who are responsible for the effective management of these resources, and potentially affected Indigenous communities and stakeholders that have an interest in the preservation and management of heritage resources related to their history and culture.	Effects on archaeology  Effects on cultural heritage resources
Traditional Land and Resource Use	This potential VC includes traditional activities, occupancy, sites, and resources identified by Indigenous communities and may be potentially affected by the Project.	Effect on spiritual, ceremonial sites  Effects on Traditional land use
Human Health	This potential VC has an inherent importance to the wellbeing of humans, food security, the related natural environment.	Effect on human health
Outdoor Recreation and Tourism	Recreation and tourism is considered a VC. This includes the current use of land in the study area, including a description of, recreational and commercial fishing, Land Use Permit holders, bear	Effect on tourism and recreation

Potential Valued Component	Rationale	Criteria
	management area licensees, bait harvesters, trappers, trails, hunting, trapping, outdoor recreation, use of seasonal cabins, wildlife viewing, lodges and outfitters	

### 7.1.2 Spatial and Temporal Boundaries

Spatial boundaries are required to focus the effects assessment. Figure 6.1.1 and Section 6.1 identifies the preliminary spatial boundaries identified to date. These areas may be revised or otherwise further clarified within the EIS / EA and a rationale will be provided for the boundaries established.

The temporal boundaries are defined based on the timing and duration of the Undertaking phases, which are anticipated to be further defined in the EIS / EA as engineering studies progress.

### 7.1.3 Effects Analysis Methodology

FMG will complete an analysis of effects on the VCs according to the defined criteria using a standardized approach. Attributes to be used to evaluate environmental effects and overall significance of the effects, are proposed to include:

- **Ecological and Social Context:** a qualitative measure of the sensitivity and/or resilience of the VC to potential change, based on professional judgement and/or consultation;
- **Magnitude:** a quantitative or qualitative measure of the size or severity of effect for a given key indicator representing the potential effect after mitigation relative to the baseline condition;
- **Extent:** the geographic area over which an effect is expected to occur;
- **Duration:** the period of time over which an effect is expected to occur;
- **Frequency:** how often an effect is expected to occur within a given time period;
- **Reversibility:** the degree to which the effect can or will be reversed;
- **Timing:** the time of year the effect is expected to occur (for select VCs); and
- **Likelihood:** the probability of the effect occurring.

The direction of the effect (positive or negative) is also considered for socio-economic effects.

For each attribute, indicators will be used to define the effect of the Undertaking on the VC, into one of three levels (Levels I, II, and III), where Level I is indicative of a negligible or limited potential to contribute to an overall significant environmental effect, and Level III is indicative of a high potential to contribute to an overall significant environmental effect. Level II represents an intermediate condition.

Examples of preliminary criteria and indicators for proposed VCs / criteria are provided in Table 7.1.3. FMG understands that each criterion should have one or more indicators that will identify how the potential environmental effects that will be measured for each criterion. The indicators can be qualitative or quantitative in nature. Criteria and indicators for the assessment of effects will be further developed, based on input received to be documented in the EIS / EA.

**Table 7.1.3: Proposed Criteria and Preliminary Indicators**

<b>Proposed Criteria</b>	<b>Preliminary Indicators</b>	<b>Related Study(ies)</b>	<b>Potential Data Sources</b>
Effects on air quality	<ul style="list-style-type: none"> <li>Emission rates of greenhouse gases</li> <li>Changes compared to baseline condition</li> </ul>	<ul style="list-style-type: none"> <li>Air quality</li> <li>GHG emissions</li> </ul>	<ul style="list-style-type: none"> <li>Baseline Studies</li> <li>Weather station data</li> <li>Government (ECCC and MECP)</li> <li>National Inventory Report: Greenhouse Gas Sources and Sinks in Canada</li> </ul>
Effects on surface water	<ul style="list-style-type: none"> <li>Changes in surface water levels and flows of water bodies and watercourses</li> <li>Changes in water quality for identified parameters</li> </ul>	<ul style="list-style-type: none"> <li>Hydrology</li> <li>Hydrogeology</li> <li>Surface Water and Sediment Quality</li> <li>Human Health</li> <li>TK/TLU</li> </ul>	<ul style="list-style-type: none"> <li>Baseline Studies</li> <li>TK/TLU</li> <li>Government (MNR and MECP)</li> </ul>
Effects on groundwater	<ul style="list-style-type: none"> <li>Changes to groundwater levels and quality in comparison to baseline conditions</li> </ul>	<ul style="list-style-type: none"> <li>Hydrogeology</li> <li>Groundwater Quality</li> </ul>	<ul style="list-style-type: none"> <li>Baseline Studies</li> <li>Government (MECP)</li> <li>MECP Guideline B-7, Incorporation of the Reasonable Use Concept</li> </ul>
Effects on wildlife species and habitat	<ul style="list-style-type: none"> <li>Changes in the area, type and quality (functionality) of terrestrial habitat</li> <li>Potential for noise and light related disturbance</li> <li>Changes in wildlife movement corridors</li> </ul>	<ul style="list-style-type: none"> <li>Terrestrial</li> <li>Surface Water</li> <li>Atmospheric</li> <li>TK/TLU</li> </ul>	<ul style="list-style-type: none"> <li>Baseline Studies</li> <li>TK/TLU</li> <li>SAR Registry</li> <li>Government (MNR and MECP)</li> <li>Ontario Federation of Hunters and Anglers</li> <li>Resource-based tourism businesses</li> </ul>
Effects on vegetation communities and wetlands	<ul style="list-style-type: none"> <li>Calculations of habitat loss: total and/or specific habitat type</li> <li>Changes in plant dispersion corridors</li> <li>Changes in wetland connectivity</li> </ul>	<ul style="list-style-type: none"> <li>Vegetation and Wetland Surveys</li> <li>Hydrogeology</li> <li>Hydrology</li> <li>Riparian conditions</li> <li>TK/TLU</li> </ul>	<ul style="list-style-type: none"> <li>Baseline Studies</li> <li>TK/TLU</li> <li>Ducks Unlimited</li> <li>Government (MNR)</li> </ul>
Effects on fish and fish habitat	<ul style="list-style-type: none"> <li>Quantity of fish habitat affected or displaced</li> <li>Changes in water flows or conditions suitable for fish passage</li> <li>Attainment of water quality guidelines for protection of aquatic life (or defensible alternative)</li> </ul>	<ul style="list-style-type: none"> <li>Aquatic Resources (species, fish toxicity / fish usability studies, habitat, benthics)</li> <li>Surface Water Quality</li> <li>Hydrology</li> <li>Hydrogeology</li> <li>Riparian</li> <li>TK/TLU</li> </ul>	<ul style="list-style-type: none"> <li>Baseline Studies</li> <li>TK/TLU</li> <li>Government (MECP, MNR and DFO)</li> <li>Commercial anglers / fishers</li> <li>SAR Registry</li> <li>Ontario Commercial Fisheries Association</li> </ul>

Proposed Criteria	Preliminary Indicators	Related Study(ies)	Potential Data Sources
	<ul style="list-style-type: none"> <li>Changes in water chemistry of groundwater recharge to aquatic habitats</li> </ul>		
Effects on SAR	<ul style="list-style-type: none"> <li>Changes in the area, type and quality of SAR habitat</li> <li>Changes in noise and light (or other potential harm and harassment) related disturbance</li> </ul>	<ul style="list-style-type: none"> <li>Terrestrial SAR</li> <li>TK/TLU</li> </ul>	<ul style="list-style-type: none"> <li>Baseline studies</li> <li>TK/TLU</li> <li>SAR Registry</li> <li>Government (MNRF and MECP)</li> </ul>
Effects on local and regional economy	<ul style="list-style-type: none"> <li>Changes in the economic opportunities</li> <li>Capital and operating costs</li> <li>Improvement of GDP value added per capita</li> <li>Changes in the number of income opportunities for local outfitters</li> </ul>	<ul style="list-style-type: none"> <li>Socio-Economic</li> <li>Engineering studies</li> <li>TK/TLU</li> </ul>	<ul style="list-style-type: none"> <li>Baseline studies</li> <li>Commercial Outfitters</li> <li>Bait harvesters, trappers</li> <li>Government (Ministry of Economic Development, Job Creation and Trade and MHSTCI)</li> <li>Statistics Canada</li> <li>Local and Indigenous Economic Development office</li> </ul>
Effects on regional infrastructure and services	<ul style="list-style-type: none"> <li>Changes in the amount of local and regional accessibility by land (roads) including for Indigenous communities</li> <li>Changes in the capacity and reliability of power supply systems</li> </ul>	<ul style="list-style-type: none"> <li>Socio-Economic</li> <li>Engineering Studies</li> </ul>	<ul style="list-style-type: none"> <li>Baseline studies</li> <li>Government (MNRF, MTO and Ministry of Infrastructure)</li> <li>Watay Power</li> <li>Hydro One Networks</li> <li>Forest Industry</li> <li>Indigenous Communities</li> </ul>
Effects on archaeological resources	<ul style="list-style-type: none"> <li>Direct or indirect (such as grade change that alter soils and drainage patterns that adversely affect an archaeological resource) land disturbances or destruction of archaeological resources</li> </ul>	<ul style="list-style-type: none"> <li>Socio-Economic</li> <li>Archaeological</li> <li>TK/TLU</li> </ul>	<ul style="list-style-type: none"> <li>Baseline studies</li> <li>TK/TLU</li> <li>Government (MHSTCI)</li> <li>Ontario Hydrology Network</li> <li>Ontario Archaeological Society</li> <li>Canadian Archaeological Association</li> </ul>
Effects on built heritage resources and cultural heritage landscapes	<ul style="list-style-type: none"> <li>Direct or indirect obstruction of significant views or vistas within, from or of built heritage resources or cultural heritage landscapes</li> <li>Requirement to disturb or destroy built heritage resources or cultural heritage landscapes</li> </ul>	<ul style="list-style-type: none"> <li>Built Heritage</li> <li>TK/TLU</li> </ul>	<ul style="list-style-type: none"> <li>Baseline Studies</li> <li>TK/TLU</li> <li>Government (MHSTCI)</li> <li>Canadian Register of Historic Places</li> </ul>
Effects on Indigenous Traditional land and resource use	<ul style="list-style-type: none"> <li>Area of Traditional Land Use that would be temporarily restricted or lost</li> <li>Changes to quantity or quality of country foods</li> <li>Destruction of known spiritual, ceremonial, cultural heritage sites</li> </ul>	<ul style="list-style-type: none"> <li>Socio-Economic</li> <li>TK/TLU</li> <li>Archaeology</li> <li>Human Health</li> </ul>	<ul style="list-style-type: none"> <li>Baseline Studies</li> <li>TK/TLU</li> <li>Aboriginal and Treaty Rights Information system</li> <li>Human Health and Ecological Risk Assessment</li> </ul>

Proposed Criteria	Preliminary Indicators	Related Study(ies)	Potential Data Sources
Effects on human health	<ul style="list-style-type: none"> <li>Changes in air quality</li> <li>Changes in drinking water quality</li> <li>Changes in consumption advisories for country food used by Indigenous Peoples.</li> </ul>	<ul style="list-style-type: none"> <li>Air Quality</li> <li>Water Quality</li> <li>Socio-Economic</li> <li>Country Foods</li> <li>TK/TLU</li> </ul>	<ul style="list-style-type: none"> <li>Baseline Studies</li> <li>TK/TLU</li> <li>Government (MECP, MNR and MOH)</li> <li>Local Indigenous health organizations</li> </ul>
Effects on outdoor recreation and tourism	<ul style="list-style-type: none"> <li>Changes in the area of current recreational use that would be restricted or lost</li> <li>Potential for general disturbance and adverse effects to aesthetics</li> <li>Changes to income opportunities for local outfitters</li> <li>Change in economic opportunities because of project-related activities</li> <li>Changes in industry revenue measurements</li> <li>Change in the degree of remoteness</li> </ul>	<ul style="list-style-type: none"> <li>Socio-Economic</li> <li>TK/TLU</li> </ul>	<ul style="list-style-type: none"> <li>Baseline Studies</li> <li>TK/TLU</li> <li>MHSTCI</li> <li>Statistics Canada</li> <li>Commercial Outfitters</li> <li>Government Agencies (MNR, ENDM and Ministry of Economic Development, Job Creation and Trade)</li> </ul>

In carrying out the environmental effects analysis, a number of analytical methods and tools will be utilized. These are expected to include laboratory tests, mass balance calculations, statistical packages and various types of models. For example, the methodology for estimating air emissions is expected to follow the required methods and requirements provided in guidance from the MOE 2017 (*Procedure for Preparing an Emission Summary and Dispersion Modelling Report Version 3.0, PIBS 3614e03*). Modelling such as using the most recent version of the U.S. EPA AERMOD model will be used to predict air quality impacts. The modelling will be done using the methods and requirements provided in *Air Dispersion Modelling Guideline for Ontario Version 2.0, PIBS 5165e02*. Results of the modelling will be combined with baseline air quality data to provide predicted total ambient air quality. The ambient air quality will be compared against ambient air quality criteria as well as *Summary of Standards and Guidelines to support Ontario Regulation 419*.

#### 7.1.4 Determination of Significance

The overall significance of an effect will be derived based on the contributing factor of each of the assessment criteria. For an effect to be defined as significant, the overall effect must be such that both of the following criteria are satisfied:

- A Level II or III rating is attained for natural environment and/or socio-economic environment context / value; and
- A Level II or III rating is attained for all of the attributes involving magnitude, extent, duration, timing and frequency.

Conversely, if a Level I rating is achieved for any of the attributes involving magnitude, extent, duration / timing or frequency; or, if a Level I rating is achieved for both the natural environment and socio-economic environment contexts (where applicable), then the effect is considered to be not significant.

## 7.2 Cumulative Effects Assessment

Both provincial and federal legislation aim to protect the environment from significant adverse environmental effects caused by an Undertaking, including cumulative effects. As stated in the ToR Code of Practice, proponents are encouraged to carry out qualitative assessments of potential cumulative impacts. To support effective coordination, technical guidance issued by the Agency, *Assessing Cumulative Environmental Effects under the Canadian Environmental Assessment Act, 2012*, will be used to guide the cumulative effects assessment for the EIS / EA.

Scoping of the cumulative effects to be assessed involves identification of other projects, activities, or disturbance features in the vicinity of the Project, including: past, present and reasonably foreseeable projects, which may have effects that could combine with the residual project effects to increase the level of effect on VCs. Input from Indigenous communities will be considered in the cumulative effects assessment.

Past and present projects as represented by the existing environmental baseline conditions, will be identified from sources such as:

- Historical records of activities;
- Spatial information identifying existing disturbance features (clearing, ground disturbance, locations of facilities, roads, and other linear disturbance features, etc.);
- Traditional Knowledge; and
- Knowledge of ongoing activities (i.e., forestry access road development and exploration activities).

Future foreseeable projects include known activities that will be carried out, based on current knowledge, such as new projects that have embarked on a formal approval process (e.g., documentation or applications for permits or regulatory approvals have been submitted or a Project Description has been formally released). The study area(s) for the cumulative effects assessment will be defined in the EIS / EA, and may not align with other defined study areas for the Undertaking.

## 7.3 Other Effects to be Considered

Climate change will be considered during the EIS / EA. FMG will consider the MECP guidance document *Considering Climate Change in the Environmental Assessment Process* in preparation of the EIS / EA. The guide considers the following:

- Impacts of a project on climate change;

- Impacts of climate change on a project; and
- Various means of identifying and minimizing negative impacts during project implementation.

The potential effects of the environment (i.e., natural hazards) on the Undertaking will also be addressed in the EIS / EA as required by both governments. A summary of the measures that will be implemented to minimize these potential effects on the Undertaking will be provided.

As per the federal requirements as defined by the EIS Guidelines, the EIS / EA will also consider the potential effects of accidents and malfunctions that could arise from the Undertaking on the environment.

#### 7.4 Preliminary Description of Potential Effects

MOE (2014b) suggests that the Proponent may include a preliminary list of potential environmental effects in the proposed ToR, recognizing that the actual determination of effects and mitigation measures will be assessed and described in the EIS / EA. A list of preliminary potential environmental effects has been developed and presented in Table 7.4. These preliminary environmental effects have been considered in the provincial context and without the application of mitigation measures to avoid or minimize effects which will be included in the EIS / EA.

Potential benefits of the Undertaking are expected to include local, regional, and provincial economic benefits, expected to be in the form of direct and indirect: employment and business opportunities, direct expenditures, taxation, and royalties. A preliminary assessment of benefits of the Undertaking is provided in Table 7.4.

**Table 7.4: Example of Potential Effects of the Undertaking**

Project Component	Potential Effect
Open Pit Mining	<ul style="list-style-type: none"> <li>• Reduction in localized air quality due to the release of particulate from mining activities and heavy equipment diesel emissions</li> <li>• Increased localized sound emissions and potential for effects to wildlife and the environment as a result of intermittent blasting activities, heavy equipment operation, and safety equipment (back-up beepers)</li> <li>• Alteration to the local terrain (physiography) from excavation of the open pit, forming a surface depression in the landscape (to become part of lake)</li> <li>• Potential for loss of aquatic habitat by the installation of coffer dams in the Springpole Lake to isolate the mining operation</li> <li>• Potential for aquatic species to be affected by changes in drainage patterns and dewatering of Springpole Lake</li> <li>• Depression of the local groundwater aquifer during operations by changes to the local landscape and mine dewatering activities</li> <li>• Potential effects of a change in residence time in Springpole Lake</li> <li>• Reduction in terrestrial habitat caused by the development of the open pits which are anticipated to become pit lakes at closure</li> <li>• Potential reduction in baseflow to surface water bodies due to mine dewatering and other groundwater takings</li> <li>• Potential effects of the proposed Undertaking on groundwater quality and quantity as well as surface water quality and quantity to surrounding watercourses</li> </ul>

Project Component	Potential Effect
Buildings (including process plant, maintenance garage, warehouse and accommodation complex)	<ul style="list-style-type: none"> <li>• Reduction in air quality and increase in localized sound emissions during construction;</li> <li>• Reduction in air quality due to the release of emissions from the process plant</li> <li>• Increased localized sound emissions as a result of process plant and maintenance operations</li> <li>• Loss of local terrestrial habitat and/or quality of habitat, including habitat for SAR</li> <li>• Potential for terrestrial species disturbance due to construction and operations noise</li> <li>• Impacts associated with the proposed domestic sewage treatment plant and discharge</li> </ul>
Mine Rock Storage Area (MRSA) and Overburden Stockpiles	<ul style="list-style-type: none"> <li>• Reduction in air quality due to the release of particulate matter from stockpiling activities and from the stockpiles themselves prior to reclamation, as well as heavy equipment emissions</li> <li>• Increased noise levels as a result of heavy equipment operation, mineral waste deposition, and safety equipment (back-up beepers)</li> <li>• Alteration to the local terrain from excavation through the forming of permanent stockpiles elevated above the existing landscape</li> <li>• Potential for loss of aquatic habitat by overprinting and/or re-routing local drainage systems to accommodate stockpiling operations</li> <li>• Potential effect on water quality in Springpole Lake, Birch Lake, or Unnamed Lakes from the release of treated runoff and/or seepage from the stockpiles</li> <li>• Reduction in terrestrial habitat caused by the MRSA footprint</li> <li>• Potential for terrestrial species disturbance due to construction and operations noise</li> </ul>
Tailings Management Facility (TMF)	<ul style="list-style-type: none"> <li>• Reduction in air quality due to dust release from the tailings surface as well as particulate matter from construction activities and heavy equipment operation</li> <li>• Increased noise levels and terrestrial disturbance as a result of heavy equipment operation and safety equipment (back-up beepers) during TMF dam construction</li> <li>• Alteration to the local terrain from the construction of a permanent facility raised above the surrounding landscape</li> <li>• Reduction in terrestrial habitat caused by the TMF footprint</li> <li>• Potential for disturbance to wildlife due to construction and operations noise</li> <li>• Potential for loss of aquatic habitat by overprinting local creeks and associated wetlands</li> <li>• Potential alteration of local groundwater infiltration rates</li> <li>• Potential effect on water quality, and aquatic life in Springpole Lake and Unnamed Lakes from the release of effluent and seepage from the TMF</li> <li>• Risks to animals from tailings supernatant</li> <li>• Potential effects of the proposed Undertaking on groundwater quality and quantity</li> <li>• Potential effects of the proposed Undertaking on surface water quality and quantity in other local watercourses</li> </ul>
On-site access roads and pipelines, power infrastructure	<ul style="list-style-type: none"> <li>• Reduction in localized air quality and increase in localized sound emissions during construction</li> <li>• Reduction in localized air quality due to dust release from roads and vehicle emissions</li> <li>• Loss of local terrestrial habitat and/or quality of habitat (possibly for SAR) as a result of the infrastructure footprints</li> <li>• Potential for terrestrial species disturbance due to construction and operations noise</li> <li>• Potential for effects from water crossings</li> </ul>
Off-site aggregate operations, transmission line and road corridor	<ul style="list-style-type: none"> <li>• Increase in localized sound emissions during construction and operations</li> <li>• Reduction and/or fragmentation of terrestrial habitat caused by the corridor development</li> <li>• Potential for terrestrial species disturbance due to construction and operations noise</li> <li>• Alteration to local visual aesthetics</li> <li>• Reduction in air quality due to dust release as well as particulate matter from construction activities, heavy equipment operation, and traffic on road</li> <li>• Potential for effects to water crossings</li> <li>• Direct and indirect mortality to wildlife including SAR</li> </ul>

Project Component	Potential Effect
Overall Undertaking (Springpole Gold Project)	<ul style="list-style-type: none"> <li>• Direct and indirect changes to SAR habitat</li> <li>• Direct local economic benefits, employment and business opportunities, direct expenditures and taxes</li> <li>• Indirect local economic benefits, spin-off employment and business opportunities; spin-off expenditures and taxes</li> <li>• Direct regional economic benefits, employment and business opportunities, direct expenditures and taxes</li> <li>• Indirect regional economic benefits, spin-off employment and business opportunities; spin-off expenditures and taxes</li> <li>• Direct provincial economic benefits, employment and business opportunities, direct expenditures and taxes</li> <li>• Indirect provincial economic benefits, employment and business opportunities, direct expenditures and taxes</li> <li>• Direct federal economic benefits, employment and business opportunities, direct expenditures and taxes</li> <li>• Indirect federal economic benefits, employment and business opportunities, direct expenditures and taxes</li> <li>• Extra demand on existing community and regional infrastructure, and social services in the region</li> <li>• Potential direct effect on cultural heritage resources</li> <li>• Potential direct effect on traditional land uses</li> <li>• Potential loss or alteration of use by the local tourism sector</li> <li>• Potential loss of aesthetic value of the lake and surrounding area</li> <li>• Potential for increased risk for forest fires and increased cost to provincial government</li> </ul>

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## **8 COMMITMENTS, MONITORING, AND FOLLOW-UP**

### **8.1 Commitments**

The EIS / EA will include a comprehensive record of commitments made by FMG during consultation activities, and where or how they have been dealt with during the EA process. The EIS / EA will also include a comprehensive record of commitments made by FMG during the preparation of the EIS / EA, such as relating to:

- Impact management / mitigation measures;
- Additional works and studies to be carried out during various phases of the Project;
- Environmental monitoring;
- Public consultation;
- Contingency planning; and
- Documentation and correspondence.

An Environmental Management Plan and a Social Management Plan will be developed as an outcome of the EA process for the construction, operation, closure, and post-closures phases of the Undertaking to ensure that:

- Impacts are appropriately mitigated;
- Benefits are enhanced as reasonable;
- Compliance with existing legislation, approvals, and FMG's corporate policies is achieved; and
- Compliance will be reported as per applicable regulatory requirements.

A summary of commitments during consultation on the ToR are included in Table 8.1.1 and includes the specific section it has been addressed.

**Table 8.1.1: Preliminary Table of Commitments**

<b>Section</b>	<b>Description</b>	<b>Commitment</b>
1.2	Land Tenure in Lake Trout Lakes	FMG will engage in discussions with MNRFP prior to an application for Crown land on a Designated Inland Lake Trout Lake as specific conditions may apply.
1.2	Land Tenure	Additional information will be provided in the Environmental Impact Statement / Environmental Assessment (EIS / EA) regarding plans to convert mining claims to leases to support this land tenure process.
1.4	Comments provided	FMG has tracked feedback provided on the ToR and the Undertaking, and will consider all comments in the future EIS / EA, and environmental approval applications should the provincial EA be approved.
2.1	Provincial EA Requirements	During the EA process, FMG will review the components of the Undertaking, including the final project design and proposed alternative methods, to determine whether additional EA requirements may apply to the Undertaking.
2.3	Coordinated Provincial and Federal EA Process	Concordance tables will be provided in the EIS / EA to demonstrate how the EIS / EA document meets both [the provincial and federal EA] requirements
2.3	Coordinated Provincial and Federal EA Process	FMG will make reasonable attempts to coordinate consultation activities required by both the provincial and federal EA process, in order to maximize opportunities for Indigenous communities and stakeholders to be effectively engaged. FMG will disseminate federal and provincial EA information simultaneously, as reasonable, to minimize duplication and unnecessary delays.
2.3	Coordinated Provincial and Federal Environmental Assessment Process Integration	FMG will continue to work with both the Agency and the MECP to refine, as appropriate, a path forward that aligns key aspects of the assessment process to that will satisfy the requirements of both the federal and provincial EA processes, to the extent practical.
3	Purpose of the Undertaking	FMG will refine the purpose statement if required.
4	Description of and Rationale for the Undertaking	FMG will include the final description and rationale for the proposed Undertaking following consideration and evaluation of alternatives.
4.1	Description of the Undertaking	The EIS / EA will identify and assess alternatives for all major components of the proposed Undertaking such that the justifications for the preferred option / approaches are clearly presented.
4.1	Description of the Undertaking	Should backfilling of the open pits with mine waste be proposed in the EIS / EA, FMG will show how this activity would impact pit water quality over the life of the

Section	Description	Commitment
		proposed mine, including post-closure, and identify associated mitigation measures. FMG anticipates geochemical data would be incorporated into a model that could be used to identify potential adverse impacts to receptors in the area.
4.1	Description of the Undertaking	An alternative assessment will be completed during the EA process to assess potential locations for the tailings management facility (TMF).
4.1	Description of the Undertaking	FMG will work with Domtar / EACOM to develop appropriate agreements for any shared infrastructure that may be required [in relation to the Wenesaga Road extension].
4.1	Description of the Undertaking	Future power needs and power supply alternatives will be addressed during the EA process.
4.1	Description of the Undertaking	Further detail regarding the components of the undertaking and associated activities, will be provided in the EIS / EA, and future environmental approval applications as appropriate.
4.1	Description of the Undertaking	FMG will determine the change in residence time in Springpole Lake as a result of the proposed dewatering and will consider potential environmental effects due to this change in the EIS / EA.
4.1	Description of the Undertaking	Processing methods will be discussed in the EIS / EA, and this may include conventional ore processing methods of crushing and grinding, followed by whole feed leaching with cyanide, detoxification, electrowinning, and refining.
4.2	Project Phases	FMG will refine the production schedule in the EIS / EA if required.
4.2	Project Phases	FMG will develop a mine plan that will include sequencing of construction activities and will be presented in the EIS / EA.
4.2.1	Construction Phase	A more comprehensive design for the site wide system (e.g., perimeter storm water and seepage collection system) will be presented in the EIS / EA. Effectiveness monitoring will be identified and committed to in the EIS / EA.
4.2.3	Closure Phase	A description of the conceptual closure strategy will be provided with EIS / EA and will include both progressive and final rehabilitation measures. Where available, feedback gained through ongoing consultation and engagement activities will be incorporated into the conceptual closure during permitting.

<b>Section</b>	<b>Description</b>	<b>Commitment</b>
5.1.2	Evaluation Criteria and Indicators	First Mining Gold Corp. will describe in its summary of consultations how comments and concerns were considered and, in the event that input is not incorporated in the EA process, First Mining Gold Corp. will provide justification for its decision.
5.1.2	Evaluation Criteria and Indicators	Preliminary criteria and indicators presented in this ToR will be refined/modified through the EA process, following further analysis and to incorporate input from government agencies (including MECP), the various stakeholders and Indigenous communities. Further data sources will be added during EA development with justification, if it is determined in consultation with government agencies that they are required to adequately assess the alternative methods.
5.1.3	Identification of the Preferred Alternative	The results [of the alternative methods assessment] will be recorded in a summary table and conclusions for each criterion will be established based on the advantages and disadvantages of the alternative methods.
5.2.1	Identification of Alternatives	The advantages and disadvantages of each method will be assessed within the EA based on a series of performance objectives, evaluation criteria and indicators, to define the preferred alternative based on a reasoned process and presented in the EIS / EA along with supporting rationale.
5.2.1	Identification of Alternatives	The EIS / EA will identify and assess alternatives for major components of the proposed Undertaking such that the justifications for the preferred option / approaches are clearly presented. A reasonable range of alternative methods will be considered during the EA process, and viable alternatives will be brought forward for assessment in the EIS / EA.
5.2.1	Identification of Alternatives	In its environmental assessment, First Mining Gold Corp. will identify and assess a “do nothing” alternative. The “do nothing” alternative will be considered in the context of a benchmark against which the potential effects of alternative methods will be evaluated and compared to determine the advantages and disadvantages of the alternatives. The “do nothing” alternative will also be compared against the project to assess the overall advantages and disadvantages of proceeding with the preferred undertaking.
5.2.2	Mine Water Management	FMG will develop on-site water management system that will be based on the water balance and hydrological modelling and include in the EIS / EA

<b>Section</b>	<b>Description</b>	<b>Commitment</b>
5.2.2	Mine Water Management	FMG will identify the CoC and from this an appropriate treatment method will be determined.
5.2.3	Mine rock and Overburden Management	FMG will conduct a detailed alternative assessment, as required by the MDMER for overprinting of waters frequented by fish in accordance with the Guidelines for the Assessment of Alternatives for Mine Waste Disposal (Government of Canada 2016) if required from the regulatory perspective.
5.2.3	Mine Rock and Overburden Management	Quantitative evidence on how mine rock will be used and managed to avoid potential effects associated with ML/ARD, including identification of feasible mitigation measures, will be considered during the EA process. Further considerations include the development of a conceptual approach for mine rock management to be included in the EIS / EA. FMG will assess alternative methods for management of overburden and mine rock that will not be utilized for construction activities [...] in the EIS / EA.
5.2.4	Ore Processing	A reasonable range of alternative methods for ore processing will be considered and assessed in the EA, including alternatives for on-site and off-site ore processing facilities
5.2.5	Process Effluent and Tailings Management	FMG will consider and assess a reasonable range of potential treatment methods for the process effluent during the EA process. A reasonable range of alternatives for the TMF location as well as tailing management alternatives will be assessed during the EA process and detailed in the EIS / EA.
5.2.6	Water Supply	Alternative water supply sources will be considered in the EIS / EA, including groundwater, alternative surface water sources and a combination of open pit mine water and surface water sources.
5.2.7	Water Discharge	FMG will undertake an assessment to determine the quantity and quality of excess site contact waters that will require discharging to the environment, and appropriate location(s) for effluent discharge. The assessment of alternatives to treat wastewater prior to discharge to the environment will be considered during the EA process.
5.2.7	Water Discharge	FMG will develop and implement receiver-based effluent criteria as well and short and long-term monitoring approach for the Undertaking.
5.2.7	Preliminary Alternative Effluent Discharge Points	A detailed evaluation of alternative discharge points and configurations will be undertaken as part of the EA process.

<b>Section</b>	<b>Description</b>	<b>Commitment</b>
5.2.8	Process Plant and Related Site Infrastructure	Alternative locations for the process plant will be assessed during the EA process to ensure it is in line with the technical, environmental, social and economic attributes. For each alternative location for the process plant, related infrastructure will be oriented to support the process plant.
5.2.8	Process Plant and Related Site Infrastructure	Reasonable alternatives [for worker accommodations for construction and operation phases] will be assessed in the EIS/EA.
5.2.9	Explosives Siting and Storage	Limited practical alternatives are available [for manufacturing, storage and handling of explosives due to these factors being highly regulated], but they will be assessed during the EA process.
5.2.10.1	Non-Hazardous Solid Waste	A range of reasonable alternative methods will be considered for non-hazardous solid waste management for the predicted waste streams and volumes and evaluated in the EIS / EA.
5.2.10.2	Hazardous Solid Waste	A range of reasonable alternatives will be considered for hazardous solid waste management during the EA process and presented in the EIS / EA.
5.2.10.3	Domestic Sewage	A reasonable range of alternatives for the domestic sewage treatment will be identified and assessed in the EIS / EA. FMG will design the treatment system and obtain the necessary permits in accordance with provincial requirements.
5.2.11	Quarries and Aggregate Supply	Should aggregate pit(s) be developed under the care and control of FMG, appropriate approvals will be obtained, and the EIS / EA will consider potential environmental impacts associated with proposed aggregate extraction, including identification of feasible mitigation measures.
5.2.12	Power Supply	A reasonable range of power supply alternative methods will be considered and assessed in the environmental assessment, including alternatives for transmission line corridors and routings if grid power is selected as a preferred power supply. FMG will consider carbon and greenhouse gas emissions when assessing alternatives during the EA process, as appropriate.
5.2.13	Site Access	In its environmental assessment, First Mining Gold Corp. will identify and assess a reasonable range of alternative access road locations and alignments for the proposed two-lane all-season access road to the project site, including alternative access corridors from the west and from the east. For each access road and alignment alternative, First Mining Gold Corp. will assess proposed aggregate sources, as well as any aggregate source

Section	Description	Commitment
		alternatives and the potential environmental effects of extracting and transporting aggregate from any source. The assessment will include the consideration of the duration and frequency of the use of the access alternatives. Options to avoid impacts to species at risk and species at risk habitat shall be considered.
5.2.14	Mine Closure	The EIS / EA will include an assessment of reasonable closure alternatives for the Undertaking. The EIS / EA will assess alternative closure methods consistent with provincial regulatory requirements.
5.2.15	Fish Habitat Loss and Offsetting/ Compensation	FMG will evaluate several fish habitat offsetting / compensation options through discussions with Indigenous communities, Fisheries and Oceans Canada and Environment and Climate Change Canada in order to define a base case that will be acceptable to <i>Fisheries Act</i> policies. A reasonable range of alternatives for fish habitat offsetting / compensation options will be identified and assessed in the EIS / EA.
6.1	Description of the Environment	FMG will include a more detailed description of the environment based on the extensive baseline data collection completed to date.
6.1	Description of the Environment	Refine and update the study areas, if necessary, in the EA.
6.2	Traditional Lands or Sites of Cultural Significance	FMG will complete or support completion of TK/TLU studies and incorporate more consultation opportunities for collecting data during the EA.
6.2	General Site Description and Current Land Use	Baseline environmental work has been ongoing for the proposed Undertaking since 2011. Further details and copies of reports will be included with the EIS / EA as supporting documentation.
6.2.6	Proximity to any Indigenous Traditional Lands	Information on traditional lands and sites of cultural significance will be updated through the Traditional Knowledge / Traditional Land Use (TK/TLU) study and will include direct consultation with Indigenous communities or designated Land Use Planning Committees. As appropriate, this information will be used to support the preparation of the EIS / EA, and will be detailed only in accordance with any agreements with knowledge holders.
6.3.3	Geochemistry	Characterization of mine rock, pit walls, ore and ore stockpiles, and tailings for ARD/ML will be detailed in the EIS / EA.
6.3.4	Climate	FMG will install a weather station at the Springpole site.

Section	Description	Commitment
6.3.4	Climate	FMG will consult MECP before [data from the new weather station at the Springpole site] is used for atmospheric and hydrological modelling.
6.3.5	Air Quality	FMG will consult MECP regarding the proposed ambient air monitoring program.
6.3.6.1	Noise	In its environmental assessment, First Mining Gold Corp. will assess and include potential off-site noise sources associated with the undertaking as described in the ToR including, but not limited to, proposed access routes and transmission lines.
6.3.6.2	Vibration	The following vibrational study items will be considered when preparing the EIS / EA as applicable: <ul style="list-style-type: none"> <li>Vibration Limits: such as the MECP vibration limits in: Draft technical publication NPC-207, Impulse Vibration in Residential Buildings, November, 1983, supplementing the Model Municipal Noise Control By-Law, Final Report, August 1978, as amended; and Publication NPC-119, Blasting, Model Municipal Noise Control By-Law, Final Report, August 1978.</li> </ul>
6.3.6.3	Light	Light assessment and mitigation will be completed during the EA process and included in the EIS / EA.
6.3.7	Sediment Quality	Additional sediment quality sampling and analysis (e.g., total metals, particle size and total organic carbon content) for key sites likely to receive mine effluents will be assessed during the EA process. Collection in the vicinity of the proposed effluent discharge location will follow the sampling methodologies outlined in the Metal Mining Technical Guidance for Environmental Effects Monitoring document.
6.3.8.1	Hydrology (as found in other discipline-specific sections)	Where necessary, FMG will engage with regulatory agencies on these additional studies. Supporting technical documents will be provided with the EIS / EA and include a description of the baseline methodology, results of the studies and will be used to assess and/or verify the potential impacts of the project
6.3.8.1	Hydrology	The local watersheds will be defined during the baseline data for the Undertaking [...] The applicability of the WSC Station, or a suitable alternative, to the Undertaking will be rationalized in the EIS / EA.  A water balance modelling and effects assessment plan will be developed to estimate effects of the Undertaking on watercourses and will be included in the EIS / EA.

Section	Description	Commitment
6.3.8.2	Surface Water	Supporting documentation regarding the water program will be provided in the EIS / EA. Such information as sampling methodologies, surface water sampling locations, analytical results and will be provided.
6.3.9	Hydrogeology	The EA process allows for consultation on environmental baseline. FMG will continue to consult with MECP's Northern Region Technical Support Section throughout the EA process.
6.3.9.1	Hydrogeology	<p>FMG will develop programs to predict pit water quality for the LOM, closure and post-closure and assess pit filling in terms of associated environmental effects, and mitigation measures. Additional components of the program that will be considered to provide further description of the environment may include:</p> <ul style="list-style-type: none"> <li>• Estimation of the zone of influence of the proposed water takings, with predicted impact to surface water features and/or groundwater users;</li> <li>• Prediction of seepage water quality to assess potential impacts to receivers from the proposed mine facilities;</li> <li>• Modelling of scenarios based on upper and lower boundary scenarios for filling the open pits;</li> <li>• Sensitivity analysis for operations, closure and post-closure phases; and \</li> </ul> <p>Potential for impact via subsurface transport. A technical hydrogeological report by a subject matter expert will be included as supporting documentation in the EA. The report will detail but not be limited to methodologies, groundwater sampling locations, analytical results, frequency and water quality modelling including sensitivity analysis for operations, closure and post-closure phases. Prediction of groundwater flow paths, seepage rates, potential receptors, subsurface travel times, etc. is anticipated to be provided in the EIS / EA and its supporting documentation.</p>
6.3.9.2	Groundwater Quality	Groundwater will be collected up-gradient, cross-gradient, down-gradient, from all relevant facilities, including potential seepage areas and areas where there is potential for groundwater-surface water interaction. Groundwater monitoring wells will be installed at the potential compliance points and within the footprint of the planned operation with an aim of having most wells remain in-place during all phases of the Project. FMG will update its monitoring program to include other criteria

Section	Description	Commitment
		and guidelines to ensure that baseline groundwater quality studies provide adequate information.
6.3.9.2	Groundwater Quality	Groundwater sampling methodologies, sampling locations and results of groundwater quality analyses will be provided in the EIS / EA and its supporting documentation.
6.3.10.1	Fish and Fish Habitat	First Mining Gold Corp. will consult with the Ministry of the Environment, Conservation and Parks as well as other government agencies on baseline studies to determine the geographic extent of studies and evaluations needed to assess the potential impact of the project on fish populations and management objectives. During the environmental assessment, First Mining Gold Corp. will conduct the appropriate studies to determine the availability and viability of proposed avoidance and mitigation strategies to address any potential impacts to fisheries including studies beyond the boundary of the northern basin of Springpole Lake.
6.3.10.2	Fish Usability	Traditional Knowledge Studies will be reviewed to support the selection of fish species targeted for fish tissue sampling. Tissue analyses will be conducted in accordance with the Metal Mining Technical Guidance for Environmental Effects Monitoring document (Environment Canada 2012). The results of monitoring of metal content in fish tissue will be presented in the EIS / EA.
6.3.10.3	Benthic Communities	Additional benthic community data will be collected in the vicinity of the proposed effluent discharge location following the sampling methodologies outlined in the Metal Mining Technical Guidance for Environmental Effects Monitoring document (Environment Canada 2012).
6.3.11	Terrestrial Environment	FMG will conduct a radio satellite collaring program for Caribou (Boreal population) in order to support longer term permitting requirements and contribute towards monitoring the impacts of the Undertaking on Caribou (Boreal population) movement and habitat selection / use
6.3.11.1	Species at Risk	FMG will provide additional information in the EIS / EA for each SAR that have the potential to occur in the area of the Project. FMG will include a complete list of appropriate indicators for these species identified,

Section	Description	Commitment
		including Caribou (Boreal population), and this information will be provided in the EIS / EA.
6.3.11.1	Species at Risk	All project components will be assessed for potential impacts to SAR and their habitat.
6.4.1	Indigenous Communities	The Cat Lake - Slate Falls Community Based Land Use Plan will continue to be reviewed through the environmental assessment (EA) process. First Mining Gold (FMG) will fully consider the data collected under this plan and the key strategic directions during the EA process, in consultation with Cat Lake and Slate Falls Nation.
6.6	Archaeology and Cultural Heritage	A cultural heritage report, including existing conditions and preliminary impact assessment, will be undertaken for the entire study area during the planning phase to inform the EA process and will be summarized in the EIS / EA.
6	Human Health	The assessment of impacts to human health from the Project will consider Health Canada Guidance for Evaluating Human Health Impacts in Environmental Assessment.
6.7	Description of the Built Environment	A cultural heritage report including built heritage resources and cultural heritage landscapes will be completed during the planning phase to inform the EA process and will be summarized in the EIS / EA.
6.8	Indigenous Participation in Future Studies	FMG will provide the opportunity for local Indigenous communities to participate in future field studies.
6.8	Draft EIS/EA	First Mining Gold Corp. will prepare a draft EIS/EA report including supporting studies for review by interested persons, Indigenous communities and the government review team.
6.8	Ongoing and Future Studies	Baseline study methods will be circulated for review and comment to government and Indigenous communities. Opportunities to review and provide input on the programs and results will be provided during the EA, which will be considered going forward as ongoing fieldwork programs are refined into monitoring programs.
7.1.1	Selection of Valued Components	FMG will gather additional input from Indigenous communities, non-Indigenous stakeholders, and other interested parties to refine the list of valued components that will be finalized during the EA process.
7.1.1	Valued Components	During the EA process, potential adverse environmental effects to VCs will be described for each phase of the Undertaking. Further refinement of the VCs may occur

Section	Description	Commitment
		during the EA process and this evolution will be presented in the EIS / EA, as appropriate.
7.1.2	Spatial and Temporal Boundaries	Spatial boundaries may be revised or otherwise further clarified within the EIS / EA and a rationale will be provided for the boundaries established. The temporal boundaries are defined based on the timing and duration of the Undertaking phases, which are anticipated to be further defined in the EIS / EA as engineering studies progress.
7.1.3	Identification of Criteria, Indicators and Data Sources	FMG will refine the Criteria, Indicators and Data Sources.
7.2	Cumulative Effects Assessment	A cumulative effects analysis will be conducted, and technical guidance issued by the Agency, Assessing Cumulative Environmental Effects under the Canadian Environmental Assessment Act, 2012, will be used to guide the cumulative effects assessment for the EIS / EA. The study area(s) for the cumulative effects assessment will be defined in the EIS / EA, and may not align with other defined study areas for the Undertaking.
7.2	Cumulative Effects Assessment	FMG will consider input received from Indigenous communities in the cumulative effects assessment.
7.3	Other Effects to be Considered	Climate change will be considered during the EIS / EA. FMG will consider the MECP guidance document Considering Climate Change in the Environmental Assessment Process in preparation of the EIS / EA. The potential effects of the environment (i.e., natural hazards) on the Undertaking will also be addressed in the EIS / EA as required by both governments. A summary of the measures that will be implemented to minimize these potential effects on the Undertaking will be provided.
7.3	Other Effects to be Considered	The EIS / EA will consider the potential effects of accidents and malfunctions that could arise from the Undertaking on the environment
7.4	Mitigation Measures in Future Studies	Refine the description of the actions necessary to prevent or mitigate the effects upon the environment.
7.4	Preliminary Description of Potential Effects	The actual determination of effects and mitigation measures will be assessed and described in the EIS / EA.
8.2	Monitoring and Follow-up Programs	A Monitoring Framework will be developed with consideration of comments raised by stakeholders and Indigenous communities for the post-EA phase to address the stages of the proposed Undertaking.

Section	Description	Commitment
8.2	Monitoring and Follow-up Programs	Monitoring programs to be implemented throughout the life of the Project to evaluate the effectiveness of mitigation measures and guide subsequent management actions will be identified in the EIS / EA. FMG will identify potential monitoring requirements early in the EA process.
9	Stakeholder distribution List	FMG will maintain a current (internal) stakeholder distribution list and associated Record of Consultation (ROC).
9.1	Consultation Overview	In its environmental assessment, First Mining Gold Corp. will ensure effective and meaningful communication and engagement through the building of trust between the Project team and Indigenous communities to enhance awareness of the Undertaking. First Mining Gold Corp. will provide flexible consultation opportunities, issues resolution and feedback to consult Indigenous communities for the ... environmental assessment process.
9.1	Consultation Overview	First Mining Gold Corp. will provide opportunities for Indigenous communities to be engaged at critical decision-making points during the environmental assessment process, so that Indigenous communities may provide input on how the undertaking and its alternatives may have an impact on their rights and interest through the sharing of traditional knowledge; and, that First Mining Gold Corp. will consider and incorporate, where appropriate, traditional knowledge and traditional land use into each environmental assessment decision-making milestone.
9.1	Consultation Overview	First Mining Gold Corp. will also provide opportunities for government agencies and interested persons to be engaged at critical environmental assessment decision-making milestones, including the identification of criteria and indicators, the development of baseline studies and evaluation methodologies.
9.1	Overview	First Mining Gold Corp. will provide flexible consultation opportunities, issues resolution and feedback to consult Indigenous communities for the following components of the environmental assessment process: <ul style="list-style-type: none"> <li>- The development of community-specific Indigenous consultation plans, if requested, for the preparation of an environmental assessment;</li> <li>- The development of criteria and indicators for the assessments of alternative methods and the preferred Undertaking;</li> </ul>

Section	Description	Commitment
		<ul style="list-style-type: none"> <li>- The development of the methodology, evaluation and results of Baseline Studies;</li> <li>- The development of the evaluation methodology for the assessment of alternatives and the preferred Undertaking;</li> <li>- The conclusion of assessment and evaluation of alternatives (including the identification of potential effects and the development of appropriate mitigation and management measures);</li> <li>- The development and implementation of Traditional Knowledge and Traditional Land Use studies;</li> <li>- The assessment and evaluation of the preferred Undertaking (including the development of mitigation and monitoring measures to address any potential effects); and,</li> <li>- The conclusion of the assessment and evaluation of the preferred Undertaking (including potential effects, and appropriate effects management measures).</li> </ul>
9.3.2	Consultation Objectives	FMG will provide opportunities for Indigenous communities to be engaged throughout the EA process, so that Indigenous communities may provide input on how the Undertaking and its alternatives may have an impact on their rights and interests through the sharing of Traditional Knowledge; and that FMG will consider and incorporate, where appropriate and available, Traditional Knowledge into each EA component of the EA. FMG will also provide opportunities for the public and agencies to be engaged and consider input received.
9.3.2	Consultation with Indigenous communities	FMG will provide reasonable capacity support to communities to enable them to provide meaningful input and feedback. FMG will prepare and make available a plain language summary of the EA to facilitate understanding of the various documents.
9.3.3	Consultation with Indigenous communities	FMG also will provide reasonable support to the Métis Nation of Ontario (Métis Region 1)'s to participate in consultation meetings.
9.8	Consultation Plans for the EA	Comments received during consultation on the Project will be considered in the Project design and EIS / EA, as applicable. The EIS / EA will document how the Project has been modified, as applicable, as a result of inputs from stakeholders and Indigenous communities.

Section	Description	Commitment
9.8.1	Indigenous Consultation Plans	FMG will establish a mutually agreed upon Nation-specific approach to consultation with the Indigenous Nations listed in Section 9.3.2 if requested by the Nation. This includes FMG co-developing a Nation-specific Consultation Plan with any Nation that requests it.
9.8.2	Public Consultation Plans	FMG will engage the public at key EA decision making milestones, including environmental baseline studies, alternatives assessment and potential effects and mitigation.
9.8.3	Government Consultation Plan	FMG will consult with government agencies at key EA decision making milestones, including environmental baseline studies, alternatives assessment and potential effects and mitigation.
10	Flexibility to Accommodate New Circumstances	As part of the EA, FMG will develop short term contingency plans as appropriate to gain further flexibility, such as minor design changes or specific consultation activities. Such plans will outline a course of action to be followed if unforeseen situations occur.
11	Other Approvals Required	FMG will continue to consult with municipal, provincial, and federal agencies to ensure that the required approvals are identified throughout the EA process.
All Sections	Updated Figures	All figures will be updated accordingly.

More generally, a summary of commitments developed during consultation activities associated with the ToR are included in Table 8.1.2, including a description of the commitment.

**Table 8.1.2: Commitments developed through Consultation**

Date	Community / Comment #	Commitment
April 2021	Contingency Plan	FMG will make a commitment to developing a spills contingency plan and accidents and malfunctions plan in the event of contamination of the watershed.
April 2021	TK (TEK)	FMG will provide the opportunity for the Ojibway Nation of Saugeen and other interested Indigenous communities in developing a TK study.
April 2021	TK (TEK)	FMG understands that that the receipt of TK is an iterative process (through consultation input and receipt of TK studies) and the results will be incorporated into the assessment upon receipt of information.
April 2021	Youth Project	FMG will provide the opportunity to include Wabauskang post-secondary students and other interested Indigenous communities to supplement field crews or undertake educational site tours where appropriate.

Date	Community / Comment #	Commitment
April 2021	Consultation Plan	When requested, FMG will work with community leadership to identify an appropriate translator from within the community for community meetings to help engage the Elders and those who do not speak English.
April 2021	Consultation Plan	FMG will bring in experts where feasible to help explain the technical information when appropriate.
April 2021	Seismic Activity	FMG will include studies and information on how seismic activities will be monitored.
April 2021	Consultation Plan	FMG will maintain a project specific website to help keep community members informed regarding the Undertaking.
April 2021	Fencing	FMG will commit to ensure safety on site by fencing of some of the site components where required and practical.
April 2021	Consultation Plan	FMG will provide before and after pictures of other mines to consultation sessions to demonstrate reclamation.
April 2021	Employment and Training	FMG will work with local communities to identify training requirements for the labour force and support initiatives towards job training.
April 2021	Work Plans / Technical Work Plans	Baseline studies for the Springpole Gold Project have been ongoing since 2011. Where necessary, FMG and Wood have identified a few additional studies to supplement programs in 2021. Engagement with MECP will be ongoing during key milestones of the EA process. FMG will engage MECP on new baseline studies planned for 2021 where regulatory feedback is required by the technical experts at Wood.
April 2021	Consultation Plan	FMG provided capacity funding for the review of the ToR and has commenced discussions with communities on next steps for support during the EA process
April 2021	Consultation Plan	As requested, FMG will provide hard copies of presentation and other materials, and follow up as requested. FMG will provide a summary of the comments and concerns raised by each community to their respective contact.
April 2021	Consultation Plan	<p>FMG will consult with Indigenous communities as well as agencies at key EA decision making milestones. These include:</p> <ul style="list-style-type: none"> <li>- Environmental baseline</li> <li>- Alternatives</li> <li>- Potential Effects / Mitigation</li> </ul> <p>Given the current limitations imposed by the COVID pandemic, different approaches to consultation through the EA process may need to be considered by FMG, if this is of interest to communities. FMG will continue to discuss opportunities to consult with Indigenous Communities during the EA process as the pandemic vaccination process advances. These opportunities will be dependent upon the capacity and interest of the Indigenous</p>

Date	Community / Comment #	Commitment
		Communities and may include sharing baseline reports, preliminary alternatives assessments, preliminary technical supporting documents or portions of the EA Report. First Mining Gold Corp. will prepare a draft EIS/EA report including supporting studies for review by interested persons, Indigenous communities and the government review team. The draft EIS/EA report will be circulated for a comment period lasting a minimum of six weeks. Notice of the comment period on the draft EIS/EA report will be provided. Comments will be considered and responses demonstrating how comments/concerns would be addressed in the final EIS/EA will be provided by First Mining Gold Corp. prior to submission of the final environmental assessment.”
April 2021	Consultation Plan	FMG will develop a community specific consultation plan with the STPN.
April 2021	Environmental Monitoring	FMG will provide the opportunity to local Indigenous communities to participate in environmental monitoring programs
April 2021	External Experts	FMG has commenced discussions with communities on next steps for support during the EA process. This support will enable local communities to bring in external experts to review FMG’s technical reports where appropriate and when warranted.
April 2021	Archaeology	If required, FMG will identify mitigation measures to protect sites that contain pictographs.
April 2021	Heritage Resources and Cultural Heritage Landscapes	If required, FMG will identify mitigation measures to protect sites / lands that are of cultural and heritage importance
April 2021	Land Use Plan	FMG will review the existing land use plan of Cat Lake First Nation and Slate Falls Nations to include previously collected data.
April 2021	Mine Waste Disposal	FMG will prepare an assessment of alternatives for mine waste disposal and will consult with local Indigenous communities, government and the public
April 2021	Consultation Plan	FMG will provide local radio advertisements for public consultation sessions.
April 2021	Environmental	FMG will provide information on the website about the process for capturing and relocating fish from the north basin.
April 2021	Employment	FMG will present a list of jobs that will be available when the mine opens during consultation sessions.
April 2021	SAR	FMG will provide the SAR Report to the MNO.
April 2021	Outreach	FMG will organize education packages for the school, including “Mining Matters” education program and provide an opportunity to visit the site if there is interest where practical and when safe.

Date	Community / Comment #	Commitment
April 2021	Recreation	FMG will develop a series of options designed to mitigate the potential loss of the portage adjacent to the current location of the Project camp. These will be presented at meetings with the communities potentially impacted by the removal of the portage.
April 2021	Road Access	FMG is aware of the local interest in improving community road access and will collaborate with communities and government on their initiatives outside of the EA process to determine where synergies can be found.
April 2021	Environmental	No pesticide spraying would be completed as part of mine access road construction unless legally required.
April 2021	Culturally Sensitive Environs	Indigenous communities will be consulted to determine culturally sensitive alternatives before removal of environs where required, taking into account legal requirements.
April 2021	Socio-Economic	FMG will implement a procurement process that encourages Indigenous and local suppliers.
April 2021	Socio-Economic	FMG will work with potentially affected Indigenous communities to identify potential mitigation measures to minimize socio-economic effects related to the Undertaking.
April 2021	Culturally Sensitive Environs	Indigenous communities will be consulted to determine culturally sensitive alternatives before removal of environs where required, taking into account legal requirements.
<b>Indigenous communities</b>		
April 2021	STPN-4	FMG will be considering reasonable power supply alternative methods in the EIS / EA, including renewable energy. FMG will consider carbon and greenhouse gas emissions when assessing alternatives during the EA process, as appropriate.
April 2021	STPN-8	Geotechnical work regarding the stability of the MRSA will be further investigated and addressed in the EAb which will be shared with the STP Nations.
April 2021	STPN-12	The Regional study area (RSA) will be developed for the EA and will be specific to the traditional and non-traditional land use activities, based on the information collected during consultation, the baseline studies and the anticipated effects. The RSA will be described and illustrated in the EIS/EA.
April 2021	STPN-13	Additional commercial operations will be identified and considered during the EA process, including but not limited to Knobby's and Bamaji Air.
April 2021	STPN-15	Surface water monitoring stations will be identified as a result of the effects assessment, including input received during consultation with the SEC and regulator agencies during the EA process. A preliminary list of expected surface water monitoring stations will be based on the monitoring stations in the baseline hydrology and surface water reports, which will be provided in the EIS / EA.

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April 2021	STPN-16	Groundwater monitoring stations will be identified as a result of the effects assessment, including consultation with the SEC and regulator agencies during the EA process. A preliminary list of expected groundwater monitoring stations will be based on the monitoring stations in the baseline hydrogeology reports which will be provided in the EIS / EA.
April 2021	STPN-22	The potential impacts and mitigation to SAR as a result of the Project will be described in the EIS / EA.
April 2021	STPN-23	The EA process will provide opportunities to share input on potential SAR mitigation and monitoring programs proposed for the Project.
April 2021	STPN-27	During the EA, information collected on terrestrial environment will be reviewed to determine what potential wildlife habitat for various life stages (including furbearers such as marten) may be potentially impacted by the Project.
April 2021	STPN-28, 29, 30, 31, 32, 34	During the EA, new and updated information is expected to be provided on Indigenous communities, and FMG plans to seek input and review of the information prior to submission of a final EIS / EA.
April 2021	ONS-2	Opportunities to salvage medicinal plants, other plants of importance and firewood on the Project site prior to construction will be discussed between FMG and ONS as the project progresses.
April 2021	ONS-4	Measures to reduce the impact on fisheries in Springpole Lake will be developed in consultation with regulatory agencies and Indigenous communities during the EA and may include timing windows as well as other suitable measures to protect fish during sensitive times.
April 2021	ONS-6, 15	In the event that grid power is considered preferred, alternative transmission line routes and interconnections will be assessed during the EA process. Opportunities for feedback [on power supply alternatives] will be provided to Indigenous communities during the EA process.
April 2021	ONS-7	For construction, FMG will identify trainings to be in place at the camps for both FMG staff and third-party contractors that address prevalent health, social, and environmental issues associated with worker camps. Management plans will continue to be developed/enhanced prior to the construction and operations phase of the project.
April 2021	ONS-8, 10	An assessment of alternatives for the storage of mine waste associated with the Springpole Gold Project will be completed, as required by the <i>Metal and Diamond Mining Effluent Regulations</i> .
April 2021	ONS-9	FMG will consider and assess a reasonable range of potential treatment methods for the process effluent during the EA process.

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April 2021	ONS-11	The assessment of groundwater quantity and quality will be conducted during the EA process. Based on the results, various measures will be considered to mitigate groundwater influent, if required [...] consideration for alternative mine water treatment options will be assessed during the environmental assessment process.
April 2021	ONS-16	The Regional Study Area for Traditional Land Use will be defined during the EA process and consider the applicable caribou populations potentially affected by the Project. Further, the Regional Study Area for the human environment will include those communities potentially affected by the Project.
April 2021	ONS-17	FMG will consult with ONS during the EA to minimize impacts and resolve issues related to the Project, including the identification of traplines.
April 2021	ONS-21	In the event that overprinting of these waterbodies is anticipated, further study may be undertaken during the environmental assessment.
April 2021	ON-23, 24, 27	FMG will provide an overview of the fisheries studies completed to date, including lake trout and their habitat, and what studies are planned for future investigation. The baseline studies will be presented in the EIS / EA when submitted.
April 2021	ONS-25	Fish species collected for fish tissue sampling will be consistent with provincial Fish Contaminant Monitoring Program. Sampling may also include fish species identified by Indigenous Nations. With respect to the fish species required for the Environmental Effect Monitoring Program required by the Metal and Diamond Mining Effluent Regulations, FMG will collected species that meet the Metal Mining Technical Guidance for Environmental Effects Monitoring document (Environment Canada, 2012).
April 2021	ONS-28	A list of SAR with the potential to occur in the proximity of the Project will be provided in the EIS/EA, and will be considered when undertaking further baseline studies.
April 2021	ONS-30	Potential effects on moose will be assessed in the EIS / EA
April 2021	ONS-31	Should TKLU studies identify wild rice locations with the local study area of the Project, it will be added as an indicator as part of the effects assessment provided in the EIS / EA.
April 2021	ONS-39	FMG will work collaboratively with ONS in developing the methodology for resolving issues related to the Project, during the EA process. Where required, commitments will be reflected in the EIS / EA.
Jan / Mar 2021	MFN-5	A summary of Project benefits will be provided in the EIS / EA.
Jan / Mar 2021	MFN-7	FMG will investigate the potential for contaminants to leach from the mineral waste storage areas and, if necessary, develop

Date	Community / Comment #	Commitment
		measures to mitigate this risk during the EA process. FMG will work with federal and provincial agencies to ensure applicable standards and guidelines are met.
Jan / Mar 2021	MFN-11, 16, 49	A summary of the geochemistry assessment will be provided in the EIS / EA, and will include a description of the ARD/ML testing program. Depending on the results of the ARD/ML program, measures will be outlined in the EIS / EA to manage potential impacts due to ARD/ML rock. The geochemistry assessment will be prepared by a qualified individual with experience in conducting these types of studies
Jan / Mar 2021	MFN-12, 18	Watercourse realignments are not anticipated as part of the Project, however should they be required, a reasonable range of alternatives would be assessed in the EIS / EA.
Jan / Mar 2021	MFN-19	A Follow Up Program will be presented in the EIS / EA to confirm predictions made during the EA process. A preliminary water quality monitoring program will be developed during the EA process, to be finalized during the permitting stage that will meet provincial regulatory requirements.
Jan / Mar 2021	MFN-20	A summary of the baseline fisheries studies will be provided in the EIS / EA. Completed aquatic baseline study reports will also be appended to the EIS / EA. A Follow Up Program will be presented in the EIS / EA to confirm predictions made during the EA process.
Jan / Mar 2021	MFN-21	A summary of the baseline fish and fish habitat studies will be provided in the EIS / EA, including water quality parameters. Further, a detailed fish salvage program will be developed as required during the regulatory stage of the project.
Jan / Mar 2021	MFN-22	A range of reasonable alternatives for closure will be investigated during the EA process.
Jan / Mar 2021	MFN-22	A summary of the baseline fish and fish habitat studies will be provided in the EIS / EA, including the proposed dewatered area of Springpole Lake. Comprehensive aquatic baseline reports will also be available.
Jan / Mar 2021	MFN-23	A summary of the baseline fish and fish habitat studies will be provided in the EIS / EA, including the small waterbodies proposed to be overprinted by the tailings and waste rock. Comprehensive aquatic baseline reports will also be available. A detailed fish salvage program will be developed as required during the regulatory stage of the project.
Jan / Mar 2021	MFN-24	The EIS / EA will include an assessment of the loss of ungulate habitat, potential impacts to species at risk/conservation concern and the potential impact on Indigenous current use and human health and ecological risk, along with a discussion on potential mitigation measures.

Date	Community / Comment #	Commitment
Jan / Mar 2021	MFN-25	A description of Indigenous communities will be provided in the EIS / EA to enable assessment of potential effects of the project using information publicly available or traditional knowledge/ land use.
Jan / Mar 2021	MFN-26, 27	Archaeology studies will be completed and included in the EIS / EA. These studies will consider input received from Indigenous communities and /or Traditional Knowledge Studies, where available.
Jan / Mar 2021	MFN-28	The cultural heritage study will consider input received from Indigenous communities and /or Traditional Knowledge Studies, where available
Jan / Mar 2021	MFN-34	FMG will discuss with Indigenous communities how they wish to be consulted / appropriate means during the COVID-19 pandemic, such as by virtual tools (i.e. Zoom, Webex or other social platforms) and other identified, mutually agreeable methods.
Jan / Mar 2021	MFN-43, 44	A summary of applicable hydrogeological studies and determination of the potential effects of pit dewatering will be provided in the EIS / EA
Jan / Mar 2021	MFN-46	A summary of baseline hydrology conditions will be provided in the EIS / EA, sufficient to be able to assess potential project impacts and develop appropriate mitigation, management and monitoring plans. Technical report(s) will also be appended to the EIS / EA as needed for understanding.
Jan / Mar 2021	MFN-47	A preliminary site-wide water balance will be developed to a level needed to support the EA process. The site-wide water balance will continue to be refined during ongoing engineering studies to support the permitting process
Jan / Mar 2021	MFN-50	The EIS / EA will identify how contact water and process water will be managed and treated, if necessary
Jan / Mar 2021	MNO-4, 9,10, 11, 12,	FMG confirms that we will provide reasonable support for the MNO's meaningful participation in the environmental assessment process. FMG anticipates providing capacity funding for consultation and engagement, as well as technical reviews going forward through the EA process.
Jan / Mar 2021	MNO-13, 16	FMG [...] will discuss with MNO how they wish to be consulted during a time where COVID-19 is a threat. FMG will discuss with R1CC appropriate means of carrying out consultation and engagement during the pandemic, including virtual tools (i.e. Zoom, Webex or other social platforms) and other mutually agreeable methods. FMG will continue to work with MNO to determine how best to plan consultation activities so that the health and wellbeing of MNO citizens is protected.
Jan / Mar 2021	MNO-21	FMG will provide information for comparability of other projects [regarding sizes of other waterbodies that have been drained or

Date	Community / Comment #	Commitment
		overprinted] during the EA process including during consultation and engagement, as appropriate
Jan / Mar 2021	MNO-22	FMG [...] will consult with the MNO to ensure the fish tissue assessment includes fish species that are commonly captured as traditional food sources, as reasonable.
Jan / Mar 2021	MNO-24	<p>FMG will comply with the fish and fish habitat protection provisions of the <i>Fisheries Act</i> during the necessary dewatering process, including by incorporating measures to avoid: causing the death of fish harmful alteration, disruption or destruction of fish habitat in your work, undertaking or activity.</p> <p>FMG will also ensure effective sediment control measures to avoid deleterious substances from entering the watercourses during dewatering and other activities. Further, FMG will plan all in-water work with consideration for timing windows to protect fish, during all life stages. Further information will be provided in the EA documentation.</p>
March 2021	MNO-Valued Components	FMG commits to addressing MNO's VC's within the EA.
January 2021	CLFN-4	Alternative locations for the processing plant will be assessed during the EA process. For each alternative processing plant location, related infrastructure (including mine site roads) will be oriented to support the process plant alternative.
January 2021	CLFN-8	A reasonable range of alternatives for TMF location as well as tailings management alternatives will be assessed during the EA process.
January 2021	CLFN-9	The design of the project will fully consider the International Cyanide Management Code. As appropriate, those design elements will be documented in the EIS/EA.
January 2021	CLFN-10	The management of drainage will be reviewed as engineering studies advance and the preferred location of the MRSAs and TMF are selected. Watercourse realignments are not anticipated as part of the Project, however should they be required, a reasonable range of alternatives would be assessed in the EIS / EA.
January 2021	CLFN-11	These options [for fish habitat offsetting/compensation options] will also be discussed with Indigenous communities and stakeholders for comment. Consultation with Indigenous communities will occur during the development of offsetting / compensation options during the EA process
January 2021	CLFN-12	In the event the Wenesaga Road extension is suspended, and/or is not completed, FMG will consider other alternatives for access to site. These will be presented in the EIS / EA. FMG will continue to work with Cat Lake First Nation to support the all-weather private road to the community.

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January 2021	CLFN-13	Alternative closure methods for the open pit will be considered. A range of reasonable alternatives for pit flooding will be investigated during the EA process.
January 2021	CLFN-14	Treatment options for pit lake water will be identified during the EA process as needed to assess environmental impacts. Closure of the mine site will be more fully documented through the Closure Plan required by the <i>Mining Act</i> , which will be filed prior to construction.
January 2021	CLFN-19	An assessment of the potential effects [of the access road] will be included in the EIS / EA.
January 2021	CLFN-21	Appropriate water quality thresholds will be determined during the EA and permitting process, and will consider baseline conditions and provincial water quality guidelines.
January 2021	CLFN-22	The management of potential effects of the project on groundwater levels and quality will be investigated during the EA, and mitigation measures will be implemented as appropriate based on those findings
January 2021	CLFN-24	FMG will consider the CABIN protocol to assess the effects on the aquatic environment. Opportunities to participate in the implementation of the monitoring program will be discussed with Indigenous communities.
January 2021	CLFN-26	Fisheries studies have been ongoing in Springpole Lake since 2011 and will be summarized in the EIS / EA. Potential impacts to Lake Trout from the Project will be assessed during the EA process and mitigation will be determined, including the development of fish habitat offsetting measures
January 2021	CLFN-27	Traditional Knowledge Studies will be reviewed to support the selection of fish species targeted for fish tissue sampling. Use of non-lethal sampling methods will be fully considered and preferred as reasonable. The selection of fish species will be in accordance with the Metal Mining Technical Guidance for Environmental Effects Monitoring.
January 2021	CLFN-35	FMG will fully consider the inclusion of Significant Wildlife Habitat as an indicator under the terrestrial environment for assessment during the EA process.
January 2021	CLFN-38	Where specific issues / aspects arise during project implementation, FMG staff will be engaged with specialist support if needed, to develop management plans to outline the proposed approach FMG will take to manage particular these issues during the construction, operation and closure the Project. An overarching Construction / Operational Environmental Management Plan would be prepared during the regulatory phase and include such issues

Date	Community / Comment #	Commitment
		as environmental training and awareness [and] Indigenous Awareness / Cultural Sensitivity Training.
January 2021	CLFN-39	FMG will review the Lake St. Joseph Accord including, and consider potential impacts from the Project in the EIS / EA.
January 2021	CLFN-40	FMG will document issues and concerns received from Indigenous communities and demonstrate how they were addressed in the EIS / EA. The EIS / EA will also document at a preliminary level how comments and concerns will be considered and responded to over the life of the mine.
January 2021	CLFN-41	The presence of navigable waters as defined by the <i>Canada Navigable Waters Act</i> will be assessed during the EA process.
January 2021	CLFN-42	There will be an assessment of the Indigenous traditional activities, occupancy, sites, and resources identified by Indigenous communities. Further, the assessment of fish and fish habitat will consider Indigenous fisheries. Although these requirements are part of the federal EIS guidelines, the information will also be included in the EA report required for the provincial EA.
<b>Public and Stakeholder</b>		
Jan 29, 2021	Municipality of Sioux Lookout (MSL)	FMG is committed to working with MSL to identify opportunities for mutual benefit and to minimize potential negative impacts. [FMG] intend to convene an Infrastructure Working Group to advance collaborative discussions on how the Project may support the vision and objectives for community road access and other strategic infrastructure as the Project progresses
Jan 14, 2021	Member of Public	Potential accidents and malfunctions will be assessed in the EA (e.g., a potential breach of the Cofferdams, which would result in water entering the open pit, as well as spills and other unplanned events).
January 2021	BLL-2	Noise from the Project will be assessed during the EA process and mitigation measures will be added to the design to make sure regulatory requirements are met and to reduce the impact of noise on the surrounding environment.
January 2021	BLL-3	The overburden stockpile will be developed during the construction phase of the Project. However, during operations and closure, the size of the overburden stockpile will be reduced as it is to be used to reclaim portions of the mine site such as the mine rock stockpiles and tailings management area. This will be further described in the conceptual closure strategy to be provided with the EIS / EA. The EIS / EA will also assess the effects of the project development on local aesthetics.
January 2021	BLL-4	Air quality will be assessed during the EA and mitigation measures will be developed to ensure regulatory requirements are met. For example, the processing plant will include systems to control cyanide fumes and destroy residual cyanide. Systems will be

Date	Community / Comment #	Commitment
		employed to ensure that the storage and use of the reagent which is necessary to gold processing is properly management, meeting or exceeding all regulatory requirements
January 2021	BLL-5,14,15,16	The potential impacts to tourism will be assessed as part of the EA process and will be presented in the EIS / EA. Measures to mitigate residual impacts as appropriate, will be developed for implementation over the life of the Project.
January 2021	BLL-6, 7, 35	The potential impacts to water quality, fish and human health from the Project will assessed during the EA process including from processing and mining of ore. A monitoring program will be developed and implemented over the life of the mine confirm the results from the EA process. This follow up program will be presented in the EIS / EA.
January 2021	BLL-7	To support the assessment and the monitoring program, baseline water quality and fish tissue will be collected prior to operations. This will be presented in the EIS / EA
January 2021	BLL-8	The potential impacts to fish and fish habitat and remote tourism will be assessed during the EA. Measures to mitigate impacts to fish and fish habitat will be developed for implementation during the life of the Project. Where appropriate, compensation / offsetting measures to enhance fish productivity will be developed, in consultation with regulatory agencies, Indigenous communities and other stakeholders. This will be presented in the EIS / EA.
January 2021	BLL-9	The power supply for the mine will be assessed during the EA process for the Springpole Project. If hydroelectric power is the preferred source, alternative transmission line routes will be assessed and provided in the EIS / EA.
January 2021	BLL-10	The potential impacts of the mine camp such as domestic water use, domestic sewage and waste, will be assessed during the EA, and measures will be developed to mitigate residual impacts and meet regulatory requirements. This will be presented in the EIS / EA.
January 2021	BLL-12	The potential effect on water quality in Birch Lake due to seepage from the mine rock stockpiles and tailings management facility seepage will be assessed during the EA. Measures to mitigate residual impacts from seepage will be developed and implemented during the Project. This will be presented in the EIS / EA.
January 2021	BLL-13	The potential effect of the Project on water quality in the Birch River, downstream of the Project, will be assessed during the EA process. Measures to mitigate residual impacts will be developed and implemented during the Project. This will be presented in the EIS / EA.
January 2021	BLL-15	An updated site plan, impact assessment to tourism and conceptual closure strategy will be presented in the EIS / EA

Date	Community / Comment #	Commitment
January 2021	BLL-19,20, 23	Alternatives for the TMF will be identified and assessed during the EA process. The EIS / EA will include information on the location and operation of the TMF, an assessment of environmental effects from the facility and measures to mitigate residual effects. The facility will be designed by qualified engineers to meet all regulatory requirements, including with respect to stability. There will also be an Operation, Maintenance and Surveillance (OMS) Manual developed for the tailings facility as the project progresses.
January 2021	BLL-21,22, 44	The EIS / EA will include a water quality monitoring program that will be established to verify the predicted effects to the environment and to support the implementation of further mitigation, where warranted
January 2021	BLL-31	Design of the processing facility is ongoing and will be completed by qualified engineers. A description of the process will be provided in the EIS / EA. Potential impacts to the natural and social environment will be assessed in the EIS / EA.
January 2021	BLL-32	Alternative mine rock storage areas will be assessed during the EA process. Further information will be presented in the EIS / EA, including the total volume of mine rock and storage locations.
January 2021	BLL-36	An updated description of the overburden requiring management at the site will be provided in the EIS / EA, along with an assessment of alternative storage options. This will provide a more accurate assessment of the area needed for overburden management and the flexibility needed, if necessary.
January 2021	BLL-37	An updated description of the cofferdams will be provided in the EIS / EA, along with an assessment of environmental impacts from the construction and operation of the dams.
January 2021	BLL-38	An assessment of the potential impacts from construction blasting will be provided in the EIS / EA.
January 2021	BLL-39, 41, 43	<p>An assessment of the Project's effects on fish and fish habitat, and Lake Trout in particular, will be conducted during the EA. The results of this assessment will be presented in the EIS / EA.</p> <p>The fish usability study will assess the metal loads for fish in the study area and be used in the assessment of potential impacts to human health. The results of these assessments will be presented in the EIS / EA.</p>
January 2021	BLL-40	Lake Trout spawning sites have been documented in Springpole Lake, including the area around the cofferdam. The baseline reports will provide further information on spawning areas and the assessment will outline measure to mitigate and/or offset fish habitat. The baseline and assessment report will be presented in the EIS / EA.

Date	Community / Comment #	Commitment
January 2021	BLL-42	A follow up program will be developed as part of the EA process and presented in the EIS / EA. Potential measures to be implemented if effects are different than predicted, will be presented in the EIS / EA.
January 2021	BLL-45, 46	A description of the conceptual closure strategy will be provided with EIS / EA that will include information on rehabilitating the TMF and managing water on site. Prior to construction, the process to develop a regulatory Closure Plan for the mine site will be completed as required by the <i>Mining Act</i> , 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.
<b>Government Review Team</b>		
January 2021	IAAC-16	FMG is working with Indigenous communities on the provision of information relevant to the assessment of the Project, and includes discussion on confidentiality of information provided. This approach will be clarified in the EIS / EA.
January 2021	ISC-1,2,13,14	[Criteria and indicators] will be refined during the EA process, through consultation with regulators, the public and Indigenous communities. The EIS / EA will provide the rationale for criteria and indicators. Sediment quality and benthic invertebrates will be considered for inclusion. Bioaccumulation of contaminants in fish will be considered for inclusion.
January 2021	ISC-3,4,5	[Valued components] are being refined during the EA process, through consultation with regulators, the public and Indigenous communities. The EIS / EA will provide the rationale for valued components. Sediment quality will be considered for inclusion as a valued component, criteria or indicator. Benthic invertebrates will be considered for inclusion as a valued component, criteria or indicator. The EIS / EA will take into consideration the employment and business under the applicable valued component.
January 2021	ISC-6,7,8	[Preliminary potential effects] are being refined during the EA process, through further assessment and consultation with regulators, the public and Indigenous communities. The EIS / EA will take into consideration the potential effects to sediment quality and aquatic resources from runoff and/or seepage from stockpiles. The EIS / EA will take into consideration the potential effects to sediment quality and aquatic resources, in watercourses from the TMF. The EIS / EA will include an assessment of the potential effects (direct and indirect) to Indigenous people from the Project.
January 2021	ISC-9	The EIS / EA will provide additional detail on the workforce requirements to support the effects assessment as applicable and as available at the time.

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January 2021	ISC-10	The EIS / EA will provide an assessment of vibration on the environment. Further, the potential effects to fish will consider the effects of blasting from project activities. Mitigation measures will be described where necessary.
January 2021	ISC-11	[Water discharge] will be considered under the assessment of water quality. Further, unplanned discharges will be considered under the Accidents and Malfunctions assessment as required by the federal EIS guidelines. These assessments will be provided in the EIS / EA, along with appropriate mitigation measures.
January 2021	MHSTCI-4	Opportunities will be provided to the public, including nearby outfitters, to provide input through the EA process and FMG will establish a strategy / plan for addressing noise-related concerns.
January 2021	MHSTCI-5	The EIS / EA will include information on visual aesthetics for the Project and considered in the assessment of various valued components.
January 2021	MHSTCI-7	FMG appreciates the input for additional criteria [i.e., effect on local businesses and economy, effect on tourism and recreation, regional economy] under the heading Economic Environment and will consider these three criteria during EA development.
January 2021	MHSTCI-9	[Preliminary potential effects] will be refined during the EA process, and may include the potential loss or alteration of use by the local tourism sector. The EIS / EA will include an assessment of the effects on outdoor recreation and tourism.
January 2021	MHSTCI-11	The Kenora District Campowners Association will be added to the list of public stakeholders
January 2021	MENDM-2	A description of the conceptual closure strategy will be provided with the EIS / EA including with respect to the items indicated.
January 2021	MENDM-3	FMG will discuss consultation requirements with MENDM, prior to commencing preparation of the regulatory Closure Plan process.
January 2021	MECP-Air 1	Metals in TSP will be included in the [air quality] program to establish a baseline for air quality.
January 2021	MECP-Policy 1 (CCPB)	FMG will consider carbon and greenhouse gas emissions when assessing alternatives during the EA process, as appropriate.
January 2021	MECP-Policy 2 (CCPB)	FMG will consider alternative methods to reduce / eliminate carbon and greenhouse gas emissions during the EA, as appropriate
January 2021	MECP-Policy 3 (CCPB)	FMG will consider alternative methods for power supply in the identification of the preferred alternative.
January 2021	MECP-Policy 3 (CCPB)	FMG will consider the MECP guide on Considering Climate Change in the Environmental Assessment Process during the EA process, as appropriate.
January 2021	MECP-HG 1,2, 4, 5, 6, 7, 8, 9, 10, 11, 12, 14, 15, 17,	Hydrogeology comments [provided during the reviews of the ToR] related to the EA will be considered during the preparation of the EIS / EA

Date	Community / Comment #	Commitment
January 2021	MECP-HG 3	Additional information will be provided in the EIS / EA regarding the closure and reclamation strategy. Details will be provided in the regulatory Closure Plan required under the <i>Mining Act</i> .
January 2021	MECP-HG 13	Guideline B-7 (Incorporation of the Reasonable Use Concept into MOEE Groundwater Management Activities) will be considered in the assessment of groundwater during the EA process. The results of groundwater assessment will be presented in the EIS / EA, along with methodology used to conduct the assessment.
January 2021	MECP-Hydro 2	The need for effluent aging alternatives will be assessed during the EA process, to ensure that adequate retention times are available. If necessary, contingency methods (such as a water treatment plant) will be identified and assessed for feasibility.
January 2021	MECP-Hydro 3	The applicability of the data from the Cat River hydrometric station will be considered in relation to the hydrology for the Project. Rationale for its consideration will be included in the EIS / EA.
January 2021	MECP-SAR 1	The EIS / EA will include an assessment of potential effects on species at risk from various project components. Further, an assessment of alternatives for various project components will be included the EIS / EA, and take into consideration the ability to avoid impacts to species at risk.
January 2021	MECP-SAR 6	FMG will work with Domtar / EACOM to develop appropriate agreements for any shared infrastructure that may be required [in relation to the Wenesaga Road extension].
January 2021	MECP-SAR 8	A description of the conceptual closure strategy will be prepared during the EA process and included in the EIS / EA. Progressive rehabilitation measures will be outlined in the description of the conceptual closure strategy and will consider the Best Management Practices (BMP) for Mineral Exploration and Development Activities and Woodland Caribou in Ontario.
January 2021	MECP-SAR 18, 30, 34	The RSA for Caribou (Boreal population) will be expanded to take into consideration the Churchill and Kinloch Caribou Ranges. A description of the RSA for Caribou (Boreal population) will be provided in the EIS / EA.
January 2021	MECP-SAR 19, 20, 22, 23, 28, 29, 32, 33, 35, 36, 37	Supporting technical documents will be provided with the EIS / EA and include a description of the baseline methodology, results of the studies and will be used to assess and/or verify the potential impacts of the project. FMG will continue to work closely with MECP SAR throughout the EIS / EA.
January 2021	MECP-SAR 40, 50	FMG will consider the memo provided by MECP in the assessment of potential project effects on Caribou (Boreal population). The assessment will include a summary of the assessment methodology and will be provided in the EIS / EA. References used in the assessment will be provided in the EIS / EA.

Date	Community / Comment #	Commitment
January 2021	MECP-SAR 49	FMG will consider the relevant scale when developing the list of projects contributing to cumulative effects for the EA. The study area and list of projects will be presented in the EIS / EA
April 2021	MECP-SARB 1	FMG will review FMP – 10 for additional information related to the Project. Baseline information on Species at Risk will be reviewed and updated through the environmental assessment process, and presented in the EIS / EA.
April 2021	MECP-SARB 4	FMG will continue to work with IESO and electrical utility operators to identify potential connection points to the regional electrical grid, to support the development of routing options for the transmission line for the environmental assessment.
April 2021	MECP-SARB 5, 8, 10, 39, 40	FMG appreciates MECP's input on the preliminary criteria and indicators and will consider this feedback in developing criteria and indicators for the Project when preparing the environmental assessment. FMG will continue to work with MECP – SARB during the environmental assessment and approvals process for the Springpole Project.
April 2021	MECP-SARB 7	The EIS / EA will include additional information on the determination of the rankings to demonstrate that the assessment will be transparent and verifiable.
April 2021	MECP-SARB 11	Further information [on determination of significance] will be provided in the EIS / EA as needed to ensure the methodology is understandable, including to ensure protection of sensitive species / habitat.
April 2021	MECP-SARB 12	The assessment will be fully described in the EIS / EA, to support a clear, logical and traceable assessment using the methodology outlined in the Amended ToR.
April 2021	MECP-SARB 41	The SAR registry is included as a potential data source, and would also consider the federal SAR registry which may include status reports and other publications. Other publicly available data sources (as noted by MECP) will be considered during preparation of the EIA / EA as appropriate.
April 2021	MECP-SARB 42	The determination of significance will take into consideration the sensitivity of the valued component, either through the magnitude and/or ecological context criteria. During preparation of the EIS / EA, the magnitude criteria will be determined specifically for species at risk valued components. As a result, species at risk will inherently have a lower threshold for significance.
January 2021	MECP-Waste 1	Waste management will be further considered during the EA process and described in the EIS / EA, including waste types, preliminary quantities, disposal options and locations, and potential related environmental monitoring.
January 2021	MECP – WW1	Should FMG decide to re-use treated domestic sewage as process water, appropriate approvals will be obtained from the MECP.

Date	Community / Comment #	Commitment
January 2021	MECP-EAB 2	FMG will work with Domtar / EACOM to develop appropriate agreements for any shared infrastructure that may be required [in relation to the Wenesaga Road extension]. In the event the Wenesaga Road extension is suspended, and/or is not completed, FMG will consider other alternatives for access to site. These will be presented in the EIS / EA.
January 2021	MECP-EAB 9	The identification and assessment of alternative aggregate sources will be included in the EA process
April 2021	MECP- EAB 2-2	The final methodology [for the assessment] will be described in the EIS / EA to ensure that the methodology is fully transparent and understandable.
April 2021	MECP EAB 2-3	FMG is committed to engaging local stakeholders that have an interest the Project. Based on interest that has been expressed to date, the list of stakeholders has been updated and current. Should new stakeholders express an interest in the project, FMG will fully consider including them in future engagement activities.

On April 21, 2021, FMG also discussed the ToR and advancing the establishment of the environmental committee with the Chief of Cat Lake First Nations. Specifically, FMG committed to the following commitments to provide certainty for the STPN:

1. FMG will work with the three STP Nations, as led by Cat Lake First Nation, to establish a joint environment committee for the EA.
2. FMG will work with the three STP Nations, as led by Cat Lake First Nation, to develop a consultation plan specific for the communities meaningful participation in the EA. This will include appropriate resourcing support.
3. FMG will fund the reasonable costs associated with required technical experts for the STP Nations, as led by Cat Lake, to independently review the EA and working with the environment committee.
4. FMG will support the reasonable costs associated with a community consultation coordinator. One for each of the three STP Nations for the EA.
5. FMG will support the reasonable costs associated with the participation of a community environmental monitor. One for each of the three STP Nations to participate in environmental field work for the Project.
6. FMG will remain flexible during the EA process to address new areas of comment and issues that might arise during consultation activities, information sharing, and technical reviews carried out by the environment committee and its expert advisors.
7. FMG will consult with the STP Nations at key decision-making milestones throughout the EA process including Environmental Baseline, Alternatives, and Effects and Mitigation.
8. FMG will fund the reasonable costs associated with project-specific TK/ TLRU studies. The results will be incorporated into the Project planning.

The above commitments were shared via email (April 21, 2021) with the Chief of Cat Lake First Nations and copied to the Chiefs of Slate Falls and Lac Seul First Nations.

## **8.2 Monitoring and Follow-up Programs**

A Monitoring Framework will be developed with consideration of comments raised by stakeholders and Indigenous communities for the post-EA phase to address the stages of the proposed Undertaking. Where appropriate, it will include compliance monitoring and effects monitoring. The existing environmental baseline monitoring network may be modified following the EA and environmental approval processes to reflect conditions of approval.

Monitoring programs to be implemented throughout the life of the Project to evaluate the effectiveness of mitigation measures and guide subsequent management actions will be identified in the EIS / EA.

FMG understands a consistent and long-term data record is required to ensure meaningful and appropriate seasonal, annual and spatial background conditions are available to compare against. Therefore, FMG will identify potential monitoring requirements early in the EA process.

FMG will develop management strategies / approaches to address specific issues associated with the potential effects of the Undertaking. These strategies may be combined for usability, where appropriate, and could include the following topics / subject areas:

- Preliminary Mineral Waste (Tailings and Mine Rock) Management, including ML/ARD Management if appropriate;
- Conceptual Transportation and Access Management;
- Preliminary Spill Prevention, and Emergency Response and Preparedness;
- Preliminary Erosion and Sediment Control;
- Conceptual Waste Management;
- Preliminary Archaeology and Heritage Resources Protection;
- Conceptual Vegetation, Habitat, Invasive and Rare Plant Management;
- Preliminary Environmental Monitoring (all media); and
- Conceptual Closure and Reclamation.

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## 9 CONSULTATION

### 9.1 Overview

In its environmental assessment, First Mining Gold Corp. will ensure effective and meaningful communication and engagement through the building of trust between the Project team and Indigenous communities to enhance awareness of the Undertaking. First Mining Gold Corp. will provide flexible consultation opportunities, issues resolution and feedback to consult Indigenous communities for the following components of the environmental assessment process: FMG recognizes the importance of consultation as an integral aspect of the Undertaking. Participation in consultation ensures an open and fair process and strengthens the quality and credibility of the results. In a coordinated effort with the provincial and federal government agencies, FMG intends to prepare one knowledge base about the current environmental settings and the potential effects of the Undertaking on various components of the environment. This knowledge base will be used to support the coordinated provincial and federal EA process.

- The development of community-specific Indigenous consultation plans, if requested, for the preparation of an environmental assessment;
- The development of criteria and indicators for the assessments of alternative methods and the preferred Undertaking;
- The development of the methodology, evaluation and results of Baseline Studies;
- The development of the evaluation methodology for the assessment of alternatives and the preferred Undertaking;
- The conclusion of assessment and evaluation of alternatives (including the identification of potential effects and the development of appropriate mitigation and management measures);
- The development and implementation of Traditional Knowledge and Traditional Land Use studies;
- The assessment and evaluation of the preferred Undertaking (including the development of mitigation and monitoring measures to address any potential effects); and,
- The conclusion of the assessment and evaluation of the preferred Undertaking (including potential effects, and appropriate effects management measures).

First Mining Gold Corp. will provide opportunities for Indigenous communities to be engaged at critical decision-making points during the environmental assessment process, so that Indigenous communities may provide input on how the undertaking and its alternatives may have an impact on their rights and interest through the sharing of traditional knowledge; and, that First Mining Gold Corp. will consider and incorporate, where appropriate, traditional knowledge and traditional land use into each environmental assessment decision-making milestone.

First Mining Gold Corp. will also provide opportunities for government agencies and interested persons to be engaged at critical environmental assessment decision-making milestones,

including the identification of criteria and indicators, the development of baseline studies and evaluation methodologies.

Combining and coordinating consultation efforts in the preparation and review in the EA process, as much as practical, ensures that Indigenous communities, the public, and government agencies and departments are engaged in dialogue about the current environment, potential effects, and management measures at the same, or similar time. The Indigenous Consultation Plan, Public Consultation Plan and Government Agency Consultation Plan (Consultation Plans) (Appendices E.1, E.2, and E.3, respectively) provide a strategy for these coordinated consultation and engagement efforts. These plans will guide consultation during the EA process while remaining flexible. A Record of Consultation (RoC) detailing FMG's consultation and engagement efforts is provided under separate cover.

### **9.1.1 Provincial EA and Consultation Plan Requirements**

In consultation with provincial regulatory agencies, FMG entered into a Voluntary Agreement in April 2018 with the MECP to conduct an EA for the Undertaking in accordance with the requirements of the EAA.

The first step in preparing the EIS / EA is consultation and engagement on and approval of this document, the ToR, to guide what is to be assessed in the EIS / EA, and a consultation plan that defines how Indigenous communities and other stakeholders will be consulted and engaged on the EA.

The approach to consultation on the EA as part of the provincial EA process will follow the MECP's Code of Practice: Consultation in Ontario's Environmental Assessment Process (MOE 2014c). The Code of Practice dictates that a proponent's consultation plan must:

- Indicate how potentially interested and affected persons, including Indigenous communities, will be identified, notified and consulted;
- Indicate how government agencies will be identified, notified and consulted;
- Identify the points in the EA process when interested persons will be consulted;
- Identify the methods that will be used to consult;
- Identify the decisions that interested persons can provide input to and what role they can play when the proponent makes choices; and
- Acknowledge and attempt to address concerns raised during the EA process.

According to the Code of Practice: *Preparing and Reviewing Terms of Reference for EAs in Ontario* (MOE 2014a) the consultation plan should outline:

- General consultation methods proposed;

- How input from interested persons will be obtained;
- A description of key decision-making milestones during the preparation of the EIS / EA when consultation will occur; and
- An issues resolution strategy.

### **9.1.2 Federal EA and Consultation Plan Requirements**

The Agency has determined that the Project will require a federal EA under CEAA 2012. Consultation with interested parties about projects undertaken by the Government of Canada is conducted for a variety of reasons including:

- Creating improved working relationships with people affected;
- Addressing new business and policy directions;
- Meeting Section 35 of the *Constitution Act, 1982* requirements (for Indigenous consultation); and
- Meeting statutory requirements.

The Government of Canada has a duty to consult Indigenous communities and, where appropriate, to accommodate Indigenous interests (First Nation, Métis and Inuit) with respect to federal programs that could infringe on constitutionally protected Aboriginal and/or Treaty Rights. *Aboriginal Consultation and Accommodation: Updated Guidelines for Federal Officials to Fulfill the Legal Duty to Consult* (AANDC 2011) is referenced in the development of this Plan. The federal Crown does not delegate its duty to consult to the proponent during the EA process, however proponent-led activities with Indigenous communities would be considered engagement activities.

The Agency has released guidance for inclusion of a consultation plan in the Project Description (CEAA 2012). The guidance states that the Project Description must include:

- A consultation and information gathering plan that outlines the ongoing and proposed Indigenous engagement or consultation activities, the general schedule for these activities and the type of information to be collected (or alternatively, an indication of why such engagement or consultation is not required);
- Background information on Indigenous communities' potential or established Indigenous or Treaty Rights; and
- Information on the impact area of the designated Project and how it overlaps with uses by Indigenous communities that have potential or established Indigenous or Treaty Rights.

A Project Description was submitted to the Agency in February 2018, and after the Project was screened, it was determined that the Springpole Gold Project requires a federal EA. EIS Guidelines were issued for the Springpole Gold Project on June 18, 2018.

### **9.1.3 Responsibility for Plan Implementation**

The Consultation Plans presented herein is based on the information presented in the Project Description, the Code of Practice: *Consultation in Ontario's Environmental Assessment Process* (MOE 2014c) and the federal EIS Guidelines.

As described in previous sections (Sections 9.1.1 and 9.1.2), provincial and federal government agencies have specific requirements for consultation as part of the EA process. While the government has a role in supporting and guiding FMG in consultation planning and activities, this Plan is a guide for the activities and responsibilities of FMG. FMG is responsible for preparing the EIS / EA for the Undertaking, preparing the associated consultation plan, and supporting reasonable EA consultation and engagement activities.

The government-led consultation activities (such as posting notices on government websites) will not be outlined in this plan.

The responsibility of FMG for EA-related consultation is understood to be the following:

- Consult with government agencies;
- Identify and involve interested Indigenous communities, throughout the process including those likely to be directly affected and that may be potentially affected;
- Design and implement an Indigenous consultation plan as part of the overall EA process;
- Engagement activities of notification and consultation.
- Initiate meaningful consultation with interested persons to identify information needs and concerns early in the planning process;
- Gather information from the communities about how the Project may adversely impact their Aboriginal and/or Treaty Rights (for example, hunting and fishing) or site of cultural significance (for example, burial ground, archaeological sites);
- Provide adequate time and resources for Indigenous communities to review and comment on EA-related materials and documents;
- Identify issues and concerns received from Indigenous communities;
- Document how issues and concerns received from Indigenous communities were considered in the preparation of the EIS / EA;
- Address and where reasonable, resolve concerns raised through the consultation process;

- Discuss potential mitigation strategies with communities (where appropriate); and
- Keep Indigenous participants informed of decisions made and how FMG addressed identified concerns or reasons that concerns were not addressed.

## **9.2 Purpose, Principles and Objectives**

### **9.2.1 Consultation Purpose**

The purpose of consultation for the preparation of the EIS / EA is to engage Indigenous communities and stakeholders through various methods to gather feedback on the Undertaking and promote environmentally responsible decision-making. Meaningful consultation is a two-way communication process that involves affected and interested persons in the planning, implementation, and monitoring of the Undertaking. It requires providing information to and collaborating to:

- Identify concerns that may arise from the Undertaking;
- Create opportunities to develop FMG's commitments and responses to local input; and
- Provide appropriate information to the Ministry to enable fair and balanced decision-making.

During the overall EA process, input will be sought on baseline information, alternatives, the effects assessment, mitigation measures, and monitoring approach.

### **9.2.2 Consultation Principles**

A successful consultation process involves the development of principles to guide the Plan. FMG takes a partnership model to its community relations approach as mutual responsibility and respect for community values is integral for successful consultation. FMG believes that proactive communication facilitates direct consultation with local communities. FMG seeks to work with communities to provide meaningful benefits of mining locally.

FMG understands that Indigenous consultation is the foundation of positive Indigenous community relations. FMG believes that Indigenous consultation is based on principles of trust, respect, flexibility, openness and transparency.

Overall, FMG's key strategies to achieve successful consultation and engagement with Indigenous communities and stakeholders include:

- Understanding the information needs and capabilities of the community, and tailoring consultation opportunities to the local context;
- Identifying key stakeholders and community leaders;

- Working with the community to develop the goals and objectives of the consultation and engagement program, and asking participants for continuous feedback on how the program is working for them;
- Involving participants early;
- Being open and transparent;
- Providing clear, concise and relevant information; and
- Focusing timing of engagement and consultation activities at key decision milestones.

Consultation with Indigenous communities, public stakeholders and government (federal and provincial) will continue throughout the EA process in an open and transparent manner. Consultation will be proactive, flexible, and based on a goal of continuous improvement particularly as Indigenous communities, the community and interested persons identify how they prefer to be involved. This will build on FMG's existing relationships and will ensure that participants are engaged in dialogue about the current environment, project activities, potential effects, and management measures.

### **9.2.3 Consultation Objectives**

The objectives of FMG's consultation program are to:

- Establish formal, agreed-upon protocols and approaches to consultation with individual Indigenous communities if requested by the Nation including identifying and scoping potential consultation and engagement activities to be conducted throughout the life of the Project.
- Provide the Indigenous communities and interested persons / stakeholders with opportunities to understand the proposed Project, identify potential environmental impacts, and effects to Aboriginal or Treaty Rights and interests;
- Identify, consider, and respond to feedback on the baseline information, alternatives, the effects assessment, mitigation measures, and monitoring approach;
- Demonstrate where reasonable how project designs or management practices address comments and help to reduce or avoid identified adverse impacts;
- If the proposed Project cannot be modified in a certain manner, provide rationale;
- Document and respond to comments, concerns and interests raised throughout the consultation process; and
- Meet regulatory requirements for consultation during the EIS / EA preparation.

FMG will provide opportunities for Indigenous communities to be engaged throughout the EA process, so that Indigenous communities may provide input on how the Undertaking and its alternatives may have an impact on their rights and interests through the sharing of Traditional Knowledge; and that FMG will consider and incorporate, where appropriate and available, Traditional Knowledge into each EA component of the EA. FMG will also provide opportunities for the public and agencies to be engaged and consider input received.

### **9.3 Identification of Interested Indigenous Communities**

#### **9.3.1 Aboriginal and Treaty Rights Recognition**

First Nations and Métis people are recognized to have Aboriginal and Treaty Rights that are protected under Section 35(1) of the *Constitution Act, 1982*. An Aboriginal Right is an activity which is an element of a custom, practice, or tradition integral to the distinctive culture of the Indigenous community claiming the right. Examples of Treaty Rights include such things as reserve lands, farming equipment and animals, annual payments, ammunition, clothing, and certain rights to hunt, trap, and fish.

The Supreme Court of Canada has determined that the Crown has a duty to consult with Indigenous communities with respect to their Aboriginal and Treaty Rights when it has knowledge of an existing or asserted Aboriginal or Treaty Rights, and contemplates conduct that may adversely affect these rights.

The source of the Crown's duty to consult and accommodate is grounded in the "honour of the Crown", and as such cannot be delegated to third parties. Legal responsibility for meeting any duty to consult with Indigenous communities will always rest with the Crown (*R. v. Taku River Tlingit First Nation*).

Third parties, such as FMG, may be required to carry out procedural aspects of the duty to consult such as gathering information about Aboriginal and Treaty Rights that may be impacted by a proposed project and consideration of ways in which the Indigenous concerns can be accommodated.

The Crown has a legal duty to maintain an oversight over the consultation to ensure that potentially affected Indigenous communities have been fully informed about a proposed project, that meaningful attempts to solicit their input and feedback have been carried out, and that attempts to resolve the concerns have been presented.

While the duty to consult in good faith rests with the Crown, FMG has and will continue to provide opportunities to consult Indigenous communities, their governments, and organizations in a manner that advances their meaningful input on the Project.

This consultation will be undertaken without prejudice to the treaty and titles relationships between the Government of Canada and the respective Indigenous communities.

Provincial regulatory agencies overseeing EAs may delegate procedural aspects of consultation to proponents and have set out specific requirements for recording the activities that proponents

undertake with respect to carrying out these obligations. FMG recognizes its responsibility toward consultation and will follow the procedural aspects delegated by the provincial regulatory agencies. FMG will encourage Indigenous communities to participate in the process, making their concerns known, and make responsive efforts to address their concerns. CEAA 2012 requires that potential impacts to Aboriginal and Treaty Rights be documented on an ongoing basis as part of the EA process.

Treaty Rights and Aboriginal Rights are recognized and affirmed in Section 35 of the *Constitution Act, 1982* and are also a key part of the United Nations Declaration on the Rights of Indigenous communities which the Government of Canada has committed to adopt.

Treaties with Indigenous communities include both:

- Historic treaties with First Nations; and
- Modern treaties (also called comprehensive land claim agreements) with Indigenous communities.

### **9.3.2 Indigenous Participants**

The focus of Indigenous consultation and engagement activities will be primarily on those potentially affected Indigenous communities. Initial contact has been made with the highest levels of decision-makers consisting of the Band Chief and Council or the Tribal Council. Discussions or correspondence includes the First Nation Chief and Council unless directed otherwise by the Chief.

It is also important to involve members of these communities outside of these required activities. When requested by the Indigenous community, interpretation and translation of presentation or printed materials into their local language will be made available. Consultation activities that seek to broadly engage the community will assist in identifying issues that are unknown to individual leadership or dissenting views amongst the community. Inclusive consultation also helps build support for the Project.

Consultation was initiated with the MNO and has subsequently focused with the region-specific consultation committee (Region 1 Consultation Committee). Consultation activities have been designed based on the needs of the communities.

FMG will provide reasonable capacity support to communities to enable them to provide meaningful input and feedback. FMG will prepare and make available a plain language summary of the EA to facilitate understanding of the various documents.

An understanding of the potential Indigenous communities interested in the Project was developed through advice from the MECP to FMG in a letter dated April 25, 2018 and through advice based on information provided by the Agency.

Considering the previous advice from regulators, the proposed footprint of the current Project, and through discussion with local communities, potentially impacted Indigenous communities for the purposes of the provincial EA process are signatories of Treaty #3, Treaty #5, and Treaty #9.

### **Treaty #9 Communities: Potentially affected or interested First Nations**

The following potentially affected or interested First Nations are signatories to Treaty #9, also known as the James Bay Treaty signed in 1905:

- Cat Lake First Nation;
- Mishkeegogamang First Nation; and
- Slate Falls Nation.

The Treaty #9 area is comprised of approximately 233,000 km<sup>2</sup> of northern Ontario. At the time of signing, the land was occupied by Ojibwe and Cree peoples. Reserves were set aside for all the signatories whose hunting grounds were within the treaty area. Signatories and their descendants retained “the right to pursue their usual vocations of hunting, trapping, and fishing throughout the tract surrendered”. Exceptions to these rights pertain to tracts of land that have been taken up “for settlement, mining, lumbering, trading, and other purposes”.

In addition to their individual First Nations’ governance (Chief and Council), Treaty #9 has a collective governing body called Nishnawbe Aski Nation (NAN). NAN (known as Grand Council Treaty #9 until 1983) was established in 1973. It represents the legitimate, socioeconomic, and political aspirations of its First Nation members of Northern Ontario to all levels of government in order to allow local self-determination while establishing spiritual, cultural, social, and economic independence. In 1977, Grand Council Treaty #9 made a public declaration of the rights and principles of Nishnawbe Aski.

### **Treaty #5 Communities: Potentially affected or interested First Nations**

- Pikangikum First Nation.

In addition to individual band councils in each community, Treaty #5 communities are also members of NAN. As mentioned above, NAN encompasses James Bay Treaty #9 and Ontario’s portion of Treaty #5 and has a total landmass covering two-thirds of the province of Ontario spanning 543,900 km<sup>2</sup>. The people traditionally speak four languages: OjiCree in the west, Ojibway in the central-south area, and Cree and Algonquin in the east.

### **Treaty #3 Communities: Potentially affected or interested First Nations**

- Lac Seul First Nation;
- Wabauskang First Nation;

- Ojibway Nation of Saugeen; and
- Northwestern Ontario Métis Community.

In addition to their individual First Nations' governance (Chief and Council), Treaty #3 has a collective governing body called the Grand Council Treaty #3. Lac Seul First Nation, Wabauskang First Nation, and Ojibway Nation of Saugeen are members of the Treaty Grand Council. Lac Seul is also a member of Nishnawbe Nation.

Grand Council Treaty #3 is 142,500 km<sup>2</sup> spanning from west of Thunder Bay to north of Sioux Lookout, along the international border, to the province of Manitoba.

It is made up of 28 First Nation communities.

### **Métis Nation of Ontario**

Northwestern Ontario Métis Community citizens are also signatories to Treaty #3. Métis are recognized to have Aboriginal and Treaty Rights that are protected under Section 35(1) of the *Constitution Act, 1982*. Further, the Métis assert a right to harvest in large sections of Ontario. The provincial government has accommodated Métis rights on a regional basis within the Métis harvesting territories identified by the MNO. The interim agreement between the MNO and the MNRF recognizes the MNO's Harvest Card system. A Métis Harvester's Certificate holder engages in traditional Métis harvesting activities. Further discussion with the MNO and community councils and TK/TLU will determine if Métis harvesting will be affected by the Project.

### **Interest in the Springpole Gold Project**

Overall, FMG has received direction from both federal (The list for the federal process is found in Part 2 Section 5 of the EIS Guidelines and may be updated from time to time based on information brought forward to the Agency) and provincial Crown agencies on the potentially impacted communities. The Indigenous communities that should be consulted with respect to the Project and EA include:

- Cat Lake First Nation;
- Lac Seul First Nation;
- Ojibway Nation of Saugeen;
- Pikangikum First Nation;
- Slate Falls Nation;
- Wabauskang First Nation;

- MNO Region 1 Consultation Committee; and
- Mishkeegogamang First Nation.

MECP advised FMG to initiate contact through the elected Chief and Council of each First Nation and through the President of the MNO community council, copying the MNO Head Office. Further, the MECP informed FMG that the list may be subject to change as new information becomes available.

FMG has contacted the individual Indigenous communities about their interests in the Project and have noted that all communities have indicated a strong interest in the Project, aside from Pikangikum First Nation. Pikangikum First Nation has stated that they would contact FMG about their level of interest in the Project. FMG will continue to provide updates about the Project and remain open to further discussions if requested.

To date, consultation has focused on Cat Lake First Nation, Mishkeegogamang First Nation, Slate Falls Nation, Pikangikum First Nation, Lac Seul First Nation, Ojibway Nation of Saugeen, and Wabauskang First Nation. FMG has also met with the MNO, Region 1 Consultation Committee to discuss the Project.

FMG will remain open to receiving additional assertions of claim over the areas potentially impacted by the Project and will consult with communities identified and delegated by the MECP and the Agency.

Table 9.3.1 provides a summary of the Indigenous communities that will be consulted throughout the EA. Contact details for each group are also provided while the list of regional governing entities is listed in Table 9.3.2

**Table 9.3.1: List of Interested Indigenous Communities**

Indigenous Organization	Governance Organization	Brief Description
Cat Lake First Nation Chief Matthew Keewaykapow P.O. Box 80, Cat Lake, P0V 1J0 Telephone: 807 347 2100 Fax: 807-347-2116 <a href="http://firstnation.ca/cat-lake">http://firstnation.ca/cat-lake</a>	The council is a member of the Windigo First Nations Council, a non-political regional chiefs' council. In turn, the Windigo First Nations Council is a member of the larger Nishnawbe Aski Nation, a Tribal Political Organisation which represents many of the First Nations in northwestern Ontario.	Cat Lake First Nation is an Ojibway First Nation reserve approximately 180 kilometres northwest of Sioux Lookout in northwestern Ontario, Canada, located on the Cat central north shore of Cat Lake. The Cat Lake reserve is within the boundaries of the territory described by the James Bay Treaty of 1905 – Treaty #9.
Lac Seul First Nation Chief Derek Maud P.O. Box 100, Hudson, Ontario P0V 1X0 Telephone: 807 582 3503 Fax: 807-582-3449 <a href="http://www.lacseulfirstnation.ca">www.lacseulfirstnation.ca</a>	Tribal Council: Independent First Nations Alliance (IFNA) Political Territorial Organization: Nishnawbe-Aski Nation (NAN) Treaty #3	Lac Seul First Nation is an Ojibway First Nation band government located on the southeastern shores of Lac Seul, 56 km (35 mi) northeast of the city of Dryden, Ontario. Though Lac Seul First Nation is a treaty signatory to Treaty #3, the First Nation is a member of the Independent First Nations Alliance, a regional tribal council and a member of the Nishnawbe Aski Nation.

Indigenous Organization	Governance Organization	Brief Description
		Lac Seul First Nation consists of three communities: Frenchmen's Head, Ontario; Kejick Bay, Ontario; and Whitefish Bay, Ontario.
Slate Falls Nation Chief Lorraine Crane 48 Lakeview Drive, Slate Falls, Ontario P0V 3C0 Telephone: 807 737 5700 Fax: 1 888 431 5617 <a href="http://www.slatefalls.firstnation.ca">www.slatefalls.firstnation.ca</a>	Tribal Council: Windigo First Nations Political Territorial Organization: Nishnawbe-Aski Nation (NAN) Treaty #9	Community is located 120 km N of Sioux Lookout, on shore of Bamaji Lake. Slate Falls Nation was recognized in 1985 as the Slate Falls Band #259 under the <i>Indian Act</i> . On December 14, 2018 Slate Falls Nation received an Order-in-Council that sets aside lands to Slate Falls Nation to finally achieve reserve status. On February 12, 2019 Slate Falls Nation celebrated the "long-awaited reserve status".
Wabauskang First Nation Chief Doug Riffel P.O. Box 339, Ear Falls, Ontario P0V 1T0 Telephone: 807 529 3174 Fax: 807 529 3007 <a href="http://www.firstnation.ca/wabauskang">http://www.firstnation.ca/wabauskang</a>	Tribal Council: Bimose Tribal Council (BTC) Provincial Territorial Organization: Grand Council Treaty #3 (GCT3) Treaty #3	Community is approximately 70 km N of Vermilion Bay off Hwy 105 and 30 km S of Ear Falls along eastern shores of Wabauskang Lake. Wabauskang First Nation is a Sauteaux First Nation in northwestern Ontario and is a member of the Bimose Tribal Council and the Grand Council of Treaty #3.
Ojibway Nation of Saugeen Chief Edward Machimity c/o Ojibway Nation of Saugeen Band Office, General Delivery, Savant Lake, ON P0V 2S0 Telephone: 807 928 2351 Fax: 807-928-2710	Tribal Council: Unaffiliated Political Territorial Organization: Unaffiliated Treaty #3	Community is approximately 100 km N from Hwy 17 just east of Ignace along Hwy 599, and approximately 20 km NW of Savant Lake.
Mishkeegogamang First Nation Chief David Masakeyash 1 First Nation Street Mishkeegogamang, Ontario P0V 2H0 Phone: (807) 928-2414 Fax: (807) 928-2077 Toll-free: 1-877-528-2414	Independent First Nation (not part of a Tribal Council) Political Territorial Organization: Nishnawbe-Aski Nation (NAN) Mishkeegogamang is a signatory to the James Bay Treaty #9	Mishkeegogamang is located about 500 km northwest of Thunder Bay, Ontario, and about 30 km south of Pickle Lake, Ontario. Provincial Highway 599 passes through Reserves 63A and 63B, making the community accessible year-round.
Pikangikum First Nation Chief Amanda Sainnawap c/o Band Office PO Box 323 Pikangikum, ON P0V 2L0 Telephone: 807 733 5536 Fax: 807 773 5536	Tribal Council (TC): Independent First Nations Alliance (IFNA) Political Territorial Organization (PTO): Nishnawbe-Aski Nation (NAN) Treaty #5	Pikangikum is approximately 100 km NW of Red Lake, on the eastern shores of Pikangikum Lake at the Berens River. PTO: Nishnawbe Aski Nation TC: Independent First Nations Alliance
Métis Nation of Ontario –  Theresa Stenlund, PCMNO Regional Councillor and Chair of the Consultation Committee for Region 1. Email: <a href="mailto:theresas@kmts.ca">theresas@kmts.ca</a>	MNO Region 1	In Ontario, historic Métis settlements emerged along the rivers and watersheds of the province, surrounding the Great Lakes and throughout to the northwest of the province. These settlements formed regional Métis communities in Ontario

Indigenous Organization	Governance Organization	Brief Description
<a href="http://www.Métisnation.org">www.Métisnation.org</a>		that are an indivisible part of the Métis Nation. In 1993, the Métis Nation of Ontario (MNO) was established through the will of Métis people and Métis communities coming together throughout Ontario to create a Métis-specific governance structure. Prior to 1993, Métis had been involved in pan-Indigenous lobby groups and organizations. The MNO was not created to represent all individuals and communities that claim to be Métis, but those individuals and communities that are a part of the Métis Nation.

**Table 9.3.2: List of Regional Governing Entities**

Provincial Territorial Organization	Affiliated Communities	Treaties Affiliated	Contact Information
Nishnawbe Aski Nation	Lac Seul First Nation, Mishkeegogamang FN, Pikangikum First Nation, Slate Falls Nation, Cat Lake First Nation	Treaty #9 and Treaty #5	Grand Chief Alvin Fiddler Administrative Office: 710 Victoria Avenue East, Thunder Bay, ON P7C 5P7 Telephone: 807 623 8228 Fax: 807 623 8228
Tribal Council: Windigo First Nations Council	Slate Falls Nation and Cat Lake First Nation	Treaty #9	Council Chair / CEO: Frank McKay 160 Alcona Dr, Sioux Lookout, ON P8T 1B3 Telephone: 807 737 1585 Fax: 807 737 3133
Grand Council Treaty #3 (GCT3)	Lac Seul First Nation, Ojibway Nation of Saugeen, Wabauskang FN	Treaty #9	Grand Chief Francis Kavanaugh P.O. Box 1720, Kenora, Ontario P9N 3X7 Telephone: 807 548 4214 Fax: 807 548 5041
Tribal Council (TC): Independent First Nations Alliance (IFNA)			Chief Executive Officer: Mathew Hoppe Thunder Bay Office: 1151 Barton Street, Unit 203 Thunder Bay, ON P7B 5N3 Tel: (807) 626-7730 Fax: (807) 626-7738 Sioux Lookout Office: P.O. Box 5010, 98 King Street Sioux Lookout, ON P8T 1K6 Toll Free: 1-888-253-IFNA Tel: (807) 737-1902 Fax: (807) 737-3501

### **9.3.3 Indigenous Participant Support**

FMG began negotiating a Predevelopment and Exploration Agreement (PDEA) with the Shared Territory Protocol Nations (STPN) that includes Lac Seul First Nation, Cat Lake First Nation, and Slate Falls Nation. As part of the undertakings under the PDEA, FMG has and continues to offer capacity support to these communities for technical review of the PDEA document.

FMG also will provide reasonable support to the Métis Nation of Ontario (Métis Region 1)'s to participate in consultation meetings.

FMG bears the reasonable costs associated with providing information about the Project and the EA processes to Indigenous communities. The information is used to conduct meetings and information sessions that build an understanding of the Project. The accessible format of the information permits Indigenous communities to participate meaningfully in the EA.

### **9.4 Identification of Public Stakeholders**

FMG intends to engage in consultation throughout the EA process with a wide range of stakeholders, including:

- Tenure holders in the immediate vicinity of the Site;
- Local and regional stakeholders with interest in the Undertaking; and
- Local users of the land, including hunters, trappers, and fishermen.

Based on a preliminary review of local businesses it was determined that general delivery mail drops (unaddressed mail) would be the best method to incorporate as many local businesses as reasonable. The following organizations / businesses have been specifically added to the distribution list:

- KaBeelo Lodge;
- Pickerel Arm Camps;
- True North Outposts;
- Hidden Bay Lodge;
- Red Pine Lodge;
- Whitewing Floating Lodges;
- Fort Frances Northern Wilderness Outfitters;
- Millard Johnson (private landowner);

- Latrielle Lake Lodge;
- Kay Air Service;
- Green Airways;
- Best Baits;
- D and E Minnows;
- Birch Lake Lodge;
- Red Lake District Chamber of Commerce;
- Ear Falls Community and Economic Development Committee;
- Ontario Prospectors Association;
- Boreal Prospectors Association;
- Red Lake Trappers Association;
- Ear Falls Trappers Council;
- Ear Falls Hunters and Anglers; and
- Kenora District Campowners Association.

Non-Government Organizations (NGOs):

- Nature and Outdoor Tourism Ontario;
- Ontario Mining Association; and
- Ontario Prospectors Association.

As stakeholders express their interest, submit comments or contact any member of the Project team, they are added to the distribution list. It is anticipated that this master list will continue to grow throughout the various project stages and with the variance of stakeholders' level of interest over the life cycle of the Undertaking.

## **9.5 Identification of Government Agencies**

FMG intends to continue consultation throughout the EA process with government agencies, including agencies with an interest in the Undertaking and municipal representatives and planners.

In early 2018, ENDM helped to organize an inter-agency meeting regarding the Undertaking. This meeting allowed FMG to introduce the Project and to network with the primary contact people at each agency. It is anticipated that regular follow-up meetings with the regulatory agencies will be undertaken to provide updates, share information and seek alignment on Project plans. Where applicable, FMG will endeavor to advance consultation with the below noted government agencies regarding the development of the Project.

### **Provincial (Ontario) Government**

- Ministry of Indigenous Affairs;
- Ministry of Economic Development, Job Creation and Trade (MEDJCT);
- Ministry of Environment, Conservation and Parks (MECP);
- Ministry of Infrastructure;
- Ministry of Labour, Training and Skills Development (MOLTSD);
- Ministry of Municipal Affairs and Housing (MAH);
- Ministry of Natural Resources and Forestry (MNRF);
- Ministry of Energy, Northern Development and Mines (ENDM);
- Ministry of Heritage, Sport, Tourism, and Culture Industries (MHSTCI);
- Ministry of Transportation (MTO);
- Ontario Energy Board and Independent Electricity System Operator;
- Ontario Provincial Police; and
- Provincial Parliament representatives.

### **Federal Government**

- Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC).
- Impact Assessment Agency of Canada (the Agency).
- Environment and Climate Change Canada (ECCC).
- Fisheries and Oceans Canada (DFO).
- Health Canada (HC);

- Major Projects Management Office (MPMO);
- Natural Resources Canada (NRCan);
- Transport Canada (TC); and
- Federal Parliament representatives.

### **Municipal Governments**

- Township of Ear Falls;
- Municipality of Sioux Lookout;
- Municipality of Red Lake; and
- City of Dryden.

## **9.6 Consultation and Engagement Activities**

FMG initiated consultation activities with Indigenous communities and stakeholders to provide information about the Undertaking, the EA processes to be followed, and to identify and consider concerns and issues to be addressed in the EA. FMG provided public stakeholders and Indigenous communities with an opportunity to receive information about, and make meaningful input into, the review and development of the Undertaking.

The consultation objectives for the initial stage of the Undertaking were to:

- Gain an understanding of Indigenous interests and consultation expectations;
- Establish a positive working relationship with all interested parties (Indigenous groups, stakeholders and agencies);
- Provide information about the Undertaking and the EA process; and
- Share information about the Undertaking and gather feedback on the Project.

The information gathered through the various engagement activities provided valuable information to FMG about how individual communities would like to be consulted with, what environmental concerns are important to each community and stakeholder, and a better understanding of the socio-economic benefits of the Project that are desired by each community and stakeholder. This information was used in part to develop the ToR and will continue to guide the decisions to be made throughout the EA. Section 9.7 outlines how the information gathered through the engagement activities have been considered in the decisions made to date.

FMG has consulted with Indigenous communities, the public and government agencies on the ToR. Where applicable to the ToR phase, FMG has revised the ToR to address comments, issues and concerns before the final Amended ToR was submitted to MECP.

A summary of the key milestones during the preparation of the Terms of Reference include:

- April 18, 2018: Voluntary Agreement
- August 29, 2018: Notice of Commencement
- October 29, 2019: Draft ToR, circulated to agencies for comment
- February 2020: Updated Draft ToR circulated for review and comment (comments received from agencies only)
- May 2020: Revised Draft ToR updated and re-circulated to agencies
- August 21, 2020: final ToR submitted for review and approval (comment received from agencies and Indigenous communities)
- January 2021: Draft Amended ToR (Red-line version) circulated for review and comment (comment received from agencies and Indigenous communities)
- April 29, 2021: Final Amended ToR

Sections 9.6.1 through 9.6.3 described the consultation and engagement activities that FMG have carried out to date in a chronological order. The complete record of activities and information that was gathered from Indigenous communities and stakeholders can be found in the RoC. The RoC document includes communications logs, meeting minutes and notes, comments and responses, and the presentations that were delivered. The RoC also includes some historic consultation carried out by the previous tenure owner, GCU, prior to the Voluntary Agreement.

FMG will continue to collect and work to address comments, issues and concerns throughout the EA process. The RoC has been updated to reflect the results of the engagement and consultation activities about the ToR.

## **9.6.1 Consultation with Indigenous Communities**

### **9.6.1.1 Consultation prior to the EA process**

Consultation and engagement prior to the Voluntary Agreement primarily focused on the dissemination of information about the Project by hosting community meetings and establishing community relationships and contacts. Consultation was conducted by GCU for preliminary permits and the Class EA process for the Access Corridor Project from 2013 to 2017.

GCU engaged the First Nations of Cat Lake, Slate Falls, and Lac Seul, who were identified by the Crown in 2009 as the affected First Nations with respect to the Access Corridor Project. On

May 22, 2012, Chiefs from these First Nations signed an internal protocol agreement, in which they agreed to work together for the purpose of negotiations with GCU.

A Working Committee, with members from each of these First Nations, met on a regular basis to discuss the progress of the Project and the development of an agreement between GCU and these First Nations that would allow the Project to be developed with the support of these First Nations, while respecting their Aboriginal and Treaty Rights. Following the acquisition of the Project from GCU, FMG has engaged in ongoing discussions with this Working Committee.

Historic comments regarding the Project during the time of GCU's ownership are summarized in the RoC. These are regarded as a starting point for FMG to understand issues and concerns regarding the development of the Project. FMG does not have specific details of this engagement (names, dates and means of engagement), but relevant information will be provided in an Engagement Log going forward.

In January 2017 the First Nations of Cat Lake, Slate Falls and Lac Seul entered into a Shared Territory Protocol agreement. These three First Nations are known collectively as the STPN. In the fall of 2017, Lac Seul First Nation and Wabauskang First Nation entered a Shared Territory Protocol. FMG has committed to engage with these First Nations under the terms of their respective protocols.

In late 2017 and early 2018, FMG held community meetings and open houses to provide an overview of the Springpole Gold Project in Wabauskang First Nation, Slate Falls Nation, Mishkeegogaming First Nation and Cat Lake First Nation. Tables presenting the various questions that were asked and the responses provided are included in Section 7 of the RoC. Questions received were primarily regarding general information about the Project, job opportunities and baseline conditions.

GCU also completed introductory meetings with Wabauskang First Nation early in the process. In 2014 GCU co-funded a "Traditional Knowledge and Land Use Study" in the area of the Springpole Gold Access Corridor Project. The study remains the property of Wabauskang First Nation and a copy has been provided to ENDM and MNRF.

MNRF and ENDM directed GCU to consult with the MNO as part of the EA for the Access Corridor Project that was initiated in 2012. Consultation has periodically been undertaken regarding exploration permits and permits for the Access Corridor Project.

### **9.6.1.2 Consultation on the ToR**

On August 29, 2018, FMG distributed the Notice of Commencement of the ToR to Indigenous communities interested in the Project by mail. Consultation with Indigenous communities at the ToR stage intended to allow FMG to identify and consider potential concerns of Indigenous communities related to the Project and to provide those communities with an opportunity to receive information about and have meaningful input into the development of the ToR.

The objective of consultation throughout the ToR development was to:

- Establish a good working relationship with identified Indigenous communities;
- Describe the Project and related activities while gaining an understanding of Indigenous interests and consultation expectations;
- Describe the field programs and ongoing studies and discuss preliminary results; and
- Gather feedback on the Project and/or any of the information discussed.

In the fall of 2018 and early in 2019, FMG hosted community meetings to provide an overview of the Undertaking and the ToR in Mishkeegogaming First Nation, Lac Seul First Nation, Slate Falls Nation and Wabuskang First Nation. A committee meeting was held with MNO in January 2019 to review the Project Description, EIS Guidelines and baseline studies. Tables presenting the various questions that were asked and the answers provided are included in Section XX of the RoC. Questions were primarily regarding general information about the Undertaking, job opportunities and baseline conditions. In general, primary concerns raised were regarding impacts of the Project on water quality, fish health and land use.

FMG hosted open houses and meetings with Slate Falls Nation, Ojibway Nation of Saugeen, Cat Lake First Nation, Waubasking First Nation, Lac Seul First Nation and Mishkegoogaming First Nation as well as MNO in late 2019 and early 2020 to provide an update and receive input on the draft ToR. Various forms of information were provided to each community throughout each session to provide a understanding of the Undertaking. FMG provided visual aids including a physical three-dimensional model of the Springpole Gold Project site, containing interactive pieces indicating the location of the mine rock and tailings location, the area of Springpole Lake that is proposed to be drained, and the proposed location of the coffer dams and the processing mill. In addition, an animation video was played which presented various stages of the Springpole Gold Project during the construction and development process.

These engagement activities allowed the communities to review and provide comments on key documentation that has been completed. The documents for review that were made available to each community between include:

- PowerPoint presentation of the Project overview and timeline;
- Project Description;
- Location map;
- Voluntary Agreement;
- Environmental Impact Study Guidelines;
- Preliminary Economic Assessment;
- Fisheries report and summary; and

- Fisheries and water quality baseline results posters.

Tables presenting the various questions that were asked and the responses provided by FMG are included in Section 7 of the RoC. Key concerns raised and how they influenced the ToR is summarized in Section 9.7.

Copies of the draft ToR were sent electronically and physically mailed to Cat Lake First Nation, Lac Seul First Nation, Mishkeegogaming First Nation, Slate Falls Nation and Wabauskang First Nation for review and comments in February 2020. At this time, no formal written comments were provided by these Indigenous communities.

The ToR was updated and submitted to MECP as final on August 21, 2020. At that time, Indigenous communities were provided with both hard copies and electronic copies. The typical 30-day comment period on the ToR was extended to 45 days to allow additional time for Indigenous communities to review and comment on the ToR. These comments were requested by October 5, 2020. However, due to COVID-19 pandemic at that time, many Indigenous communities had declared a state of emergency or were involved in taking other measures to protect community health and safety. As a result, MECP extended the review period to accept comments from Indigenous communities until November 23, 2020.

MNO submitted comments on the final ToR on October 23, 2020 and FMG responded on November 9, 2020. The MNO comments and FMG responses were discussed further during subsequent consultation on the draft Amended ToR. Cat Lake First Nation provided comments on November 20, 2020 and Mishkeegogaming First Nation provided comments on November 23, 2020. FMG provided responses to comments submitted by Cat Lake First Nation and Mishkeegogaming First Nation comments on January 8, 2021 (along with a copy of the draft Amended ToR for review).

On December 18, 2020, FMG sent a letter to the Indigenous communities providing them with advance notification of the intent to circulate the draft Amended ToR for review. FMG noted that since the ToR circulation in August 2020, FMG has taken time to review the comments received and as a result, intends to circulate the draft Amended ToR on January 8, 2021

A copy of the comments received from Indigenous communities and responses from FMG are included in Appendix C of the RoC. Key concerns raised and how they influenced the Amended ToR are summarized in Section 9.7.1.

### **9.6.1.3 Consultation on the Amended ToR**

A copy of the draft Amended ToR was provided to all identified Indigenous communities for review on January 8, 2021. FMG offered to have meetings with the communities to discuss the draft Amended ToR and how previous comments were addressed in January and February 2021.

On February 8, 2021, FMG met with MNO to review the draft Amended ToR. FMG gave a presentation providing an update on the Pre-feasibility Study, summarized the objectives of the draft Amended ToR, and provided an overview of the key amendments made. A copy of the meeting notes and presentation are provided in the RoC. MNO provided written comments on the

draft Amended ToR on February 16, 2021 and FMG met with MNO to discuss the comments on February 19, 2021. The meeting was primarily regarding one comment that noted MNO's concern that a VC workshop had not yet been held. As an outcome of the meeting, FMG clarified that the commitment to consider any new VCs suggested by MNO would occur during the EA. Written responses from FMG to MNO comments received on the draft Amended ToR, including this commitment, were provided to MNO on March 30, 2021. A copy of the comments and responses can be found in Appendix C of the RoC and a copy of the meeting notes can be found in Appendix B of the RoC.

On February 5, 2021 Mishkeegogaming First Nation provided written comments on the draft Amended ToR and FMG provided responses on March 17, 2021. FMG met with Mishkeegogaming First Nation on March 26, 2021 to discuss the responses to comments. The focus of the discussion was on responses that Mishkeegogaming First Nation viewed as being only partly addressed by FMG, and was primarily related to TK/TLU and environmental baseline. In the meeting, FMG confirmed that details of the TK study would be discussed further and upon agreement with the Mishkeegogaming First Nation, the work would commence. FMG also noted that further information will be provided on the baseline work for the Undertaking completed to date as well as planned field programs for 2021. FMG are anticipating being able to begin providing the baseline reports in April 2021. A copy of the meeting notes can be found in Appendix B of the RoC.

On March 26, 2021, the Ojibway Nation of Saugeen provided written comments on the draft Amended ToR and FMG provided responses on April 13, 2021. FMG met with the Ojibway Nation of Saugeen to discuss the responses to their comments on April 22, 2021.

FMG has followed-up several times via email and phone calls with Pikangikum First Nation and Wabauskang First Nation to ascertain if the communities have any questions or comments on the draft Amended ToR and offered a meeting to discuss the document. As of the submission of this document, no comments have been provided.

With respect to STPN (Cat Lake First Nation, Lac Seul First Nation and Slate Falls Nation), FMG discussed the ToR and advancing the establishment of the environmental committee with the Chief of Cat Lake First Nations on April 21, 2021. To provide certainty, FMG has committed (See Section 8) to working with STPN to establish an environmental committee, develop a community specific consultation plan along with appropriate resourcing to participate in the environmental assessment process, and to fund a project-specific Traditional Knowledge / Traditional Use study.

## **9.6.2 Consultation with Public Stakeholders**

Early consultation with public stakeholders was carried out by GCU and focused on consultation under the federal EA process and provincial Class EA processes for the Access Corridor Project previously undertaken prior to the decision to subject the Project to an individual EA.

On September 4, 2018, FMG distributed the Notice of Commencement of the ToR to public stakeholders by mail to those listed on the stakeholder mail list. To encourage consultation with the public, throughout 2019, FMG held open houses in key central locations in Wabauskang First Nation, Lac Seul First Nation, the City of Thunder Bay, and the Town of Sioux Lookout. These

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open house meetings were advertised locally through radio announcements and local newspaper ads. The open houses consisted of the physical and visual 3D displays, an oral presentation of the Project overview and the following documents were made available for review and comments:

- Project Description;
- Location map;
- Environmental Impact Study Guidelines;
- Preliminary Economic Assessment;
- Fisheries report and summary; and
- Fisheries and water quality baseline results posters:

Table 9.6.1 lists the date, location and purpose of substantive public stakeholder engagement activities carried out by FMG. Copies of the ToR were made available to the public for review and additional open house meetings were scheduled to provide opportunities for consultation. Comments received on the ToR have been considered for incorporation into the Amended ToR. Key concerns raised throughout the ToR process by members of the public and how they influenced the Amended ToR are summarized in Section 9.7.2. FMG's plan to consult with the Public during the EA can be found in Appendix E.2 Proposed Public Engagement Plan.

**Table 9.6.1: List of Public Stakeholder Engagement Activities**

Contact / Location	Date	Type of Engagement	Purpose of Engagement
Stakeholder Contact List	September 4, 2018	Notice sent by mail	<ul style="list-style-type: none"> <li>• Commencement of ToR</li> </ul>
Lac Seul FN, Events Centre	May 1, 2019	Open House at the Lac Seul Career Fair	<ul style="list-style-type: none"> <li>• Provide a visual overview of the Undertaking</li> <li>• Review and Comment of presented materials</li> </ul>
	September 18, 2019	Open House at the Lac Seul Elder's and Youth Gathering Event	<ul style="list-style-type: none"> <li>• Provide a visual overview of the Undertaking (ToR)</li> <li>• Review and Comment of presented materials</li> </ul>
	September 19, 2019	Open House at the Lac Seul Elder's and Youth Gathering Event	<ul style="list-style-type: none"> <li>• Provide a visual overview of the Undertaking (ToR)</li> <li>• Review and Comment of presented materials</li> </ul>
Sioux Lookout, Arena	June 26 to 28, 2018	Open House at the Northern Housing Summit	<ul style="list-style-type: none"> <li>• Provide a visual overview of the Undertaking</li> <li>• Review and Comment of presented materials</li> </ul>
	August 8, 2019	Open House at the Trade and Craft Show during Blue Berry Festival	<ul style="list-style-type: none"> <li>• Provide a visual overview of the Undertaking (ToR)</li> <li>• Review and Comment of presented materials</li> </ul>
	August 9, 2019	Open House at the Trade and Craft Show during Blue Berry Festival	<ul style="list-style-type: none"> <li>• Provide a visual overview of the Undertaking (ToR)</li> <li>• Review and Comment of presented materials</li> </ul>
Thunder Bay, Valhalla Inn	April 2 and 3, 2019	Open House at the North Western Ontario Prospectors Symposium	<ul style="list-style-type: none"> <li>• Provide a visual overview of the Undertaking</li> <li>• Review and Comment of presented materials</li> </ul>
Wabauskang FN, Community Hall	May 22, 2019	Open House at the Career Fair	<ul style="list-style-type: none"> <li>• Provide a visual overview of the Undertaking</li> <li>• Review and Comment of presented materials</li> </ul>

### 9.6.3 Consultation with Government Agencies

Consultation with government agencies has been conducted to ensure applicable regulatory standards are complied with and to seek guidance on conduct various assessment methodologies and other aspects of the Undertaking. FMG has held various meetings with the identified agencies, municipalities and townships. A summary of key meetings is noted below. A communication log with government agencies (along with dates and meeting purpose), as well as meeting notes can be found in the RoC.

FMG issued the Notice of the Commencement of a ToR to the identified government agencies on August 29, 2018. Over the following year, multiple meetings were held with government agencies to discuss the Undertaking and the preparation of the ToR. On March 26, 2019 a meeting was held with MECP, DFO, HC, Impact Assessment Agency of Canada (IAAC), TC, ENDM, MNRF and NRCan to discuss the Springpole Gold Project, environmental baseline studies, access road, community consultation and engagement, EA timeline and anticipated regulatory approvals.

On October 29, 2019, the draft ToR was provided to MECP for review and comment. MECP provided preliminary comments on November 26, 2019 from the Environmental Approvals Branch and Indigenous Consultation Advisor. Responses to these comments, and an updated version of the ToR to address the comments were provided to MECP on January 27, 2020. FMG met with MECP on January 30, 2020 to discuss FMG's responses to the preliminary comments.

A second draft ToR was circulated to government agencies for review in February 2020. Over the following months, comments were provided by MECP (including the following branches: Environmental Assessment, Environmental Assessment Services, SAR, Air Quality Technical Support, Ontario Parks and Environmental Permissions), ECCC and MNR. FMG updated the ToR to address these comments and completed a concordance table to demonstrate how comments were addressed (see Appendix A of the RoC). An updated draft ToR and concordance table were provided to MECP on May 25, 2020.

MECP provided comments on the updated draft ToR on June 26, 2020. FMG addressed these comments in the final ToR, which was submitted to MECP for approval on August 21, 2020. The final ToR underwent a 45-day public comment period. During that period, comments were provided by ECCC, HC, IAAC, Indigenous Services Canada, MECP, MEDJCT, MHSTCI and MNR on the ToR.

On November 12, 2020, FMG submitted a letter to MECP notifying of the intent to amend the ToR within an eight-week time period. MECP responded on November 19, 2020 acknowledging the request and stated that in accordance with the Deadlines Regulation (O.Reg. 616/98), FMG has eight weeks from that date to amend the proposed ToR. FMG circulated the draft Amended ToR on January 8, 2021 for comment, along with responses to comments received on the August submission. Copies of the comments and responses are included in Appendix C of the RoC.

Through January to April 2021, FMG provided responses to written comments received from government agencies on the Amended ToR, held meetings where required to discuss responses and updated the Amended ToR to address the agency comments. Copies of the agency comments and FMG responses are provided in Appendix C of the RoC. Key concerns raised throughout the ToR process by government agencies and how they influenced the ToR is summarized in Section 9.7.3.

The final Amended ToR was submitted to MECP on April 29, 2021.

## **9.7 Consultation Input**

FMG has put considerable amount of care in collecting the input from all consultation engagement activities. The comments and concerns raised have been recorded with the corresponding response from FMG and provided in the RoC.

### **9.7.1 Input from Indigenous Communities**

Through the consultation activities described in Section 9.6.1, FMG has heard comments and concerns from Indigenous communities, raised during meetings with leadership, community open house sessions in person, or through questionnaires that were provided in hard copy at each

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community open house session. FMG used this input to help guide the information presented in this Amended ToR by considering the values and concerns that were raised by each community. A list of commitments that were developed through consultation are included in Table of Commitments in Section 8 of this ToR.

Consultation sessions with key Indigenous Communities will also provide valuable input that will be used in the TK/TLU that will be completed in the EA. These studies have not yet commenced.

Table 9.7.1 summarizes the key comments and concerns raised by the Indigenous Communities through the engagement meetings carried out and how they influenced the Amended ToR. In addition, written responses to comments received on the ToR and Amended ToR were provided and can be found in Appendix C of the RoC.

**Table 9.7.1: Summary of Key Comments and Concerns of Indigenous Communities**

Summary of Comment / Concern	Summary of FMG Response	RoC Reference	Influence on the ToR
<b>Cat Lake First Nation</b>			
Request for translator during consultation events	FMG will engage a translator for future events.	Table 7-7	Incorporated into the Indigenous Consultation Plan for the EA
Questions regarding and noting concern for surface water quality and quantity	FMG will be assessing potential effects on surface water and identifying mitigation if required.	Table 7-7	Surface Water Systems included as a VC for assessment in EA
Questions and concern for fish and fish habitat, including related to fish removal programs	FMG will be assessing potential effects on fish and fish habitat and identifying mitigation if required.	Table 7-7	Fish and Fish Habitat included as a VC for assessment in EA
Concern regarding seismic activity	FMG will have develop a plan to monitor seismic activities.	Table 7-7	Commitment included in the ToR
Request for before and after pictures to be presented at consultation events	FMG will provide before and after pictures of other mines to consultation sessions to demonstrate reclamation.	Table 7-7	Commitment included in the ToR
<b>Lac Seul First Nation</b>			
Questions and interest in training and employment	FMG will work with local communities to identify training requirements for the labour force and support initiatives towards job training.	Table 7-9, Table 7-17	Commitment included in the ToR
Request for consultation events and methods to consider timing and transportation needs of community	FMG will work with the community to ensure that meetings are scheduled with suggested aspects in mind.	Table 7-9	Incorporated into the Indigenous Consultation Plan for the EA
Request for translator during consultation events.	FMG will engage a translator for future events.	Table 7-17	Incorporated into the Indigenous Consultation Plan for the EA
Questions and concern regarding pit at closure	FMG provided information regarding plans for the pit lake at closure.	Table 7-17	The EIS / EA will include an assessment of alternatives for filling the pit lake. Conceptual Closure and Reclamation plan/ strategies to be included in the EIS/ EA.
<b>Metis Nation of Ontario</b>			
Questions and concerns regarding wildlife and SAR	FMG will be assessing potential effects on wildlife including SAR and identifying mitigation if required.	Table 7-14	Wildlife and Wildlife Habitat and SAR (various) included as VCs for assessment in EA

Summary of Comment / Concern	Summary of FMG Response	RoC Reference	Influence on the ToR
Concern regarding noise and effects on habitat and land use	FMG will be assessing potential effects of noise from the Project and identifying mitigation if required.	Table 7-14	Other Atmospheric Environment (including acoustic emissions) included as a VC for assessment in the EA
Request for technical studies to be reviewed	FMG will provide MNO with technical studies to be reviewed.	Table 7-14	Incorporated into the Indigenous Consultation Plan for the EA
Questions and concerns regarding water quality	FMG will be assessing potential effects on surface water and identifying mitigation if required.	Table 7-14	Surface Water Systems and Groundwater included as VCs for assessment in EA
Questions and concerns regarding fish and fish habitat	FMG will be assessing potential effects on fish and fish habitat and identifying mitigation if required.	Table 7-14	Fish and Fish Habitat included as a VC for assessment in EA
Concern regarding safety and fencing	FMG will commit to ensure safety on site by fencing of some of the site components where required and practical.	Table 7-14	Commitment included in the ToR
<b>Mishkeegogaming Ojibway First Nation</b>			
Various comments and suggestions regarding consultation methods	Community consultation is a requirement of the EA process and FMG will be continuing engagement,	Table 7-5	Incorporated into the Indigenous Consultation Plan for the EA
Noted importance of protecting water system	FMG will be assessing potential effects on water and identifying mitigation if required.	Table 7-5	Surface Water Systems and Groundwater included as VCs for assessment in EA
Questions and concerns regarding tailings management including stability and impacts to water	FMG will design the TMF to ensure that the receiving environment is not impacted. FMG will be assessing potential effects on water and identifying mitigation if required.	Table 7-8	TMF identified as a Project Component to be considered in the EA. Surface Water Systems and Groundwater included as VCs for assessment in EA.
<b>Ojibway Nation of Saugeen</b>			
Concerns related to spills and leaks	FMG will develop a spill management plan.	Table 7-10	Commitment included in the ToR
Questions and concerns regarding engagement process and TK	FMG will involve Saugeen in the development of TEK Terms of Reference and its execution.	Table 7-10	Commitment included in the ToR
Questions related to power source	FMG confirming preferred power source.	Table 7-10	Reasonable power supply alternative methods will be considered in the EIS / EA,
Questions and concern for fish and fish habitat, including related to fish removal programs	FMG will be assessing potential effects on fish and fish habitat and identifying mitigation if required.	Table 7-19	Fish and Fish Habitat included as a VC for assessment in EA
Questions related to access road	An access road will connect to the Wenesaga road.	Table 7-19	A reasonable range of alternative alignments will be considered for the remaining all-weather road requirement to the mine site.

Summary of Comment / Concern	Summary of FMG Response	RoC Reference	Influence on the ToR
			Access Road identified as a Project Component to be considered in the EA,
<b>Slate Falls Nation</b>			
Concern for loss of portage route providing access to campsite	At this stage of the project there is no immediate concern and the access will be maintained.	Table 7-2	Commitment included in the ToR: FMG will develop a series of options designed to mitigate the potential loss of the portage adjacent to the current location of the Project camp. These will be presented at meetings with the communities potentially impacted by the removal of the portage.
Concern for loss of pictographs on Springpole Lake	The archaeological work to date has identified areas of cultural significance and these sites would have to be protected. FMG will identify what measures could be implemented to protect these sites	Table 7-2	Commitment included in the ToR
Noted that data had been collected under the Cat Lake/ Slate Falls Land Use Plan	FMG requested data be shared for use in the EA process.	Table 7-4	Commitment included in the ToR
Questions regarding monitoring program and request for monitoring program to be operated by First Nations	Follow-up will be required to discuss the community's involvement in the environmental monitoring related to the Springpole Gold Project.	Table 7-4, Table 7-11, Table 7-18	Commitment included in the ToR
Questions and concern regarding fish and fish habitat, including fish relocation program	Provided information on fish tagging program and fish relocation process.	Table 7-4, Table 7-11, Table 7-18	Fish and Fish Habitat included as a VC for assessment in EA
Request for detailed timeline for life cycle of the mine	Explained that there will be approximately 2 years of construction before the production phase of the mine. The life of the mine will be about 12 years. The closure phase may take 3 to 5 years with monitoring occurring as long as required. The total estimate is about 17 years.	Table 7-11, Table 7-18	Project phases described in Section 4 of ToR. The final description and rationale for the proposed undertaking will be further developed and included in the EIS / EA once alternatives have been fully considered and evaluated.
Concern regarding potential impacts on water system	FMG will be assessing potential effects on water and identifying mitigation if required.	Table 7-11, Table 7-18	Surface Water Systems and Groundwater included as VCs for assessment in EA
Questions and concerns regarding potential impacts on wildlife	FMG will be assessing potential effects on wildlife and wildlife habitat and identifying mitigation if required.	Table 7-18	Wildlife and Wildlife Habitat and SAR (various) included as VCs for assessment in EA

Summary of Comment / Concern	Summary of FMG Response	RoC Reference	Influence on the ToR
Questions and interest in training and employment	FMG will work with local communities to identify training requirements for the labour force and support initiatives towards job training.	Table 7-2, Table 7-11, Table 7-18	Commitment included in the ToR
Provided input into consultation methods	Comments were noted and will be incorporated into future consultation events	Table 7-4, Table 7-11	Incorporated into the Indigenous Consultation Plan for the EA
<b>Wabauskang First Nation</b>			
Questions and interest in training and employment	FMG will work with local communities to identify training requirements for the labour force and support initiatives towards job training.	Table 7-3, Table 7-12	Commitment included in the ToR
Request for FMG to participate in youth project related to environmental work.	FMG and Wabauskang FN would work to see if the arrangement would be possible.	Table 7-1	Commitment included in the ToR
Questions related to baseline fish results and concerns for potential effects on fish and fish habitat.	Questions answered at meetings. FMG will be assessing potential effects on fish and fish habitat and identifying mitigation if required.	Table 7-3, Table 7-12	Fish and Fish Habitat included as a VC for assessment in EA
Questions and concerns regarding potential impacts on water	Questions answered at meetings. FMG will be assessing potential effects on water and identifying mitigation if required.	Table 7-12	Surface Water Systems and Groundwater included as VCs for assessment in EA
Questions and concerns regarding potential impacts on wildlife	FMG will be assessing potential effects on wildlife and wildlife habitat and identifying mitigation if required.	Table 7-12, Table 7-15	Wildlife and Wildlife Habitat and SAR (various) included as VCs for assessment in EA
Request for independent data collection and data review.	Agreed to discuss further as project progresses	Table 7-3, Table 7-15	Commitment included in the ToR
Input into consultation methods, including request to include Elders in meetings, and presentation suggestions	FMG will include a cross-section of the community during consultation events and incorporate suggestions into future events.	Table 7-12, Table 7-15	Incorporated into the Indigenous Consultation Plan for the EA

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### **9.7.2 Input from Public Stakeholders**

Consultation with public stakeholders was carried out through open houses and meetings with known local land users. These early consultation activities identified the following key concerns:

- Impacts on outfitters and their employees due to loss of remoteness value;
- Impacts on water quality;
- Impacts of fish and fish habitat;
- Effects of access corridor and increased access to remote areas; and
- Impacts to Caribou (Boreal population) and their habitat.

FMG has considered these concerns in the development of the ToR. Outdoor recreation and tourism, surface water systems, groundwater, fish and fish habitat, and Caribou (Boreal population) have been included in the ToR as potential VCs. The EA will include an assessment of potential adverse environmental effects of the Undertaking on the identified VCs.

### **9.7.3 Input from Government Agencies**

Input from government agencies was collected through agency meetings and comments provided on the ToR. Available meeting notes, agency comments and FMG responses can be found in the RoC. The final Amended ToR reflects updates made as a result of comments received from government agencies. Key changes to the document include the following:

- Preliminary study areas updated;
- Additional VCs added for consideration;
- Criteria and Indicators updated to reflect comments;
- Commitment tables refined as a result of consultation input and to add clarity; and
- Updates to the consultation section of the document and Indigenous Consultation Plan.

### **9.8 Consultation Plans for the EA**

FMG will continue to inform and involve Indigenous communities, the public and other stakeholders in a variety of ways (see the Consultation Plans in Appendix E). Early consultation activities conducted to date were to introduce the Company, to inform the community of the status of the exploration and mining-related activities, to provide information regarding the provincial ToR, federal Project Description, EA(s) and future consultation opportunities.

Comments received during consultation on the Project will be considered in the Project design and EIS / EA, as applicable. The EIS / EA will document how the Project has been modified, as applicable, as a result of inputs from stakeholders and Indigenous communities.

FMG and the federal and provincial government agencies recognize that opportunities exist to collaborate on planning and implementing stakeholder engagement and consultation for their respective EA processes, and will attempt to align consultation activities to the extent practical.

Given the COVID-19 pandemic, consultation and engagement activities will need to remain flexible. Traditional methods including in-person meetings may not be feasible during the EA process, and alternate methods will be used to ensure that the purpose and objectives of consultation are met, while being consistent with the principles of successful consultation. Methods involving virtual meeting tools, conference calls and email will be discussed with stakeholders and Indigenous communities to identify mutually agreeable methods.

As much as possible, consultation and engagement on both the provincial and federal EA processes will be coordinated in terms of timing and jointly held activities. If the Minister of MECP approves the ToR, the following activities are planned for the EA process and are detailed in Appendix E:

- Post notices, such as Notice of Commencement of the EA, Notice of Public Information Events(s), in local newspapers and on the FMG website, and distribute information to those on the Project mailing list.
- Hold ongoing discussions with stakeholders and Indigenous communities (e.g., meetings, workshops, and/or community open houses) to identify and attempt to resolve issues, collect baseline data, and to gather feedback on Project component options as well as the draft EA findings.
- Prepare and widely distribute an FMG community newsletter at least two times per year to highlight information about the Project, EA findings including summaries of baseline studies, upcoming public meetings and to encourage feedback through the Company website, dedicated e-mail address or through direct contact with Company staff.
- FMG will review and gather feedback on the results of baseline studies, evaluation and selection of alternative methods, potential environmental effects and mitigation measures, and closure planning.
- Make available copies of EIS / EA documents for review and make hard copies available at convenient and strategic public locations, such as public libraries, Indigenous community administration offices as well as FMG and government offices. The EIS / EA will also be made available for downloading from the FMG website.
- Host meetings or open houses in local communities to provide updated information about the Project, provide information about the EA processes / findings, discuss alternatives and gather feedback about appropriate management of potential environmental effects.

- Maintain FMG’s website to provide Project information and a link for direct feedback.

Table 9.8.1 outlines the consultation tools and engagements milestones planned to support the preparation and review of the EA and stated consultation purpose and objectives for government agencies, Indigenous communities and public.

**Table 9.8.1: Consultation Tools and Activities Planned to Support Preparation and Review of the EA**

<b>Objective</b>	
Key consultation opportunities include consultation on baseline studies carried out to support the EA (with input received being considered to inform the EA and future on-going field programs and monitoring); alternative methods and selection of the preferred methods (with input received being considered to refine the evaluation where applicable); and conclusion of the evaluation of the preferred undertaking including potential effects and mitigation to allow interested parties to formulate their view of the Project, (with input received being considered to refine environmental management going forward where applicable). The following consultation tools will be used to achieve these objectives:	
<b>Approximate Date</b>	<b>Consultation and Engagement Milestones</b>
Winter 2021 – Summer 2021	<ul style="list-style-type: none"> <li>• Notice of Commencement of an Environmental Assessment</li> <li>• Quarterly Newsletters, with topics to include: ToR submission, environmental baseline, summary of open house and comments/responses</li> <li>• Public and Indigenous Open Houses (dependent on any pandemic-based restrictions): <ul style="list-style-type: none"> <li>○ Locations may include: Cat Lake, Slate Falls, Lac Seul, Mishkeegogamang, Pikangikum, Ojibway Nation of Saugeen, Wabauskang, MNO, Sioux Lookout, Red Lake, Ear Falls</li> <li>○ Topics may include: Alternatives, Valued Components, Criteria/Indicators and Preliminary Preferred Alternatives</li> </ul> </li> <li>• Indigenous Meetings. <ul style="list-style-type: none"> <li>○ The priorities will need to be modified to meet the needs of each Indigenous community as appropriate</li> </ul> </li> <li>• Government Review Team Meetings: <ul style="list-style-type: none"> <li>○ Topics may include: Baseline reports, assessment methodology, VC’s/criteria/indicators, alternatives, effects assessment, mitigations.</li> </ul> </li> <li>• Intergovernmental Meeting (federal and provincial Agencies) <ul style="list-style-type: none"> <li>○ Topics may include: Project Update, Baseline Studies and Effects, Alternatives</li> </ul> </li> <li>• Municipal Meeting(s)</li> </ul>
Winter 2022 – Spring 2022	<ul style="list-style-type: none"> <li>• Notice of preliminary EA Review Period</li> <li>• Public and Indigenous Open House (dependent on any pandemic-based restrictions): <ul style="list-style-type: none"> <li>○ Present preliminary EA results, including effects assessment and proposed mitigation</li> </ul> </li> <li>• Project Update Newsletter, including: Project updates, summary of open houses.</li> <li>• Ongoing Indigenous Meetings</li> <li>• Ongoing Government Review Team Meetings</li> <li>• Ongoing Municipal Meeting(s)</li> <li>• Ongoing Interest Group meetings, if required.</li> <li>• Notice of Submission of EA to MECP</li> </ul>

<b>Objective</b>	
Key consultation opportunities include consultation on baseline studies carried out to support the EA (with input received being considered to inform the EA and future on-going field programs and monitoring); alternative methods and selection of the preferred methods (with input received being considered to refine the evaluation where applicable); and conclusion of the evaluation of the preferred undertaking including potential effects and mitigation to allow interested parties to formulate their view of the Project, (with input received being considered to refine environmental management going forward where applicable). The following consultation tools will be used to achieve these objectives:	
<b>Approximate Date</b>	<b>Consultation and Engagement Milestones</b>
Following Submission of EA	<ul style="list-style-type: none"> <li>• Ongoing meetings with MECP and CEAA as required to coordinate federal and provincial EA decisions to the extent practical</li> <li>• Confirmation of EA submission to Indigenous communities and description of anticipated decision timelines</li> <li>• Ongoing Indigenous Meetings, if required</li> <li>• Ongoing Government Review Team Working Group Meetings, if required</li> <li>• Ongoing Municipal Meeting(s), if required</li> <li>• Ongoing Interest Group meetings, if required</li> </ul>

FMG has developed three Consultation Plans (Appendix E) to guide consultation and engagement with Indigenous Communities, Agencies and the Public during the environmental assessment for the Project.

### 9.8.1 Indigenous Consultation Plan

The Indigenous consultation plan (Appendix E.1) outlines the protocol for how FMG will carry out consultation throughout the EA process with the interested Indigenous communities. With the guidance of MECP, Indigenous communities were consulted with to ensure the proposed Consultation Plan was developed in such a way that communities are enabled to participate in a meaningful way, provide input that will be considered, and ensure information is transparent and shared appropriately. For example, through FMG's consultation sessions, the communities have requested handouts of information to take home and review, as well as a summary of the comments and concerns raised at each meeting to be shared with the community contact. Community-specific consultation approaches will be discussed with each Indigenous Community to ensure their specific circumstances and needs are met while progressing the environmental assessment for the Undertaking in a predictable timeline.

Consultation opportunities will be dependent upon the capacity and interest of the Indigenous Community and will include consultation on a draft EIS / EA, as well as potential opportunities for sharing baseline reports, criteria/indicators, preliminary alternative assessments, preliminary technical support documents in advance of the draft EIS / EA submission. Consultation plans will consider capacity support provided to each community, and consultation methods, tools and techniques to ensure meaningful consultation can take place during the EA process. The timing of when communities should be consulted will also be included and is intended to align with the EA process phases of pre and post EA submission to ensure adequate consultation is completed throughout the process. Engagement activities will remain flexible considering the COVID-19 global pandemic and can include virtual meetings and teleconferences, preparation of information packages for review in person meetings where safe to do so.

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While the Indigenous Consultation Plan applies to all Nations impacted by the Project, FMG will establish a mutually agreed upon Nation-specific approach to consultation with the Indigenous Nations listed in Section 9.3.2 if requested by the Nation. This includes FMG co-developing a Nation-specific Consultation Plan with any Nation that requests it.

Further details about the specific topics and information shared for consultation can be found in Table E.1.1.9 of Appendix E.1.

### **9.8.2 Public Engagement Plan**

The Public Engagement Plan (Appendix E.2) outlines the protocol for how FMG will carry out consultation throughout the EA process with public stakeholders. The plan was developed with the input of the stakeholders and government agencies.

FMG will engage the public at key EA decision making milestones, including environmental baseline studies, alternatives assessments and potential effects and mitigation. Given the current limitations imposed by the COVID-19 pandemic, different approaches to consulting throughout the EA process may need to be considered by FMG. Each engagement activities may include meetings, materials and consultation tools appropriate to the objective of the consultation topic.

Details about the specific topics and information shared at each engagement can be found in Table E.2.1.8 of Appendix E.2.

### **9.8.3 Government Consultation Plan**

The Government Consultation Plan (Appendix E.3) outlines the protocol for how FMG will carry out consultation throughout the EA process with federal and provincial government agencies.

FMG will consult with government agencies at key EA decision making milestones, including environmental baseline studies, alternatives assessments and potential effects and mitigation. Given the current limitations imposed by the COVID-19 pandemic, different approaches to consulting throughout the EA process may need to be considered by FMG.

Details about the specific topics and information shared at each engagement can be found in Table E.3.1.8 of Appendix E.3.

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## 10 FLEXIBILITY TO ACCOMMODATE NEW CIRCUMSTANCES

This ToR was issued to facilitate public consultation and comment and has been prepared in accordance with the *Code of Practice: Preparing and Reviewing Terms of Reference for Environmental Assessments in Ontario* (MOEC 2014a). The description of the Undertaking described in Section 4 and the alternatives described in Section 5 are preliminary in that the locations of the Project component such as ore and mine rock stockpiles, TMF, processing facilities, administrative facilities, etc., will be optimized during the engineering stage and as a result of ongoing consultation activities.

The EIS / EA which will be guided by the approved ToR will be prepared in accordance with the Code of Practice: *Preparing and Reviewing Environmental Assessments in Ontario* (MOEC 2014b). FMG recognizes that the EA must be prepared in accordance with the approved ToR, which sets out the minimum requirements for the EA, and the information in the ToR will be confirmed during the preparation of the EIS / EA. Nonetheless circumstances may arise that could prevent the commitments made in the ToR from being made in full or in part. It is recognized that the Springpole Gold Project is at the pre-feasibility engineering design stage and consultation is on-going. Situations may therefore arise that cause FMG to be unable to completely fulfil the commitments contained herein as a result of a need to accommodate new circumstances. FMG have attempted in this ToR to anticipate these changes but minor adjustments to the ToR may be required to be undertaken by FMG in consultation with MECP.

As part of the EA, FMG will develop short term contingency plans as appropriate to gain further flexibility, such as minor design changes or specific consultation activities. Such plans will outline a course of action to be followed if unforeseen situations occur.

## 11 OTHER APPROVALS REQUIRED

The following sections outline the anticipated municipal, provincial, and federal approvals that will be required for the Project. The list of permits and approvals will continue to be reviewed as the Project progresses. FMG will continue to consult with municipal, provincial, and federal agencies to ensure that the required approvals are identified throughout the EA process.

### 11.1 Municipal Approvals

FMG does not anticipate requiring any municipal approvals.

### 11.2 Provincial Approvals

A list of the anticipated provincial approvals and permits are summarized below in Table 11.2.1.

**Table 11.2.1: Anticipated Provincial Approvals**

Permit / License	Applicable Act	Responsible Agency	Description
Permit to Take Water	<i>Ontario Water Resources Act</i>	MECP	Springpole Lake tributaries fresh water takings.
	<i>Ontario Water Resources Act</i>	MECP	Mine dewatering of North Basin and open pit
	<i>Ontario Water Resources Act</i>	MECP	Other areas (construction minor takings, milling operations, perimeter pumping wells, dewatering aggregate sources below water table, tailings storage area construction, aquifer testing).
Environmental Compliance Approval	<i>Ontario Water Resources Act</i>	MECP	Industrial and Domestic Sewage
	<i>Ontario Water Resources Act</i>	MECP	Mine / mill water treatment discharging into the environment (tailings, pit water, run-off etc.).
	<i>Environmental Protection Act</i>	MECP	Air / Noise, including but not limited to air emissions and noise, such as mill processes, on-site works, and haul trucks.
	<i>Environmental Protection Act</i>	MECP	Waste Disposal, for operation of a landfill or waste transfer site.
Work Permit	<i>Lakes and Rivers Improvement Act, Public Lands Act</i>	MNRF	Access roads and water crossings
	<i>Lakes and Rivers Improvement Act, Public Lands Act</i>	MNRF	TMF dams (online)
	<i>Lakes and Rivers Improvement Act, Public Lands Act</i>	MNRF	Proposed dewatering, waterbody realignments and removals, and pipelines.
	<i>Public Lands Act</i>	MNRF	Use of signage
Land Use Permit / Sale of Crown Land / License of Occupation (lake bottom)	<i>Public Lands Act</i>	MNRF	To obtain tenure for long-term facilities on Crown land, such as for a transmission line, or shoreline structures (dock, pumphouse, and pipeline). Consultation with MNRF planned regarding shoreline tenure at north end of main pit, given that the shoreline will be mined as part of the main pit.

Permit / License	Applicable Act	Responsible Agency	Description
			Consultation with MNRF planned regarding tenure for lake bottom where main pit is located.
Forest Resource License	<i>Crown Forest Sustainability Act</i>	MNRF	Clear merchantable timber (if any).
Authority to Haul	<i>Crown Forest Sustainability Act</i>	MNRF	Hauling of merchantable timber (if any).
ESA Authorization	<i>Endangered Species Act</i>	MECP	Killing, harming or harassing of a member of a SAR and/or damaging or destroying SAR habitat
Aggregate Resource License	<i>Aggregate Resource Act</i>	MNRF	Extraction of aggregate for construction purposes.
Various Permits	Various	MNRF	Scientific collection permits (including fish collection, and salvage), authorization of wildlife interference.
Entrance Permit and Encroachment Permit	<i>Public Transportation and Highway Improvement Act, Highway Traffic Act</i>	MTO	May not be applicable as no major road upgrades are planned at this time.
Closure Plan	<i>Mining Act</i>	ENDM	For mine construction / production including that related to the eventual decommissioning of the Springpole Gold Project. TMF dams (offline)
Clearance Letter	<i>Heritage Act</i>	MHSTCI	Confirmation that appropriate archeological studies and mitigation, if required have been completed for the Project.

### 11.3 Federal Approvals

A list of the anticipated federal approvals and permits are summarized below in Table 11.3.1.

**Table 11.3.1: Anticipated Federal Approvals**

Permit / License	Applicable Act	Responsible Agency	Description
<i>Fisheries Act</i> Authorization	<i>Fisheries Act</i>	Fisheries and Oceans Canada	Based on an assessment of impacts to fish and fish habitat, authorization may be required for an undertaking or activity that may result in the death of fish or the harmful alteration, disruption or destruction (HADD) of fish habitat. This may include: <ul style="list-style-type: none"> <li>Establishment of the stockpile(s) and tailings storage facility;</li> <li>In-water structures such as for fresh water taking;</li> <li>Watercourse diversions if applicable; and/or,</li> <li>Mine dewatering groundwater effects that would cause fish disruption to watercourses supporting fisheries.</li> </ul>
Works in Navigable Waters	<i>Canadian Navigable Waters Act</i>	Transport Canada	Alteration of navigable waters (e.g., coffer dam in Springpole Lake) and crossing of navigable

Permit / License	Applicable Act	Responsible Agency	Description
			waters with transmission line and access road(s).
Schedule 2 Listing	Metal and Diamond Mining Effluent Regulations under the <i>Fisheries Act</i>	Environment and Climate Change Canada	Overprinting of water frequented by fish by tailings and mine rock stockpiles (or other deleterious material) will require a listing under Schedule 2 of the Metal and Diamond Mining Effluent Regulations, pursuant to the <i>Fisheries Act</i> . Potential areas of impact include tailings storage and mine rock repository.
Manufacturing, storage, and transportation of explosives	<i>Explosives Act</i>	Natural Resources Canada	Any explosives magazine, manufacturing facility, and transportation require a federal permit, pursuant to Section 7. If facility is owned by licensed explosives contractor, permit will be issued to them.
Transportation of Dangerous Goods	<i>Transportation of Dangerous Goods Act</i>	Transport Canada	Permits of equivalent level of safety.
SAR	<i>Species at Risk Act</i>	Environment and Climate Change Canada	Affects caused by the Project to species as listed under Schedule 1 of the <i>Species at Risk Act</i> .
Radioisotope License	<i>Nuclear Safety Control Act</i>	Canadian Nuclear Safety Commission	Authorization for Nuclear Density Gauges / X-ray analyzer in process plant.

---

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**Appendix A**  
**Voluntary Agreements**



10 January 2018

**First Mining Finance Corporation**  
Suite 1800 – 925 West Georgia Street  
Vancouver, BC V6C 3L2

**Attn: Ms. Kathleen O'Neill, Director Environmental Assessment and Permissions**  
**Ministry of Environment and Climate Change**  
**135 St. Clair Ave. West., 1<sup>st</sup> Floor**  
**Toronto, ON M4V 1P5**

Dear Ms. O'Neill,

**Re: First Mining Finance Corp., Springpole Gold Project – Request for a Voluntary Agreement for an Individual Environmental Assessment**

First Mining Finance Corp. (First Mining) is proposing the development of the Springpole Gold deposit located in Northwestern Ontario, approximately 110 kilometres from the Municipality of Red Lake and situated within the Birch-Uchi Greenstone Belt.

This undertaking involves the development, construction, operation and closure of a gold and silver mine and any associated ancillary facilities and activities.

As per Section 3.0.1 of the Ontario Environmental Assessment Act (OEAA), First Mining is submitting this request for a Voluntary Agreement to the Ministry of Environment and Climate Change (MOECC), to have the OEAA apply to the Springpole Gold Project Undertaking.

First Mining appreciates your expeditious attention to this request and we look forward to working with you to obtain a Voluntary Agreement for this Undertaking.

Also appended to this letter is a technical memo prepared by First Mining providing justification for Open Pit mining methods for this Undertaking. This was requested by your staff in our meeting with them on December 18<sup>th</sup>, 2017.

Should you have any questions or comments, please do not hesitate to contact me at (705) 929-5245

Yours sincerely,

**First Mining Finance Corp.**

A handwritten signature in blue ink, appearing to read "John Sferrazza".

John Sferrazza  
Manager, Permitting and Environmental  
Assessments

A handwritten signature in blue ink, appearing to read "Chris Osterman".

Chris Osterman  
Chief Executive Officer

Date: 22<sup>nd</sup> December 2018

To: John Sferrazza

From: Bill Tanaka, VP Technical Services

Copies: Jeff Swinoga; Chris Osterman; Pat Donnelly; Laird Tomalty; Hazel Mullin

RE: Justification for open pit mining for the Springpole Au-Ag Project

John

At your request I have prepared the following response explaining the rationale for open-pit bulk mining as the optimal extraction strategy for the Springpole Project.

In determining an optimal mining method for any given deposit the following criteria are usually considered among the most important:

1. The grade-tonnage distribution relative to likely cutoff grades for the mining method selected;
2. The geometry of mineralization above the selected cutoff grade; and
3. Geotechnical characteristics of the rock mass in the material above the selected cutoff grade.

1) The grade-tonnage distribution above likely cutoff grades for different mining methods is relevant because it permits direct comparison of the proportion of the resource extracted by each method, thereby revealing the extent to which the available resource is utilized.

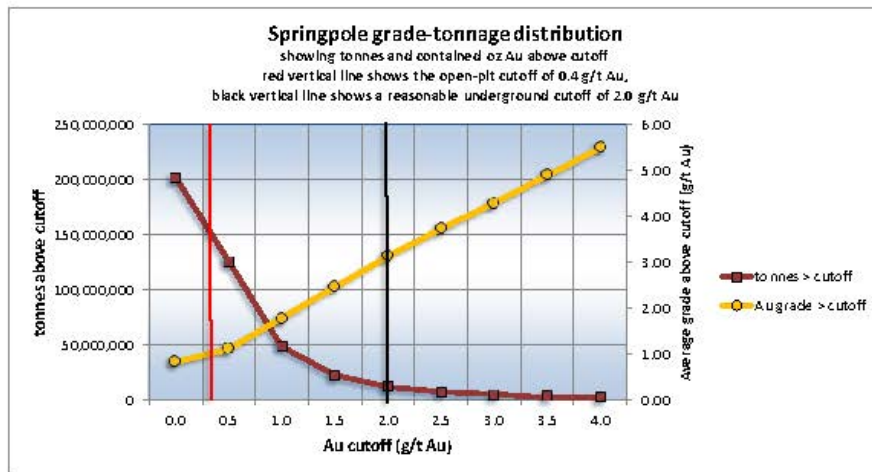


Figure 1: Grade tonnage distribution by cutoff

More revealing is a similar chart showing the total contained oz Au by cutoff grade category shown below in Figure 2.

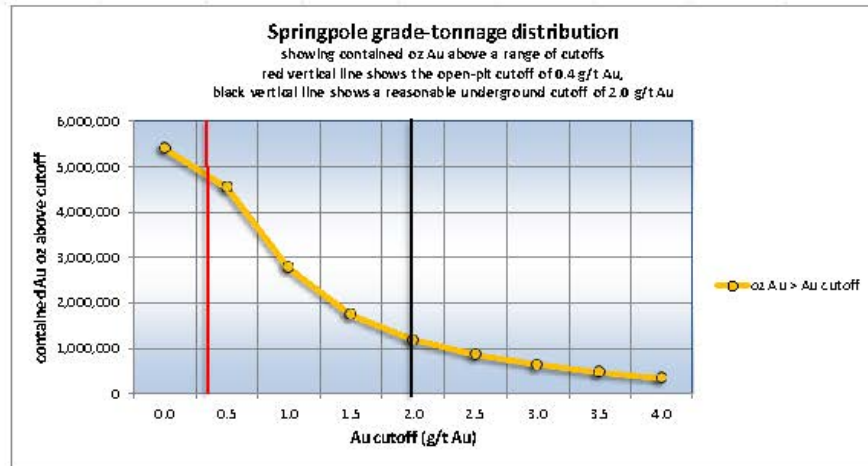


Figure 2: Contained Au distribution by cutoff

The open-pit resource is reported above a cutoff grade of 0.4g/t Au and contains approximately 4.9MMoz Au and 25.3MMoz Ag.

By comparison and without respect to geometry, position, or demonstrated mineability; a query of the entire block listing above 2.0g/t Au to simulate a reasonable hypothetical cutoff grade for an unspecified bulk underground mining method contains 1.18MMoz Au and 3.76MMoz Ag.

- Mining Springpole as an open pit operation will recover at least four times as much Au as might an underground operation.
- Given practical considerations of underground mine design, it is highly unlikely that 100%, or even > 80% of blocks above a 2.0 g/t Au cutoff would be recovered in a design.

2) Springpole consists of three closely co-located domains two of which are described as greenstone-hosted stockwork style deposits with gold present in impersistent, centimeter-scale quartz-carbonate veinlets of irregular distribution. This style of mineralization does not present consistent zones of material above 2.0 g/t Au that could be recovered by reasonable underground mining methods. These two domains represent less than 10% of the total resource reported.

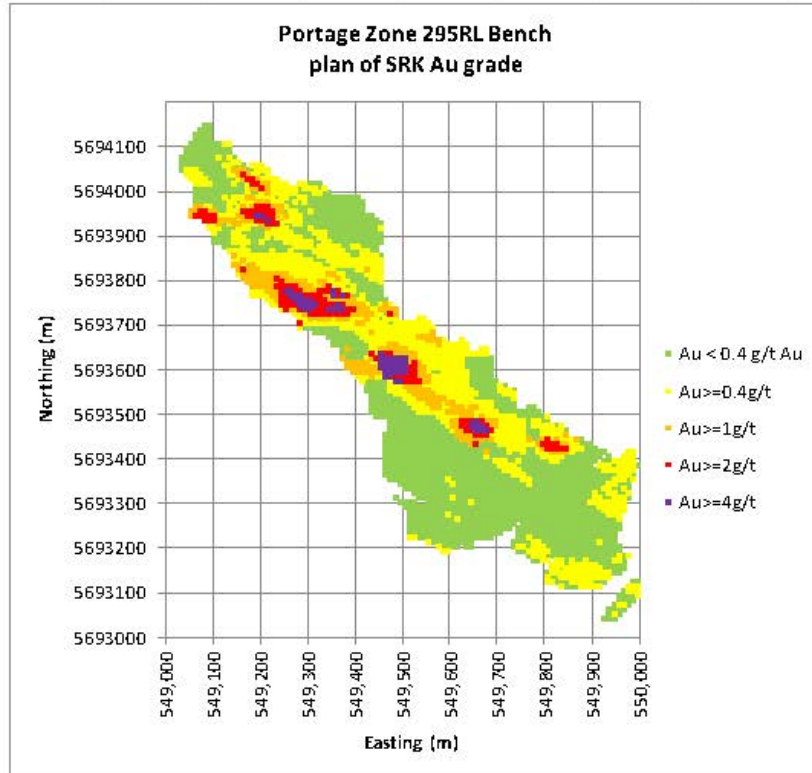


The third domain, Portage representing over 90% of the reported resource, is described as a gold porphyry hosted in a variably brecciated alkaline diatreme intrusive. The closest analogs to Portage identified are the Cripple Creek deposit in Colorado and the Refugio deposit in Chile.

Gold mineralization in the Portage zone is highly disseminated and the degree of gold mineralization is closely correlated with the intensity of potassic alteration: i.e. the greater the degree of alteration, the higher the gold grade. Potassic alteration presents at Portage in the form of biotite replacement rather than the more common forms of K-spar like adularia.

The geometry of mineralization above a given cutoff is relevant as it indicates continuity of mineralized zones above the selected cutoff and thereby indicates the practicality of supporting capital development to access the zones for extraction. In open pit mining this is relevant largely as an indication likely dilution incurred in mining.

For underground mining it is much more important as contiguous zones above the cutoff grade must be large enough to support reasonable stope designs for the selected underground mining method and these zones must be sufficiently large to carry the capital cost of decline/shaft access and primary drift development. Figure 3 below presents a bench plan of the major domain (Portage, > 90% of total resource) approximately 100m below general surface topographic elevation.



**Figure 3: Plan map of the 295RL bench showing the distribution of Au grade.**

It can be seen above that mineral continuity above a 0.4 g/t Au cutoff is extremely high, but much less so above a 2.0 g/t Au cutoff. Figure 3 also presents a very cogent demonstration of the physical grade distribution giving rise to the grade-to-tons relationships described above in Figures 1 and 2.

3) The geotechnical characteristics of the rock mass are highly relevant for underground mining as it provides an indication of the extent of what underground mining methods are likely to be possible and what ground support requirements are likely to be incurred for different available mining methods.

As described above, gold mineralization is closely correlated with the intensity of potassic alteration: the greater the degree of alteration, the higher the gold grade. Potassic alteration presents at Portage in the form of biotite replacement rather than the more common forms of K-spar like adularia. The higher-grade material at Portage ( $\geq 2.0$  g/t Au) frequently consists of more than 50% biotite. The material is so friable that it requires special treatment in core drilling to maximize drill recovery. Once recovered and



placed in core boxes it very easily decrepitates to biotite mud when wet or biotite sand when dry. Figure 4 below presents a photograph of mineralized core from the Portage zone.



**Figure 4: Photo of mineralized core from the Portage zone showing the extreme friability of the potassic-altered rock.**

Neither First Mining Finance Corp nor Gold Canyon before them ever undertook investigations for the potential for underground exploitation at Springpole. The weakness and friability of the higher-grade material is so apparent in core that no Rock-Mass characterization was done with expectations that reasonable underground mining methods might be identified. The conditions are so readily apparent on so many levels that such consideration would not be given by a reasonable and experienced individual.

Regards

Bill Tanaka, VP Technical Services

First Mining Finance Corp.

Ministry of the Environment  
and Climate Change

Ministère de l'Environnement et  
de l'Action en matière de  
changement climatique



Environmental Assessment and  
Permissions Branch

Direction des évaluations et des  
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APR 18 2018

John Sferrazza, Manager, Permitting and Environmental Assessments  
First Mining Gold Corp.  
Suite 1800-925 West Georgia Street  
Vancouver, BC V6C 3L2

Dear Mr. Sferrazza:

Thank you for requesting that the Springpole Gold Project be made subject to the requirements of the Environmental Assessment Act (the act).

Please find enclosed an original signed copy of the Agreement between the Ministry and First Mining Gold Corp. The Agreement requires First Mining Gold Corp. to fulfill the requirements of the act, including the preparation and submission of a terms of reference and environmental assessment for review and approval.

Should you require further assistance please contact Agni Papageorgiou, Special Project Officer of the Environmental Assessment and Permissions Branch, at 416-314-8214 or by e-mail at [agni.papageorgiou@ontario.ca](mailto:agni.papageorgiou@ontario.ca).

Sincerely,

Kathleen O'Neill  
Director  
Environmental Assessment and Permissions Branch

Enclosure(s)

One original copy of signed voluntary agreement for the Springpole Gold Project

AGREEMENT

This agreement is made in triplicate,

BETWEEN

The Minister of the Environment and Climate Change [the “Minister”]

AND

First Mining Gold Corp., its agents, successors and assigns [the “Proponent”]

CONCERNING

The Proponent proposes to develop and operate the Springpole Gold Project located in the District of Kenora, approximately 110 kilometres (km) northeast of Red Lake. This undertaking involves the development, construction, operation, and closure of an open pit gold and silver mine and any associated facilities and ancillary activities.

[the “Undertaking”]

Whereas section 3.0.1 of the *Environmental Assessment Act* states:

A person, other than a person referred to in clause 3(a), who carries out, proposes to carry out or is the owner or person having charge, management or control of an enterprise or activity or a proposal, plan or program in respect of an enterprise or activity may enter into a written agreement with the Minister to have this Act apply to the enterprise, activity, proposal, plan or program.

Whereas the Proponent is a person, other than a person referred to in clause 3(a) of the *Environmental Assessment Act*, who carries out, proposes to carry out or is the owner or person having charge, management or control of an enterprise or activity or a proposal, plan or program in respect of an enterprise or activity which is described above as the Undertaking.


Whereas the Proponent who proposes to engage in the Undertaking has requested that the *Environmental Assessment Act* apply to the Undertaking.

The Minister and the Proponent therefore agree that the *Environmental Assessment Act* applies to the Undertaking.

This agreement shall take effect from the date of the last signature below and shall continue indefinitely unless terminated by the agreement of both parties, in writing.

Executed by:

   
Minister of the Environment and Climate Change DATE

 Jeff Swinoga, President and CEO April 11, 2018  
First Mining Gold Corp. DATE  
I have the authority to bind the Corporation.

Ministry of the Environment  
and Climate Change

Environmental Assessment and  
Permissions Branch

136 St. Clair Avenue West  
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APR 25 2018

John Sferrazza, Manager, Permitting and Environmental Assessments  
First Mining Gold Corp.  
Suite 1800-925 West Georgia Street  
Vancouver, BC V6C 3L2

Dear Mr. Sferrazza:

On April 18, 2018 the Ministry of the Environment and Climate Change (the ministry) entered into a voluntary agreement with First Mining Gold Corp. to make the proposed Springpole Gold Project (the Project) subject to the Ontario *Environmental Assessment Act* (the Act). As a result, First Mining Gold will complete an individual environmental assessment process under the Act, for which the first step will be the preparation of a terms of reference.

The Crown has a constitutional duty to consult Aboriginal communities and, where appropriate, accommodate impacts to their rights when the Crown contemplates conduct that may adversely impact known established or asserted Aboriginal or treaty rights. Although the Crown remains responsible for ensuring the adequacy of consultation with Aboriginal communities to whom the duty to consult is owed, it may delegate procedural aspects of the consultation process to project proponents.

The Crown may use existing regulatory processes as a vehicle for fulfilling its constitutional duty. In this case, the ministry will be relying on the *Environmental Assessment Act* process, including the mandatory public consultation requirements, as a means of ensuring relevant information is shared and that identified Aboriginal communities have an opportunity to participate by asking questions and bringing forward their concerns.

Based on the information First Mining Gold has provided to date on the nature and location of the Project, the anticipated environmental effects, and the ministry's current understanding of Aboriginal and treaty rights in the area, the ministry has concluded that a duty to consult may arise. Accordingly, the ministry is delegating the procedural aspects of Aboriginal consultation to First Mining Gold for the Project.

Based on information First Mining Gold has provided to date and the Crown's preliminary assessment, First Mining Gold is required to consult with the following communities who have been identified as potentially affected by and/or interested in the Project:

- Cat Lake First Nation;
- Lac Seul First Nation;
- Métis Nation of Ontario (MNO) Northwest Métis Council / Region 1 Consultation Committee;
- Mishkeegogamang First Nation;
- Ojibway Nation of Saugeen;
- Pikangikum First Nation;
- Slate Falls Nation; and
- Wabauskang First Nation.

You are advised to initiate contact through the elected Chief and Council of each First Nation and through the President of the MNO community council, copying the MNO Head Office. Please let the ministry know if you require contact information for any of the communities listed above. Please be aware that this list may be subject to change as new information becomes available and/or there are changes to the scope of the Project.

The ministry relies on consultation conducted by proponents when it assesses the sufficiency of consultation carried out under the duty to consult during a regulatory process. First Mining Gold's responsibilities for procedural aspects of consultation for the Project include:

- Providing identified communities with information about the proposed Project including anticipated impacts, and information on timelines;
- Following up with communities to ensure they received Project information and that they are aware of opportunities to express comments and concerns about the Project;
- Gathering information from the communities about how the Project may adversely impact their Aboriginal and/or treaty rights (for example, hunting, fishing) or sites of cultural significance (for example, burial grounds, archaeological sites);
- Considering the comments and concerns provided by communities and providing responses;
- Where appropriate, discussing potential mitigation strategies with communities; and
- Bearing the reasonable costs associated with these procedural aspects of consultation.

First Mining Gold is also required to create and maintain an accurate and up-to-date record of consultation for each individual community, that contains all related communications including letters/emails (outgoing & incoming), public notices, meetings (agendas, meeting minutes), issues raised and how they have been addressed. This

information will be a vital component for the Crown's consideration prior to making required decisions about your Project.

Steps that you may need to take in relation to Aboriginal consultation for your proposed Project are outlined in the "Code of Practice for Consultation in Ontario's Environmental Assessment Process" which can be found at the following link:

<https://www.ontario.ca/document/consultation-ontarios-environmental-assessment-process> ].

Should you or any members of your project team have any questions regarding the above, please contact Agni Papageorgiou, Special Project Officer, at 416-314-8214 or by e-mail at [agni.papageorgiou@ontario.ca](mailto:agni.papageorgiou@ontario.ca).

Sincerely,



Kathleen O'Neill  
Director  
Environmental Assessment and Permissions Branch

- c. Ronnie Therriault, Ministry of Northern Development and Mines  
Myles Perchuk, Ministry of Natural Resources and Forestry  
Amy Sen, Canadian Environmental Assessment Agency

## Métis Nation of Ontario's Voluntary Letter

Ministry of the Environment  
and Climate Change

Environmental Assessment and  
Permissions Branch

135 St. Clair Avenue West  
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Ministère de l'Environnement et  
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Toronto ON M4V 1P5  
Tél.: 416 314-8001  
Télééc.: 416 314-8452



APR 25 2018

President Ronald Robinson  
Métis Nation of Ontario Northwest Métis Council  
34B King Street  
Dryden ON P8N1B4

Dear Mr. Robinson:

The Ontario Ministry of the Environment and Climate Change (the ministry) has received project information regarding a proposal for an open pit gold and silver mine by First Mining Gold Corp. The Springpole Gold Project (the Project) is to be located in northwestern Ontario, approximately 110 kilometres northeast of the Municipality of Red Lake, southwest of Cat Lake First Nation and northeast of Slate Falls Nation.

### **Environmental Assessment Process for the Project**

The Ontario *Environmental Assessment Act* (the Act) does not typically apply to private sector projects. However, some aspects of a proposed mine may trigger provincial environmental assessment requirements, such as the disposition of rights to Crown resources, and the construction of transmission facilities. In addition, a proposed mine may have to meet federal environmental assessment requirements under the *Canadian Environmental Assessment Act, 2012*.

As a first step towards meeting its provincial environmental assessment requirements, First Mining Gold has volunteered to have its Project, consisting of an open pit gold and silver mine and associated infrastructure, subject to the Act. I am writing today to inform you that on April 18, 2018, the Minister of the Environment and Climate Change signed a Voluntary Agreement with First Mining Gold to make the Project subject to the requirements of the Act (the Agreement). This means that First Mining Gold will prepare an individual environmental assessment for the Project. A copy of this Agreement has been enclosed for your reference.

This Agreement does not mean that First Mining Gold can proceed with the Project. Rather, this Agreement sets out the requirement for a provincial environmental assessment process and provides an opportunity for First Mining Gold to enhance coordination between provincial and federal environmental assessment processes, as applicable, which will avoid duplication and align consultation on the Project as a whole.

It will also allow First Mining Gold to undertake a single, rigorous process that includes a detailed evaluation of the Project's potential impacts and benefits to the natural, social, built, economic and cultural environment.

As a first step in the environmental assessment process, First Mining Gold will develop a terms of reference. A terms of reference is essentially a work plan that will outline how First Mining Gold will complete the environmental assessment, including the studies it will complete and consultation plans it will implement. The terms of reference must be approved by the Minister of the Environment and Climate Change before the environmental assessment can commence.

### **Consultation Requirements and Process**

Based on the ministry's current understanding of treaties, traditional territories, claims and assertions in the Project area, the ministry has identified that your community may be impacted by the Project. The ministry has therefore delegated the procedural aspects of consultation with your community to First Mining Gold for the environmental assessment process for the Project.

First Mining Gold is required to provide you with notices about the Project, as well as Project documentation and summaries that will be submitted as part of the environmental assessment process.

You can expect to be contacted by First Mining Gold as it prepares its Terms of Reference, which will include consultation plans for the environmental assessment. First Mining Gold will be required to document any consultation activities completed with your community, as well as any input you provide that you do not deem confidential, in a record of consultation. Once the terms of reference is completed, the consultation record together with the Project documentation will be submitted to the ministry for its review and a decision on the Terms of Reference.

During the environmental assessment process, First Mining Gold will also be required to seek your community's input in respect of the Project and, in particular, information that your community may have about:

- Adverse impacts the Project may have on Aboriginal or treaty rights
- Measures for mitigating those adverse impacts

First Mining Gold will also be required to communicate with you about any other adverse impacts or mitigation measures you identify and document these discussions in a consultation record. Once completed, the consultation record together with the environmental assessment will be submitted to the ministry for its review and a decision on the environmental assessment.

### **Next Steps**

The ministry is committed to environmental protection and engaging interested persons

throughout the environmental assessment process. The ministry encourages you, and your community, to participate in the consultation process and will be available throughout should you have any questions or concerns.

If you have any questions or concerns at this time, please don't hesitate to contact Agni Papageorgiou, Special Project Officer of the Environmental Assessment and Permissions Branch at 416-314-8214 or [agni.papageorgiou@ontario.ca](mailto:agni.papageorgiou@ontario.ca). If you have any questions about the Project, you may also contact John Sferrazza, Permitting and Environmental Assessments Manager, First Mining Gold Corp. at 705-929-5245 or [john@firstmininggold.com](mailto:john@firstmininggold.com).

Sincerely,



Kathleen O'Neill  
Director  
Environmental Assessment and Permissions Branch

c: Métis Consultation Unit, Métis Nation of Ontario Head Office  
Ronnie Theriault, Ministry of Northern Development and Mines  
Myles Perchuk, Ministry of Natural Resources and Forestry  
Amy Sen, Canadian Environmental Assessment Agency  
John Sferrazza, First Mining Gold Corp.

AGREEMENT

This agreement is made in triplicate,

BETWEEN

The Minister of the Environment and Climate Change [the “Minister”]

AND

First Mining Gold Corp., its agents, successors and assigns [the “Proponent”]

CONCERNING

The Proponent proposes to develop and operate the Springpole Gold Project located in the District of Kenora, approximately 110 kilometres (km) northeast of Red Lake. This undertaking involves the development, construction, operation, and closure of an open pit gold and silver mine and any associated facilities and ancillary activities.

[the “Undertaking”]

Whereas section 3.0.1 of the *Environmental Assessment Act* states:

A person, other than a person referred to in clause 3(a), who carries out, proposes to carry out or is the owner or person having charge, management or control of an enterprise or activity or a proposal, plan or program in respect of an enterprise or activity may enter into a written agreement with the Minister to have this Act apply to the enterprise, activity, proposal, plan or program.

Whereas the Proponent is a person, other than a person referred to in clause 3(a) of the *Environmental Assessment Act*, who carries out, proposes to carry out or is the owner or person having charge, management or control of an enterprise or activity or a proposal, plan or program in respect of an enterprise or activity which is described above as the Undertaking.


Whereas the Proponent who proposes to engage in the Undertaking has requested that the *Environmental Assessment Act* apply to the Undertaking.

The Minister and the Proponent therefore agree that the *Environmental Assessment Act* applies to the Undertaking.

This agreement shall take effect from the date of the last signature below and shall continue indefinitely unless terminated by the agreement of both parties, in writing.

Executed by:

   
Minister of the Environment and Climate Change DATE

 Jeff Swinoga, President and CEO April 11, 2018  
First Mining Gold Corp. DATE  
I have the authority to bind the Corporation.

Ministry of the Environment  
and Climate Change

Environmental Assessment and  
Permissions Branch

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APR 25 2018

Chief Dean Owen  
Pikangikum First Nation  
P.O. Box 323  
Pikangikum ON P0V1L0

Dear Chief Owen:

The Ontario Ministry of the Environment and Climate Change (the ministry) has received project information regarding a proposal for an open pit gold and silver mine by First Mining Gold Corp. The Springpole Gold Project (the Project) is to be located in northwestern Ontario, approximately 110 kilometres northeast of the Municipality of Red Lake, southwest of Cat Lake First Nation and northeast of Slate Falls Nation.

#### **Environmental Assessment Process for the Project**

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### **Consultation Requirements and Process**

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throughout the environmental assessment process. The ministry encourages you, and your community, to participate in the consultation process and will be available throughout should you have any questions or concerns.

If you have any questions or concerns at this time, please don't hesitate to contact Agni Papageorgiou, Special Project Officer of the Environmental Assessment and Permissions Branch at 416-314-8214 or [agni.papageorgiou@ontario.ca](mailto:agni.papageorgiou@ontario.ca). If you have any questions about the Project, you may also contact John Sferrazza, Permitting and Environmental Assessments Manager, First Mining Gold Corp. at 705-929-5245 or [john@firstmininggold.com](mailto:john@firstmininggold.com).

Sincerely,



Kathleen O'Neill  
Director  
Environmental Assessment and Permissions Branch

c: Ronnie Theriault, Ministry of Northern Development and Mines  
Myles Perchuk, Ministry of Natural Resources and Forestry  
Amy Sen, Canadian Environmental Assessment Agency  
John Sferrazza, First Mining Gold Corp.

AGREEMENT

This agreement is made in triplicate,

BETWEEN

The Minister of the Environment and Climate Change [the “Minister”]

AND

First Mining Gold Corp., its agents, successors and assigns [the “Proponent”]

CONCERNING

The Proponent proposes to develop and operate the Springpole Gold Project located in the District of Kenora, approximately 110 kilometres (km) northeast of Red Lake. This undertaking involves the development, construction, operation, and closure of an open pit gold and silver mine and any associated facilities and ancillary activities.

[the “Undertaking”]

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A person, other than a person referred to in clause 3(a), who carries out, proposes to carry out or is the owner or person having charge, management or control of an enterprise or activity or a proposal, plan or program in respect of an enterprise or activity may enter into a written agreement with the Minister to have this Act apply to the enterprise, activity, proposal, plan or program.

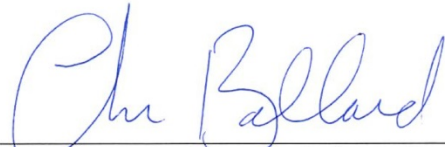
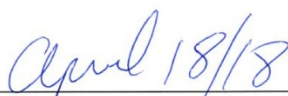
Whereas the Proponent is a person, other than a person referred to in clause 3(a) of the *Environmental Assessment Act*, who carries out, proposes to carry out or is the owner or person having charge, management or control of an enterprise or activity or a proposal, plan or program in respect of an enterprise or activity which is described above as the Undertaking.


Whereas the Proponent who proposes to engage in the Undertaking has requested that the *Environmental Assessment Act* apply to the Undertaking.

The Minister and the Proponent therefore agree that the *Environmental Assessment Act* applies to the Undertaking.

This agreement shall take effect from the date of the last signature below and shall continue indefinitely unless terminated by the agreement of both parties, in writing.

Executed by:

   
Minister of the Environment and Climate Change DATE

 Jeff Swinoga, President and CEO April 11, 2018  
First Mining Gold Corp. DATE  
I have the authority to bind the Corporation.

## Ojibway First Nation's Voluntary Letter

Ministry of the Environment  
and Climate Change

Environmental Assessment and  
Permissions Branch

135 St. Clair Avenue West  
1<sup>st</sup> Floor  
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Fax: 416 314-8452

Ministère de l'Environnement et  
de l'Action en matière de  
changement climatique

Direction des évaluations et des  
permissions environnementales

135, avenue St. Clair Ouest  
Rez-de-chaussée  
Toronto ON M4V 1P5  
Tél.: 416 314-8001  
Télééc.: 416 314-8452



APR 25 2018

Chief Edward Machimity  
Ojibway Nation of Saugeen  
General Delivery  
Savant Lake ON P0V2S0

Dear Chief Machimity:

The Ontario Ministry of the Environment and Climate Change (the ministry) has received project information regarding a proposal for an open pit gold and silver mine by First Mining Gold Corp. The Springpole Gold Project (the Project) is to be located in northwestern Ontario, approximately 110 kilometres northeast of the Municipality of Red Lake, southwest of Cat Lake First Nation and northeast of Slate Falls Nation.

### **Environmental Assessment Process for the Project**

The Ontario *Environmental Assessment Act* (the Act) does not typically apply to private sector projects. However, some aspects of a proposed mine may trigger provincial environmental assessment requirements, such as the disposition of rights to Crown resources, and the construction of transmission facilities. In addition, a proposed mine may have to meet federal environmental assessment requirements under the *Canadian Environmental Assessment Act, 2012*.

As a first step towards meeting its provincial environmental assessment requirements, First Mining Gold has volunteered to have its Project, consisting of an open pit gold and silver mine and associated infrastructure, subject to the Act. I am writing today to inform you that on April 18, 2018, the Minister of the Environment and Climate Change signed a Voluntary Agreement with First Mining Gold to make the Project subject to the requirements of the Act (the Agreement). This means that First Mining Gold will prepare an individual environmental assessment for the Project. A copy of this Agreement has been enclosed for your reference.

This Agreement does not mean that First Mining Gold can proceed with the Project. Rather, this Agreement sets out the requirement for a provincial environmental assessment process and provides an opportunity for First Mining Gold to enhance coordination between provincial and federal environmental assessment processes, as applicable, which will avoid duplication and align consultation on the Project as a whole.

It will also allow First Mining Gold to undertake a single, rigorous process that includes a detailed evaluation of the Project's potential impacts and benefits to the natural, social, built, economic and cultural environment.

As a first step in the environmental assessment process, First Mining Gold will develop a terms of reference. A terms of reference is essentially a work plan that will outline how First Mining Gold will complete the environmental assessment, including the studies it will complete and consultation plans it will implement. The terms of reference must be approved by the Minister of the Environment and Climate Change before the environmental assessment can commence.

### **Consultation Requirements and Process**

Based on the ministry's current understanding of treaties, traditional territories, claims and assertions in the Project area, the ministry has identified that your community may be impacted by the Project. The ministry has therefore delegated the procedural aspects of consultation with your community to First Mining Gold for the environmental assessment process for the Project.

First Mining Gold is required to provide you with notices about the Project, as well as Project documentation and summaries that will be submitted as part of the environmental assessment process.

You can expect to be contacted by First Mining Gold as it prepares its Terms of Reference, which will include consultation plans for the environmental assessment. First Mining Gold will be required to document any consultation activities completed with your community, as well as any input you provide that you do not deem confidential, in a record of consultation. Once the terms of reference is completed, the consultation record together with the Project documentation will be submitted to the ministry for its review and a decision on the Terms of Reference.

During the environmental assessment process, First Mining Gold will also be required to seek your community's input in respect of the Project and, in particular, information that your community may have about:

- Adverse impacts the Project may have on Aboriginal or treaty rights
- Measures for mitigating those adverse impacts

First Mining Gold will also be required to communicate with you about any other adverse impacts or mitigation measures you identify and document these discussions in a consultation record. Once completed, the consultation record together with the environmental assessment will be submitted to the ministry for its review and a decision on the environmental assessment.

### **Next Steps**

The ministry is committed to environmental protection and engaging interested persons

throughout the environmental assessment process. The ministry encourages you, and your community, to participate in the consultation process and will be available throughout should you have any questions or concerns.

If you have any questions or concerns at this time, please don't hesitate to contact Agni Papageorgiou, Special Project Officer of the Environmental Assessment and Permissions Branch at 416-314-8214 or [agni.papageorgiou@ontario.ca](mailto:agni.papageorgiou@ontario.ca). If you have any questions about the Project, you may also contact John Sferrazza, Permitting and Environmental Assessments Manager, First Mining Gold Corp. at 705-929-5245 or [john@firstmininggold.com](mailto:john@firstmininggold.com).

Sincerely,



Kathleen O'Neill  
Director  
Environmental Assessment and Permissions Branch

c: Ronnie Theriault, Ministry of Northern Development and Mines  
Myles Perchuk, Ministry of Natural Resources and Forestry  
Amy Sen, Canadian Environmental Assessment Agency  
John Sferrazza, First Mining Gold Corp.

Ministry of the Environment  
and Climate Change

Environmental Assessment and  
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Télééc.: 416 314-8452



APR 25 2018

Chief Ernest Wesley  
Cat Lake First Nation  
122 Back Road West, P.O. Box 81  
Cat Lake ON P0V1J0

Dear Chief Wesley:

The Ontario Ministry of the Environment and Climate Change (the ministry) has received project information regarding a proposal for an open pit gold and silver mine by First Mining Gold Corp. The Springpole Gold Project (the Project) is to be located in northwestern Ontario, approximately 110 kilometres northeast of the Municipality of Red Lake, southwest of Cat Lake First Nation and northeast of Slate Falls Nation.

#### **Environmental Assessment Process for the Project**

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This Agreement does not mean that First Mining Gold can proceed with the Project. Rather, this Agreement sets out the requirement for a provincial environmental assessment process and provides an opportunity for First Mining Gold to enhance coordination between provincial and federal environmental assessment processes, as applicable, which will avoid duplication and align consultation on the Project as a whole.

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### **Consultation Requirements and Process**

Based on the ministry's current understanding of treaties, traditional territories, claims and assertions in the Project area, the ministry has identified that your community may be impacted by the Project. The ministry has therefore delegated the procedural aspects of consultation with your community to First Mining Gold for the environmental assessment process for the Project.

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### **Next Steps**

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throughout the environmental assessment process. The ministry encourages you, and your community, to participate in the consultation process and will be available throughout should you have any questions or concerns.

If you have any questions or concerns at this time, please don't hesitate to contact Agni Papageorgiou, Special Project Officer of the Environmental Assessment and Permissions Branch at 416-314-8214 or [agni.papageorgiou@ontario.ca](mailto:agni.papageorgiou@ontario.ca). If you have any questions about the Project, you may also contact John Sferrazza, Permitting and Environmental Assessments Manager, First Mining Gold Corp. at 705-929-5245 or [john@firstmininggold.com](mailto:john@firstmininggold.com).

Sincerely,



Kathleen O'Neill  
Director  
Environmental Assessment and Permissions Branch

c: Ronnie Theriault, Ministry of Northern Development and Mines  
Myles Perchuk, Ministry of Natural Resources and Forestry  
Amy Sen, Canadian Environmental Assessment Agency  
John Sferrazza, First Mining Gold Corp.

AGREEMENT

This agreement is made in triplicate,

BETWEEN

The Minister of the Environment and Climate Change [the “Minister”]

AND

First Mining Gold Corp., its agents, successors and assigns [the “Proponent”]

CONCERNING

The Proponent proposes to develop and operate the Springpole Gold Project located in the District of Kenora, approximately 110 kilometres (km) northeast of Red Lake. This undertaking involves the development, construction, operation, and closure of an open pit gold and silver mine and any associated facilities and ancillary activities.

[the “Undertaking”]

Whereas section 3.0.1 of the *Environmental Assessment Act* states:

A person, other than a person referred to in clause 3(a), who carries out, proposes to carry out or is the owner or person having charge, management or control of an enterprise or activity or a proposal, plan or program in respect of an enterprise or activity may enter into a written agreement with the Minister to have this Act apply to the enterprise, activity, proposal, plan or program.

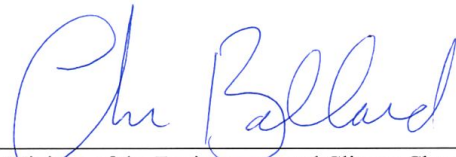
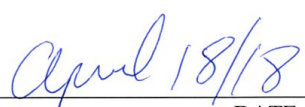
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Whereas the Proponent who proposes to engage in the Undertaking has requested that the *Environmental Assessment Act* apply to the Undertaking.

The Minister and the Proponent therefore agree that the *Environmental Assessment Act* applies to the Undertaking.

This agreement shall take effect from the date of the last signature below and shall continue indefinitely unless terminated by the agreement of both parties, in writing.

Executed by:

   
Minister of the Environment and Climate Change DATE

 Jeff Swinoga, President and CEO April 11, 2018  
First Mining Gold Corp. DATE  
I have the authority to bind the Corporation.

Ministry of the Environment  
and Climate Change

Environmental Assessment and  
Permissions Branch

135 St. Clair Avenue West  
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APR 25 2018

Chief Clifford Bull  
Lac Seul First Nation  
P.O. Box 100  
Hudson ON P0V1X0

Dear Chief Bull:

The Ontario Ministry of the Environment and Climate Change (the ministry) has received project information regarding a proposal for an open pit gold and silver mine by First Mining Gold Corp. The Springpole Gold Project (the Project) is to be located in northwestern Ontario, approximately 110 kilometres northeast of the Municipality of Red Lake, southwest of Cat Lake First Nation and northeast of Slate Falls Nation.

#### **Environmental Assessment Process for the Project**

The Ontario *Environmental Assessment Act* (the Act) does not typically apply to private sector projects. However, some aspects of a proposed mine may trigger provincial environmental assessment requirements, such as the disposition of rights to Crown resources, and the construction of transmission facilities. In addition, a proposed mine may have to meet federal environmental assessment requirements under the *Canadian Environmental Assessment Act, 2012*.

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This Agreement does not mean that First Mining Gold can proceed with the Project. Rather, this Agreement sets out the requirement for a provincial environmental assessment process and provides an opportunity for First Mining Gold to enhance coordination between provincial and federal environmental assessment processes, as applicable, which will avoid duplication and align consultation on the Project as a whole.

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### **Consultation Requirements and Process**

Based on the ministry's current understanding of treaties, traditional territories, claims and assertions in the Project area, the ministry has identified that your community may be impacted by the Project. The ministry has therefore delegated the procedural aspects of consultation with your community to First Mining Gold for the environmental assessment process for the Project.

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### **Next Steps**

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throughout the environmental assessment process. The ministry encourages you, and your community, to participate in the consultation process and will be available throughout should you have any questions or concerns.

If you have any questions or concerns at this time, please don't hesitate to contact Agni Papageorgiou, Special Project Officer of the Environmental Assessment and Permissions Branch at 416-314-8214 or [agni.papageorgiou@ontario.ca](mailto:agni.papageorgiou@ontario.ca). If you have any questions about the Project, you may also contact John Sferrazza, Permitting and Environmental Assessments Manager, First Mining Gold Corp. at 705-929-5245 or [john@firstmininggold.com](mailto:john@firstmininggold.com).

Sincerely,



Kathleen O'Neill  
Director  
Environmental Assessment and Permissions Branch

c: Ronnie Theriault, Ministry of Northern Development and Mines  
Myles Perchuk, Ministry of Natural Resources and Forestry  
Amy Sen, Canadian Environmental Assessment Agency  
John Sferrazza, First Mining Gold Corp.

AGREEMENT

This agreement is made in triplicate,

BETWEEN

The Minister of the Environment and Climate Change [the “Minister”]

AND

First Mining Gold Corp., its agents, successors and assigns [the “Proponent”]

CONCERNING

The Proponent proposes to develop and operate the Springpole Gold Project located in the District of Kenora, approximately 110 kilometres (km) northeast of Red Lake. This undertaking involves the development, construction, operation, and closure of an open pit gold and silver mine and any associated facilities and ancillary activities.

[the “Undertaking”]

Whereas section 3.0.1 of the *Environmental Assessment Act* states:

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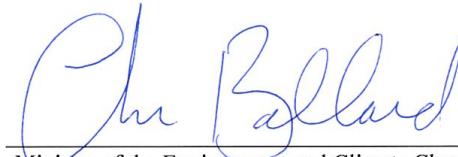
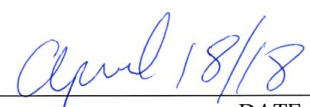
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Executed by:

   
Minister of the Environment and Climate Change DATE

 Jeff Swinoga, President and CEO April 11, 2018  
First Mining Gold Corp. DATE  
I have the authority to bind the Corporation.

Ministry of the Environment  
and Climate Change

Environmental Assessment and  
Permissions Branch

135 St. Clair Avenue West  
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APR 25 2018

Chief David Masakeyash  
Mishkeegogamang First Nation  
General Delivery  
New Osnaburgh ON P0V2H0

Dear Chief Masakeyash:

The Ontario Ministry of the Environment and Climate Change (the ministry) has received project information regarding a proposal for an open pit gold and silver mine by First Mining Gold Corp. The Springpole Gold Project (the Project) is to be located in northwestern Ontario, approximately 110 kilometres northeast of the Municipality of Red Lake, southwest of Cat Lake First Nation and northeast of Slate Falls Nation.

#### **Environmental Assessment Process for the Project**

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Sincerely,



Kathleen O'Neill  
Director  
Environmental Assessment and Permissions Branch

c: Ronnie Theriault, Ministry of Northern Development and Mines  
Myles Perchuk, Ministry of Natural Resources and Forestry  
Amy Sen, Canadian Environmental Assessment Agency  
John Sferrazza, First Mining Gold Corp.

AGREEMENT

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BETWEEN

The Minister of the Environment and Climate Change [the “Minister”]

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First Mining Gold Corp., its agents, successors and assigns [the “Proponent”]

CONCERNING

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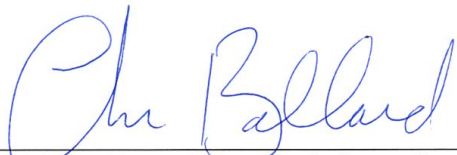

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Executed by:

   
Minister of the Environment and Climate Change DATE

  
Jeff Swinoga, President and CEO April 11, 2018  
First Mining Gold Corp. DATE  
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Ministry of the Environment  
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Environmental Assessment and  
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APR 25 2018

Chief Lorraine Crane  
Slate Falls Nation  
48 Lakeview Drive  
Slate Falls ON P0V3C0

Dear Chief Crane:

The Ontario Ministry of the Environment and Climate Change (the ministry) has received project information regarding a proposal for an open pit gold and silver mine by First Mining Gold Corp. The Springpole Gold Project (the Project) is to be located in northwestern Ontario, approximately 110 kilometres northeast of the Municipality of Red Lake, southwest of Cat Lake First Nation and northeast of Slate Falls Nation.

#### **Environmental Assessment Process for the Project**

The Ontario *Environmental Assessment Act* (the Act) does not typically apply to private sector projects. However, some aspects of a proposed mine may trigger provincial environmental assessment requirements, such as the disposition of rights to Crown resources, and the construction of transmission facilities. In addition, a proposed mine may have to meet federal environmental assessment requirements under the *Canadian Environmental Assessment Act, 2012*.

As a first step towards meeting its provincial environmental assessment requirements, First Mining Gold has volunteered to have its Project, consisting of an open pit gold and silver mine and associated infrastructure, subject to the Act. I am writing today to inform you that on April 18, 2018, the Minister of the Environment and Climate Change signed a Voluntary Agreement with First Mining Gold to make the Project subject to the requirements of the Act (the Agreement). This means that First Mining Gold will prepare an individual environmental assessment for the Project. A copy of this Agreement has been enclosed for your reference.

This Agreement does not mean that First Mining Gold can proceed with the Project. Rather, this Agreement sets out the requirement for a provincial environmental assessment process and provides an opportunity for First Mining Gold to enhance coordination between provincial and federal environmental assessment processes, as applicable, which will avoid duplication and align consultation on the Project as a whole.

It will also allow First Mining Gold to undertake a single, rigorous process that includes a detailed evaluation of the Project's potential impacts and benefits to the natural, social, built, economic and cultural environment.

As a first step in the environmental assessment process, First Mining Gold will develop a terms of reference. A terms of reference is essentially a work plan that will outline how First Mining Gold will complete the environmental assessment, including the studies it will complete and consultation plans it will implement. The terms of reference must be approved by the Minister of the Environment and Climate Change before the environmental assessment can commence.

### **Consultation Requirements and Process**

Based on the ministry's current understanding of treaties, traditional territories, claims and assertions in the Project area, the ministry has identified that your community may be impacted by the Project. The ministry has therefore delegated the procedural aspects of consultation with your community to First Mining Gold for the environmental assessment process for the Project.

First Mining Gold is required to provide you with notices about the Project, as well as Project documentation and summaries that will be submitted as part of the environmental assessment process.

You can expect to be contacted by First Mining Gold as it prepares its Terms of Reference, which will include consultation plans for the environmental assessment. First Mining Gold will be required to document any consultation activities completed with your community, as well as any input you provide that you do not deem confidential, in a record of consultation. Once the terms of reference is completed, the consultation record together with the Project documentation will be submitted to the ministry for its review and a decision on the Terms of Reference.

During the environmental assessment process, First Mining Gold will also be required to seek your community's input in respect of the Project and, in particular, information that your community may have about:

- Adverse impacts the Project may have on Aboriginal or treaty rights
- Measures for mitigating those adverse impacts

First Mining Gold will also be required to communicate with you about any other adverse impacts or mitigation measures you identify and document these discussions in a consultation record. Once completed, the consultation record together with the environmental assessment will be submitted to the ministry for its review and a decision on the environmental assessment.

### **Next Steps**

The ministry is committed to environmental protection and engaging interested persons

throughout the environmental assessment process. The ministry encourages you, and your community, to participate in the consultation process and will be available throughout should you have any questions or concerns.

If you have any questions or concerns at this time, please don't hesitate to contact Agni Papageorgiou, Special Project Officer of the Environmental Assessment and Permissions Branch at 416-314-8214 or [agni.papageorgiou@ontario.ca](mailto:agni.papageorgiou@ontario.ca). If you have any questions about the Project, you may also contact John Sferrazza, Permitting and Environmental Assessments Manager, First Mining Gold Corp. at 705-929-5245 or [john@firstmininggold.com](mailto:john@firstmininggold.com).

Sincerely,



Kathleen O'Neill  
Director  
Environmental Assessment and Permissions Branch

c:     Ronnie Theriault, Ministry of Northern Development and Mines  
       Myles Perchuk, Ministry of Natural Resources and Forestry  
       Amy Sen, Canadian Environmental Assessment Agency  
       John Sferrazza, First Mining Gold Corp.

AGREEMENT

This agreement is made in triplicate,

BETWEEN

The Minister of the Environment and Climate Change [the “Minister”]

AND

First Mining Gold Corp., its agents, successors and assigns [the “Proponent”]

CONCERNING

The Proponent proposes to develop and operate the Springpole Gold Project located in the District of Kenora, approximately 110 kilometres (km) northeast of Red Lake. This undertaking involves the development, construction, operation, and closure of an open pit gold and silver mine and any associated facilities and ancillary activities.

[the “Undertaking”]

Whereas section 3.0.1 of the *Environmental Assessment Act* states:

A person, other than a person referred to in clause 3(a), who carries out, proposes to carry out or is the owner or person having charge, management or control of an enterprise or activity or a proposal, plan or program in respect of an enterprise or activity may enter into a written agreement with the Minister to have this Act apply to the enterprise, activity, proposal, plan or program.

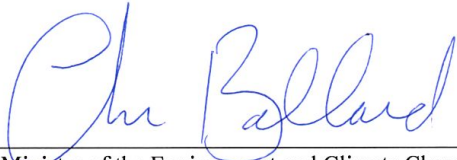
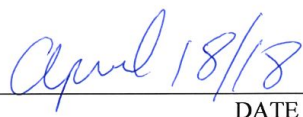
Whereas the Proponent is a person, other than a person referred to in clause 3(a) of the *Environmental Assessment Act*, who carries out, proposes to carry out or is the owner or person having charge, management or control of an enterprise or activity or a proposal, plan or program in respect of an enterprise or activity which is described above as the Undertaking.


Whereas the Proponent who proposes to engage in the Undertaking has requested that the *Environmental Assessment Act* apply to the Undertaking.

The Minister and the Proponent therefore agree that the *Environmental Assessment Act* applies to the Undertaking.

This agreement shall take effect from the date of the last signature below and shall continue indefinitely unless terminated by the agreement of both parties, in writing.

Executed by:

   
Minister of the Environment and Climate Change DATE

 Jeff Swinoga, President and CEO April 11, 2018  
First Mining Gold Corp. DATE  
I have the authority to bind the Corporation.

Ministry of the Environment  
and Climate Change

Environmental Assessment and  
Permissions Branch

135 St. Clair Avenue West  
1<sup>st</sup> Floor  
Toronto ON M4V 1P5  
Tel.: 416 314-8001  
Fax: 416 314-8452

Ministère de l'Environnement et  
de l'Action en matière de  
changement climatique

Direction des évaluations et des  
permissions environnementales

135, avenue St. Clair Ouest  
Rez-de-chaussée  
Toronto ON M4V 1P5  
Tél.: 416 314-8001  
Télééc.: 416 314-8452



APR 25 2018

Chief Martine Petiquan  
Wabauskang First Nation  
P.O. Box 339  
Ear Falls ON P0V1T0

Dear Chief Petiquan:

The Ontario Ministry of the Environment and Climate Change (the ministry) has received project information regarding a proposal for an open pit gold and silver mine by First Mining Gold Corp. The Springpole Gold Project (the Project) is to be located in northwestern Ontario, approximately 110 kilometres northeast of the Municipality of Red Lake, southwest of Cat Lake First Nation and northeast of Slate Falls Nation.

#### **Environmental Assessment Process for the Project**

The Ontario *Environmental Assessment Act* (the Act) does not typically apply to private sector projects. However, some aspects of a proposed mine may trigger provincial environmental assessment requirements, such as the disposition of rights to Crown resources, and the construction of transmission facilities. In addition, a proposed mine may have to meet federal environmental assessment requirements under the *Canadian Environmental Assessment Act, 2012*.

As a first step towards meeting its provincial environmental assessment requirements, First Mining Gold has volunteered to have its Project, consisting of an open pit gold and silver mine and associated infrastructure, subject to the Act. I am writing today to inform you that on April 18, 2018, the Minister of the Environment and Climate Change signed a Voluntary Agreement with First Mining Gold to make the Project subject to the requirements of the Act (the Agreement). This means that First Mining Gold will prepare an individual environmental assessment for the Project. A copy of this Agreement has been enclosed for your reference.

This Agreement does not mean that First Mining Gold can proceed with the Project. Rather, this Agreement sets out the requirement for a provincial environmental assessment process and provides an opportunity for First Mining Gold to enhance coordination between provincial and federal environmental assessment processes, as applicable, which will avoid duplication and align consultation on the Project as a whole.

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### **Consultation Requirements and Process**

Based on the ministry's current understanding of treaties, traditional territories, claims and assertions in the Project area, the ministry has identified that your community may be impacted by the Project. The ministry has therefore delegated the procedural aspects of consultation with your community to First Mining Gold for the environmental assessment process for the Project.

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### **Next Steps**

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throughout the environmental assessment process. The ministry encourages you, and your community, to participate in the consultation process and will be available throughout should you have any questions or concerns.

If you have any questions or concerns at this time, please don't hesitate to contact Agni Papageorgiou, Special Project Officer of the Environmental Assessment and Permissions Branch at 416-314-8214 or [agni.papageorgiou@ontario.ca](mailto:agni.papageorgiou@ontario.ca). If you have any questions about the Project, you may also contact John Sferrazza, Permitting and Environmental Assessments Manager, First Mining Gold Corp. at 705-929-5245 or [john@firstmininggold.com](mailto:john@firstmininggold.com).

Sincerely,



Kathleen O'Neill  
Director  
Environmental Assessment and Permissions Branch

c: Ronnie Theriault, Ministry of Northern Development and Mines  
Myles Perchuk, Ministry of Natural Resources and Forestry  
Amy Sen, Canadian Environmental Assessment Agency  
John Sferrazza, First Mining Gold Corp.

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AND

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[the “Undertaking”]

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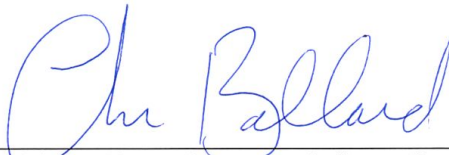

Whereas the Proponent is a person, other than a person referred to in clause 3(a) of the *Environmental Assessment Act*, who carries out, proposes to carry out or is the owner or person having charge, management or control of an enterprise or activity or a proposal, plan or program in respect of an enterprise or activity which is described above as the Undertaking.


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The Minister and the Proponent therefore agree that the *Environmental Assessment Act* applies to the Undertaking.

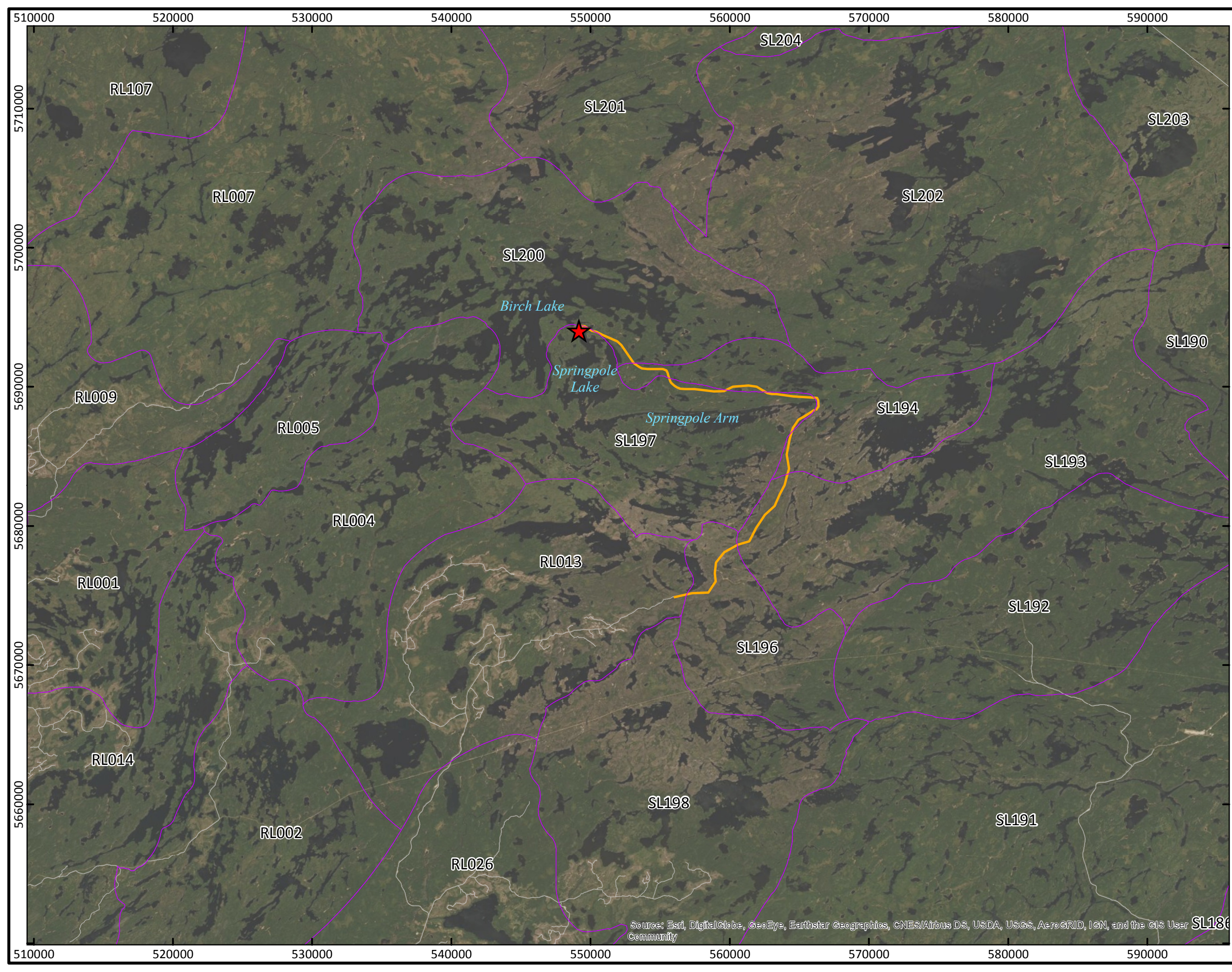
This agreement shall take effect from the date of the last signature below and shall continue indefinitely unless terminated by the agreement of both parties, in writing.

Executed by:

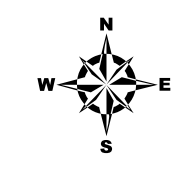
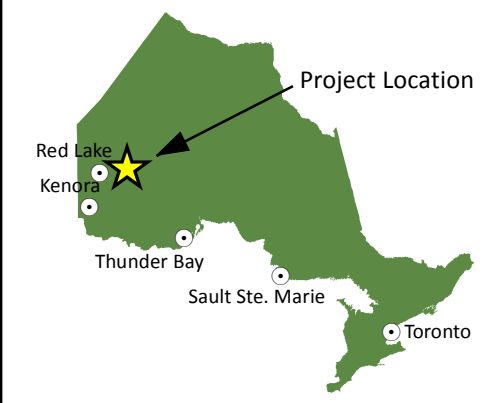
   
Minister of the Environment and Climate Change DATE

 Jeff Swinoga, President and CEO April 11, 2018  
First Mining Gold Corp. DATE  
I have the authority to bind the Corporation.

**Appendix B**  
**Additional Figures**



Property Reference



-  Project Location
-  Access Corridor
-  Road
-  Trapline Area



**Springpole Gold Project**  
 Trapline Areas  
 Figure A

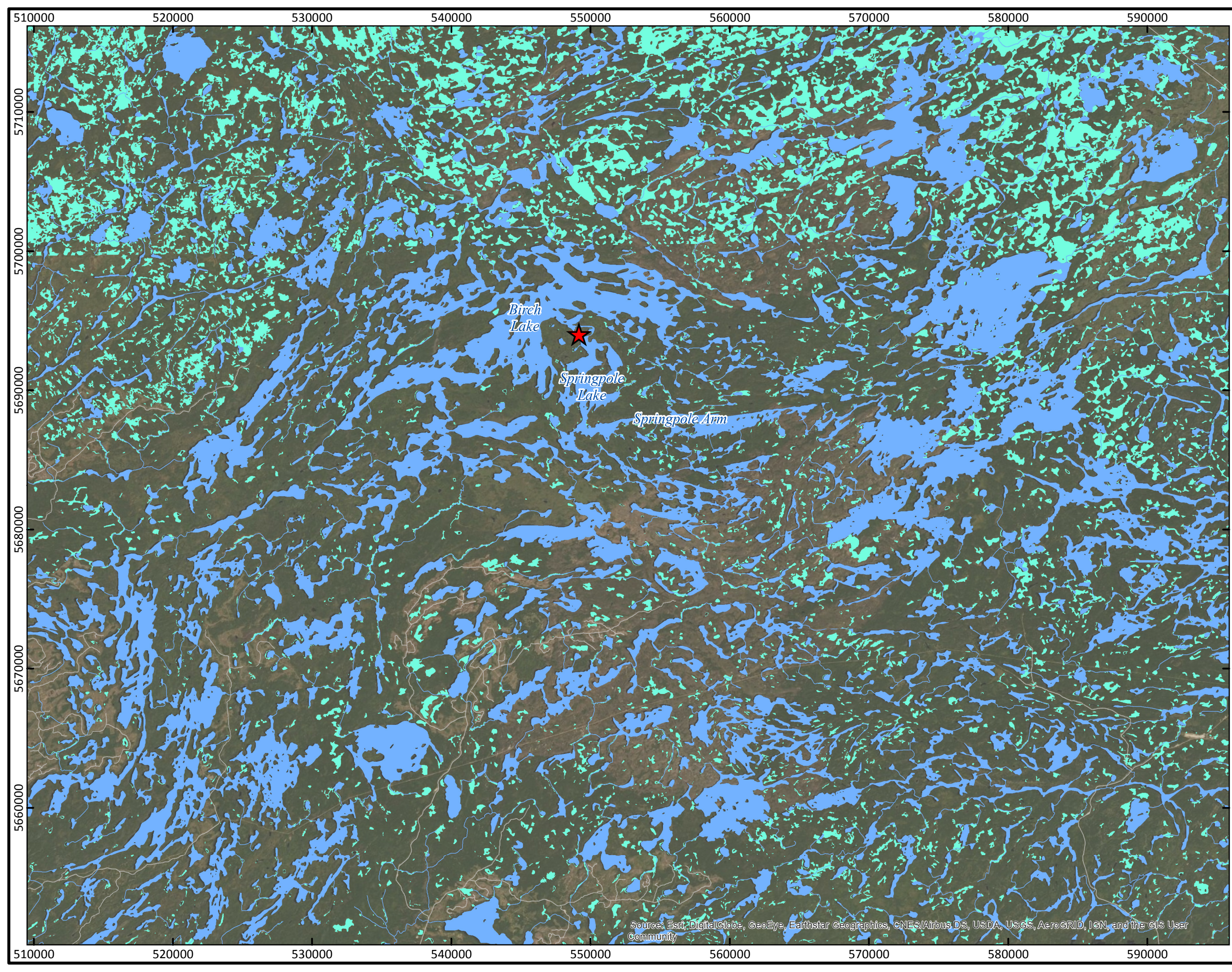
Kenora District, Ontario

April 2021 NAD83, UTM zone15

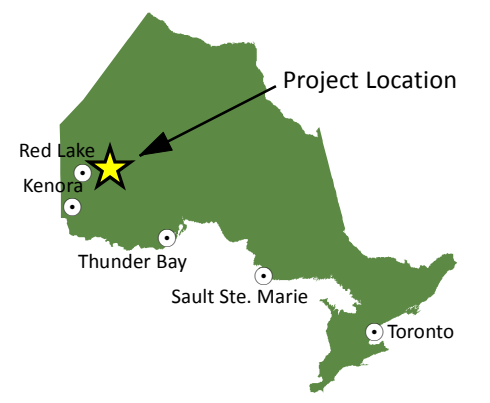
0 Kilometers 10







Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community



Property Reference



-  Project Location
-  Watercourse
-  Water Body
-  Wetland



**Springpole Gold Project**  
Regional Wetlands  
Figure B

Kenora District, Ontario

April 2021 NAD83, UTM zone15

0 Kilometers 10



Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

**Figure C: View of Birch River Crossing Location (Looking North)**



Figure D: View of Birch River Crossing – North Abutment



Figure E: View of Birch River Crossing – South Abutment



Figure F: Example of Clear Span Bridge



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## **Appendix C**

### **Workforce Requirements**

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## **Preliminary Workforce Requirements**

Given that the Project is envisioned to be an open pit and not an underground mine, FMG anticipates that there will be an opportunity to employ workers that have been displaced from the forestry sector following the gradual downturn of the sector since ~2005. Furthermore, FMG anticipates an opportunity to improve the local workforce with skills that would be transferable to other sectors such as heavy construction, trucking, forestry, and other workplaces.

FMG is aware that it will have to compete with other employers and mining projects across the continent to attract and retain its workforce. As such, the Project management team will develop attractive schedules providing flexibility to workers that require it, excellent accommodation arrangements, and competitive compensation packages. Consistent with current industry practice, FMG will be committed to a drug and alcohol-free workplace that promotes healthy lifestyle choices as a core company value.

Table C.1 below presents a list of potential production phase positions based on a benchmarking of other mining operations. Note, qualifications have been summarized from available postings for similar positions recently posted on the internet. FMG has not undertaken an evaluation of the positions required for the Project and the list is preliminary and subject to change as better information becomes available. Salaries for these positions have a range of approximately \$40,000 per year to \$170,000 per year, based on a 2014 benchmarking of mining sector positions available from <https://www.mihr.ca/careers>.

**Table C.1: Summary of Potential Operations Phase Positions**

Department	Position <sup>(1)</sup>	Education Requirements <sup>(2)</sup>	Number Required
Technical and Administration	Mine General Manager	College or University	1
	Administrative Assistant	Grade 12 minimum	2
	Safety Coordinator	College or University	2
	Environmental Coordinator	College or University	2
	Community Liaison Coordinator	Grade 12 minimum	1
	Human Resources	College or University	2
	Information Technology / Information Services	College or University	2
	Controller	College or University	1
	Cost accountant, accounts payable	College or University	2
	Purchaser, receiver, warehouse	College or University	6
	Security	Grade 12 minimum	8
	Occupational Health Nurse	College or University	2
Mine	Chief Engineer	College or University	1
	Mine Engineer	College or University	2
	Mine Planning	College or University	1
	Mine Technologist	College or University	4
	Surveying	College or University	4
	Chief Geologist	College or University	1
	Mine Geologist	College or University	2
	Mine Superintendent	Grade 12 minimum	1
	General Foremen, Supervisors	Grade 12 minimum	4
	Leaders	Grade 12 minimum	8
	Miners (includes drill technicians; drillers, blasters, service supervisors; truck drivers; Shovel operators; dozer and loader operators)	Grade 12 minimum	30+
	Labourer	Grade 12 (or less)	8
Trainer	Grade 12 minimum	2	
Mill	Mill Superintendent	Grade 12 minimum	1
	General Foremen, Supervisors	Grade 12 minimum	6
	Metallurgist	College or University	2
	Operators	Grade 12 minimum	20+
	Labourer	Grade 12 minimum	4
	Assayers	College or University	4
	Assay lab and metallurgical lab technicians	Grade 12 minimum	10
	Trainer	Grade 12 minimum	1
Maintenance	Maintenance Superintendent	College or University	1
	Maintenance Planner	College or University	2
	Supervisor	Grade 12 minimum	4
	Electrical & Instrumentation	Grade 12 minimum	8
	Millwright / Mechanic	Grade 12 minimum	20+
	Custodial / Janitorial / General Maintenance / Kitchen	Grade 12 (or less)	10+

(1) The list of production phase positions and the numbers of these positions are preliminary and are subject to change as better information becomes available.

(2) Education requirements are based on MNDM publication titled “Occupations in Mineral Exploration and Mining”

**Appendix D**  
**Land Tenure**

**Table D.1: Summary of Patented Claims for the Springpole Gold Project**

<b>Township</b>	<b>Claim ID</b>	<b>Area (Ha)</b>
Casummit Lake Area	KRL11229	14.01
Casummit Lake Area	KRL11230	18.17
Casummit Lake Area	KRL11231	24.90
Casummit Lake Area	KRL12868	18.78
Casummit Lake Area	KRL12869	20.72
Casummit Lake Area	KRL11233	13.74
Casummit Lake Area	KRL11234	23.69
Casummit Lake Area	KRL11235	19.77
Casummit Lake Area	KRL12896	15.60
Casummit Lake Area	KRL12897	22.12
Casummit Lake Area	KRL12898	17.68
Casummit Lake Area	KRL12899	16.48
Casummit Lake Area	KRL12900	18.69
Casummit Lake Area	KRL12901	19.89
Casummit Lake Area	KRL13043	14.88
Casummit Lake Area	KRL11236	17.41
Casummit Lake Area	KRL12872	24.60
Casummit Lake Area	KRL12874	23.72
Casummit Lake Area	KRL12904	16.67
Casummit Lake Area	KRL12905	15.15
Casummit Lake Area	KRL12908	21.85
Casummit Lake Area	KRL12909	26.85
Casummit Lake Area	KRL12902	24.59
Casummit Lake Area	KRL12906	16.29
Casummit Lake Area	KRL12903	28.43
Casummit Lake Area	KRL12907	17.27
Casummit Lake Area	KRL12870	10.64
Casummit Lake Area	KRL12871	22.70
Casummit Lake Area	KRL12873	25.24
Casummit Lake Area	KRL12867	19.22

**Table D.2: Summary of Mining Leases for the Springpole Gold Project**

<b>Township</b>	<b>Lease ID</b>	<b>Area (Ha)</b>
Casummit Lake Area	108953	18.04
Casummit Lake Area	108954	7.72
Casummit Lake Area	108955	13.02
Casummit Lake Area	108956	12.02
Casummit Lake Area	108957	15.36
Casummit Lake Area	108958	16.95
Casummit Lake Area, Keigat Lake Area, Seagrave Lake Area	109846	708.37
Casummit Lake Area	109847	260.82
Casummit Lake Area	109848	83.47
Casummit Lake Area	109849	62.62
Casummit Lake Area	109850	92.28
Satterly Lake Area, Seagrave Lake Area	109851	190.72
Seagrave Lake Area	109852	133.00

**Table D.3: Summary of Mining Claims for the Springpole Gold Project**

Township	Cell Type	Tenure ID	Anniversary Date	Area (Ha)
Casummit Lake Area	Boundary Cell Mining Claim	103662	10/29/2021	1.85
Casummit lake Area, Satterly Lake Area	Single Cell Mining Claim	103667	7/22/2021	20.16
Keigat Lake Area	Boundary Cell Mining Claim	103668	9/14/2021	0.21
Casummit Lake Area	Boundary Cell Mining Claim	104244	7/22/2021	3.85
Casummit Lake Area	Boundary Cell Mining Claim	104286	5/24/2021	1.38
Casummit Lake Area	Boundary Cell Mining Claim	105399	10/29/2020	1.09
Satterly Lake Area	Single Cell Mining Claim	105428	3/18/2021	20.17
Satterly Lake Area, Seagrave Lake Area	Boundary Cell Mining Claim	105478	3/18/2021	12.98
Casummit Lake Area, Satterly Lake Area	Single Cell Mining Claim	107996	7/22/2021	20.16
Casummit Lake Area	Single Cell Mining Claim	109926	10/29/2021	20.14
Casummit Lake Area	Boundary Cell Mining Claim	111631	4/8/2021	3.84
Casummit Lake Area	Single Cell Mining Claim	111633	4/8/2021	20.14
Satterly Lake Area	Single Cell Mining Claim	113775	7/22/2021	20.16
Seagrave Lake Area	Single Cell Mining Claim	113829	3/18/2021	20.18
Seagrave Lake Area	Single Cell Mining Claim	115161	2/11/2021	20.17
Satterly Lake Area	Single Cell Mining Claim	116306	3/18/2021	20.18
Keigat Lake Area	Boundary Cell Mining Claim	118421	4/27/2021	9.59
Casummit Lake Area	Boundary Cell Mining Claim	118652	7/22/2021	0.36
Casummit Lake Area	Boundary Cell Mining Claim	118951	10/29/2020	15.77
Satterly Lake Area	Single Cell Mining Claim	119296	4/2/2021	20.17
Satterly Lake Area	Single Cell Mining Claim	121183	4/2/2021	20.17
Satterly Lake Area	Single Cell Mining Claim	121185	4/2/2021	20.17
Casummit Lake Area	Boundary Cell Mining Claim	125879	4/20/2021	1.77
Satterly Lake Area, Seagrave Lake Area	Single Cell Mining Claim	125902	3/18/2021	20.17
Casummit Lake Area	Boundary Cell Mining Claim	131165	10/29/2021	7.06
Satterly Lake Area, Seagrave Lake Area	Single Cell Mining Claim	132651	3/18/2021	20.17
Keigat Lake Area	Boundary Cell Mining Claim	134579	8/24/2021	8.99
Seagrave Lake Area	Single Cell Mining Claim	134703	3/18/2021	20.17
Casummit Lake Area	Boundary Cell Mining Claim	136607	8/28/2021	12.56
Casummit Lake Area	Single Cell Mining Claim	136608	8/28/2021	20.16
Keigat Lake Area	Boundary Cell Mining Claim	137351	9/14/2021	3.06
Satterly Lake Area	Single Cell Mining Claim	138184	7/22/2021	20.16
Casummit Lake Area	Boundary Cell Mining Claim	147741	4/8/2021	7.51
Keigat Lake Area	Boundary Cell Mining Claim	148695	9/14/2021	16.11
Seagrave Lake Area	Single Cell Mining Claim	149974	2/11/2021	20.17
Keigat Lake Area	Boundary Cell Mining Claim	150017	9/14/2021	13.98
Keigat Lake Area	Boundary Cell Mining Claim	150610	9/14/2021	0.46
Keigat Lake Area	Boundary Cell Mining Claim	150679	7/8/2021	0.24

Township	Cell Type	Tenure ID	Anniversary Date	Area (Ha)
Seagrave Lake Area	Single Cell Mining Claim	152169	2/11/2021	20.17
Keigat Lake Area	Boundary Cell Mining Claim	153829	9/14/2021	4.04
Seagrave Lake Area	Single Cell Mining Claim	158816	5/12/2021	20.17
Satterly Lake Area, Seagrave Lake Area	Boundary Cell Mining Claim	158865	8/31/2021	7.05
Satterly Lake Area	Boundary Cell Mining Claim	159637	4/2/2021	5.93
Casummit Lake Area, Satterly Lake Area	Single Cell Mining Claim	160434	5/24/2021	20.16
Keigat Lake Area	Single Cell Mining Claim	161711	9/14/2021	20.15
Casummit Lake Area	Boundary Cell Mining Claim	161839	4/8/2021	4.83
Casummit Lake Area	Single Cell Mining Claim	163014	10/29/2021	20.14
Satterly Lake Area	Single Cell Mining Claim	167578	3/18/2021	20.18
Keigat Lake Area	Boundary Cell Mining Claim	167741	9/14/2021	16.39
Satterly Lake Area, Seagrave Lake Area	Single Cell Mining Claim	168108	3/18/2021	20.18
Seagrave Lake Area	Boundary Cell Mining Claim	168741	2/11/2021	0.07
Seagrave Lake Area	Boundary Cell Mining Claim	168827	2/11/2021	0.10
Keigat Lake Area	Single Cell Mining Claim	169485	7/8/2021	20.16
Keigat Lake Area, Seagrave Lake Area	Boundary Cell Mining Claim	169528	2/11/2021	1.17
Seagrave Lake Area	Boundary Cell Mining Claim	169530	2/11/2021	2.19
Satterly Lake Area	Single Cell Mining Claim	169836	3/18/2021	20.17
Casummit Lake Area	Boundary Cell Mining Claim	169881	4/20/2021	5.81
Seagrave Lake Area	Boundary Cell Mining Claim	170422	3/18/2021	4.37
Satterly Lake Area, Seagrave Lake Area	Single Cell Mining Claim	170423	3/18/2021	20.17
Keigat Lake Area	Boundary Cell Mining Claim	170478	9/14/2021	15.91
Keigat Lake Area	Boundary Cell Mining Claim	171550	4/27/2021	1.27
Keigat Lake Area	Boundary Cell Mining Claim	175888	9/14/2021	3.34
Seagrave Lake Area	Single Cell Mining Claim	177647	5/12/2021	20.17
Satterly Lake Area	Single Cell Mining Claim	179173	4/2/2021	20.17
Casummit Lake Area, Satterly Lake Area	Single Cell Mining Claim	179876	7/22/2021	20.16
Satterly Lake Area	Single Cell Mining Claim	180419	3/18/2021	20.18
Keigat Lake Area	Single Cell Mining Claim	181176	9/14/2021	20.15
Casummit Lake Area, Keigat Lake Area	Single Cell Mining Claim	183341	9/14/2021	20.14
Casummit Lake Area	Boundary Cell Mining Claim	183832	4/8/2021	0.87
Casummit Lake Area	Single Cell Mining Claim	188606	4/20/2021	20.15
Casummit Lake Area, Satterly Lake Area	Single Cell Mining Claim	188613	8/28/2021	20.16
Seagrave Lake Area	Boundary Cell Mining Claim	189400	3/18/2021	3.20
Seagrave Lake Area	Boundary Cell Mining Claim	189401	3/18/2021	13.06
Satterly Lake Area	Single Cell Mining Claim	189402	3/18/2021	20.17
Satterly Lake Area	Single Cell Mining Claim	189403	3/18/2021	20.17
Casummit Lake Area, Satterly Lake Area	Single Cell Mining Claim	193748	7/22/2021	20.16
Seagrave Lake Area	Single Cell Mining Claim	197365	3/18/2021	20.17
Seagrave Lake Area	Single Cell Mining Claim	198089	2/11/2021	20.17

Township	Cell Type	Tenure ID	Anniversary Date	Area (Ha)
Casummit Lake Area, Keigat Lake Area	Boundary Cell Mining Claim	198688	9/14/2021	2.65
Keigat Lake Area	Boundary Cell Mining Claim	198778	8/24/2021	8.57
satterly lake areA	Single Cell Mining Claim	202322	3/12/2022	20.16
keigat lake areA	Single Cell Mining Claim	206110	9/14/2021	20.15
Casummit Lake Area	Single Cell Mining Claim	209025	10/29/2021	20.14
Seagrave Lake Area	Single Cell Mining Claim	212225	5/12/2021	20.17
Casummit Lake Area	Single Cell Mining Claim	213892	4/8/2021	20.14
Casummit Lake Area, Satterly Lake Area	Single Cell Mining Claim	215192	7/22/2021	20.16
Casummit Lake Area	Boundary Cell Mining Claim	216507	10/29/2020	0.04
Keigat Lake Area	Boundary Cell Mining Claim	216516	9/14/2021	11.72
Keigat Lake Area	Boundary Cell Mining Claim	216517	9/14/2021	0.99
Casummit Lake Area	Boundary Cell Mining Claim	217915	7/22/2021	0.37
Casummit Lake Area	Boundary Cell Mining Claim	218502	9/29/2021	4.25
Casummit Lake Area	Boundary Cell Mining Claim	218634	5/24/2021	3.02
Satterly Lake Area	Boundary Cell Mining Claim	218905	7/22/2021	0.77
Seagrave Lake Area	Boundary Cell Mining Claim	219240	3/18/2021	1.97
Satterly Lake Area	Single Cell Mining Claim	219241	3/18/2021	20.17
Seagrave Lake Area	Single Cell Mining Claim	224240	5/12/2021	20.17
Satterly Lake Area	Boundary Cell Mining Claim	225028	4/2/2021	2.21
Casummit Lake Area	Boundary Cell Mining Claim	225899	4/20/2021	2.05
Casummit Lake Area	Boundary Cell Mining Claim	225902	4/20/2021	3.04
Seagrave Lake Area	Single Cell Mining Claim	226677	3/18/2021	20.17
Satterly Lake Area, Seagrave Lake Area	Single Cell Mining Claim	226678	3/18/2021	20.17
Casummit Lake Area	Single Cell Mining Claim	227199	4/29/2021	20.14
Keigat Lake Area	Boundary Cell Mining Claim	227228	9/14/2021	16.10
Keigat Lake Area	Single Cell Mining Claim	227229	9/14/2021	20.15
Casummit Lake Area, Satterly Lake Area	Single Cell Mining Claim	233787	5/24/2021	20.16
Seagrave Lake Area	Boundary Cell Mining Claim	234848	2/11/2021	0.70
Seagrave Lake Area	Boundary Cell Mining Claim	234849	2/11/2021	19.99
Keigat Lake Area	Boundary Cell Mining Claim	235519	7/8/2021	0.28
Satterly Lake Area	Boundary Cell Mining Claim	235552	4/18/2021	9.90
Casummit Lake Area	Single Cell Mining Claim	238014	4/20/2021	20.15
Casummit Lake Area	Boundary Cell Mining Claim	238015	4/20/2021	5.16
Casummit Lake Area	Single Cell Mining Claim	238016	4/20/2021	20.15
Satterly Lake Area	Single Cell Mining Claim	238757	3/18/2021	20.17
Satterly Lake Area	Single Cell Mining Claim	239315	3/18/2021	20.17
Keigat Lake Area	Single Cell Mining Claim	239359	9/14/2021	20.15
SATTERLY LAKE AREA	Single Cell Mining Claim	247130	3/18/2021	20.18
Casummit Lake Area	Boundary Cell Mining Claim	253372	5/24/2021	1.75
Keigat Lake Area	Single Cell Mining Claim	253373	9/14/2021	20.15

Township	Cell Type	Tenure ID	Anniversary Date	Area (Ha)
Satterly Lake Area	Single Cell Mining Claim	255991	3/18/2021	20.17
Seagrave Lake Area	Single Cell Mining Claim	256047	3/18/2021	20.17
Seagrave Lake Area	Single Cell Mining Claim	264142	2/11/2021	20.17
Seagrave Lake Area	Boundary Cell Mining Claim	264143	2/11/2021	3.12
Seagrave Lake Area	Single Cell Mining Claim	264144	2/11/2021	20.17
Casummit Lake Area	Boundary Cell Mining Claim	270399	8/31/2021	1.50
Keigat Lake Area	Single Cell Mining Claim	270413	9/14/2021	20.15
Keigat Lake Area	Boundary Cell Mining Claim	270823	9/14/2021	12.56
Keigat Lake Area	Single Cell Mining Claim	272120	9/14/2021	20.15
Keigat Lake Area	Boundary Cell Mining Claim	272747	9/14/2021	7.15
Keigat Lake Area	Single Cell Mining Claim	272771	9/14/2021	20.15
Seagrave Lake Area	Single Cell Mining Claim	272794	2/11/2021	20.16
Casummit Lake Area, Keigat Lake Area, Satterly Lake Area, Seagrave Lake Area	Boundary Cell Mining Claim	275496	8/31/2021	6.65
Keigat Lake Area	Boundary Cell Mining Claim	282519	9/14/2021	19.72
Satterly Lake Area	Single Cell Mining Claim	283066	3/18/2021	20.18
Casummit Lake Area, Keigat Lake Area	Boundary Cell Mining Claim	283907	8/28/2021	19.87
Seagrave Lake Area	Single Cell Mining Claim	284215	2/11/2021	20.16
Seagrave Lake Area	Boundary Cell Mining Claim	284217	2/11/2021	2.54
Keigat Lake Area	Boundary Cell Mining Claim	284764	8/24/2021	9.21
Satterly Lake Area	Boundary Cell Mining Claim	285195	3/18/2021	11.26
Seagrave Lake Area	Single Cell Mining Claim	285196	3/18/2021	20.17
Keigat Lake Area	Boundary Cell Mining Claim	285244	9/14/2021	15.78
Satterly Lake Area	Single Cell Mining Claim	290401	3/18/2021	20.18
Casummit Lake Area	Boundary Cell Mining Claim	292510	8/28/2021	1.00
Satterly Lake Area	Single Cell Mining Claim	293238	3/18/2021	20.17
Keigat Lake Area	Boundary Cell Mining Claim	293279	9/14/2021	1.04
Casummit Lake Area	Single Cell Mining Claim	299743	10/29/2020	20.14
Keigat Lake Area	Boundary Cell Mining Claim	300652	9/14/2021	3.61
Satterly Lake Area	Single Cell Mining Claim	300713	3/18/2021	20.18
Casummit Lake Area	Boundary Cell Mining Claim	301222	10/29/2020	0.64
Seagrave Lake Area	Single Cell Mining Claim	301943	2/11/2021	20.16
Keigat Lake Area	Boundary Cell Mining Claim	303286	9/14/2021	10.49
Keigat Lake Area	Single Cell Mining Claim	303505	9/14/2021	20.16
Casummit Lake Area	Boundary Cell Mining Claim	304664	4/20/2021	4.97
Casummit Lake Area, Keigat Lake Area	Single Cell Mining Claim	305413	9/14/2021	20.14
Seagrave Lake Area	Boundary Cell Mining Claim	305936	3/18/2021	0.61
Seagrave Lake Area	Boundary Cell Mining Claim	305937	3/18/2021	0.00
Seagrave Lake Area	Boundary Cell Mining Claim	305938	3/18/2021	1.66
Casummit Lake Area	Single Cell Mining Claim	306405	9/14/2021	20.14

Township	Cell Type	Tenure ID	Anniversary Date	Area (Ha)
Seagrave Lake Area	Single Cell Mining Claim	319328	3/18/2021	20.18
Keigat Lake Area, Seagrave Lake Area	Single Cell Mining Claim	319889	2/11/2021	20.16
Seagrave Lake Area	Single Cell Mining Claim	320742	2/11/2021	20.17
Casummit Lake Area, Satterly Lake Area	Single Cell Mining Claim	321849	5/24/2021	20.16
Satterly Lake Area	Single Cell Mining Claim	321871	3/18/2021	20.17
Casummit Lake Area, Keigat Lake Area	Boundary Cell Mining Claim	322413	9/14/2021	9.68
Satterly Lake Area, Seagrave Lake Area	Single Cell Mining Claim	322436	3/18/2021	20.17
Keigat Lake Area	Single Cell Mining Claim	322484	9/14/2021	20.15
Seagrave Lake Area	Boundary Cell Mining Claim	326852	5/12/2021	13.63
Seagrave Lake Area	Single Cell Mining Claim	326854	5/12/2021	20.17
Satterly Lake Area	Single Cell Mining Claim	328257	4/2/2021	20.16
Satterly Lake Area	Single Cell Mining Claim	328258	4/2/2021	20.17
Casummit Lake Area	Boundary Cell Mining Claim	329038	5/24/2021	1.07
Casummit Lake Area	Boundary Cell Mining Claim	329783	7/17/2021	2.90
Satterly Lake Area	Single Cell Mining Claim	332949	3/18/2021	20.17
Keigat Lake Area	Boundary Cell Mining Claim	333505	8/24/2021	8.29
Keigat Lake Area, Seagrave Lake Area	Single Cell Mining Claim	333860	2/11/2021	20.16
Seagrave Lake Area	Single Cell Mining Claim	333861	2/11/2021	20.16
Keigat Lake Area	Boundary Cell Mining Claim	336760	8/24/2021	8.25
Casummit Lake Area	Boundary Cell Mining Claim	338658	4/8/2021	3.65
Casummit Lake Area	Boundary Cell Mining Claim	338659	9/14/2021	4.61
Keigat Lake Area	Boundary Cell Mining Claim	342170	9/14/2021	0.00
Keigat Lake Area	Single Cell Mining Claim	342268	7/8/2021	20.16
Casummit Lake Area	Single Cell Mining Claim	343549	4/20/2021	20.15
Casummit Lake Area, Keigat Lake Area	Boundary Cell Mining Claim	343551	8/28/2021	13.70
Keigat Lake Area	Boundary Cell Mining Claim	344836	9/14/2021	3.28
Satterly Lake Area	Multi-cell Mining Claim	532159	10/27/2020	504.95
Satterly lake area	Multi-cell Mining Claim	532160	10/27/2020	504.95
Satterly Lake Area	Multi-cell Mining Claim	532161	10/27/2020	504.95
Satterly Lake Area, Seagrave Lake Area	Multi-cell Mining Claim	532162	10/27/2020	504.95
Seagrave Lake Area	Multi-cell Mining Claim	532163	10/27/2020	504.95
Seagrave Lake Area	Multi-cell Mining Claim	532164	10/27/2020	504.96
Seagrave Lake Area	Multi-cell Mining Claim	532165	10/27/2020	504.96
Seagrave Lake Area	Multi-cell Mining Claim	532166	10/27/2020	504.96
Seagrave Lake Area	Multi-cell Mining Claim	532167	10/27/2020	484.70
Satterly Lake Area	Multi-cell Mining Claim	532168	10/27/2020	504.72
Satterly Lake Area	Multi-cell Mining Claim	532169	10/27/2020	504.72
Satterly Lake Area	Multi-cell Mining Claim	532170	10/27/2020	504.72
Satterly Lake Area, Seagrave Lake Area	Multi-cell Mining Claim	532171	10/27/2020	504.73
Seagrave Lake Area	Multi-cell Mining Claim	532172	10/27/2020	504.73

Township	Cell Type	Tenure ID	Anniversary Date	Area (Ha)
Seagrave Lake Area	Multi-cell Mining Claim	532173	10/27/2020	504.73
Seagrave Lake Area	Multi-cell Mining Claim	532174	10/27/2020	504.73
Seagrave Lake Area	Multi-cell Mining Claim	532175	10/27/2020	504.74
Satterly Lake Area	Multi-cell Mining Claim	532176	9/13/2021	282.50
Satterly Lake Area	Multi-cell Mining Claim	532177	4/2/2022	201.81
Satterly Lake Area	Multi-cell Mining Claim	532178	10/27/2020	484.32
Satterly Lake Area	Multi-cell Mining Claim	532179	10/27/2020	484.34
Satterly Lake Area, Seagrave Lake Area	Multi-cell Mining Claim	532180	10/27/2020	484.34
Seagrave Lake Area	Multi-cell Mining Claim	532181	10/27/2020	484.34
Seagrave Lake Area	Multi-cell Mining Claim	532182	10/27/2020	484.35
Seagrave Lake Area	Multi-cell Mining Claim	532183	10/27/2020	484.35
Seagrave Lake Area	Multi-cell Mining Claim	532184	10/27/2020	484.44
Seagrave Lake Area	Multi-cell Mining Claim	532185	3/29/2021	484.71
Seagrave Lake Area	Multi-cell Mining Claim	532186	3/29/2021	363.74
Seagrave Lake Area	Multi-cell Mining Claim	532187	10/27/2020	121.22
Seagrave Lake Area	Multi-cell Mining Claim	532188	3/29/2021	505.19
Hailstone Lake Area, Seagrave Lake Area	Multi-cell Mining Claim	532189	3/29/2021	485.11
Hailstone Lake Area	Multi-cell Mining Claim	532190	3/29/2021	505.50
Hailstone Lake Area	Multi-cell Mining Claim	532191	3/29/2021	505.62
Hailstone Lake Area, Latreille Lake Area	Multi-cell Mining Claim	532192	3/29/2021	505.72
Hailstone Lake Area, Latreille Lake Area	Multi-cell Mining Claim	532193	3/29/2021	384.40
Latreille Lake Area	Multi-cell Mining Claim	532194	4/30/2021	485.63
Latreille Lake Area	Multi-cell Mining Claim	532195	4/30/2021	505.94
Costello, Latreille Lake Area	Multi-cell Mining Claim	532196	4/30/2021	506.09
Costello	Multi-cell Mining Claim	532197	4/30/2021	486.12
Costello	Multi-cell Mining Claim	532198	4/30/2021	445.89
Hailstone Lake Area, Latreille Lake Area	Multi-cell Mining Claim	532199	5/2/2021	242.84
Hailstone Lake Area, Latreille Lake Area	Multi-cell Mining Claim	532200	5/2/2021	404.90
Hailstone Lake Area, Latreille Lake Area	Multi-cell Mining Claim	532201	5/2/2021	405.08
Seagrave Lake Area	Multi-cell Mining Claim	532203	5/12/2021	504.52
Seagrave Lake Area	Multi-cell Mining Claim	532204	5/12/2021	484.25
Seagrave Lake Area	Multi-cell Mining Claim	532205	5/12/2021	484.05
Seagrave Lake Area	Multi-cell Mining Claim	532206	5/12/2021	504.37
Seagrave Lake Area	Multi-cell Mining Claim	532207	5/12/2021	484.18
Seagrave Lake Area	Multi-cell Mining Claim	532208	5/12/2021	464.00
Seagrave Lake Area	Multi-cell Mining Claim	532209	5/12/2021	484.03
Keigat Lake Area, Seagrave Lake Area	Multi-cell Mining Claim	532210	5/12/2021	483.87
Seagrave Lake Area	Multi-cell Mining Claim	532211	5/12/2021	484.02
Keigat Lake Area, Seagrave Lake Area	Multi-cell Mining Claim	532212	5/12/2021	483.87
Keigat Lake Area	Multi-cell Mining Claim	532213	8/24/2021	362.74

Township	Cell Type	Tenure ID	Anniversary Date	Area (Ha)
Keigat Lake Area, Seagrave Lake Area	Multi-cell Mining Claim	532214	7/8/2021	262.06
Casummit Lake Area, Little Shabumeni Lake Area, Satterly Lake Area, Shabumeni Lake Area	Multi-cell Mining Claim	532216	10/1/2020	443.55
Casummit Lake Area, Satterly Lake Area	Multi-cell Mining Claim	532217	7/13/2021	342.71
Casummit Lake Area, Little Shabumeni Lake Area, Satterly Lake Area, Shabumeni Lake Area	Multi-cell Mining Claim	532218	10/1/2020	201.55
Casummit Lake Area	Multi-cell Mining Claim	532219	10/8/2020	100.73
Satterly Lake Area	Multi-cell Mining Claim	532220	5/25/2021	504.35
Satterly Lake Area	Multi-cell Mining Claim	532221	5/25/2021	504.35
Satterly Lake Area	Multi-cell Mining Claim	532222	5/30/2021	362.99
Satterly Lake Area	Multi-cell Mining Claim	532223	5/30/2021	483.96
Casummit Lake Area, Satterly Lake Area	Multi-cell Mining Claim	532224	5/30/2021	282.20
Casummit Lake Area, Satterly Lake Area	Multi-cell Mining Claim	532225	10/6/2020	322.54
Casummit Lake Area, Satterly Lake Area	Multi-cell Mining Claim	532226	2/28/2021	181.43
Casummit Lake Area, Satterly Lake Area	Multi-cell Mining Claim	532227	10/6/2021	100.80
Casummit Lake Area, Little Shabumeni Lake Area	Multi-cell Mining Claim	532228	8/27/2021	382.89
Casummit Lake Area	Multi-cell Mining Claim	532229	5/8/2021	261.97
Casummit Lake Area	Multi-cell Mining Claim	532230	2/24/2021	423.20
Casummit Lake Area	Multi-cell Mining Claim	532231	2/24/2021	503.66
Casummit Lake Area	Multi-cell Mining Claim	532232	2/24/2021	503.62
Satterly Lake Area	Multi-cell Mining Claim	532753	3/12/2021	463.90
Satterly Lake Area	Multi-cell Mining Claim	532754	9/13/2021	242.07
Satterly Lake Area	Multi-cell Mining Claim	532755	3/12/2021	504.27
Casummit Lake Area, Satterly Lake Area	Multi-cell Mining Claim	532756	4/20/2021	443.55
Seagrave Lake Area	Multi-cell Mining Claim	532819	5/12/2021	181.56
Seagrave Lake Area	Multi-cell Mining Claim	532820	2/11/2021	504.21
Keigat Lake Area, Seagrave Lake Area	Multi-cell Mining Claim	532821	5/12/2021	241.96
Keigat Lake Area, Seagrave Lake Area	Multi-cell Mining Claim	532822	2/11/2021	362.92
Keigat Lake Area	Multi-cell Mining Claim	532823	7/8/2021	443.41
Keigat Lake Area	Multi-cell Mining Claim	532824	4/27/2022	60.45
Casummit Lake Area	Multi-cell Mining Claim	532825	5/30/2021	201.41
Casummit Lake Area	Multi-cell Mining Claim	532826	3/2/2021	463.27
Casummit Lake Area	Multi-cell Mining Claim	532827	9/17/2021	261.88
Casummit Lake Area	Multi-cell Mining Claim	532828	4/29/2021	221.54
Casummit Lake Area	Multi-cell Mining Claim	532829	7/17/2021	120.83
Casummit Lake Area	Multi-cell Mining Claim	532830	4/8/2022	140.98
Casummit Lake Area	Multi-cell Mining Claim	532831	3/12/2021	141.15
Casummit Lake Area	Multi-cell Mining Claim	532832	4/2/2021	221.80
Casummit Lake Area	Multi-cell Mining Claim	532833	7/9/2021	302.26
Casummit Lake Area	Multi-cell Mining Claim	532834	4/20/2022	181.37

<b>Township</b>	<b>Cell Type</b>	<b>Tenure ID</b>	<b>Anniversary Date</b>	<b>Area (Ha)</b>
Seagrave Lake Area	Multi-cell Mining Claim	532835	10/27/2020	161.41
Casummit Lake Area	Boundary Cell Mining Claim	102257	10/29/2020	2.52
Casummit Lake Area	Boundary Cell Mining Claim	235540	10/29/2020	4.23
Casummit Lake Area	Boundary Cell Mining Claim	263414	10/29/2020	3.84
Keigat Lake Area	Boundary Cell Mining Claim	188612	9/10/2020	2.50
Keigat Lake Area	Boundary Cell Mining Claim	343552	9/10/2020	0.66
Casummit Lake Area, Keigat Lake Area	Boundary Cell Mining Claim	265365	8/31/2020	4.10

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## **Appendix E**

### **Consultation and Engagements Plans for the EA**

Appendix E1 Indigenous Consultation Plan

Appendix E2 Public Engagement Plan

Appendix E3 Government Consultation Plan

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**Appendix E1**  
**Indigenous Consultation Plan**

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## Appendix E.1: Indigenous Consultation Plan for the EA

### 1. Overview

FMG has developed this Indigenous Consultation Plan (the Plan) for the Project. The Plan is a living document and will be reviewed regularly and updated as needed during the EA. The intent of the Plan is to provide a process for meaningful engagement throughout the EA process. Effective and meaningful communication / engagement requires building trust, enhancing awareness of the Project, and providing flexible consultation opportunities, issues resolution and feedback. Key elements of the Plan include:

- Purpose, Principles and Objectives of consultation;
- Identification of Interested Indigenous Groups;
- Consultation Approach;
- Methods and Timing of Consultation; and
- Communication and Issues resolution strategy.

This Plan outlines the activities that FMG will undertake as part of the EA process. The specific details are flexible and will be finalized based on ongoing feedback from Indigenous communities.

In particular, given the COVID-19 pandemic, consultation and engagement activities will need to remain flexible. Traditional methods including in-person meetings may not be feasible during the EA process, and alternate methods will be used to ensure that the purpose and objectives of consultation are met, while being consistent with the principles of successful consultation. Methods involving virtual meeting tools, conference calls and email will be discussed with Indigenous communities to identify mutually agreeable methods.

Indigenous communities have been engaged in a discussion regarding how they wish to be consulted before this Plan was revised for the final Amended Terms of Reference (ToR), as noted in Section 4.

Communities will have an opportunity to provide input on potential consultation approaches before they are carried out. Community-specific discussions will continue with the Indigenous communities noted in Section 3 to ensure their specific circumstances and needs are met in a manner reflective of the potential for impact to each community and while progressing the environmental assessment for the Undertaking in a predictable timeline. In particular, FMG will engage with the Shared Territory Protocol Nations (Cat Lake First Nation, Slate Falls Nation and Lac Seul First Nation) to develop a mutually-agreeable community-specific consultation plan to be carried during the environmental assessment process for the Undertaking.

Consultation planning will consider reasonable capacity support provided to each community based on potential level of impact, and consultation methods, tools and techniques to ensure meaningful consultation can take place during the EA process. Efforts will be made to coordinate independent technical reviews and information sharing between communities where possible to reduce duplication. The timing of when communities should be consulted will also be included

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and is intended to align with the EA process phases of pre and post EA submission to ensure adequate consultation is completed throughout the process.

## **2. Consultation Purpose, Principles and Objectives**

### **2.1. Consultation Purpose**

The purpose of consultation for the preparation of the EIS / EA is to engage Indigenous communities through various methods to gather feedback on the Undertaking and promote environmentally responsible decision-making. Meaningful consultation is a two-way communication process that involves affected and interested persons in the planning, implementation, and monitoring of the Undertaking. It requires providing information and collaborating to:

- Identify concerns that may arise throughout the EIS / EA process;
- Create opportunities to develop FMG's commitments and responses to local input; and
- Provide appropriate information to the Ministry of the Environment, Conservation and Parks to enable fair and balanced decision-making.

During the overall EA process, input will be sought on various topics including baseline information, alternatives, effects assessment, mitigation measures, and monitoring.

### **2.2. Consultation Principles**

A successful consultation process involves the development of principles to guide the Plan. FMG takes a partnership model to its community relations approach as mutual responsibility and respect for community values is integral for successful consultation. FMG believes that proactive communication facilitates direct consultation with local communities. FMG seeks to work with communities to provide meaningful benefits of mining locally.

FMG understands that Indigenous consultation is the foundation of positive Indigenous community relations. FMG believes that Indigenous consultation is based on principles of trust, respect, flexibility, openness and transparency.

Overall, FMG's key strategies to achieve successful consultation and engagement with Indigenous communities include:

- Understanding the information needs and capabilities of the community, and tailoring consultation opportunities to the local context;
- Identifying key community leaders;
- Working with the community to develop the goals and objectives of the consultation and engagement program, and asking participants for continuous feedback on how the Indigenous engagement program is working for them;
- Involving participants early;

- 
- Being open and transparent;
  - Seek, consider and incorporate feedback into the EA;
  - Providing clear, concise and relevant information; and
  - Focusing the timing of engagement and consultation activities at key decision milestones.

Consultation with Indigenous communities will continue throughout the EA process in an open and transparent manner. Consultation will be proactive, flexible, and based on a goal of continuous improvement particularly as Indigenous communities, the community and interested persons identify how they prefer to be involved. This will build on FMG's existing relationships and will ensure that participants are engaged in dialogue about the current environment, project activities, potential effects, and management measures.

### **2.3. Consultation Objectives**

The objectives of FMG's consultation program are to:

- Establish formal, agreed-upon protocols and approaches to consultation with individual Indigenous communities if requested by the Nation including identifying and scoping potential consultation and engagement activities to be conducted throughout the life of the Project.
- Provide the Indigenous communities and interested persons with opportunities to understand the proposed Project, identify potential environmental impacts, and potential effects to Aboriginal and/or Treaty Rights and interests;
- Identify, consider, and respond to feedback at key decision-making milestones during the EA process, baseline information, alternatives, effects assessment, mitigation measures, and monitoring;
- Demonstrate where reasonable how project designs or management practices address comments and help to reduce or avoid identified adverse impacts;
- If the proposed Project cannot be modified in a certain manner, provide rationale;
- Document and respond to comments, concerns and interests raised throughout the consultation process; and
- Meet regulatory requirements for consultation during the EIS / EA preparation.

FMG will provide opportunities for Indigenous communities to be engaged throughout the EA process, so that Indigenous communities may provide input on how the proposed Undertaking and its alternatives may have an impact on their rights and interests through the sharing of Traditional Knowledge and Traditional Land Use information (TK/TLU); and that FMG will consider and incorporate, where appropriate and available, TL/TLU into each component of the EA.

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### **3. Identification of Interested Indigenous Groups**

Following the voluntary agreement between the provincial government and FMG, a list of potentially impacted communities was provided by MECP. The Impact Assessment Agency of Canada (the Agency) has also provided a list of Indigenous communities, which is similar to the list provided by MECP, with the exception of the Ojibway Nation of Saugeen and Pikangikum First Nation. Upon receipt of the list from MECP and the Agency, FMG created a master matrix for each community (Chief and Council). The master matrix can be found in Table F.1 in Appendix F and the list from MECP includes the following communities:

- Cat Lake First Nation;
- Slate Falls First Nation;
- Lac Seul First Nation;
- Mishkeegogamang First Nation;
- Métis Nation of Ontario;
- Ojibway Nation of Saugeen;
- Wabauskang First Nation; and
- Pikangikum First Nation.

FMG intends to continue information sharing and consultation through the EA process with these communities. FMG will continue to work with MECP and the Agency to adjust consultation activities with Aboriginal rights / interest-based communities going forward in the EA process.

#### **3.1. Participant Support**

FMG will address the reasonable costs associated with providing information about the Project and the EA processes to Indigenous communities and support for expert review and advice for the local Indigenous communities. Information will be provided in a format that is accessible and supports planned meetings or information sessions used to build an understanding of the Project. This will support the meaningful participation of Indigenous communities in the Project and the EA process.

### **4. Feedback Received from Indigenous communities on Consultation**

Community consultation and engagement meetings have been ongoing since July 24, 2018 with the following interested communities:

- Cat Lake First Nation;
- Lac Seul First Nation;
- Slate Falls Nation;

- Métis Nation of Ontario.
- Mishkeegogamang First Nation;
- Ojibway Nation of Saugeen; and
- Wabauskang First Nation;

As a result of these meetings, the proposed Indigenous consultation plan has been revised based on the feedback received from Indigenous communities, which is summarized in Table 1.

**Table 1: Input Incorporated into the Proposed Indigenous Consultation Plan for the EA**

<b>Indigenous Community</b>	<b>Summary of Comment / Concern</b>	<b>Summary of FMG Response</b>	<b>RoC Reference</b>	<b>Consultation Plan Section</b>
Cat Lake First Nation	Request for translator during consultation events	FMG will engage a translator for future events.	Table 7-7	Section 5
Lac Seul First Nation	Request for consultation events and methods to consider timing and transportation needs of community	FMG will work with the community to ensure that meetings are scheduled with suggested aspects in mind.	Table 7-9	Section 1
Lac Seul First Nation	Request for translator during consultation events.	FMG will engage a translator for future events.	Table 7-17	Section 5
Metis Nation of Ontario	Request for technical studies to be reviewed	FMG will provide MNO with technical studies to be reviewed.	Table 7-14	Section 5.2
Mishkeegogamang First Nation	Various comments and suggestions regarding consultation methods, including public meetings, one-on-one/small group meetings, presenting plain language information	Community consultation is a requirement of the EA process and FMG will be continuing engagement,	Table 7-5	Section 5, Section 5.2 and Table 2
Slate Falls Nation	Provided input into consultation methods, including advertising on radio, increased Elder attendance, and more detail on mine construction.	Comments were noted and will be incorporated into future consultation events	Table 7-11	Section 5.2 and Table 2
Wabauskang First Nation	Input into consultation methods, including request to include Elders in meetings, presentation	FMG will provide the opportunity for a cross-section of the community to participate in consultation events and incorporate suggestions into future events.	Table 7-12, Table 7-15	Section 5.2 and Table 2

Indigenous Community	Summary of Comment / Concern	Summary of FMG Response	RoC Reference	Consultation Plan Section
	suggestions and handouts/factsheets			

## 5. Proposed Approach to Indigenous Consultation

Consultation will take place through the leadership of each Indigenous community, or through individuals as delegated by community leadership. It is also important to involve members of these communities through consultation and engagement activities. Consultation activities that seek to broadly engage the Indigenous community will assist in identifying issues that may be unknown to leadership and provide balance to dissenting views amongst the Indigenous community. Inclusive consultation also helps build better understanding of issues to be resolved.

The focus of Indigenous consultation and engagement activities will be primarily on those potentially affected Indigenous communities with an emphasis on those closest to the Project. Where a community, group, or individual identifies potential significant relevant impacts, FMG will provide an opportunity for that community, group or individual to be more involved in the EA process.

When requested by the Indigenous community, interpretation and translation of presentation or printed materials into their language will be made available.

Initial contact has been and will continue to be made with the leadership of each of the Indigenous communities, which in the case of First Nations will be the Band Chief and Council. Discussions or correspondence will include the First Nation Chief and Council unless directed otherwise by the Chief.

Where consultation activities with the Métis in Ontario are concerned, consultation was initiated with the Métis Nation Ontario (MNO) and has subsequently focused with the region-specific consultation committee (Region 1 Consultation Committee). Consultation activities will be designed based on the needs of the communities. FMG will seek feedback on proposed consultation activities and adjust the approach accordingly.

When necessary, FMG will provide financial and technical support to communities to enable them to provide meaningful input and feedback through document reviews and related studies. FMG will prepare and make available plain language documents to facilitate the understanding of the various studies required in the EIS / EA.

The level of consultation and engagement reflects Indigenous communities and their level of interest and influence. It includes the distribution of information, the seeking of information from Indigenous communities (e.g., identification of issues and concerns, opportunities and local knowledge), and opportunities to involve the participants in discussion of issues and the development of solutions and incorporating issues discussed into project design and development.

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Consultation and engagement will continue for the life of the Project and where necessary, beyond. The form of this consultation will include activities as detailed below in Section 5.2 and Table 2.

### **5.1. Consultation Activities and Implementation**

Indigenous communities will be asked to participate throughout the preparation of the EA process.

All communities were sent correspondence on August 29, 2018 with the Notice of Commencement (NoC) for the ToR. FMG has been consulting the Indigenous communities on the Project overview and Draft ToR to gain input on how the EA will be carried out. Indigenous communities that may be potentially impacted by the Project have been invited and will continue to be invited to discuss and comment on the Project components and process.

FMG will encourage local Indigenous communities to be involved in the collection of environmental baseline data.

The objective of consultation to date has been to scope issues about the Project and potential environmental effects that should be addressed in the EA. Future consultation activities will focus on the preparation of the EIS / EA. The consultation on the EA will be organized based on the EA process including baseline, effects assessment, and mitigation and monitoring.

### **5.2. Methods of Reaching Out to Indigenous Communities**

FMG intends to reach out to Indigenous communities as follows:

- *Virtual meetings and social media* – FMG will utilize virtual meeting methods such as Zoom, Microsoft Teams and other suitable software to meet with Indigenous communities during the EA process. In addition, several social media platforms (i.e. YouTube, Facebook, Twitter) will be considered for engagement with communities through the EA process to facilitate discussions on various topics such as baseline environmental, valued components/criteria/indicators, alternatives, and effects assessment.
- *Contact lists* – FMG has created a contact list of all participating Indigenous communities / groups, which will be maintained throughout the duration of the EA process.
- *Issues Scoping Meetings* – FMG will continue to meet with Indigenous communities throughout the EA process, particularly during the development of EIS / EA.
- *Engagement in Environmental Baseline Studies* – FMG will engage Indigenous Environmental Monitors for the local Indigenous communities closest to the Project to supplement field teams in collecting environmental baseline information. The Environmental Monitor acts as the community's eyes and ears on-site to ensure traditional interests are protected. A key role of the Environmental Monitor is to communicate environmental findings to community leadership for consideration on mitigation / support decisions. Further, the Environmental Monitor may solicit and recruit community participation in engagement activities in a manner that supports the needs of the community.

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- *Engagement in TK/TLU Studies* – The conduct of TK/TLU studies will be discussed with each community to determine timing, scope and resources.
  - *Community Meetings/Open Houses* – FMG will endeavor to host meetings in each First Nations community, as appropriate. Open houses for Métis will be held at appropriate venue(s) in locations to be determined jointly with MNO. These would be in addition to any community - led open houses that FMG would participate in.
  - *Notice and Radio Announcements* – FMG will publish a Notice of Commencement at the beginning of the EA process, notices of Open House events during the EA process and a Notice of Submission at the end of the EA process in local newspapers and by mail to Indigenous communities. FMG will continue to air radio announcements of specific community events, as appropriate.
  - *Circulation of preliminary documents (environmental baseline reports and portions of the EIS / EA)* – Where appropriate, FMG will circulate preliminary documents for information and feedback. Where possible, these documents will be provided to Indigenous communities prior to public release. FMG will work with Indigenous communities to determine appropriate timelines for feedback. FMG will review and gather feedback on baseline studies, valued components / criteria / indicators alternatives, potential effects, mitigation measures and closure planning.
  - *Plain Language Summaries* – FMG will circulate plain language summaries of technical documents (as appropriate) to ensure that feedback can be received by non-technical reviewers.
  - *Factsheets* – FMG will continue to develop factsheets on various topics, to be circulated electronically and made available on the Project website.
  - *General Meetings/Presentation* – FMG will continue to undertake face-to-face meetings/presentations with communities and/or Chief and Council, as appropriate, throughout the EA process.
  - *Newsletter* – FMG will develop Project Newsletters at key milestones, to be circulated electronically and made available on the Project website.
  - *Project Website* – FMG will continue to maintain a Project website throughout the duration of the Undertaking.
  - *Notice and circulation of a draft EIS/EA report for review* – First Mining Gold Corp. will provide an opportunity for Indigenous communities to review and provide comments on a draft EIS/EA report. A comment period lasting a minimum of six weeks will be provided.

FMG will use the methods mentioned above to notify and collect feedback from interested persons.

Throughout the consultation process, the results of consultation will be documented to ensure that key issues, concerns, and interests are recorded, and FMG responses are prepared to address the concern. FMG will review with Indigenous communities how issues, concerns and interests have been considered / addressed in the environmental assessment of the Undertaking.

FMG will continue to keep records of formal communications and correspondence as well as a communication log. This information will be available to contribute to identifying potential impacts and effects, and to support the determination of appropriate measures throughout the environmental assessment.

The above list methods are planned to support the preparation and review of the EA and stated consultation objectives.

Table 2 outlines the potential range of consultation activities, including the approximate timing, that may be carried out during the preparation and review of the EA.

**Table 2: Summary of Potential Consultation and Engagement Activities**

Consultation Activity	Description	Approximate Timing / Key Milestones
One-on-One Meetings	<ul style="list-style-type: none"> <li>Meetings between FMG and Indigenous communities to discuss aspects of the Springpole project, permitting, baseline studies, alternative assessments, mitigation and effects, and monitoring.</li> <li>Project development and mining operations.</li> <li>Development of opportunities to interview elders identified by community leadership as holding important traditional knowledge.</li> <li>Share information relating to our project.</li> </ul>	Throughout the EA process, including: <ul style="list-style-type: none"> <li>Notice of EA Commencement</li> <li>During the development of the EIS / EA report</li> <li>Pre-submission of the EA</li> <li>After formal submission of the EA</li> </ul>
Virtual Meetings	<ul style="list-style-type: none"> <li>Virtual meetings using Zoom, Microsoft Teams, etc to discuss topics related to the Springpole Gold Project with Indigenous community leadership and members.</li> </ul>	Throughout the EA process, as appropriate
Site Tours	<ul style="list-style-type: none"> <li>Community tours to provide an understanding of the size and layout of the Project.</li> </ul>	Throughout the EA process, as appropriate
Community Updates Newsletters, Brochures, Factsheets.	<ul style="list-style-type: none"> <li>“FMG press” newsletter which includes Project updates and FAQs. Flyers and factsheets will also be used by FMG to communicate the progress of the Project, issues, advertising events including engagement opportunities and invite feedback. Regular contributions to local community newsletters and the interested communities’ websites. This extends to information on web sites and other forms of social media.</li> </ul>	Throughout the EA process, including: <ul style="list-style-type: none"> <li>Notice of EA Commencement</li> <li>During the development of the EIS / EA report</li> <li>Pre-submission of the EA</li> <li>After formal submission of the EA</li> </ul>
Advertisements / Articles	<ul style="list-style-type: none"> <li>Advertisements may include notices in local newspapers for key EA milestones and events, whereas articles may include distribution in local paper for information on key issues, specific events, updates on upcoming field programs and to invite feedback.</li> </ul>	Throughout the EA process, including: <ul style="list-style-type: none"> <li>Notice of EA Commencement</li> <li>During the development of the EIS / EA report</li> <li>Pre-submission of the EA</li> <li>After formal submission of the EA</li> </ul>

Consultation Activity	Description	Approximate Timing / Key Milestones
Email Distribution List	<ul style="list-style-type: none"> <li>Written communication addressed to affected parties using the distribution list compiled from community meeting, site tours, public submissions etc. It outlines the issues, coming events and invites comment.</li> </ul>	Throughout the EA process, as appropriate
Workshop and Focus Group	<ul style="list-style-type: none"> <li>Participants will be invited because they are residents in the interested communities or because they have an involvement or interest in the subject being discussed. The purpose is to find out the range of opinions that exist on a topic.</li> </ul>	Throughout the EA process, including: <ul style="list-style-type: none"> <li>Notice of EA Commencement</li> <li>During the development of the EIS / EA report</li> <li>Pre-submission of the EA</li> <li>After formal submission of the EA</li> </ul>
Questionnaires/Surveys	<ul style="list-style-type: none"> <li>Outline or paper-based questionnaire requesting feedback on a specific issue or project.</li> </ul>	Throughout the EA process, as appropriate
Public Submissions	<ul style="list-style-type: none"> <li>Written correspondence received from the community (usually addressed to government) following the announcement of a project or a release of information.</li> </ul>	Throughout the EA process, including: <ul style="list-style-type: none"> <li>Notice of EA Commencement</li> <li>During the development of the EIS / EA report</li> <li>Pre-submission of the EA</li> <li>After formal submission of the EA</li> </ul>
Community Communications	<ul style="list-style-type: none"> <li>Written correspondence (letters, emails, enquires on website), verbal correspondence (phone calls, face-to-face meetings and informal discussions that require actions/follow-up) received from Indigenous communities.</li> </ul>	Throughout the EA process, as appropriate
Project Website	<ul style="list-style-type: none"> <li>Online resource (<a href="https://firstmininggold.com/projects/tier-1/springpole-project/">https://firstmininggold.com/projects/tier-1/springpole-project/</a>) for communities to access information about the Project at any time. Project website will publish FAQs, information sheets and approval documentation.</li> <li>FMG to develop a Springpole webpage with contact information for FMG and government resource and potentially interactive platform. All interactions will be recorded. Address and URL will be provided.</li> <li>Links will be provided to social media platforms where additional information may be found, such as technical interviews and various EA topics</li> </ul>	Throughout the EA process, as appropriate
Social Media Platforms	<ul style="list-style-type: none"> <li>Social media platforms such as YouTube, Facebook, Twitter may be used to engage Indigenous community members in discussions on various topics related to the Springpole Gold Project</li> </ul>	Throughout the EA process, as appropriate

Consultation Activity	Description	Approximate Timing / Key Milestones
Open House/Information Session, Exhibitions, Display	<ul style="list-style-type: none"> <li>An open house for community members to drop in. Presence at community events such as career fairs &amp; other events FMG is invited to attend, to provide one-on-one question and answers. Information sessions are forms used when important information is required to be delivered to the wider community. Some will be attended by an expert consultant when required or requested by the community.</li> <li>Virtual open houses and supporting virtual tools may also be used</li> </ul>	Throughout the EA process, including: <ul style="list-style-type: none"> <li>Notice of EA Commencement</li> <li>During the development of the EIS / EA report</li> <li>Pre-submission of the EA</li> <li>After formal submission of the EA</li> </ul>
Community Consultation Group	<ul style="list-style-type: none"> <li>A community group that allows for open discussion between representatives of the Company and Indigenous communities on issues directly relating to the Projects and environmental or social impacts, and to keep the community informed on these matters. These groups are not decision-making bodies; however, they provide a forum for communities and companies to engage and identify and consider issues and optimise community benefit.</li> </ul>	Throughout the EA process, including: <ul style="list-style-type: none"> <li>Notice of EA Commencement</li> <li>During the development of the EIS / EA report</li> <li>Pre-submission of the EA</li> <li>After formal submission of the EA</li> </ul>
Community Partnership or Sponsorship	<ul style="list-style-type: none"> <li>Collaborations between a company and Indigenous government, community or business groups or an individual towards a shared goal. Goals can be wide ranging and be tailored to suit the communities. They may include sponsoring an event or community facility. The establishment of a formal sponsorship program will provide a transparent method for community support initiatives.</li> <li>Participate in various community events such as Pow Wow, Festivals (2019 Blueberry Festival – Sioux Lookout), Career Fairs, etc.</li> </ul>	Throughout the EA process, as appropriate
Telephone Line and Email Address	<ul style="list-style-type: none"> <li>An FMG contact number and dedicated community email are useful tools for communities to ask for information, raise issues or make comments.</li> </ul>	Throughout the EA process, as appropriate
Group Presentation	<ul style="list-style-type: none"> <li>Meetings held with individual Chief and Councils and MNO. All interactions will be recorded.</li> </ul>	Throughout the EA process, including: <ul style="list-style-type: none"> <li>Notice of EA Commencement</li> <li>During the development of the EIS / EA report</li> <li>Pre-submission of the EA</li> <li>After formal submission of the EA</li> </ul>

Consultation Activity	Description	Approximate Timing / Key Milestones
Information Center	<ul style="list-style-type: none"> <li>Where requested, Information Centers set up in each community (Band office and either store or Health Centre) and in designated municipalities at the local library (mandated by CEAA and MECP). These centres can include print copies of important documents, e.g., PD/PD Summary, Fish Study, a project map, a poster with future meeting dates, pre-paid postcards with space for questions or comments and contact details for FMG and the contact details of the person sending the card for follow-up. In specific First Nations there will also be a survey available for individuals or families to complete and submit.</li> <li>Virtual tools and links to social media platforms (i.e YouTube) may be used to supplement the Information Centers</li> </ul>	Throughout the EA process, as appropriate
Off-Reserve Meetings	<ul style="list-style-type: none"> <li>Presentation and feedback gathering activities where there are identified concentrations of Indigenous Community members living in local communities.</li> </ul>	Throughout the EA process, including: <ul style="list-style-type: none"> <li>Notice of EA Commencement</li> <li>During the development of the EIS / EA report</li> <li>Pre-submission of the EA</li> <li>After formal submission of the EA</li> </ul>
Community Survey	<ul style="list-style-type: none"> <li>Voluntary survey to elicit feedback from on-reserve community members and their families, particularly those who have not attended our interactive sessions. All responses will be recorded.</li> </ul>	Throughout the EA process, as appropriate
Mail-in-Card	<ul style="list-style-type: none"> <li>Pre-paid postcard with areas for contact information for further information, space for questions or concerns, and the senders contact information. All respondents' concerns will be recorded</li> </ul>	Throughout the EA process, as appropriate
Radio	<ul style="list-style-type: none"> <li>FMG to utilize local radio to promote the project and to provide updates and information regarding upcoming public meetings, etc.</li> </ul>	Throughout the EA process, as appropriate

## 6. Communication and Issue Resolution

### 6.1. Notification Requirements

FMG will advertise the following Notices in local newspapers (general distribution and Indigenous newsletters where available), through radio announcements, and on the project website. FMG will complete the necessary notifications as per Appendix B of the Code of Practise for Consultation in Ontario's Environmental Assessment Process:

- Notice of Submission of ToR;

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- Notice of Commencement of EA;
  - Notices of Submission of the EA.

Additional notification includes:

- Notice of Consultation Events;
- Notice of Completion of Ministry review of EA; and
- Notice of Minister's Decision.

These notices will also be given to the leadership of potentially affected Indigenous communities, and community members that have expressed interest in the undertaking. As a minimum, all notices will be published and/or posted in the same locations for consistency, unless it is determined that the locations are not appropriate. There may be additional notifications from the government agencies outside of those listed above. FMG will also continue to provide notification and consultation materials in both official languages.

## **6.2. Issue Tracking and Resolution**

FMG is maintaining an electronic record of its consultation activities for the Project. The system being used will track records of consultation that occur between FMG and Indigenous communities. This will be used to generate reports that include:

- Who was engaged and consulted;
- When, where and by what method the activity took place;
- What issues/interests were shared and how they were addressed;
- FMG will provide summaries of engagement, issues, and responses to issues in a Record of Consultation that will be submitted with the ToR and EA documents; and
- Follow-up actions or commitments arising from consultation activities.

Correspondence regarding the Project obtained by the Agency, MECP or other government agencies will not necessarily be included, and therefore, the database is a record of FMG led consultation activities.

FMG recognizes the benefit of resolving issues early and to the mutual satisfaction of those involved. To this end, Indigenous communities bringing forward an issue of concern regarding the Project will receive a response containing information to help clarify and/or assist in issue resolution.

All comments from Indigenous communities as well as responses from FMG will be documented, and where applicable, will be considered in the EA processes. Input from Indigenous communities will be obtained at open houses, meetings, and personal contact through verbal and written comments (i.e., comment forms). Depending on the magnitude and nature of any concerns, FMG

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will make every effort to address and resolve the concern directly with the Indigenous communities.

An issue may arise where agreement on a resolution cannot be readily reached; in these cases, FMG will continue to work to resolve the issue and, where necessary, involve third parties. Third parties may include provincial representatives, mediators, or legal counsel depending on the nature of the issue. Third parties will be asked to provide advice, facilitate discussion, and provide guidance on approaches to resolving issues. The government will be notified of any outstanding issues and documented in the Record of Consultation. Rationales will be provided for comments / issues that were not addressed in the EA.

### **6.3. Plan Evaluation**

FMG will evaluate consultation activities and the consultation process to ensure successful and timely implementation. FMG is committed to continual improvement of this Plan and recognizes that it is a living document that will be revised as the Project progresses. Evaluation of these activities will be solicited from participants in the process and will be used to improve/refine ongoing activities as appropriate.

Evaluations may be conducted using a variety of methods, including:

- Targeted participant questionnaires; or
- Recording verbal feedback provided from participants and through the Project website.

The evaluations will be undertaken on an on-going basis throughout the EA.

## **7. Ongoing Consultation**

FMG is committed to continuing consultation with Indigenous communities as the Project progresses through construction, operation, and decommissioning / closure. FMG will revise plans for consultation based on evaluation and in response to expressed interests.

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**Appendix E2**  
**Public Engagement Plan**

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## **Appendix E.2: Public Engagement Plan**

### **1. Overview**

FMG has developed this Public Consultation Plan (the Plan) for the Project. The Plan is a living document and will be reviewed regularly and updated as needed during the EA. The intent of the Plan is to provide a process for meaningful engagement with all stakeholders throughout the life of the Project. Effective and meaningful communication/engagement requires building trust between the Project team and stakeholders, enhancing awareness of the Project, and providing flexible consultation opportunities, issues resolution and feedback. Key elements of the Plan include:

- Purpose, Principles and Objectives of consultation;
- Identification of Interested Indigenous Groups;
- Consultation Approach;
- Methods and Timing of Consultation; and
- Communication and Issues resolution strategy.

This Plan outlines the activities that FMG will undertake as part of the EA process. The specific details are flexible and can be finalized based on ongoing feedback from Indigenous communities, the public, other stakeholders, and government reviewers.

In particular, given the COVID-19 pandemic, consultation and engagement activities will need to remain flexible. Traditional methods including in-person meetings may not be feasible during the EA process, and alternate methods will be used to ensure that the purpose and objectives of consultation are met, while being consistent with the principles of successful consultation. Methods involving virtual meeting tools, conference calls and email will be discussed with stakeholders and Indigenous communities to identify mutually agreeable methods.

In particular, public stakeholders will be engaged in a discussion regarding how they wish to be consulted, before any plans are finalized. Communities will have an opportunity to provide input on potential consultation plans before they are carried out.

### **1. Consultation Purpose, Principles and Objectives**

#### **1.1. Consultation Purpose**

The purpose of consultation for the preparation of the EIS / EA is to engage communities and stakeholders through various methods to gather feedback on the Undertaking and promote environmentally responsible decision-making. Meaningful consultation is a two-way communication process that involves affected and interested persons in the planning, implementation, and monitoring of the Undertaking. It requires providing information to and collaborating to:

- Identify concerns that may arise throughout the EIS / EA process;

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- Create opportunities to develop FMG's commitments and responses to local input; and
  - Provide appropriate information to the Ministry of the Environment, Conservation and Parks (MECP) to enable fair and balanced decision-making.

During the overall EA process, input will be sought on various topics including baseline information, alternatives, the effects assessment, mitigation measures, and monitoring.

## **1.2. Consultation Principles**

A successful consultation process involves the development of principles to guide the Plan. FMG takes a partnership model to its community relations approach as mutual responsibility and respect for community values is integral for successful consultation. FMG believes that proactive communication facilitates direct consultation with local communities. FMG seeks to work with communities to provide meaningful benefits of mining locally.

FMG understands that consultation is the foundation of positive community relations. FMG believes that consultation is based on principles of trust, respect, flexibility, openness and transparency.

Overall, FMG's key strategies to achieve successful consultation and engagement with communities and stakeholders include:

- Understanding the information needs and capabilities of the community, and tailoring consultation opportunities to the local context;
- Identifying key stakeholders and community leaders;
- Working with the community to develop the goals and objectives of the consultation and engagement program, and asking participants for continuous feedback on how the engagement program is working for them;
- Involving participants early;
- Being open and transparent;
- Seek, consider and incorporate feedback into the EA;
- Providing clear, concise and relevant information; and
- Focusing the timing of engagement and consultation activities at key decision milestones.

Consultation with communities will continue throughout the EA process in an open and transparent manner. Consultation will be proactive, flexible, and based on a goal of continuous improvement particularly as communities and interested persons identify how they prefer to be involved. This will build on FMG's existing relationships and will ensure that participants are engaged in dialogue about the current environment, project activities, potential effects, and management measures.

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### 1.3. Consultation Objectives

The objectives of FMG's consultation program are to:

- Provide the communities and interested persons / stakeholders with opportunities to understand the proposed Project, and identify potential socio-environmental impacts;
- Identify, consider, and respond to feedback on the EA process, baseline information, alternatives, effects assessment, mitigation measures, and monitoring;
- Demonstrate where reasonable how project designs or management practices address comments and help to reduce or avoid identified adverse impacts;
- If the proposed Project cannot be modified in a certain manner, provide rationale;
- Document and respond to comments, concerns and interests raised throughout the consultation process; and
- Meet regulatory requirements for consultation during the EIS / EA preparation.

FMG will provide opportunities for communities to be engaged throughout the EA process, so that communities may provide input on how the proposed Undertaking and its alternatives may have an impact on their interests; and that FMG will consider and incorporate, where appropriate and available, community knowledge into each component of the EA.

## 2. Identification of Public Stakeholders

According to the Code of Practise Consultation in Ontario's Environmental Assessment Process proponents are required to consult with potentially interested persons before making an application for approval under the *Environmental Assessment Act*. Based on the complexity and environmental sensitivity of an undertaking to communities within the Project area, as well as those land users that maybe impacted by the Project, FMG created a master multi-stakeholder matrix that lists each public stakeholder by group. The master multi-stakeholder matrix can be found in Table F.1 in Appendix F and the list of groups includes the following:

- Group 4: Community, Associations and Civil Society.

FMG intends to continue consultation through the EA process with a wide range of stakeholders, including but not limited to those identified in Table F.1. FMG will continue to work with MECP and the Agency to adjust consultation activities with public interest-based communities going forward in the EA process.

Where a community, group, or individual identifies potential significant relevant impacts, FMG will provide an opportunity for that community, group or individual to be more involved in the EA process.

### 2.1. Participant Support

FMG bears the cost associated with providing information about the Project and the EA processes to the Public that is in a format that is accessible and for conducting any meetings or information

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sessions that build an understanding of the Project so that any interested individuals or groups may meaningfully participate in the Project and EA.

### **3. Consultation Activities and Implementation**

Interested stakeholders will be asked to participate throughout the preparation of the EA. FMG has been consulting interested stakeholders on the Undertaking and EA process to gain input on how the EA will be carried out. Interested stakeholders that may be potentially impacted by the Project have been and will continue to be invited to discuss and comment on the Undertaking and process. Consultations that have occurred to date are documented in the Record of Consultation.

The objective of consultation to date has been to scope issues about the Project and potential environmental effects that should be addressed in the EA. Future consultation activities will focus on the preparation of the EIS / EA. The consultation on the EA will be organized based on the EA process including baseline, effects assessment, and mitigation and monitoring.

#### **3.1. Methods of Reaching Out to the Public**

FMG intends to reach out to the Public as follows:

- *Virtual meetings and social media* – FMG will utilize several social media platforms (i.e. YouTube, Facebook, Twitter) for engagement with the public through the EA process to facilitate discussions on various topics such as baseline environmental, valued components/criteria/indicators, alternatives, and effects assessment.
- *Contact lists* – FMG has created a contact list of all interested stakeholders, which will be maintained throughout the duration of the EA process.
- *Issues Scoping Meetings* – FMG will continue to meet with all interested stakeholders the EA process, particularly during the development of EIS / EA.
- *Community Meetings/Open Houses* – FMG will endeavor to host meetings in each municipality, as appropriate.
- *Notice and Radio Announcements* – FMG will publish a Notice of Commencement at the beginning of the EA process, notices of Open House events during the EA process and a Notice of Submission at the end of the EA process in local newspapers and by mail to stakeholders. FMG will continue to air radio announcements of specific community events, as appropriate.
- *Circulation of preliminary documents (environmental baseline reports and portions of the EIS / EA)* – Where possible, FMG will make the documents available on the Project website. . FMG will gather feedback and review comments provided on baseline studies, evaluation and selection of alternatives, potential effects and mitigation measures and closure planning.
- *Plain Language Summaries* – FMG will circulate plain language summaries of technical documents (as appropriate) in order to ensure that feedback can be received by non-technical reviewers.

- *Factsheets* – FMG will continue to develop factsheets on various topics, to be circulated electronically and made available on the Project website.
- *General Meetings/Presentation* – FMG will continue to undertake face-to-face meetings/presentations with all interested stakeholders, as appropriate, through the EA process.
- *Newsletter* – FMG will develop Project Newsletters at key milestones, to be circulated electronically and made available on the Project website.
- *Project Website* – FMG will continue to maintain a Project website throughout the duration of the Undertaking.
- *Notice and circulation of a draft EIS/EA report for review* – First Mining Gold Corp. will provide an opportunity for interested persons to review and provide comments on a draft EIS/EA report. A comment period lasting a minimum of six weeks will be provided.

FMG will use the methods mentioned above to notify and collect feedback from interested persons.

Throughout the consultation process, the results of consultation will be documented to ensure that key issues, concerns, and interests are recorded, and FMG responses are prepared to address the concern. FMG will discuss with all public stakeholders' issues, concerns and interests have been considered / addressed in the environmental assessment of the Undertaking.

FMG will continue to keep records of formal communications and correspondence as well as a communication log. This information will be available to contribute to identifying potential impacts and effects, and to support the determination of appropriate measures throughout the environmental assessment.

The level of consultation and engagement reflects the stakeholder groups and their level of interest and influence. It includes the distribution of information, the seeking of information interested persons/stakeholders (e.g., identification of issues & concerns, opportunities and local knowledge), and opportunities to involve the participants in discussion of issues and the development of solutions and incorporating issues discussed into project design and development.

Table 1 outlines the potential range of consultation activities, including the approximate timing, that may be carried out during the preparation and review of the EA.

**Table 1: Summary of Potential Public Consultation and Engagement Activities**

<b>Consultation Activity</b>	<b>Description</b>	<b>Approximate Timing / Key Milestones</b>
One-on-One Meetings	<ul style="list-style-type: none"> <li>• Meetings held between the Company and Stakeholders from the community to discuss aspects of the Springpole project, permitting, baseline studies Development and mining operations.</li> <li>• All interactions will be recorded.</li> </ul>	Throughout the EA process, including: <ul style="list-style-type: none"> <li>• Notice of EA Commencement</li> </ul>

Consultation Activity	Description	Approximate Timing / Key Milestones
		<ul style="list-style-type: none"> <li>• During the development of the EIS / EA report</li> <li>• Pre-submission of the EA</li> </ul> After formal submission of the EA
Virtual Meetings	<ul style="list-style-type: none"> <li>• Virtual meetings using Zoom, Microsoft Teams, etc to discuss topics related to the Springpole Gold Project with stakeholders.</li> </ul>	Throughout the EA process, as appropriate
Site Tours	<ul style="list-style-type: none"> <li>• Community tours to provide an understanding of the size and layout of the Project.</li> </ul>	Throughout the EA process, as appropriate
Community Updates Newsletters, Brochures, Factsheets.	<ul style="list-style-type: none"> <li>• “FMG press” newsletter which includes Project updates and FAQs. Flyers and factsheets will also be used by FMG to communicate the progress of the Project, issues, advertising events including engagement opportunities and invite feedback. Regular contributions to local community newsletters and the interested communities websites. This extends to information on web sites and other forms of social media.</li> </ul>	Throughout the EA process, including: <ul style="list-style-type: none"> <li>• Notice of EA Commencement</li> <li>• During the development of the EIS / EA report</li> <li>• Pre-submission of the EA</li> </ul> After formal submission of the EA
Advertisements / Articles	<ul style="list-style-type: none"> <li>• Advertisements may include notices in local newspapers for key EA milestones and events, whereas articles may include distribution in local paper for information on key issues, specific events, updates on upcoming field programs and to invite feedback.</li> </ul>	Throughout the EA process, including: <ul style="list-style-type: none"> <li>• Notice of EA Commencement</li> <li>• During the development of the EIS / EA report</li> <li>• Pre-submission of the EA</li> </ul> After formal submission of the EA
Email Distribution List	<ul style="list-style-type: none"> <li>• Written communication addressed to affected parties using the distribution list compiled from community meeting, site tours, public submissions etc. It outlines the issues, coming events and invites comment.</li> </ul>	Throughout the EA process
Questionnaires/Surveys	<ul style="list-style-type: none"> <li>• Outline or paper-based questionnaire requesting feedback on a specific issue or project.</li> </ul>	Throughout the EA process, as appropriate
Public Submissions	<ul style="list-style-type: none"> <li>• Written correspondence received from the community (usually addressed to government) following the announcement of a project or a release of information.</li> </ul>	Throughout the EA process, including: <ul style="list-style-type: none"> <li>• Notice of EA Commencement</li> <li>• During the development of the EIS / EA report</li> <li>• Pre-submission of the EA</li> </ul> After formal submission of the EA

Consultation Activity	Description	Approximate Timing / Key Milestones
Community Communications	<ul style="list-style-type: none"> <li>Written correspondence (letters, emails, enquires on website), verbal correspondence (phone calls, face-to-face meetings and informal discussions that require actions/follow-up) received from stakeholders.</li> </ul>	Throughout the EA process, as appropriate
Project Website	<ul style="list-style-type: none"> <li>Online resource (<a href="https://firstmininggold.com/projects/tier-1/springpole-project/">https://firstmininggold.com/projects/tier-1/springpole-project/</a>) for communities to access information about the Project at any time. Project website will publish FAQs, information sheets and approval documentation.</li> <li>FMG to develop a Springpole webpage with contact information for FMG and government resource and potentially interactive platform. All interactions will be recorded.</li> </ul>	Throughout the EA process
Social Media Platforms	<ul style="list-style-type: none"> <li>Social media platforms such as YouTube, Facebook, Twitter may be used to engage the public in discussions on various topics related to the Springpole Gold Project</li> </ul>	Throughout the EA process, as appropriate
Open House/Information Session, Exhibitions, Display	<ul style="list-style-type: none"> <li>An open house in for community members to drop in. Presence at community events such as career fairs &amp; other events FMG is invited to attend, to provide one-on-one question and answers. Information sessions are forms used when important information is required to be delivered to the wider community. Some will be attended by an expert consultant when required or requested by the community.</li> <li>Virtual open houses and supporting virtual tools may also be used</li> </ul>	Throughout the EA process, including: <ul style="list-style-type: none"> <li>Notice of EA Commencement</li> <li>During the development of the EIS / EA report</li> <li>Pre-submission of the EA</li> </ul> After formal submission of the EA
Community Consultation Group	<ul style="list-style-type: none"> <li>A community group that allows for open discussion between representatives of the Company, the community and other stakeholders on issues directly relating to the Projects and environmental or social impacts, and to keep the community informed on these matters. These groups are not decision-making bodies; however, they provide a forum for communities and companies to engage and identify and consider issues and optimise community benefit.</li> </ul>	Throughout the EA process, including: <ul style="list-style-type: none"> <li>Notice of EA Commencement</li> <li>During the development of the EIS / EA report</li> <li>Pre-submission of the EA</li> </ul> After formal submission of the EA
Community Partnership or Sponsorship	<ul style="list-style-type: none"> <li>Collaborations between a company and community or business groups or an individual towards a shared goal. Goals can be wide ranging and be tailored to suit the communities. They may include sponsoring an event or community facility. The establishment of a formal sponsorship program will provide a transparent method for community support initiatives.</li> </ul>	Throughout the EA process, as appropriate

Consultation Activity	Description	Approximate Timing / Key Milestones
	<ul style="list-style-type: none"> <li>Participate in various community events such as Festivals (2019 Blueberry Festival – Sioux Lookout), Career Fairs, etc.</li> </ul>	
Complaints Management Mechanism	<ul style="list-style-type: none"> <li>This formal process to channel and resolve legitimate issues, concerns or problems that an individual or community has in relation to the Project. This is a mechanism for complaints to be resolved in a timely manner, with their resolution (when appropriate given certain privacy requirements) to be communicated to the community.</li> </ul>	Throughout the EA process
Live Telephone Line and Email Address	<ul style="list-style-type: none"> <li>An FMG contact number<sup>1</sup> and dedicated community email are useful tools for communities to ask for information, raise issues or make comments on the mine operations.</li> </ul>	Throughout the EA process
Information Center	<ul style="list-style-type: none"> <li>Where requested, Information Centers set up in designated municipalities at the local library (mandated by CEAA and MECP). These centres can include print copies of important documents, e.g., PD/PD Summary, Fish Study, a project map, a poster with future meeting dates, pre-paid postcards with space for questions or comments and contact details for FMG and the contact details of the person sending the card for follow-up.</li> <li>Virtual tools and links to social media platforms (i.e YouTube) may be used to supplement the Information Centers</li> </ul>	Throughout the EA process, as appropriate
Municipal Council Meeting	<ul style="list-style-type: none"> <li>Formal presentation by FMG to interested municipal councils. All interactions recorded.</li> </ul>	Throughout the EA process, including: <ul style="list-style-type: none"> <li>Notice of EA Commencement</li> <li>During the development of the EIS / EA report</li> <li>Pre-submission of the EA</li> </ul> After formal submission of the EA
Municipal Public Meetings	<ul style="list-style-type: none"> <li>Formal presentation/information session by FMG at public meetings in each interested municipality. All interactions recorded.</li> </ul>	Throughout the EA process, including: <ul style="list-style-type: none"> <li>Notice of EA Commencement</li> <li>During the development of the EIS / EA report</li> <li>Pre-submission of the EA</li> </ul> After formal submission of the EA
Community Survey	<ul style="list-style-type: none"> <li>Voluntary survey to elicit feedback from the public. All responses will be recorded.</li> </ul>	Throughout the EA process, as appropriate

Consultation Activity	Description	Approximate Timing / Key Milestones
Mail-in-Card	<ul style="list-style-type: none"> <li>Pre-paid postcard with areas for contact information for further information, space for questions or concerns, and the senders contact information. All respondents' concerns will be recorded</li> </ul>	Throughout the EA process
Store Displays	<ul style="list-style-type: none"> <li>Create store displays including a map and a short project description with contact information and links to additional information from both FMG and government sources in each municipality.</li> </ul>	Throughout the EA process, as appropriate
Radio	<ul style="list-style-type: none"> <li>FMG to utilize local radio to promote the project and to provide updates and information regarding upcoming public meetings, etc.</li> </ul>	Throughout the EA process, as appropriate

## 4. Communication and Issue Resolution

### 4.1. Notification Requirements

FMG will advertise the following Notices in local newspapers, public libraries, through radio announcements, and on the project website. FMG will complete the necessary notifications as per Appendix B of the Code of Practise for Consultation in Ontario's Environmental Assessment Process:

- Notice of Submission of ToR;
- Notice of Commencement of EA; and
- Notices of Submission of the EA.

Additional notification includes:

- Notice of Consultation Events;
- Notice of Completion of Ministry review of EA; and
- Notice of Minister's Decision.

These notices will also be given to all those who have expressed interest in the Undertaking (and are on the Multi-Stakeholder Contact List). As a minimum, all notices will be published and/or posted in the same locations for consistency, unless it is determined that the locations are not appropriate. FMG will also continue to provide notification and consultation materials in both official languages as well as having bilingual attendees at all public events.

### 4.2. Issue Tracking and Resolution

FMG is maintaining an electronic record of its consultation activities for the Project. The system being used will track records of consultation that occur between FMG and interested stakeholders. This will be used to generate reports that include:

- 
- Who was engaged and consulted;
  - When, where and by what method the activity took place;
  - What issues / interests were shared and how they were addressed;
  - FMG will provide summaries of engagement, issues and responses to issues in a Record of Consultation that will be submitted with the EIS / EA; and
  - Follow-up actions or commitments arising from consultation activities.

Correspondence regarding the Project obtained by the Agency, MECP or other government agencies will not necessarily be included, and therefore, the database is a record of FMG led consultation activities.

FMG recognizes the benefit of resolving issues early and to the mutual satisfaction of those involved. To this end, interested stakeholders bringing forward an issue of concern regarding the Project will receive a response containing information to help clarify and/or assist in issue resolution.

All comments from interested stakeholders as well as responses from FMG will be documented, and where applicable, will be considered in the EA processes. Input from interested stakeholders will be obtained at open houses, meetings, and personal contact through verbal and written comments (i.e., comment forms). Depending on the magnitude and nature of any concerns, FMG will make every effort to address and resolve the concern directly with interested stakeholders.

Some comments may not be addressed to the participant's satisfaction. An issue may arise where agreement on a resolution cannot be reached; in these cases, FMG will continue to work to resolve the issue and, where necessary, involve third parties. Third parties may include provincial representatives, mediators, or legal counsel depending on the nature of the issue. Third parties will be asked to provide advice, facilitate discussion, and provide guidance on approaches to resolving issues. The government will be notified of any outstanding issues and documented in the Record of Consultation. Rationales will be provided for comments / issues that were not addressed in the EA.

#### **4.3. Plan Evaluation**

FMG will evaluate consultation activities and the consultation process to ensure successful and timely implementation. FMG is committed to continual improvement of this Plan and recognizes that it is a living document that will be revised as the Project progresses. Evaluation of these activities will be solicited from participants in the process and will be used to improve / refine ongoing activities as appropriate.

Evaluations may be conducted using a variety of methods, including:

- Targeted participant questionnaires; or
- Recording verbal feedback provided from participants and through the Project website.

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The evaluations will be undertaken on an on-going basis throughout the EA.

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## **5. Ongoing Consultation**

FMG is committed to continuing consultation with interested persons as the Project progresses through construction, operation, and decommissioning/closure. FMG will develop plans for consultation based on evaluation and in response to expressed interests

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**Appendix E3**  
**Government Consultation Plan**

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## Appendix E.3: Government Consultation Plan

### 1. Overview

FMG has developed this Government Consultation Plan (the Plan) for the Project. The Plan is a living document and will be reviewed regularly and updated as needed during the EA. The intent of the Plan is to provide a process for meaningful engagement with all government stakeholders throughout the life of the Project. Effective and meaningful communication / engagement requires building trust between the Project team and stakeholders, enhancing awareness of the Project, and providing flexible consultation opportunities, issues resolution and feedback. Key elements of the Plan include:

- Identification of Government Stakeholders;
- Consultation Approach;
- Methods and Timing of Consultation; and
- Communication and Issues resolution strategy.

This Plan outlines the activities that FMG will undertake as part of the EA process. The specific details are flexible and can be finalized based on ongoing feedback from government reviewers.

#### 1. Identification of Government Stakeholders

According to the Code of Practise Consultation in Ontario's Environmental Assessment Process proponents are required to consult with potentially interested persons before making an application for approval under the *Environmental Assessment Act*. Based on the complexity and environmental sensitivity of an undertaking to communities within the Project area, as well as those land users that maybe impacted by the Project, FMG created a master multi-stakeholder matrix that lists each public stakeholder by group. The master multi-stakeholder matrix can be found in Table F.1 in Appendix F and the list of groups includes the following:

- Group 2: Municipal Governments (Ear Falls, Red Lake and Sioux Lookout); and
- Group 3: Government and Related Agencies (Provincial and Federal).

FMG intends to continue consultation through the EA process with a wide range of stakeholders, including but not limited to those identified in Table F.1 in Appendix F. FMG will continue to work with the Agency, MECP, and municipal governments, to adjust consultation activities going forward in the EA process.

#### 2. Consultation Approach

Government agencies will be asked to participate throughout the preparation of the EA. FMG has been consulting government agencies on the Undertaking and consulted during preparation of the draft ToR in order to gain input on how the EA will be carried out. Consultations that have occurred to date are documented in the Record of Consultation.

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The objective of consultation has been to scope issues about the Project (generally) and potential environmental effects that should be addressed in the EA. Future consultation activities will focus on the preparation of the EIS / EA. The consultation on the EA will be organized based on the EA process including baseline, effects assessment, and mitigation and monitoring.

FMG will engage with government stakeholders at key EA decision making milestone, including environmental baseline, alternatives and potential effects and mitigation. Given the current limitations imposed by the COVID-19 pandemic, different approaches to engagement through the EA process may need to be considered, which FMG will discuss during the environmental assessment process. These opportunities will be dependent upon the interest of the government stakeholders and may include sharing baseline reports, criteria/indicators, preliminary alternatives assessments, preliminary technical supporting documents or portions of the environmental assessment report.

## **2.1. Methods of Reaching out to Government**

FMG intends to reach out to government departments and agencies as follows:

- *Issues Scoping Meetings* – FMG will continue to meet with all government departments and agencies throughout the development of the Undertaking.
- *Circulation of preliminary documents (environmental baseline reports and portions of the EIS / EA)* – Where appropriate, FMG will circulate preliminary documents for review and comment. Where timing allows, these documents will be provided to government departments and agencies prior to public release. FMG will work with government agencies to determine appropriate timelines.
- *General Meetings / Presentations* – FMG will continue to undertake face-to-face meetings / presentations with government departments and agencies, as appropriate, through the EA process.
- *Project Website* – FMG will continue to maintain a Project website throughout the duration of the Undertaking.
- *Notice and circulation of a draft EIS/EA report for review* – First Mining Gold Corp. will provide an opportunity for government agencies to review and provide comments on a draft EIS/EA report. A comment period lasting a minimum of six weeks will be provided.

FMG will use the methods mentioned above to notify and collect feedback from interested parties.

Throughout the consultation process, consultation results will be documented to ensure that key issues, concerns, and interests are recorded, and responses are completed to determine their level of satisfaction. FMG will discuss with government stakeholders how its issues, concerns and interests and identified relevant impacts are considered, addressed, or incorporated in the EA of the Project.

FMG will continue to keep records of formal communications and correspondence and will provide communication logs that support agreed upon measures. This information will be available to contribute to identifying adverse impacts and effects, and to support a dialogue about appropriate measures throughout the environmental assessment.

Table 1 outlines potential range of consultation activities, including the approximate timing, that may be carried out during the preparation and review of the EA.

**Table 1: Summary of Potential Government Consultation and Engagement Activities**

Consultation Activity	Description	Approximate Timing / Key Milestones
One-on-One Meetings	<ul style="list-style-type: none"> <li>Meetings held between the Company and Government departments agencies to discuss aspects of the Project, permitting, baseline studies development and mining operations.</li> <li>All interactions will be recorded.</li> </ul>	Throughout the EA process, including: <ul style="list-style-type: none"> <li>Notice of EA Commencement</li> <li>During the development of the EIS / EA report</li> <li>Pre-submission of the EA</li> <li>After formal submission of the EA</li> </ul>
Site Tours	<ul style="list-style-type: none"> <li>Site tours to provide an understanding of the size and layout of the Project.</li> </ul>	Throughout the EA process, as appropriate
Project Website	<ul style="list-style-type: none"> <li>Online resource (<a href="https://firstmininggold.com/projects/tier-1/springpole-project/">https://firstmininggold.com/projects/tier-1/springpole-project/</a>) for communities to access information about the Project at any time. Project website will publish FAQs, information sheets and approval documentation.</li> <li>FMG to develop a Springpole webpage with contact information for FMG and government resource and potentially interactive platform. All interactions will be recorded.</li> </ul>	Throughout the EA process
Municipal Council Meeting	<ul style="list-style-type: none"> <li>Formal presentation by FMG to interested municipal councils. All interactions recorded.</li> </ul>	Throughout the EA process, including: <ul style="list-style-type: none"> <li>Notice of EA Commencement</li> <li>During the development of the EIS / EA report</li> <li>Pre-submission of the EA</li> <li>After formal submission of the EA</li> </ul>

### 3. Communication

#### 3.1. Notification Requirements

FMG will advertise the following Notices in local newspapers (general distribution), gazette, through radio announcements, and on the Project website:

- Notice of Submission of ToR;
- Notice of Commencement of EA; and
- Notices of Submission of the EA.

Additional notifications may include:

- 
- Notice of Completion of Ministry review of EA;
  - Notice of Minister's Decision; and
  - Notice of Consultation Events.

### **3.2. Plan Evaluation**

FMG will evaluate consultation activities and the consultation process to ensure successful and timely implementation. FMG is committed to continual improvement of this Plan and recognizes that it is a living document that will be revised as the Project progresses. Evaluation of these activities will be solicited from participants in the process and will be used to improve / refine ongoing activities as appropriate.

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## **Appendix F**

### **Indigenous Communities and Multi-Stakeholder Matrix**

**Table 1: Indigenous Community and Multi Stakeholder Matrix**
**GROUP I - INDIGENOUS COMMUNITIES**

Name	Title	Affiliation / Community	Email Address	Mailing Address	Phone Number
<b>Lac Seul First Nation</b>					
Derek Maud	Chief	Lac Seul First Nation	<a href="mailto:derekmaud@lacseulfn.org">derekmaud@lacseulfn.org</a>	PO Box 100, Hudson, ON, P0V 1X0	807-738-2069
Clifford Bull		Lac Seul First Nation	<a href="mailto:EugeneClifford.Bull@ontario.ca">EugeneClifford.Bull@ontario.ca</a> <a href="mailto:cbull@bpas.ca">cbull@bpas.ca</a>		807-738-3242
Raymond Angecone	Councillor	Lac Seul First Nation	<a href="mailto:raymondangecone@lacseulfn.org">raymondangecone@lacseulfn.org</a>	PO Box 100, Hudson, ON, P0V 1X0	807-738-5162
Elvis Trout	Councillor	Lac Seul First Nation	<a href="mailto:elvistrout@lacseulfn.org">elvistrout@lacseulfn.org</a>	PO Box 100, Hudson, ON, P0V 1X0	807-737-0280
Samantha Kejick	Councillor	Lac Seul First Nation	<a href="mailto:samanthakejick@lacseulfn.org">samanthakejick@lacseulfn.org</a>	PO Box 100, Hudson, ON, P0V 1X0	
Chris Lawson	Councillor	Lac Seul First Nation	<a href="mailto:chrislawson@lacseulfn.org">chrislawson@lacseulfn.org</a>	PO Box 100, Hudson, ON, P0V 1X0	807-738-0433
Gerald Kejick	Councillor	Lac Seul First Nation	<a href="mailto:geraldkejick@lacseulfn.org">geraldkejick@lacseulfn.org</a>	PO Box 100, Hudson, ON, P0V 1X0	807-738-3355
Stanley Littledeer	Councillor	Lac Seul First Nation	<a href="mailto:stanlittledeer@lacseulfn.org">stanlittledeer@lacseulfn.org</a>	PO Box 100, Hudson, ON, P0V 1X0	
Wade Bull	Councillor	Lac Seul First Nation	<a href="mailto:wadebull@lacseulfn.org">wadebull@lacseulfn.org</a>	PO Box 100, Hudson, ON, P0V 1X0	
Emma Littledeer	Councillor	Lac Seul First Nation	<a href="mailto:elittledeer@lacseulfn.org">elittledeer@lacseulfn.org</a>	PO Box 100, Hudson, ON, P0V 1X0	
Barry King	Commercial	Lac Seul First Nation	<a href="mailto:barryking@lacseulfn.org">barryking@lacseulfn.org</a>	PO Box 100, Hudson, ON, P0V 1X0	807-738-1124
Liz Kejick	Lands	Lac Seul First Nation	<a href="mailto:lizkejick@lacseulfn.org">lizkejick@lacseulfn.org</a>	PO Box 100, Hudson, ON, P0V 1X0	807-220-2519
Shera Wesley	Executive Assistant	Lac Seul First Nation	<a href="mailto:executiveassistant@lacseulfn.ca">executiveassistant@lacseulfn.ca</a>	PO Box 100, Hudson, ON, P0V 1X0	807-582-3503
<b>Cat Lake First Nation</b>					
Matthew Keewaykapow	Chief	Cat Lake First Nation	<a href="mailto:matthewk@catlake.ca">matthewk@catlake.ca</a>	PO Box 81, Cat Lake, ON, P0V 1J0	807-738-2434
Abigail Wesley	Deputy Chief	Cat Lake First Nation	<a href="mailto:Abigailwesley@knet.ca">Abigailwesley@knet.ca</a>	PO Box 81, Cat Lake, ON, P0V 1J0	807-738-0403
Derek Spence	Councillor	Cat Lake First Nation	<a href="mailto:derekspence@catlake.ca">derekspence@catlake.ca</a>	PO Box 81, Cat Lake, ON, P0V 1J0	
Joyce Peters	Councillor	Cat Lake First Nation		PO Box 81, Cat Lake, ON, P0V 1J0	807-738-0705
Shiela Flesher	ELK's Club Coordinator	Cat Lake First Nation Elderly Ladies Kokkums			807-620-7917
Jonathan Salo	Windigo First Nations Council	Cat Lake First Nation Provides technical assistance on road	<a href="mailto:jsalo@windigo.on.ca">jsalo@windigo.on.ca</a>	Sioux Lookout	807-738-3637
Abraham Keesickquayash	Councillor	Cat Lake First Nation	<a href="mailto:abrahamk@catlake.ca">abrahamk@catlake.ca</a>	PO Box 81, Cat Lake, ON, P0V 1J0	807-738-3963
Chad Wesley	Councillor	Cat Lake First Nation	<a href="mailto:chadw@catlake.ca">chadw@catlake.ca</a>	PO Box 81, Cat Lake, ON, P0V 1J0	
Theresa Oonbash	Economic Dev. Officer	Cat Lake First Nation		PO Box 81, Cat Lake, ON, P0V 1J0	807-212-8248
Ernie Wesley		Cat Lake First Nation	<a href="mailto:erniew@catlake.ca">erniew@catlake.ca</a>	PO Box 81, Cat Lake, ON, P0V 1J0	
Gabriella Williams	Executive Assistant	Cat Lake First Nation	<a href="mailto:gabriellaw@catlake.ca">gabriellaw@catlake.ca</a>	PO Box 81, Cat Lake, ON, P0V 1J0	807-738-1679
Wilfred Wesley	Lands	Cat Lake First Nation	<a href="mailto:wilfredwesley@icloud.com">wilfredwesley@icloud.com</a>	PO Box 81, Cat Lake, ON, P0V 1J0	807-738-0522

Name	Title	Affiliation / Community	Email Address	Mailing Address	Phone Number
Noreen Crane	Administrative Assistant	Cat Lake First Nation	catlakefirstnation@knet.ca	PO Box 81, Cat Lake, ON, P0V 1J0	
Josie Oombash	Lands	Cat Lake First Nation	<a href="mailto:Josieoombash_06@yahoo.ca">Josieoombash_06@yahoo.ca</a>	PO Box 81, Cat Lake, ON, P0V 1J0	807-323-1603
Russell Wesley	Windigo	Cat Lake First Nation	<a href="mailto:rwesley@windigo.on.ca">rwesley@windigo.on.ca</a>	PO Box 81, Cat Lake, ON, P0V 1J0	807-374-0096
<b>Slate Falls Nation</b>					
Lorraine Crane	Chief	Slate Falls Nation	<a href="mailto:lcrane@slatefalls.ca">lcrane@slatefalls.ca</a>	48 Lakeview Dr, Slate Falls, ON P0V 3C0	807-738-0991
Glen Whiskeyjack	Councillor	Slate Falls Nation	<a href="mailto:gwhiskeyjack@slatefalls.ca">gwhiskeyjack@slatefalls.ca</a>	48 Lakeview Dr, Slate Falls, ON P0V 3C0	807-737-5700
Arlene Wabason	Councillor	Slate Falls Nation		48 Lakeview Dr, Slate Falls, ON P0V 3C0	807-737-5700
Elsie Sakakeesic	Band Manager	Slate Falls Nation	<a href="mailto:esakakeesic@slatefalls.ca">esakakeesic@slatefalls.ca</a>	48 Lakeview Dr, Slate Falls, ON P0V 3C0	807-737-5700 ext 103
Arlene Bearman	Councillor	Slate Falls Nation	<a href="mailto:abearman@slatefalls.ca">abearman@slatefalls.ca</a>	48 Lakeview Dr, Slate Falls, ON P0V 3C0	
Cecilia Spence	Councillor	Slate Falls Nation	<a href="mailto:cspence@slatefalls.ca">cspence@slatefalls.ca</a>	48 Lakeview Dr, Slate Falls, ON P0V 3C0	
Wally Baskatawang	Economic Dev. Officer	Slate Falls Nation	<a href="mailto:wbaskatawang@slatefalls.ca">wbaskatawang@slatefalls.ca</a>	48 Lakeview Dr, Slate Falls, ON P0V 3C0	807-737-5700
Delford Mitchell	Lands	Slate Falls Nation	<a href="mailto:Delfordsmitchell@hotmail.com">Delfordsmitchell@hotmail.com</a>	48 Lakeview Dr, Slate Falls, ON P0V 3C0	807-707-3077
Lars Ohman	Lands	Slate Falls Nation/Cat Lake First Nation	<a href="mailto:bamajairinc@hotmail.com">bamajairinc@hotmail.com</a>	48 Lakeview Dr, Slate Falls, ON P0V 3C0	807-738-2481
<b>Wabauskang First Nation</b>					
Doug Riffel	Chief	Wabauskang First Nation	<a href="mailto:Banjo325@hotmail.com">Banjo325@hotmail.com</a>	PO Box 339, Ear Falls, ON, P0V 1T0	807-221-6019
Joanne Petiquan-Moore	Councillor	Wabauskang First Nation	<a href="mailto:womanrepwab@hotmail.com">womanrepwab@hotmail.com</a>	PO Box 339, Ear Falls, ON, P0V 1T0	807-216-8793
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Munzeroy Roundhead	Councillor	Mishkeegogamang First Nation		General Delivery, Osnaburgh, ON P0V 2H0	
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John Chum		Mishkeegogamang First Nation	<a href="mailto:jchum@hotmail.com">jchum@hotmail.com</a>	General Delivery, Osnaburgh, ON P0V 2H0	
Darren Harper		Mishkeegogamang First Nation	<a href="mailto:Darren@indigenouseengagement.ca">Darren@indigenouseengagement.ca</a>	General Delivery, Osnaburgh, ON P0V 2H0	
<b>Ojibway Nation of Saugeen</b>					
Edward Machimity	Chief	Ojibway Nation of Saugeen	<a href="mailto:v.mach101@gmail.com">v.mach101@gmail.com</a>	General Delivery, Savant Lake, ON P0V 2S0	807-216-8059
Gladys Oombash	Councillor	Ojibway Nation of Saugeen		General Delivery, Savant Lake, ON P0V 2S0	
John Sapay	Councillor	Ojibway Nation of Saugeen		General Delivery, Savant Lake, ON P0V 2S0	
Eileen Keesick	Councillor	Ojibway Nation of Saugeen	<a href="mailto:ekeysic@outlook.com">ekeysic@outlook.com</a>	General Delivery, Savant Lake, ON P0V 2S0	807-220-2343
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Susan Turtle	Councillor	Pikangikum First Nation		PO Box 323, Pikangikum, ON, P0V 2L0	807-773-5578
Susan Strang	Councillor	Pikangikum First Nation		PO Box 323, Pikangikum, ON, P0V 2L0	807-773-5578
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<b>Municipality of Sioux Lookout</b>					
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Delford Mitchell	Lands	Slate Falls Nation	<a href="mailto:Delfordsmitchell@hotmail.com">Delfordsmitchell@hotmail.com</a>	48 Lakeview Dr, Slate Falls, ON P0V 3C0	807-707-3077
Brian McIntomny	Legal	Mann Lawyers/STPN			
<b>Indigenous Owned Businesses</b>					
Doug Riffel	Group I Stakeholder Map/Slide 13		<a href="mailto:Banjo325@hotmail.com">Banjo325@hotmail.com</a>		807-529-6447
Lars Ohman	Group I Stakeholder Map/Slide 13		<a href="mailto:bamajair@hotmail.com">bamajair@hotmail.com</a>		807-737-1020
Manitou Forest Products	Group I Stakeholder Map/Slide 13				807-482-2722
Louis Ainslie	Group I Stakeholder Map/Slide 13				807-221-6002
Esther Pitchenese	Group III Stakeholder Map/Slide 13		<a href="mailto:Chief-council@wlon.ca">Chief-council@wlon.ca</a>		807-938-6684
Terry Favelle	Group III Stakeholder Map/Slide 13				807-938-6684
Howard Kabestra	Group III Stakeholder Map/Slide 13		<a href="mailto:naotchief@bellnet.ca">naotchief@bellnet.ca</a>		
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**GROUP II – MUNICIPAL GOVERNMENTS**

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Kevin Kahoot	Mayor	<a href="mailto:kkahoot@outlook.com">kkahoot@outlook.com</a>	2 Willor Crescent, PO Box 309, Ear Falls, ON, POV 1T0	807-727-0365	
Kimberley Ballance	Clerk Treasurer Administrator	<a href="mailto:kballance@ear-falls.com">kballance@ear-falls.com</a>		807-222-3624 ext 30	807-727-0458
Economic Development		<a href="mailto:eftownship@ear-falls.com">eftownship@ear-falls.com</a>		807-222-3624	
<b>Municipality of Sioux Lookout</b>					
Doug Lawrance	Mayor	For emails, see "contact" tab on website	25 Fifth Avenue, PO Box 158 Sioux Lookout, ON, P8T 1A4	807-737-2700	
<b>Municipality of Red Lake</b>					
Mayor Role - Vacant					
Mark Vermette	Chief Administrative Officer	<a href="mailto:mark.vermette@redlake.ca">mark.vermette@redlake.ca</a>	2 Fifth Street, PO Box 1000 Balmertown, ON, POV 1C0	807-735-2096 ext 229	
Red Lake Economic & Planning Department		<a href="mailto:economic.development@redlake.ca">economic.development@redlake.ca</a>		807-735-2096 ext 239	
Brenda Gignac	Community Devpt	<a href="mailto:brenda.gignac@redlake.ca">brenda.gignac@redlake.ca</a>		807-735-2096 ext 239	
Alexander Middleton	Councilor	<a href="mailto:sandy.middleton@redlake.ca">sandy.middleton@redlake.ca</a>			
Carol Baron	Councilor	<a href="mailto:carol.baron@redlake.ca">carol.baron@redlake.ca</a>			
Fred Mota	Councilor	<a href="mailto:fred.mota@redlake.ca">fred.mota@redlake.ca</a>			
Jack Goodwillie	Councilor	<a href="mailto:jack.goodwillie@redlake.ca">jack.goodwillie@redlake.ca</a>			
<b>Municipality of Dryden</b>					
Greg Wilson	Mayor	For email, see "contact" tab on website	30 Van Horne Ave Dryden, ON P8N 2A7	807-223-6119	
Roger Nesbitt	Chief Administrator Officer			807-223-1194	
Debra Kincaid	Clerk's Office			807-223-1125	

**GROUP III – GOVERNMENT AND RELATED AGENCIES – ONTARIO GOVERNMENT AGENCIES**

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Charlie Mattina	District Planner	<a href="mailto:Charlie.mattina@ontario.ca">Charlie.mattina@ontario.ca</a>	227 Howey Street, PO Box 5003, Red Lake, ON P0V 2M0		
<b>Ministry of the Environment, Conservation and Parks</b>					
Jenny Archibald	Special Project Officer	<a href="mailto:jenny.archibald@ontario.ca">jenny.archibald@ontario.ca</a>		416-314-8214	
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<b>Ministry of Tourism, Culture and Sports</b>					
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<b>Conservation Ontario</b>					
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<b>Ministry of Energy, Northern Development and Mining</b>					
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		<a href="mailto:secondarylanduse@hydroone.com">secondarylanduse@hydroone.com</a>			
<b>Ministry of Transportation</b>					
Scott Thompson		<a href="mailto:scott.thompson@ontario.ca">scott.thompson@ontario.ca</a>		416-327-9162	
Cindy Brown	Head, Corridor Management Section, Engineering Office, Northwestern Region	<a href="mailto:cindy.brown2@ontario.ca">cindy.brown2@ontario.ca</a>	615 James St. S., 2nd Floor, Thunder Bay, ON P7E 6P6	807-473-2127	F: 807-473-2168
<b>Office of the Fire Marshall</b>					
		<a href="http://www.mah.gov.on.ca/page_1591.aspx">www.mah.gov.on.ca/page_1591.aspx</a> <a href="mailto:firechief@redlake.ca">firechief@redlake.ca</a>			
Walter Scarrow	Fire Chief		The Corporation of the Municipality of Red Lake, 2 Fifth Street, P.O. Box 1000, Balmertown, ON P0V 1C0	807-735-2096	F: 866-681-2954
<b>Ministry of Energy</b>					
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<b>Public Health Units</b>					
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<b>Ministry Of Municipal Affairs</b>					
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<b>Minister of Health and Long-Term Care</b>					
<b>Northwestern Health Unit</b>					
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Paul Ryan	Board of Health Chair	-			
<b>Ministry of Community Safety and Correctional Services</b>					
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<b>Ontario Provincial Police</b>					
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<b>Federal</b>					
<b>Impact Assessment Agency of Canada</b>					
Springpole Gold Project	Project email	<a href="mailto:iaac.springpolegoldmine-minedorspringpole.aeic@canada.ca">iaac.springpolegoldmine-minedorspringpole.aeic@canada.ca</a>	55 York Street, Suite 600 Toronto, ON M5J 1R7	416-952-1576	
<b>Fisheries and Oceans Canada</b>					
Fisheries Protection Program, Fisheries and Oceans Canada		<a href="mailto:fisheriesprotection@dfo-mpo-gc.ca">fisheriesprotection@dfo-mpo-gc.ca</a>	867 Lakeshore Road, Burlington, ON L7S 1A1	1-855-852-8320	

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		EnviroOnt@tc.gc.ca			
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<b>Indigenous Services Canada</b>					
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Dr. Julieta Werner, PhD	Sr. Environment Officer, Ontario Region Indigenous Services Canada	julieta.werner@canada.ca		807-624-5914	
Aboriginal and Treaty Rights Information System (ATRIS)		<a href="http://sidait-atris.aadnc-aandc.gc.ca/atris_online/">http://sidait-atris.aadnc-aandc.gc.ca/atris_online/</a>			
Indigenous Services Canada (ISC)		<a href="https://www.Canada.ca/en/indigenous-services-Canada.html">https://www.Canada.ca/en/indigenous-services-Canada.html</a>			
Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC)		<a href="http://www.Canada.ca/en/crown-indigenous-relations-northern-affairs.html">http://www.Canada.ca/en/crown-indigenous-relations-northern-affairs.html</a>			
Public Enquiries Contact Centre		<a href="mailto:aadnc.infopubs.aadc@canada.ca">aadnc.infopubs.aadc@canada.ca</a>	10 rue Wellington, Gatineau, QC K1A 0H4	1-800-567-9604	F: 1-866-817-3977
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**GROUP VI – COMMUNITY, ASSOCIATIONS & CIVIL SOCIETY – BUSINESS OWNERS**

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<b>North Cariboo Air***</b>					
John Green	VP				
<b>True North Outposts &amp; Camps</b>					
		<a href="mailto:fish@tno.on.ca">fish@tno.on.ca</a>		807-482-2362	
<b>Hidden Bay Lodge***</b>					
Sioux Lookout		<a href="mailto:hiddenbaylodge@gmail.com">hiddenbaylodge@gmail.com</a>			
<b>Whitwing Floating Lodges</b>					
Ear Falls		<a href="mailto:daveandbobbie@whitwingresort.com">daveandbobbie@whitwingresort.com</a>			
<b>Red Pine Lodge &amp; Outposts</b>					
Sioux Lookout		<a href="mailto:john@fishredpine.com">john@fishredpine.com</a>		807-738-2594	
<b>Latreille Lake Lodge</b>					
		<a href="mailto:info@latrellelakelodge.com">info@latrellelakelodge.com</a>	PO Box 874, Red Lake, ON P0V 2M0	317-544-2250	
<b>Millard Johnson***</b>					
	Private landowner				
<b>Trout Forest Tourist Outfitter</b>					
Bill & Laura Deschaps		<a href="mailto:info@troutriverlodge.ca">info@troutriverlodge.ca</a>		807-222-3265	
Birch Lake Lodge - Red Lake				807-727-2158	
<b>Fort Frances Northern Wilderness Outfitters</b>					
		<a href="mailto:fishcanada@nwonet.net">fishcanada@nwonet.net</a>		218-341-6309	
<b>Pickerel Arm Camp</b>					
		<a href="mailto:lee@pickerelam.com">lee@pickerelam.com</a>		807-737-4058	
<b>Green Airways</b>					
		<a href="mailto:info@jackgreenflyincamps.com">info@jackgreenflyincamps.com</a>			
<b>Kay Air Service</b>					
		<a href="mailto:kayair@toaytel.net">kayair@toaytel.net</a>		807-222-2434	
<b>Remote Tourism Lakes ***</b>					
		<a href="https://www.ontario.ca/page/trapping-ontario#section-0">https://www.ontario.ca/page/trapping-ontario#section-0</a>			
Seagrave					
Bertha					
Deaddog					
Gulf Fawcett					
Christina					

Name	Title	Email	Mailing Address	Phone Number	Cell Number
<b>Birch Lake Lodge</b>					
Edith & Barry Labine		<a href="mailto:info@birchlakelodge.com">info@birchlakelodge.com</a>		807-727-2384	
<b>Best Baits (Ear Falls)***</b>					
<b>D&amp;E Minnows (Ear Falls) ***</b>					

\*\*\* DOMTAR (Holds the Sustainable Forest License (SFI) for the Trout Lake Forest. Wenasaga Road is connected to the property. Harvesting standing timber

**GROUP VI – COMMUNITY, ASSOCIATIONS & CIVIL SOCIETY – ASSOCIATIONS**

Name	Title	Email	Mailing Address	Phone Number	Cell Number
<b>Independent First Nations Alliance</b>					
Matthew Hoppe	CEO	<a href="mailto:mhoppe@ifna.ca">mhoppe@ifna.ca</a>	PO Box 5010, 98 King St, Sioux Lookout, ON P8T 1K6	807-737-1902	
Gail Binguis	Acting CEO	<a href="mailto:gbinguis@ifna.ca">gbinguis@ifna.ca</a>		807-737-1902 Ext 100	
Donna Wesley	CFO	<a href="mailto:dwesley@ifna.ca">dwesley@ifna.ca</a>		807-737-1902 Ext 102	
<b>Ear Falls Hunters &amp; Anglers</b>					
Pat Cullen	President			807-222-3384	
Doreen Williamson	Secretary	<a href="http://www.ofah.org">www.ofah.org</a>			
<b>Red Lake District Chamber of Commerce (Red Lake &amp; Ear Falls)</b>					
Chukuni Communities Devpt Corp.			137 Howey Street, PO Box 250 Red Lake, ON P0V 2M0	807-727-3275	
<b>Ear Falls Trappers Council / Northwestern Fur Trappers Association</b>					
		<a href="mailto:secretarynwfta@tbaytel.net">secretarynwfta@tbaytel.net</a>	PO Box 10163, Thunder Bay, ON P7B 6TY		
<b>Ear Falls Community &amp; Economic Development Committee (see Ear Falls Economic Development, Group II)</b>					
<b>Ontario Prospectors Association</b>					
Garry Clark		<a href="mailto:gjclark@ontarioprospectors.com">gjclark@ontarioprospectors.com</a>	1000 Alloy Drive, Thunder Bay, ON P7B 6A5	807-622-3284	
<b>Red Lake Trappers Association</b>					
<b>Boreal Prospectors Association</b>					
		<a href="mailto:borealprospectors@hotmail.com">borealprospectors@hotmail.com</a>		866-259-3727	

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**Appendix G**  
**List of Previous Baseline Studies**

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## Appendix G: List of Previous Baseline Studies

The list below contains the initial baseline studies which have been used to inform the description of the environment provided within this Terms of Reference:

- Springpole Project Hydrogeology Baseline Reports:
  - Armstrong T., Puritch E., Yassa A. (2006). Technical Report and Resource Estimate on the Springpole Lake Gold Property, Red Lake Mining Division, Northwestern Ontario for Gold Canyon Resources Inc., P & E Mining Consultants.
  - DST Consulting Engineers (2012). Preliminary Airstrip & Granular Borrow Source Assessment, 29 February 2012.
  - DST Consulting Engineers (2017). Springpole Potential Aggregate Sources, 31<sup>st</sup> October 2017.
  - Pinchin (2014). Factual Soil & Groundwater Testing Report, Pinchin, 10th January 2014.
  - Saunders, R. and McIntosh A. (2009). Petrographic Analysis of Selected Core Samples, Springpole Property, Ontario. Internal Report, Gold Canyon Resources Inc.
  - Saunders, R. and McIntosh A. (2010). Petrographic Analysis of Selected Drill Core Samples, Springpole 2010 Winter Core Program. Internal Report, Gold Canyon Resources Inc.
  - Zabev B. (2004). Technical Report on the Springpole Lake Property, Red Lake Mining Division, NW Ontario for Gold Canyon Resources Inc.
- Springpole Project Hydrology and Water Quality Baseline Reports:
  - Chem-Dynamics (2018). Report on Springpole Tailings Kinetic Humidity Cell Test Results, January 20, 2018.
  - DST Consulting Engineers (2012). Hydrology, 2011 Baseline Study by DST dated April 2012.
  - DST Consulting Engineers (2013). Hydrology, 2012 Baseline Study by DST dated April 2013.
  - KBM (2017). Springpole Gold Project, Potential Aggregate Sources, October 31, 2019.
  - North Rock Environmental (2017). Groundwater Monitoring Program, Springpole Project, January 2017.
  - North Rock Environmental (2018). Groundwater Monitoring Program, Springpole Project, 2018.

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- Springpole Project Meteorological Baseline Reports:
    - DST Consulting Engineers (2012). Meteorology, 2012 Baseline Study by DST dated March 2013.
  - Springpole Project Terrestrial and Wetland Habitat Baseline Reports:
    - DST Consulting Engineers Inc. (2013). Biological Constraints Report for Springpole Gold Access Corridor Project Alternatives Assessment. Prepared for Gold Canyon Resources Inc.
    - DST Consulting Engineers Inc. (2013). Biological Constraints Report for Springpole Gold Access Corridor Project Alternatives Assessment. Prepared for Gold Canyon Resources Inc.
    - KBM (2019). Summary Baseline Terrestrial Biology Report for the Springpole Gold Project, First Gold Corp., March 2019.
  - Springpole Project Aquatic Baseline Reports:
    - DST Consulting Engineers Inc. (2012). Aquatic Baseline Study Report for the Springpole Gold Project. March 2012.
    - DST Consulting Engineers Inc. (2012) Gold Canyon Resources Project 2011 Fisheries Baseline Study. July 2012.
    - DST Consulting Engineers Inc. (2013). Aquatic Baseline Report for the Springpole Gold Project. March 2013
    - First Mining Gold Corp., and C. Portt and Associates (2018). Existing Conditions Report: Fish Community and Habitat, March 2018.
    - Story Environmental Inc. (2019). East and West Basins Bathymetry, September 28, 2019.
  - Wildlife and Species at Risk Baseline Reports:
    - DST Consulting Engineers Inc. (2013). Biological Constraints Report for Springpole Gold Access Corridor Project Alternatives Assessment. Prepared for Gold Canyon Resources Inc.
  - Traditional Land Use and Resource Use Baseline Report:
    - Cat Lake First Nation, Slate Falls Nation, and Ontario Ministry of Natural Resources (2011). Cat Lake – Slate Falls Community Based Land Use Plan, “Niigaan Bimaadiziwin” – A Future Life.

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- Socio-Economic Baseline Reports:
    - Dennis A. Forbes & Associates and DST (2012). Socio-Economic Baseline Report, May 2012.
  - Archaeology Baseline Reports:
    - Norris (P307-0019-2011) Stage 1 Report.
      - Report prepared but not entered MTCS Database.
    - Slattery (No MTCS File Number) Stage 1 Report.
      - MTCS advised that Stage 1 Report had been issued but not accepted.
    - Elder (P335-015-2012) Stage 2 Report.
      - Report submitted and accepted by the MTCS.
    - Elder (P335-016-2012) Stage 2 Report.
      - Additional work to 10 sites identified within the Study Area.