



# FIRST MINING GOLD

**First Mining Gold Corp.  
Springpole Gold Project**

## **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

**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 all 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 (EIS).

**BIF:** Banded iron formation

**BMP:** Best Management Practice

**CALA:** Canadian Association for Laboratory Accreditation

**CAPEX:** Capital costs

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

**CIM:** Canadian Institute of Mining, Metallurgy, and Petroleum

**CIP:** Carbon-in-pulp

**CLFN:** Cat Lake First Nation

**Code:** The Mine Rehabilitation Code of Ontario, as provided in Ontario Regulation 240/00 (as amended).

**COC:** Contaminants of Concern

**COG:** Cut-off grade

**COI:** Communities of Interest

**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.

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

**CRA:** Commercial, recreational or Aboriginal, used in reference to a fishery.

**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.

**Deleterious substance:** “Deleterious substance” as defined in subsection 34(1) of the *Fisheries Act*.

**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:** Department of Fisheries and Oceans

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

**DST:** DST Consulting Engineers

**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.

**EAA:** Ontario Environmental Assessment Act

**EAB:** Environmental Assessment Branch (MECP)

**ECCC:** Environment and Climate Change Canada

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

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

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

**EIS:** Environmental Impact Statement

**Environment:** The components of the Earth, including:

- A) air, land or water,
- B) plant and animal life, including human life,
- C) the social, economic and cultural conditions that influence the life of humans or a community,
- D) any building, structure, machine or other device or thing made by humans,
- E) any solid, liquid, gas, odor, heat, sound, vibration or radiation resulting directly or indirectly from human activities, or
- F) 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*.

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**Fisheries and Oceans Canada:** The Department of Fisheries and Oceans (DFO) 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 Wenasaga 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

**GPS:** Global Positioning System

**GRN:** Generator Registration Number, as defined pursuant to *Environmental Protection Act*.

**GRT:** Government Review Team

**HDPE pipe:** High-density polyethylene pipes are used for fluids and gas transfer.

**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

**Horizon:** Horizon Archaeology, an archaeological consulting company.

**HWIN:** Hazardous Waste Information Network

**IBA:** Impact Benefit Agreement; an agreement between several Indigenous communities and FMG replacing the PDEA.

**Indigenous Communities:** the following Indigenous communities: Cat Lake First Nation, Lac Seul First Nation, Ojibway Nation of Saugeen, Pikangikum First Nation, Slate Falls First Nation,

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Wabauskang First Nation, Métis Nation of Ontario (MNO) Northwest Métis Council/Regional 1 Consultation Committee, and Mishkeegogamang First Nation.

**LOM:** Life of Mine

**LSA:** Local Study Area

**MAFA:** Moose aquatic feeding 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.

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

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

**MENDM:** Ontario Ministry of Energy, Northern Development and Mines

**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)

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

**MOH:** Ontario Ministry of Health

**MLTSD:** Ontario Ministry of Labour, Training and Skills Development

**MPMO:** Major Projects Management Office

**MRA:** 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, waste rock, tailings and quarry rock (excavated rock from a quarry area within the TMF and/or waste rock pile footprints).

**NGO:** Non-governmental organization

**NHIC:** Natural Heritage Information Centre

**NPV:** Net Potential Value

**NRCan:** Natural Resources Canada

**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>

**OLT:** Ontario Landscape Tool

**OPEX:** Operating costs

**OSAP:** Ontario Stream Assessment Protocol

**PAG:** Potentially acid generating. PAG may be used in reference to ore, waste 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)

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

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

**Project Area / Project Study Area (PSA):** This is an undefined area used to describe the local extent of the Undertaking and generally includes the area shown on the figures in this document. The study area boundaries for the Undertaking will be defined as the EA for the Undertaking progresses. For the purpose of this document, this term is used to help the reader understand the existing setting.

**Project Site or Springpole Site:** This is the location of the majority of the onsite 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:** FMG and its successors or assigns.

**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 surface water resources in Ontario, as defined in MOE (1994B).

**Record of Consultation (RoC):** A document submitted with the proposed terms of reference that describes the consultation carried out during the preparation of the terms of reference and the results of that consultation.

**RSA:** Regional Study Area

**SAR:** Species at Risk.

**SEI:** Story Environmental Inc.

**SFL:** Sustainable Forest License, used in reference to the Trout Lake Forest management area.

**SGS:** SGS Laboratories

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

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

**SRK:** SRK Consulting Inc. SRK is the author of the PEA.

**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

**TLU:** Traditional Land Use

**TMF:** Tailings Management Facility. Tailings are the fine materials left over after the crushing, grinding, and extraction of valuable minerals from slurried ore. Tailings Management Facility must be engineered to manage 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; or

(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”)

**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 all 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.

**LIST OF UNITS**

<b>Distance</b>		<b>Flow Rate</b>	
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	<b>Power</b>	
mm	millimetre	kW	kilowatt
		MW	megawatt
<b>Elements and Compounds</b>		W	watt
Au	gold	<b>Energy</b>	
Ag	silver	kWh	kilowatt hour
CN	cyanide	<b>Electric Potential</b>	
Cu	copper	kV	kilovolt
Fe	iron	V	volt
NaCN	sodium cyanide	<b>Time</b>	
S	sulphur	d	day
<b>Mass/Concentration</b>		hr	hour
g	gram	s	second
mg	milligram	yr	year
kg	kilogram	<b>Density</b>	
ug	microgram		
kt	kilotonne	t/m <sup>3</sup>	tonne per cubic metre
µg/L	microgram/L	<b>Cost</b>	
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	<b>Other</b>	
<b>Area</b>		%	percent
m <sup>2</sup>	square metre	tmm	Total material mined = ore + waste material
ha	hectare		
<b>Volume</b>			
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 **Figures 1.1.1 and 1.1.2** and the current camp is illustrated in **Figure 1.1.3 and 1.1.4**.

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 395m.

### 1.2 Land Tenure

FMG acquired 100% of the Project in 2015 when it completed the acquisition of Gold Canyon Resources Inc. (GCU). When the 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 understands as per Policy 4.02.01 Application Review and Land Disposition Process - **Appendix A**, restrictions may apply to obtaining tenure on Designated Inland Lake Trout Lakes. FMG will engage in discussions with MNR/F prior to an application for Crown land on a Designated Inland Lake Trout Lake as specific conditions may apply.

### 1.3 Mineral Resource Estimate and Mineable Resource

The updated resource estimate is summarized in **Table 1.3.1** below.

**Table 1.3.1 Mineral Resource Statement, Springpole Gold Project (September 1, 2019)**

Category	Quantity (Mt)	Grade		Contained Metal	
		Au (g/t)	Ag (g/t)	Au (Moz)	Ag (Moz)
<b>Open Pit**</b>					
Indicated	139.1	1.04	5.4	4.67	24.19
Inferred	11.4	0.63	3.1	0.23	1.12

Source: Springpole Gold Project, Northwestern Ontario, SRK Consulting, March 17, 2017

*\*Mineral resources are reported in relation to a conceptual pit shell. Mineral resources are not mineral reserves and do not have demonstrated economic viability. All figures are rounded to reflect the relative accuracy of the estimate. All composites have been capped where appropriate.*

*\*\*Open pit mineral resources are reported at a cut-off grade of 0.4 g/t gold. Cut-off grades are based on a gold price of \$1,400/oz and a gold processing recovery of 80% and a silver price of \$15/oz and a silver processing recovery of 60%.*

## 1.4 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
Website:	<a href="http://www.firstmininggold.com">www.firstmininggold.com</a>
Chief Executive Officer:	Mr. Dan Wilton Chief Executive Officer and Director
Contact for the Provincial Environmental Assessment (EA):	Dr. David Mchaina, Ph. D., P.Eng. Vice President, Environment and Sustainable Development Telephone: 1-519-241-9655 Email: <a href="mailto:dmchaina@firstmininggold.com">dmchaina@firstmininggold.com</a>

## 1.5 Outline of the Terms of Reference

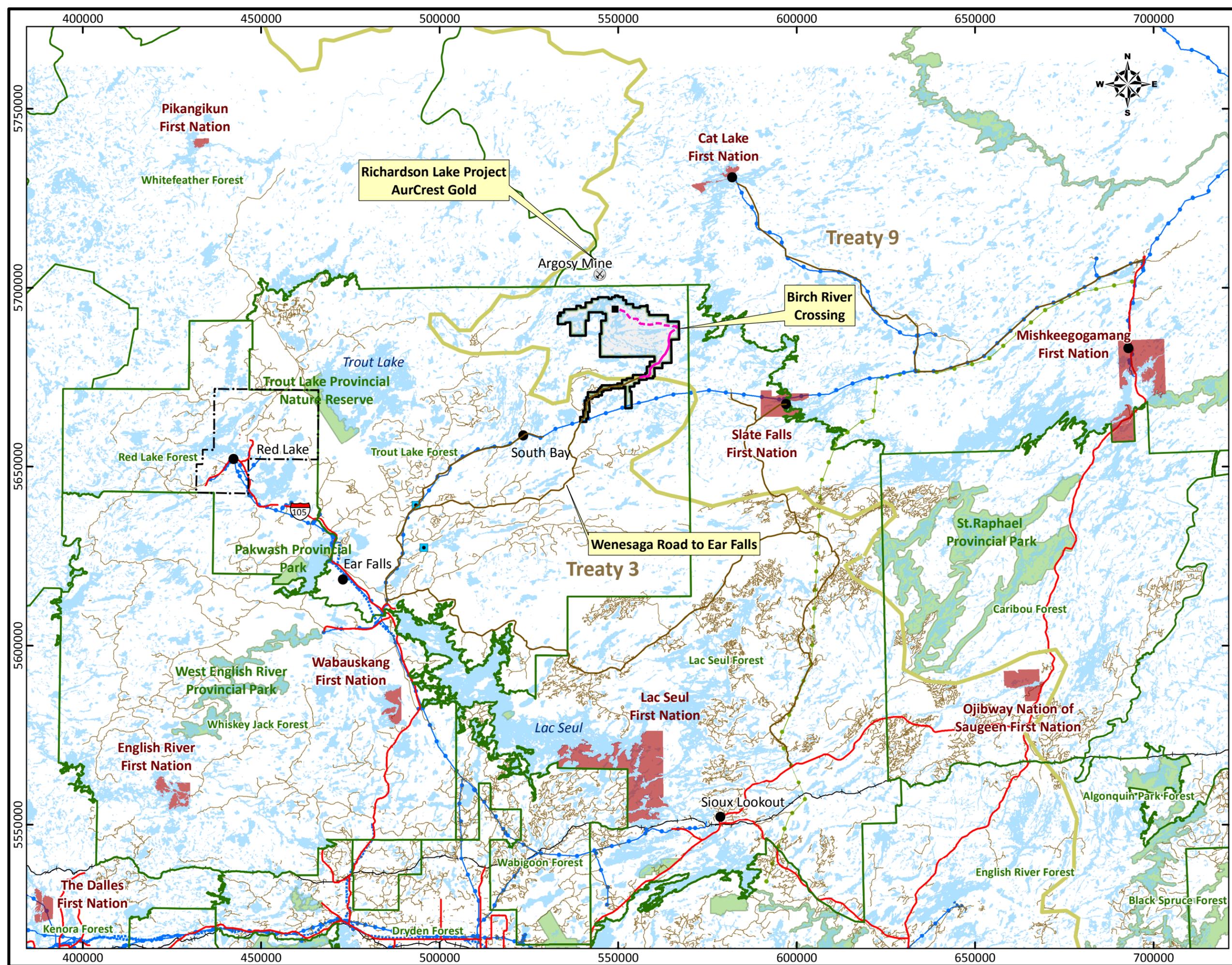
The purpose of this Terms of Reference (ToR) is to provide a framework for the preparation of a provincial EA. This document has been prepared in accordance with the *Ontario Environmental Assessment Act (EAA)* and with the Code of Practice: *Preparing and Reviewing Terms of Reference for Environmental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

- Identification of the proponent (**Section 1**);
- Indication of how the environmental assessment 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 and potential effects of the undertaking (**Section 6**);
- Assessment and evaluation (**Section 7**);
- Commitments, monitoring, and follow-up (**Section 8**);
- Consultation plan for the environmental assessment (**Section 9**);
- Flexibility to accommodate new circumstances (**Section 10**); and
- Other approvals required (**Section 11**).

FMG has issued draft versions of this proposed ToR to the MECP 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. FMG is tracking all feedback provided on the draft ToR and the Undertaking, and will fully consider all comments in future submissions, including in the future EA Report/EIS and environmental approval applications should the provincial EA be approved.

## 1.6      **Figures**



Property Reference



- Camp
- Town/Community
- Hydroelectric Station
- ⊗ Past Producing Mine
- - - Proposed Access Road
- - - Wenesaga Road Extension
- - - Logging Road
- - - Highway
- - - Treaty Boundary \*
- - - Electricity Transmission Line
- - - Natural Gas Pipeline
- - - Planned Watay Power Transmission Line
- - - Springpole Property Boundary
- - - Forest Management Unit
- - - First Nation Reserve
- - - Red Lake Municipality Boundary
- - - Provincial Park

\* Source: Grand Council Treaty 3 Website



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

Kenora District, Ontario

July 2020 NAD83, UTM zone15



**Figure 1.1.2 Project Location Map**

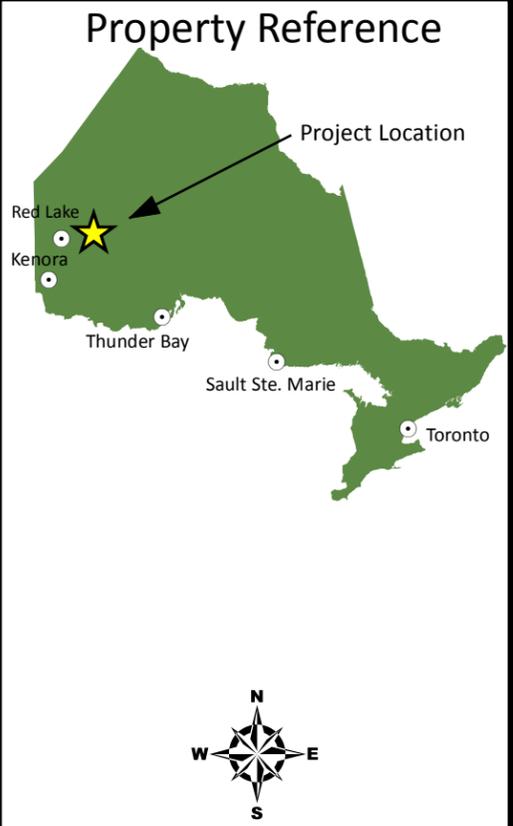
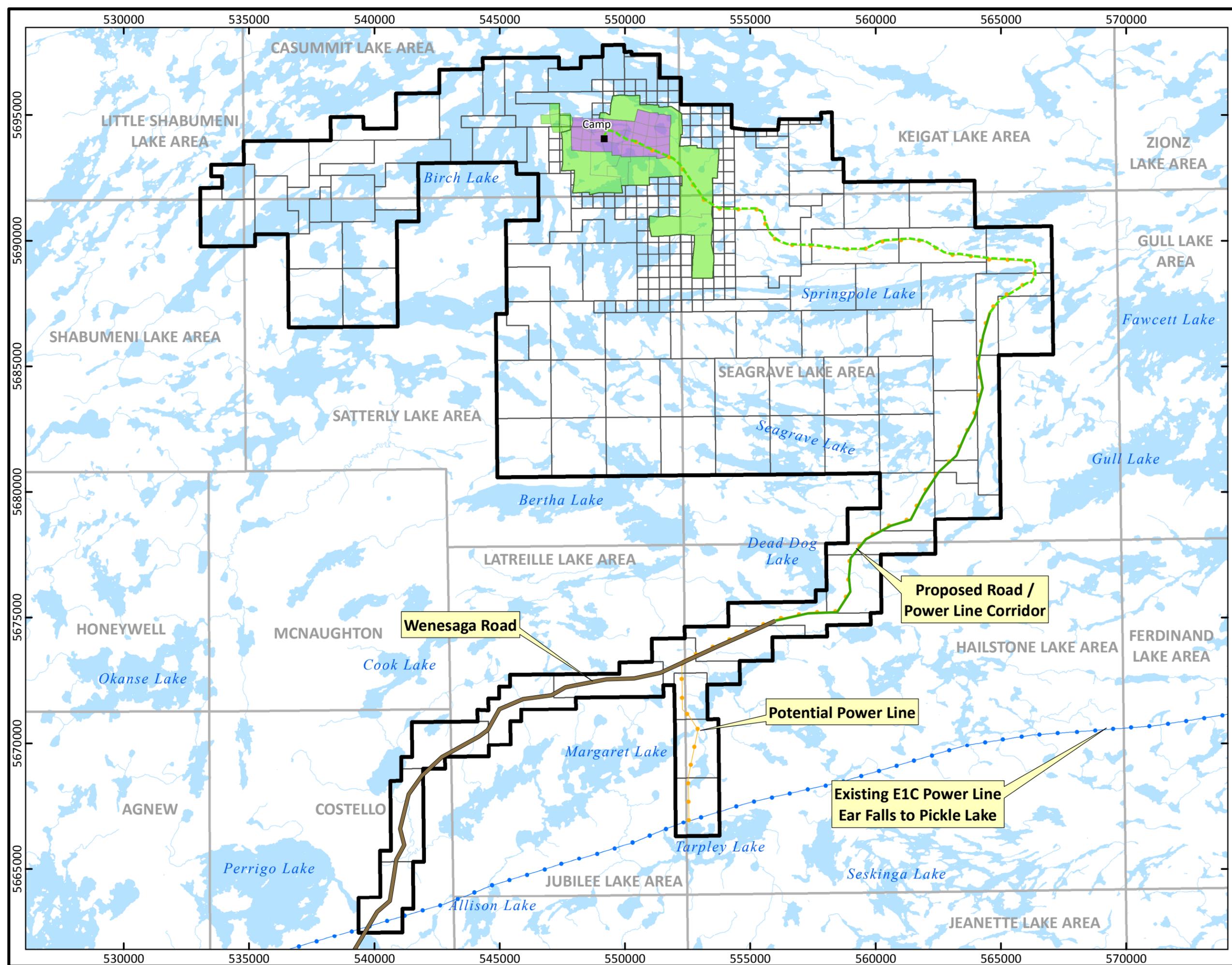


**Figure 1.1.3 Aerial View of the Campsite 1**



**Figure 1.1.4 Aerial View of the Campsite 2**





- Camp
- Proposed Access Road
- Wenesaga Road Extension
- Logging Road
- Proposed Power Line
- Existing Power Line
- Township Boundary
- Springpole Property Boundary
- Patent
- Mining Lease
- Mining Claim


**FIRST MINING GOLD**

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

July 2020 NAD83, UTM zone15

0 Kilometers 5



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

### 2.1 Provincial Environmental Assessment Requirements

Environmental assessment (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 Environmental Assessment Act (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 environmental assessments in Ontario:

- individual environmental assessments
- streamlined environmental assessments

In Ontario, mining development projects that are carried out by private sector proponents are required to meet the requirements of the Ontario *Environmental Assessment Act* (EAA), as well as other applicable regulatory requirements. While the Province does not require assessment of mining projects in their entirety, several 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 *Endangered Species Act*;
- Class EA for activities of the Ministry of Energy, Northern Development and Mines (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 (diesel power generation of between 1 and 5 MW);
- 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 transmissline is required.)

During the EA process, FMG will review the components of the Undertaking, including all 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 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 Ontario EAA. The Minister concurred with our request and on April 18, 2018, FMG entered into a Voluntary Agreement (provided in **Appendix A**) with the Ministry of Environment and Climate Change (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 this processes 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;
- 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 environmental assessment; and
- consultation with regulatory agencies, historical knowledge from previous owners and based on feedback from stakeholders, including as described in the Record of Consultation.

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.

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 Report 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, and
  - ii) the alternative methods of carrying out the Undertaking
- 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, and
  - 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; and
- 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, therefore, as per section 2.1 and subsection 6.1 (2), (b) (iii) and (d) of the EAA, “alternatives to the Undertaking” will not be considered (SRK 2019). Open pit mining is the only alternative, there are no other alternatives to the undertaking; however, all other requirements under section 2.1, subsection 6.1 (2), (b) (iii) 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* (CEAA 2012). Designated Projects included in the Regulations Designating Physical Activities are subject to a federal EA. The Canadian Environmental Assessment Agency (now the Impact Assessment Agency of Canada) confirmed 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 Canadian Environmental Assessment Agency in February 2018. The Project Description was prepared to meet the requirements of the Major Projects Management Office (MPMO) Guide to Preparing a Project Description for a Major Resource Project (2008). They reviewed the Project Description and confirmed that a federal EA would be required under CEAA 2012. The federal Environmental Impact Statement (EIS) Guidelines were provided by the Canadian Environmental Assessment Agency on June 19<sup>th</sup>, 2018, which outlines the nature, scope and extent of the information required in the federal EIS. As per Section 19(1) of the 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 is 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; and
- i) the results of any relevant study conducted by a committee established under Section 73 or 74, and
- j) any other matter relevant to the environmental assessment that the responsible authority required to be considered.

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

There are specific overlapping and similarities in requirements between the provincial EA under the EAA and a federal EA under the 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 Impact Assessment 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. Projects requiring both provincial and federal EAs will require separate decisions that will be based on the same body of information and may announce their EA decisions in roughly the same time frame. These decisions will be jointly communicated to the proponent and the public, to the extent possible.

FMG intends to prepare a single EA document (EA Report/EIS) 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 EA Report/EIS to demonstrate how the document meets both of these requirements. After FMG issues the final EA Report/EIS, the provincial and federal EA review and approval processes will continue in a parallel manner to the extent possible, 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 EA Report/EIS by FMG,

6. Review of EA Report/EIS by regulatory agencies, Indigenous communities and stakeholders,
7. EA decisions from provincial Minister of MECP and federal Minister of ECCC, 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 Canadian Environmental Assessment 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 EA Report/EIS, 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 key milestone consultation activities required by both the provincial and federal EA process, in order to maximize opportunities for stakeholders to be effectively engaged (as outlined in **Appendix E**). FMG will disseminate federal and provincial EA information simultaneously to the maximum extent possible to minimize duplication and unnecessary delays.

As previously mentioned, 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 Agency and MECP to satisfy their requirements, and will explore all feasible alternative methods to ensure project options are not limited. FMG will ensure the content of the EA Report/EIS 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 conducting joint public comment periods, coordinating Indigenous consultation, 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

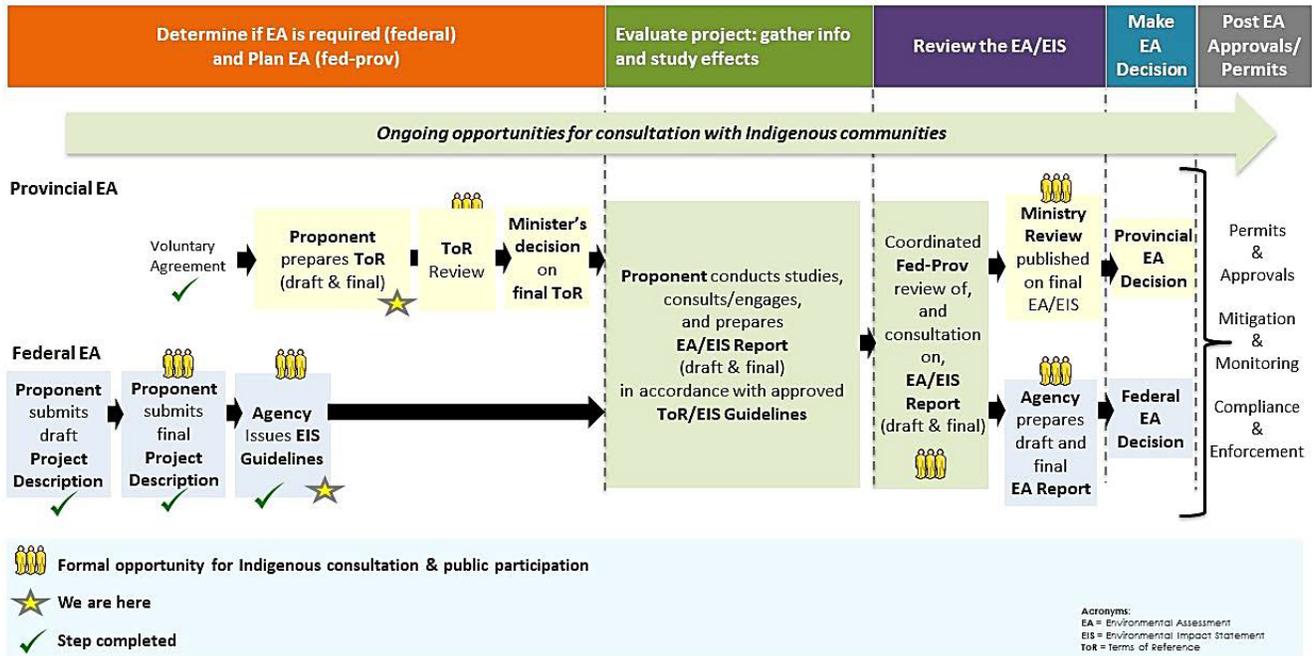
preliminary assessment, there are many milestones and activities that may be aligned for both the Federal and Provincial EA processes. These may include the following:

- Coordination of timelines;
- Environmental baseline studies (biophysical and socio-economic);
- Community consultation and engagement, activities and methodologies;
- Joint technical meetings;
- Formulation and joint review of Work plans/Technical Work Plans;
- Predictive studies
- Assessment of potential effects, mitigation, and significance of residual effects (biophysical and human environment);
- EA Report/EIS preparation; and
- Environmental management plans and reporting.

## 2.4 Figures

Figure 2.3.1 Coordinated Provincial and Federal EA Process Integration

### Coordinated Federal–Provincial EA Process for the Springpole Gold Project



Please note that this diagram reflects the progress of the federal and provincial EA processes for the Springpole Gold Project as of January, 2020. This diagram is for illustrative purposes only.

### **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 EA Report/EIS 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 EA Report/EIS.

### 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 dewatering basin, onsite ore process plant, tailings management facility (TMF), waste rock areas (WRA), related buildings and infrastructure, as well as aggregate operations, an access road and transmission line. The components, as part of the conceptual site plan, for the operational phase of the Undertaking are presented in **Figures 4.1.1, 4.1.2, 4.1.3, 4.1.4 and 4.1.5**.

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 EA Report/EIS as the provincial EA process will be concurrent with ongoing environmental and engineering studies. Further studies may provide input into more alternative methods for key components which will be examined in detail during the EA process. The EA Report/EIS 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 EA Report/EIS.

The open pit area of the mine is comprised of three distinct geological domains; Eastern Extension, Camp Zone and Portage Zone, shown in **Figure 4.1.6**. The open pits have a surface area of approximately 140 ha. The preliminary mine development plan includes mining of approximately 150 Mt of mineralized material and 320 Mt of waste rock from the open pits, and an approximate 12-year production life, including stockpile reclamation and processing. The maximum ore production capacity of the mine is anticipated to be 60,000 tpd, subject to additional engineering studies.

Approximately 158 ha of the north basin of Springpole Lake will be dewatered to allow for the development of the open pit mine. This represents approximately 6% of the surface area of Springpole Lake. Based on preliminary engineering to date, FMG anticipates that three coffer dams with a total length of approximately 510 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) (**Figure 4.1.8**). Once mining is complete, the intent is to reflood the open pits and reconnect with the lake once all environmental 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. **Figure 4.1.7** shows a conceptual image of the open pits and the associated coffer dams needed to hold back surface waters to allow mining to occur. 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 MRAs anticipated to be located immediately adjacent to the open pit limits, as generally shown in **Figure 4.1.1**, **4.1.2**, and **4.1.3**. The MRAs have a total surface area of approximately 450 ha. Given the deposit configuration and extraction sequence, backfilling into previously mined areas with waste rock is not planned for the open pits. Should backfilling of the open pit with mine waste be proposed in the EA Report/EIS, 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 and contingencies. FMG anticipates geochemical data would be incorporated into a numerical hydrogeological reactive-transport model specific to conditions observed and quantified at and around the backfilled pit. This model could be used to identify any potential adverse impact to receptors in the area.

Mined ore will be transported, likely by truck, to an on site process plant for processing. Processing is expected to involve the conventional ore processing methods of crushing and grinding, followed by whole feed leaching with cyanide, detoxification, electrowinning, and refining. The general arrangement of the process plant is shown in **Figure 4.1.5**. The temporary pile of run-of-mine coarse ore that will potentially occupy an area of approximately 5 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 **Figures 4.1.1**, **4.1.2**, and **4.1.3**. 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 all 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.

Other on site infrastructure is expected to include a maintenance garage, warehouses and administration buildings. A camp designed to accommodate 300 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 (package sewage treatment plant or equivalent) will be established to manage onsite requirements. The EA report/EIS will include information on the treatment proposed to allow for re-use of the treated sewage as process water.

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 2013 DFO document titled Fisheries Productivity Investment Policy: A Proponent's Guide to Offsetting. 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 MRA 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. 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 two-lane access road is proposed that will extend approximately 15 km from the site to the regional road network at the planned Wanesaga road extension. The approved 24 km extension of Wanesaga road to the Birch River crossing is

under the care and control of Domtar/EACOM and is not part of the Undertaking. Although not expected at this time, there is the potential that minor upgrades/maintenance may be required of the proposed/existing road to Highway 105. FMG will work with Domtar to develop appropriate environmental management plans for any shared infrastructure that maybe required.

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. **Figure 4.1.1** identifies known potential aggregate source areas. 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. 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 the location of connection will be determined in association with the Independent Electricity System Operator (IESO), that will determine the potential power sources and manage 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;
- coffer dams and dewatering infrastructure;
- WRA;
- ore stockpile;
- 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 pit(s); and
- power transmission line;
- clearing of trees.

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

FMG wishes to create a lasting positive legacy and shall seek opportunities to strengthen the communities, infrastructure, and businesses in the region. FMG recognizes that mining involves interim land use and fully believes that the impacts associated with active periods of a mineral development project can and should be effectively mitigated such that there is a net benefit to the surrounding region prior to returning the land to a productive, aesthetically pleasing, and ecologically functional region upon closure.

## 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 2019, 2017). 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 EA Report/EIS. 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 all applicable regulatory requirements.

**Table 4.2.1 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.
Year 11 and 12		Processing of reclaim ore from the stockpile to feed process plant.
Year 13 to 18	Closure	Decommissioning and reclamation/closure of the Undertaking.
Year 18+		Post-closure environmental monitoring.

FMG is developing guiding principles regarding the planning for future potential phases of the Project. The guiding principles that have been developed to date are summarized below.

- Adopt a watershed management approach and situate the primary components of the Undertaking (i.e., onsite infrastructure) within a single watershed (Springpole Lake watershed) and avoid situating primary components within the Birch Lake watershed to the extent practical;
- 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 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, minimize inflows (groundwater and surface water) to the mine, maximize water recycling, and minimize effluent discharge;
- Minimize the terrestrial footprint as practical;
- Minimize the spatial extent of the effluent mixing zone to the extent 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;
- Implement a precautionary approach to development that utilizes best available technology that is economically achievable to reduce potential environment, health, and safety risks;
- Achieve a net overall economic benefit to the region, taking into consideration the potential adverse environmental effects that would be minimized through mitigation measures;
- Develop a design that minimizes the risk of spills or accidental releases to the environment; and
- 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 (2) years, subject to additional permitting requirements.

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 onsite 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 practises (BMPs) and guidelines for MNRF, MTO and MECP and others for the construction where appropriate, such as the MNRF 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
- 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 EA Report/EIS. Effectiveness monitoring will be identified and committed to in the EA Report/EIS.

## 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 EA Report/EIS and subsequent environmental approvals. Activities to be completed during the active closure phase 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 flood, 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;
- 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);
- Physical stability monitoring program (e.g., waste rock pile, tailings dams, etc.).

The conceptual post closure general arrangement is illustrated in **Figure 4.2.1**. Closure related matters will be described in greater detail in the EA Report/EIS, including incorporating feedback gained through ongoing consultation and engagement activities.

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* (O. Reg. 240/00). Closure concepts will be introduced in the EA Report/EIS. A comprehensive closure plan will be developed

during the environmental approvals process for the Undertaking as required by the *Mining Act*, and will provide a more detailed plan to rehabilitate the Undertaking. The closure plan will include all aspects required by the regulation, such as progressive and final rehabilitation measures, measures during temporary suspension, state of inactivity, or until the site is closed out. 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.

### 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 Environment Conservation and Parks, 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 1.0 g/tonne for 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, and as required, FMG will complete a preliminary feasibility study (PFA) and a feasibility study as part of the ongoing development process.

The Undertaking includes a prospective gold deposit that contains 4.9 million ounces of gold and 25.3 million ounces of silver (SRK 2019, 2017). Development of this deposit in a responsible manner that respects Indigenous communities, regional stakeholders, and environmental protection best practices 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.
- Conservative 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.
- Conservative government is supporting the opening of three new mines and the expansion of five others across Northern Ontario.

The preliminary design of the Undertaking, which will be better defined through further engineering and consultation and engagement, suggests that there would be approximately 650 construction phase jobs, and about 360 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.

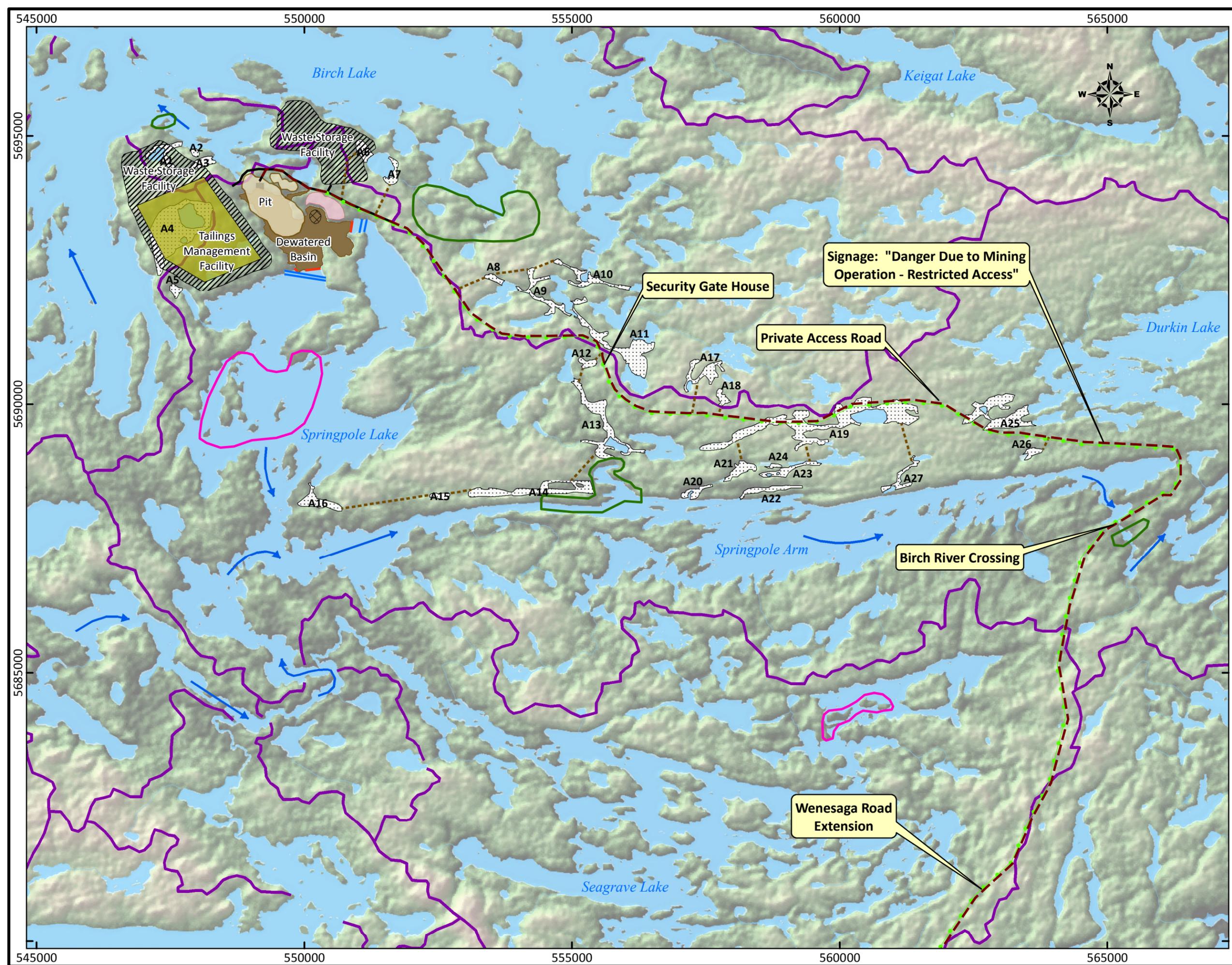
Development of the Undertaking as a producing gold and silver mine would be of significant benefit to the local economy and provincial/federal taxation base. The capital cost for the Undertaking as currently envisioned, would be on the order of \$725 million. The provincial and federal governments would 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. Workforce requirements can be seen in **Appendix C**.

The Undertaking would contribute approximately \$1.28 billion into the local economy over the life of the mine:

- 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 anticipated benefits from the Undertaking are expected to include charitable donations, infrastructure upgrades, and contributions to the local and Indigenous communities that are commonplace with large scale resource development projects once a revenue stream is achieved, in accordance with the tenets of modern corporate social responsibility.

Supporting documents, including those appended to the proposed ToR and the Record of Consultation, 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 EA Report/EIS, including through the assessment of potential alternatives and ongoing consultation and engagement activities.



**Property Reference**



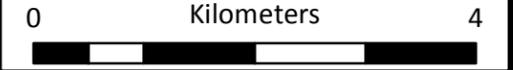
- - - Access Road
- - - Power Line
- - - On-Site Haul Road
- - - Temporary Road\*
- - - Watershed Boundary
- Water Flow
- = Cofferdam
- = Silt Curtain
- Potential Aggregate Source
- Pit
- Plant Site & Shops
- Stockpile & Crusher
- Tailings Management Facility
- Waste Storage Facility
- Dewatered Basin of Lake
- Archaeological Setback
- Potential Caribou Habitat Feature

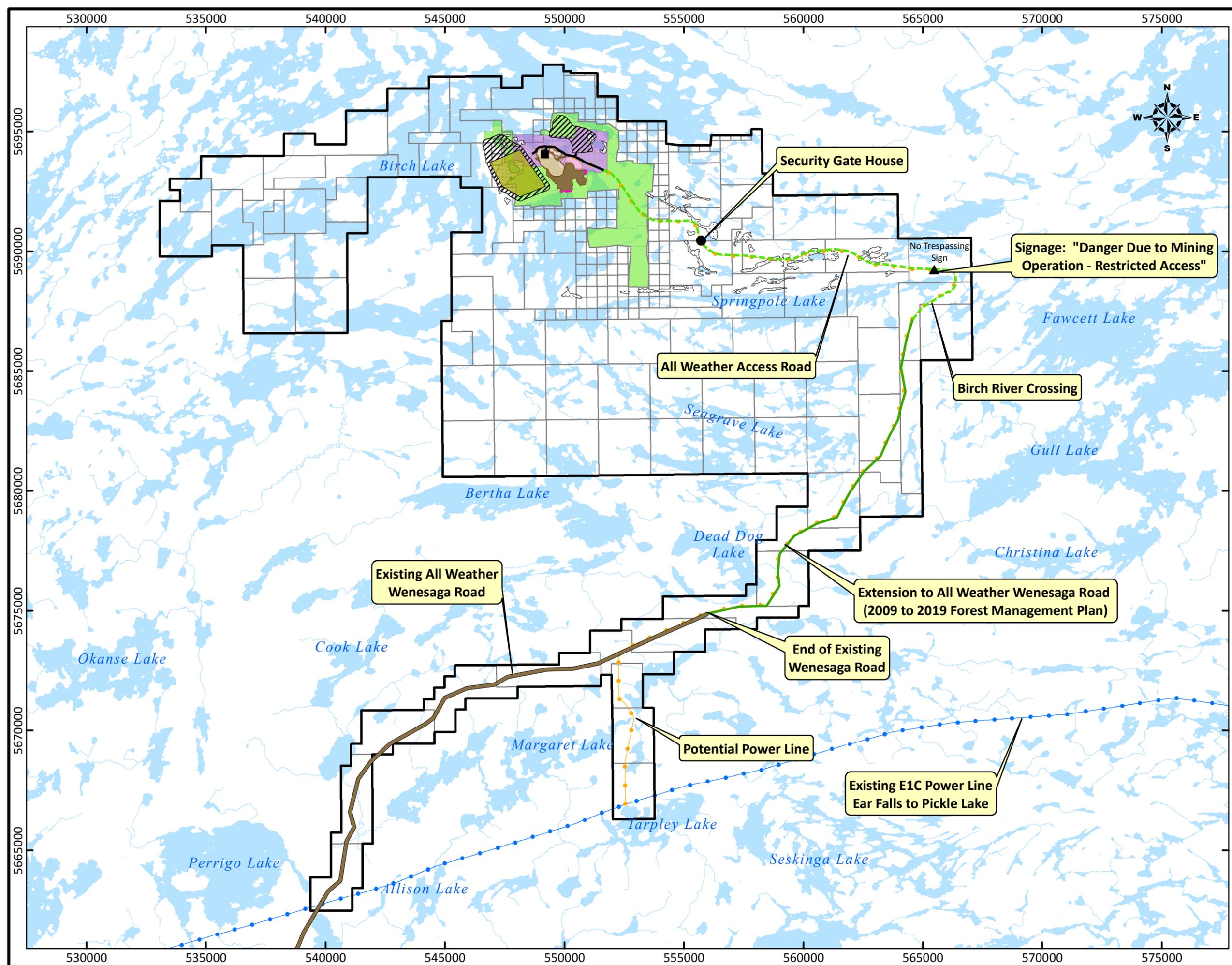
\*Temporary Road would only be built if proximal aggregate deposit is developed  
 Mine Layout from Springpole PEA (SRK, 2019)



**Springpole Gold Project**  
 Conceptual General Arrangement  
 Figure 4.1.1

Kenora District, Ontario  
 July 2020 NAD83, UTM zone15





### Property Reference

**Legend:**

- Existing Camp
- On-Site Haul Road
- Logging Road
- Proposed Access Road
- Wenesaga Road Extension
- Existing Power Line
- Proposed Power Line
- Coffer Dam
- Potential Aggregate Source
- Pit
- Plant Site & Shops
- Tailings Management Facility
- Waste Storage Facility
- Dewatered Basin
- Springpole Property Boundary
- Patent
- Mining Lease
- Mining Claim

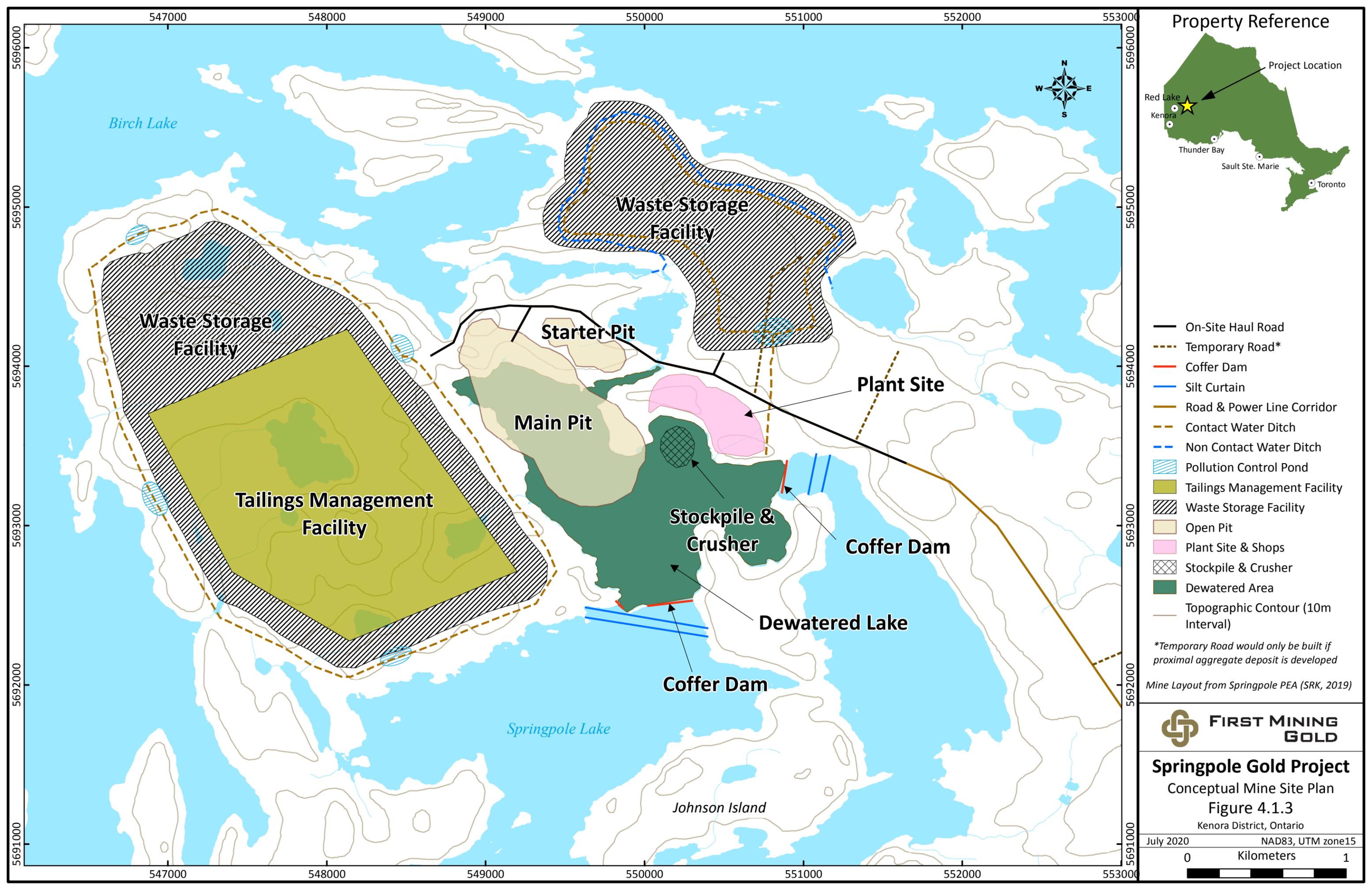
*Mine Layout from Springpole PEA (SRK, 2019)*

**FIRST MINING GOLD**

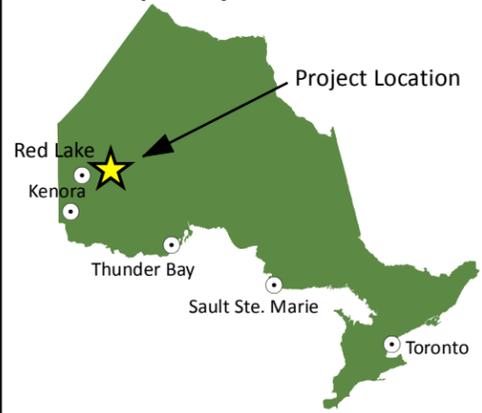
**Springpole Gold Project**  
 Conceptual General Arrangement  
 Production Phase  
 Figure 4.1.2  
 Kenora District, Ontario

July 2020 NAD83, UTM zone15

0 Kilometers 8



**Property Reference**



- On-Site Haul Road
- - - Temporary Road\*
- Coffers Dam
- Silt Curtain
- Road & Power Line Corridor
- - - Contact Water Ditch
- - - Non Contact Water Ditch
- ▨ Pollution Control Pond
- Tailings Management Facility
- ▨ Waste Storage Facility
- Open Pit
- Plant Site & Shops
- ▨ Stockpile & Crusher
- Dewatered Area
- Topographic Contour (10m Interval)

\*Temporary Road would only be built if proximal aggregate deposit is developed

Mine Layout from Springpole PEA (SRK, 2019)

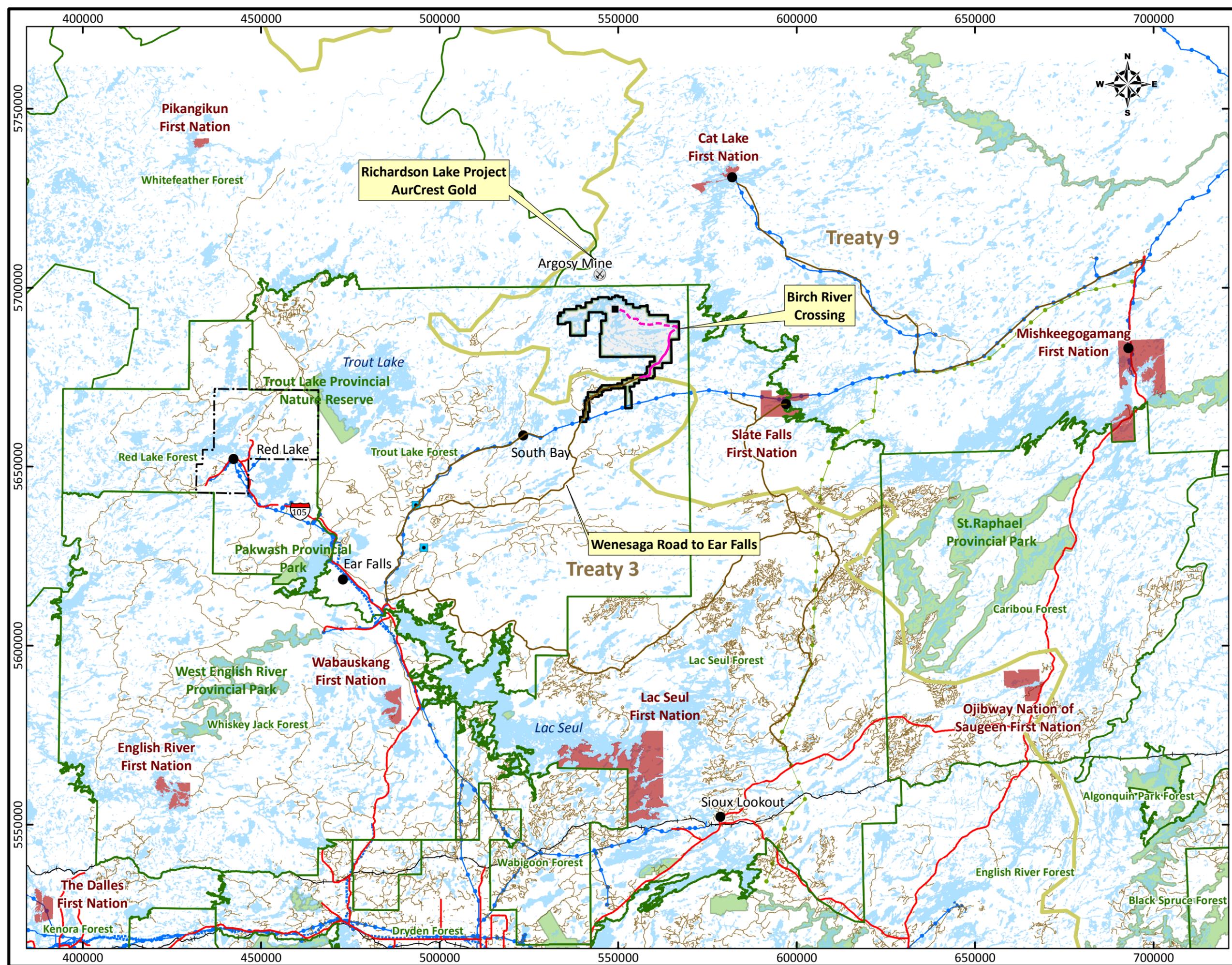


**Springpole Gold Project**  
 Conceptual Mine Site Plan  
 Figure 4.1.3

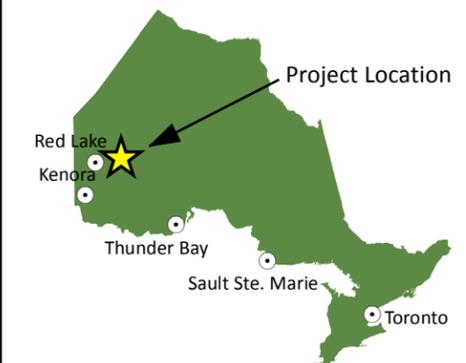
Kenora District, Ontario

July 2020 NAD83, UTM zone15





**Property Reference**



- Camp
- Town/Community
- Hydroelectric Station
- ⊗ Past Producing Mine
- - - Proposed Access Road
- - - Wenesaga Road Extension
- - - Logging Road
- - - Highway
- - - Treaty Boundary\*
- - - Electricity Transmission Line
- - - Natural Gas Pipeline
- - - Planned Watay Power Transmission Line
- Springpole Property Boundary
- Forest Management Unit
- First Nation Reserve
- - - Red Lake Municipality Boundary
- Provincial Park

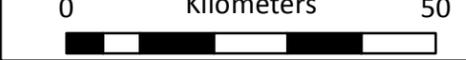
\* Source: Grand Council Treaty 3 Website

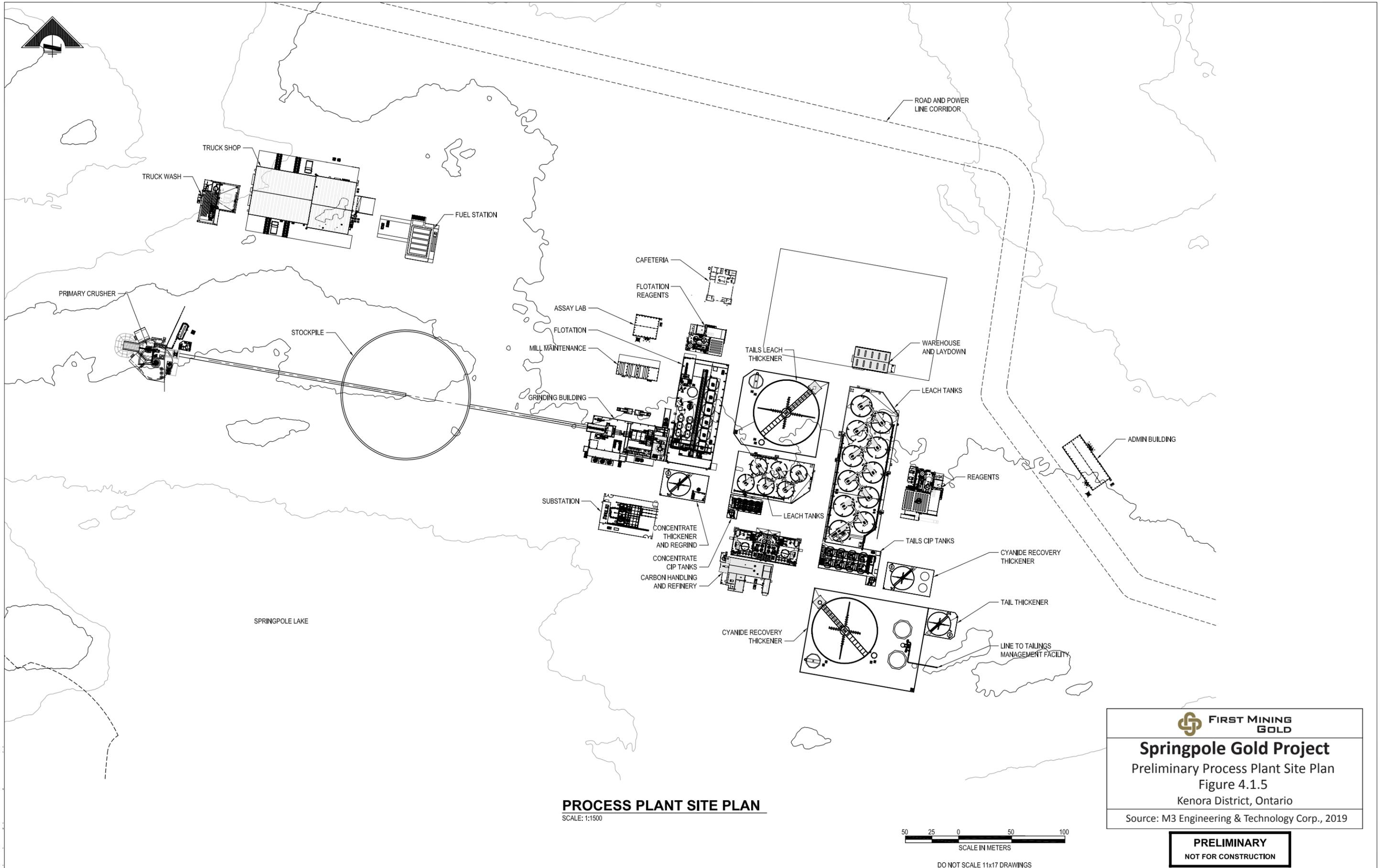


**Springpole Gold Project**  
 Property Location Plan  
 Figure 4.1.4

Kenora District, Ontario

July 2020 NAD83, UTM zone15





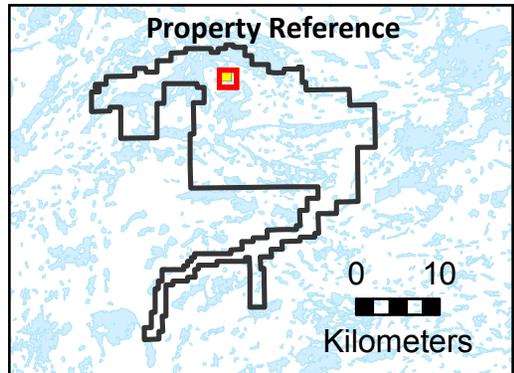
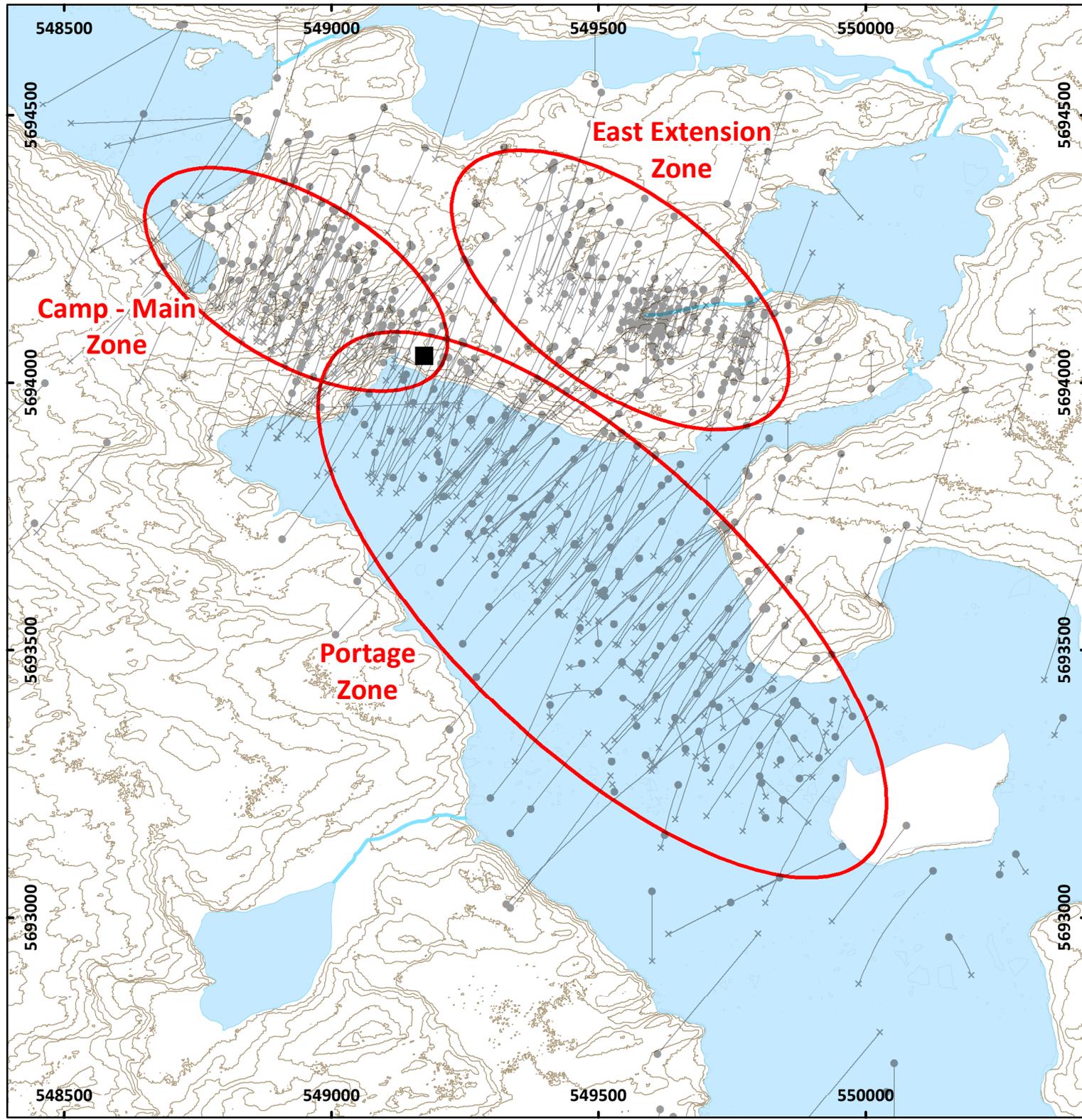
**PROCESS PLANT SITE PLAN**  
 SCALE: 1:1500



DO NOT SCALE 11x17 DRAWINGS

 **FIRST MINING GOLD**  
**Springpole Gold Project**  
 Preliminary Process Plant Site Plan  
 Figure 4.1.5  
 Kenora District, Ontario  
 Source: M3 Engineering & Technology Corp., 2019

**PRELIMINARY**  
 NOT FOR CONSTRUCTION



N  
W —+— E  
S

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

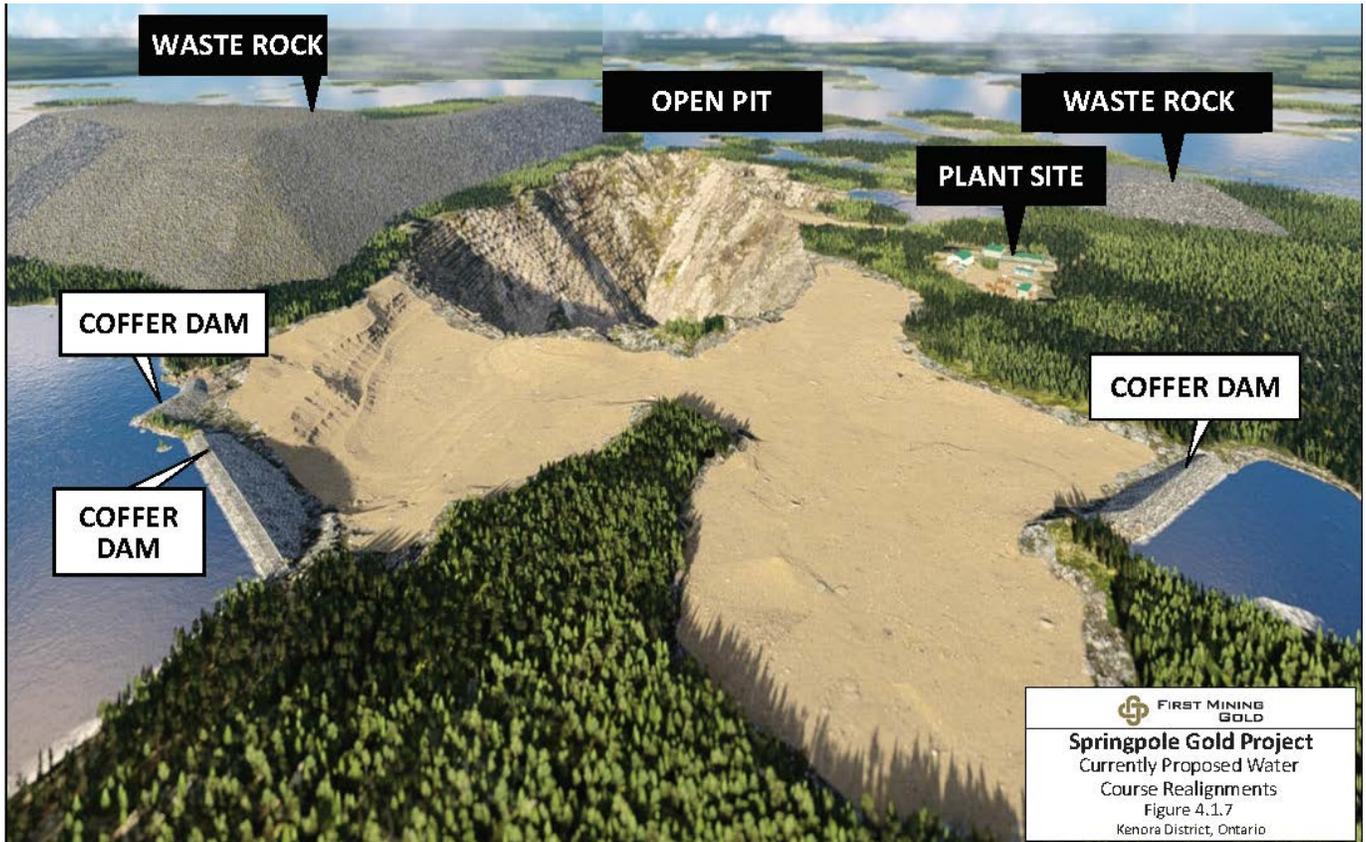
**FIRST MINING GOLD**

**Springpole Gold Project**  
 Geological Domains for  
 Springpole Gold Project  
 Figure 4.1.6  
 Kenora District, Ontario

July 2020
NAD83, UTM zone15

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**Figure 4.1.7 Currently Proposed Watercourse Realignments**



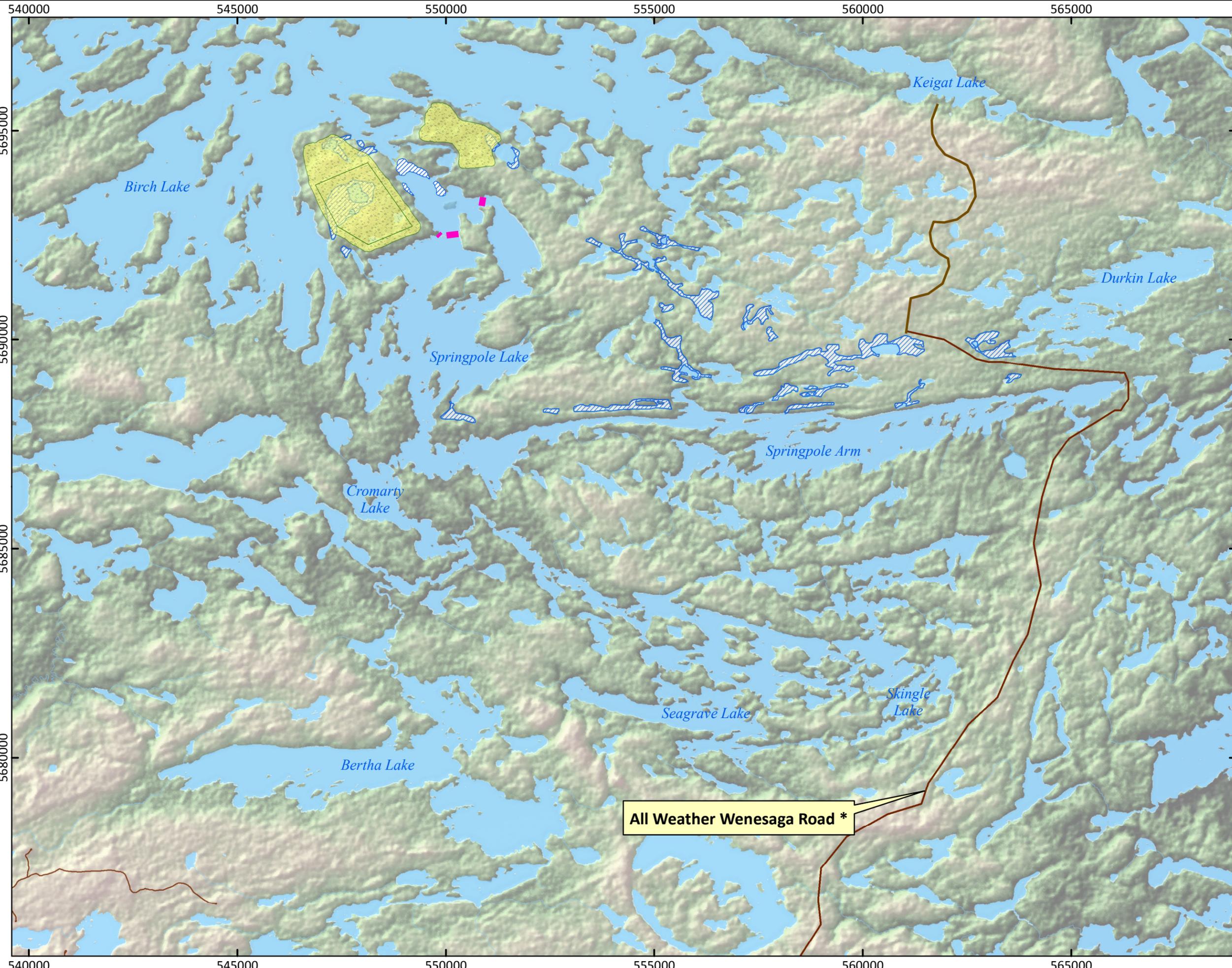
**Figure 4.1.8 Other Canadian Mines Built in Lakes**

Agnico Eagle's Meadowbank Mine in Nunavut



Rio Tinto/Harry Winston's Diavik Diamond Mine in the Northwest Territories





**Property Reference**



- Potential New Spawning Shoal  
*(created by coffer dam decommissioning - evaluation in progress)*
- Sloped & Vegetated
- Potential New Fish Habitat  
*(created by developing aggregate pit below water table)*

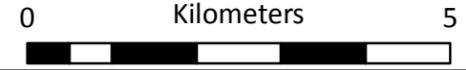
\*Trout Lake Forest Management Plan



**Springpole Gold Project**  
 Conceptual General Arrangement  
 After Mine Closure  
 Figure 4.2.1

Kenora District, Ontario

July 2020 NAD83, UTM zone15



**All Weather Wenesaga Road \***

## 5 DESCRIPTION OF AND RATIONALE FOR ALTERNATIVES

The Ontario EAA refers to two different types of alternatives: “alternatives to” a proposed Undertaking and “alternative methods” to a proposed Undertaking. As defined by the MECP, “alternatives to” are defined as “functionally different ways of approaching and dealing with a problem or opportunity”, while alternative methods are defined as “different ways of performing the same activity” (MECP, 2016). The assessment of a wide range of alternatives is essential to the EA planning process in Ontario and is proposed 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. As per section 2.1 and subsection 6.1 (2) (b) (iii) 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. Further rationale for the decision to proceed with the open pit can be found in the Technical Memo located in **Appendix A**.

The “Do Nothing” approach has been carried forward for the assessment of “alternative methods” to provide the benchmark against which alternatives are assessed. As previously stated, the preliminary study areas for the Undertaking, and description of the existing environment based on a “Do Nothing” scenario are described in **Section 6.0**.

The following sections provide information about the alternative methods that will be examined in the EA Report/EIS. Additional alternative methods may also be considered. FMG will prepare the EA in accordance with Sections 6(2)(c) and 6.1(3) of the EAA.

The EA Report/EIS 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.

## 5.1 Background

To determine the range of alternatives to be evaluated during EA process, the following aspects have and will be considered, as outlined in The Code of Practice: Preparing and Reviewing the Terms of Reference for Environmental Assessments in Ontario (MOE, 2014).

The comments and concerns that were raised during community meetings are documented in the RoC. Alternatives will also be selected based on input received during consultation with regulatory agencies, the public, and Indigenous communities. A reasonable range of alternative methods for each of the key components of the proposed preferred alternative to the undertaking will be considered and evaluated during the EA process and will be based on the following considerations:

### *Initial Internal Scoping Questions to Determine Potentially Available Alternatives:*

- Does the alternative provide a viable solution to the problem or opportunity being addressed?
- Does the alternative use proven technologies and is technically feasible?
- Are they consistent with other relevant federal/provincial planning objectives, policies, and decisions?
- Are they consistent with the provincial government priorities, such as: significant wetlands, species at risk (SAR), built heritage, endangered species, waste diversion, source water protection, reducing greenhouse gases, etc.?
- Could they affect any sensitive environmental features, such as: significant wetlands, species at risk (SAR), built heritage, endangered species, 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 to FMG's undertaking of the study?
- Are they able to meet the purpose of the EAA?

In addition, an alternative is considered unacceptable if any of the following criteria are met:

- The alternative cannot adequately satisfy the needs of the Undertaking;
- The alternative cannot be financially supported by FMG because it can cause an unacceptable return on investment and/or may not be cost effective. Cost effectiveness is measured within the context of capital costs (CAPEX), operating costs (OPEX), sustaining capital, maintenance costs, closure/rehabilitation costs, and decommissioning costs; or
- The alternative would result in substantive and unnecessary disruption to biophysical or human environments when compared with other more viable alternatives

There is potential that other alternatives may arise through ongoing engineering studies or the EA process and related consultation/engagements activities, and will be assessed if appropriate in the EA Report/EIS.

## **5.2 Identification of Alternatives to the Project**

As indicated above, engineering studies have deemed the Undertaking is only feasible as an open pit mine and therefore the “Do Nothing” approach will be the only comparison. The “Do Nothing” alternative means that the Undertaking would not proceed, which does not meet the purpose of the Undertaking.

## **5.3 Alternatives Methods of Carrying Out the Project**

### **5.3.1 Identification of Alternatives Methods**

Alternatives will be identified and selected for assessment only if they satisfy the FMG requirements for health and safety, environmental protection, and cost effectiveness. It is well established that all mining operations pose some unavoidable on-site safety, environmental, social, and economic risks as do other industrial operations. FMG recognizes these risks and will ensure that worker health and safety and training programs are in place to prevent them from occurring.

The “Do Nothing” approach will be carried forward for the assessment of alternative methods, and as noted in the ToR Code of Practice, the “Do Nothing” alternative represents what is expected to happen if none of the alternatives being considered are carried out (e.g., it is a benchmark/baseline against which alternatives can be measured).

FMG will explore feasible alternative methods to ensure project options are not limited in the event of an unforeseen change in plan. A reasonable range of alternative methods will be considered during the EA process, and viable alternatives will be brought forward for assessment in the EA Report/EIS. A preliminary list of alternative methods for carrying out the Undertaking will be developed for the following components of the Undertaking:

- Mine water management;
- Mine rock and overburden management;
- Ore processing (process plant);
- Process effluent and tailings management;
- Water supply;
- Water discharge;
- Watercourse realignments;
- Site infrastructure positioning;
- Explosive handling and storage;
- Solid waste management and domestic sewage treatment;
- Aggregate supply;
- Power supply and routing;

- Site access and access road routing; and
- Mine closure.

In terms of access roads, two potential alternatives were studied. These included an access road from the west side and the east side. Additional alternatives for road access will be considered and included in the assessment for alternatives as FMG continues with consultation and engagement activities. Both options and any additional alternatives will be assessed and included in the EA Report/EIS, and considerations will be made for species at risk, specifically caribou. See **Figures 6.3.15, 6.3.16, 6.3.17, 6.3.18**, and **Figures C, D, E** in **Appendix B** for the two road access option.

For mineral waste storage (tailings, overburden and waste rock), FMG is also expecting 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).

### **5.3.2 Mine Water Management**

The Undertaking will require the management of water from several different areas, including from the open pit. FMG also has an overall goal of wishing 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. Additional management and treatment will be required for the mine water. Appropriate mine water alternatives will be considered in the EA Report/EIS. The need for extended effluent aging alternative will be adequately assessed during the EA process, and will provide clear, quantitative evidence that adequate retention times are feasible, and identify feasible contingencies.

FMG will identify the Contaminants of Concern (COCs) for mine water management, and from this will explore all 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 EA Report/EIS.

### **5.3.3 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 consist of overburden and other rock materials excavated in order to create foundation pads for surface facilities. Identifying suitable mineral waste (waste rock and overburden) disposal locations requires careful considerations of key factors including:

- Minimizing 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 all mine rock will be used and managed to avoid potential effects associated with ML/ARD, including identification of feasible mitigation measures and contingencies, will be considered during the EA process. Further considerations include the development of a conceptual waste rock management plan to be included in the EA Report/EIS.

The Undertaking is expected to generate approximately 6 Mt of overburden and 310 Mt of mine rock. Some of the mine rock is expected to be used in various forms during construction, 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 MRAs are currently expected to serve as storage for mine rock and overburden material.

FMG will assess alternative methods for management of overburden and waste rock that will not be utilized for construction activities, and will assess feasible alternatives to ensure the project options are not limited and will be included in the EA Report/EIS. 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).

#### **5.3.4 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. Given the lack of nearby off-site processing capacity, only on-site processing will be assessed utilizing a reasonable range of alternative methods during the EA process.

A reasonable range of alternative methods for gold recovery will be considered and assessed in the EA Report/EIS. Some examples of alternatives potentially available for recovering gold from the ore are the following:

- Whole ore cyanidation;
- Gravity Separation; and
- Flotation concentrate recovery.

### **5.3.5 Selected Gold Recovery Method**

A reasonable range of alternative methods for gold recovery will be considered and assessed during the EA process. The details regarding this assessment will be detailed in the EA report/EIS.

### **5.3.6 Process Effluent Treatment and Tailings Management**

One of the two by-products of gold production is process effluent, which together with the tailings, will be conveyed to the TMF. Some reagents may remain in the process effluent and will require further treatment; therefore, 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 (rejects from the processing of ore) will be produced over the expected 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 discharged to the TMF for further effluent treatment (extended aging) and permanent storage of the tailings solids. Once in the TMF, the tailings solids would settle out. 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 EA Report/EIS. 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.

### **5.3.7 Water Sourcing**

Process water will derive from open pit dewatering, runoff collected from the various stockpile areas, water recycled from the TMF and fresh water withdrawn from Springpole Lake. There are many benefits to recycling of 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 processing 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 the Springpole Lake is currently envisaged, which would allow for a reliable source of water from this water body and relatively short distance from the ore processing plant, which will be the main water consumer. Alternative water supply sources that will be considered in the EA Report/EIS include

groundwater, alternative surface water sources, and a combination of open pit mine water and surface water sources.

### **5.3.8 Water Discharge**

FMG anticipates that it will manage the 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 water 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 and will be protective of receiving water aquatic life. FMG will identify that effluent limits are receiver based and will be developed on the sensitivity of the receiver, available assimilative capacity of the receiver and baseline water quality, and be consistent with the Ministry's "*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 dilution, minimizing the extent of the mixing zone (MOE, 1994B) as well as the risk of chemo-stratification and potential changes to the photic zone. These preliminary discharge locations may change as more information is discovered through the EA process.

### **5.3.9 Watercourse Realignment**

As part of the proposed development of the Springpole site, including the open pit, TMF, and MRAs, watercourse realignments are anticipated to be required. These realignments require further investigation and will be reviewed as engineering studies advance and the preferred location of the MRAs and TMF are selected. The principal guidelines for selection of the watercourse realignment arrangement are as follows:

- Select watercourse realignments with the aim of minimizing the overall environmental footprint of the Undertaking, while at the same time considering economic efficiency;
- Minimize disturbance of the existing water flow regime and existing aquatic habitat, thereby also minimizing disturbance on existing terrestrial flora and fauna;
- Plan for and establish fish habitat compensation;
- Minimize disturbance of existing land use;
- Minimize water transfer amongst existing sub-watersheds; and
- Ensure safety of personnel in the open pit and any other components near any future realignments.

Alternative watercourse realignment arrangements will be assessed in the EA Report/EIS.

### **5.3.10 Site Infrastructure Positioning**

Options for locating the majority of site infrastructure are dictated by the positioning of the open pits, TMF, MRAs, 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, and administration complex;
- Accommodations complex, to be used for both construction and operations phases;
- Fuel and lube bay;
- General laydown areas and temporary storage facilities during construction; and
- Explosives manufacturing and storage facilities.

The ore processing, maintenance, and administrative complexes are 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 overall 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. However, the selected locations will be assessed during the EA process to ensure that they are in line with the technical, environmental, social and economic attributes.

Alternative locations for support facilities will be evaluated in the EA Report/EIS where a reasonable range of alternatives exist for the support facility. It is expected that approximately 360+ workers will be accommodated during the construction and operation phases. Options for worker accommodations during the construction phase may include an on-site construction camp and camp facilities during the operational phase. These and other reasonable alternatives will be assessed in the EA Report/EIS.

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.

### **5.3.11 Explosives Storage Siting and Storage**

FMG anticipates the supply of explosives required for site development and operation will be carried out under a contractor-provided service. Explosives needed for development will be prepared in a dedicated explosive manufacturing facility. The positioning of the explosives facilities is prescribed by the Quantity Distance Principles User's Manual (Natural Resources Canada, 1995) and is dependent in part on the location of other site facilities. Handling of explosives is equally legislated, and methods will be required to meet regulations. For these reasons, limited practical alternatives are available, but they will be assessed during the EA process.

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

#### **5.3.12.1 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 for waste streams, volumes and waste management we will be considered and evaluated in the EA Report/EIS.

#### **5.3.12.2 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. This will be assessed during future engineering investigations and both alternatives will be assessed during the EA process.

#### **5.3.12.3 Domestic Sewage**

Domestic sewage will be generated during the Undertaking and will require treatment. A reasonable range of alternatives for the domestic sewage treatment will be considered and assessed in the EA Report/EIS. FMG will design the treatment system and obtain the necessary permits in accordance with provincial requirements.

### **5.3.13 Aggregate Supply**

Most of the aggregate required to develop the Undertaking is anticipated to be inert 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. It may therefore be necessary to investigate and develop additional aggregate source(s); therefore, identification of alternative aggregate supply sources will be assessed during the EA process and could include the following options alone or in combination:

- Overburden/mine rock;

- Dedicated aggregate pits; and/or
- Commercial (i.e. non-FMG controlled) aggregate pits located along the Wenasaga 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 EA Report/EIS will consider potential environmental impacts associated with proposed aggregate extraction, including identification of feasible mitigation measures and contingencies.

#### **5.3.14 Power Supply**

Development and operation of a remote mine requires a reliable power source, including to ensure the safety of workers. The mine and processing plant will be the main power consumers. Reasonable alternatives for power supply for the various phases of the Undertaking will be considered in the EA Report/EIS. The primary alternatives to be assessed will be diesel generation and grid power delivered to the Springpole site via a transmission line. On-site renewable power generation is considered impractical as renewable energy cannot consistently and reliably provide power during mine operations. Therefore, it will be not assessed and included in the EA Report/EIS. Diesel power is an effective method to support mine construction prior to additional grid power being brought to site and can serve effectively as emergency power for critical site functions. This alternative will be brought forward into the EA to be considered for short-term use during the construction phase and subsequent periodic use during the operations phase (and potentially during the closure phase) as needed when grid power is unavailable. On-site diesel-fired power generation is not expected to be selected to support operations.

Power for operations phase is expected to be supplied via a new 115 kV or 230 kV transmission line connected to the regional electric grid, feeding a main on-site substation. Alternative transmission line routings will be considered in the EA Report/EIS.

#### **5.3.15 Site Access**

The Undertaking will require a means for bringing in processing equipment, mining equipment, supplies, and personnel to access the site. Two alternatives for the primary transport of equipment, supplies and personnel are by land and by air. Alternatives for site access including corridors and alignments will be assessed in the EA process.

#### **5.3.16 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 EA Report/EIS will include an assessment of reasonable closure alternatives for the Undertaking.

The EA Report/EIS 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 flooding and enhanced flooding);
- Water management system (leave in place, partial or full removal);
- Stockpiles (stabilization and covering/revegetation, use in backfill, engineered covers);
- TMF (permanent flooding, covering and revegetation);
- Buildings and linear infrastructure (decommission and rehabilitate or leave in place for future use);
- 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.

## 6 DESCRIPTION OF EXISTING ENVIRONMENT AND POTENTIAL EFFECTS OF THE UNDERTAKING

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 EA Report/EIS. 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 EA Report/EIS. For the EA Report/EIS, three spatial extents have been identified on a preliminary basis, as follows, to be used in assessing the potential effects of the Undertaking:

**Project Study Area (PSA):** Encompasses the entire footprint of the Undertaking as seen in **Figure 6.1.1**. Project study area includes but is not limited to, the process plant, shops and other buildings, TMF, MRAs, ore stockpile and crusher, open pit, access and haul roads and the transmission line corridor. Though all infrastructure in the claim area and areas for development are not listed, **Figure 6.1.1** encompasses the entire claim area.

**Local Study Areas (LSA):** This study area extends beyond the proposed development area and was defined by applying buffers around a contiguous area that includes all footprint elements and the watershed catchments containing them. LSA buffer distances were selected to reflect the expected range at which Undertaking effects are expected to extend, and may be revised in the EA Report/EIS including in consideration of technical advice from regulators. The LSA can be seen in **Figure 6.1.2**.

MECP recommends using a 10 km buffer to define the LSA for wolverine. Up until now FMG has been using the General Wildlife LSA (5 km) for all furbearers. However, FMG will update to a 10 km around the PSA if required during the EA process.

**Regional Study Areas (RSA):** Extend beyond the LSAs to include the maximum geographical extent in which impacts from the Undertaking are expected (**Figure 6.1.3**). 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 buffer distances, including potentially as revised based on ongoing studies (refer to **Table 6.8.1**), will be included in the EA Report/EIS.

## **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 Wenasaga Road to the south.

All fuel, food, and material supplies are 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 EA Report/EIS 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 F through I** 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 Project in 2015 when it completed the acquisition of Gold Canyon Resources Inc. (GCU). When the Springpole 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. Some of these lands are subject to royalty agreements. The Property boundary is illustrated in **Figure 1.2.1**.

FMG understands as per Policy 4.02.01 Application Review and Land Disposition Process - Appendix A, restrictions may apply to obtaining tenure on Designated Inland Lake Trout Lakes. FMG will engage in discussions with MNR/F 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 MNR. 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, Bertha, Deaddog, Gull, Fawcett and Christina (refer to **Figure 4.1.2**).

Distance from Springpole site to the nearest protected areas are provided below. These are shown in **Figure 1.1.1**, and protected areas and Areas of Natural or Scientific Interest in the region are shown in **Figure 6.2.1**.

### Conservation Areas

- Trout Lake Provincial Park: 79.4 km
- St. Raphael Provincial Park: 97 km
- Conservation Reserves
  - Gull-Christine: 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

### Dedicated Protected Areas

- Beekahncheekahmeeng deebahncheekayweehn eenahnahnuhn: 21.4 km
- Kahnahmaykoosayseekahk: 119.9 km

To the knowledge of FMG, there have been no regional studies for the area. The Wataynikaneyap Transmission Line project has finalized their EA. Cat Lake First Nation and Slate Falls First Nation prepared a joint land use plan in 2011 with support from MNR (Cat Lake First Nation *et al.* 2011).

## 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 south of the Property and the Municipality of Sioux Lookout is situated 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 numerous 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.

Remote tourism lakes in the general vicinity of the Project Site include Birch, Seagrave, Bertha, Deaddog, Gull, Fawcett, and Christina.

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

The Project area straddles Treaty 9 and Treaty 3 boundaries, as generally presented in **Figure 1.1.1**. The project boundaries are also overlain by registered trap lines that FMG understands are held by a family from Cat Lake First Nation. 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 Ecological Knowledge/Land Use 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 EA Report/EIS, and will be detailed only in accordance with any agreements with knowledge holders. Preliminary discussions with Cat Lake First Nation can be found in Section 5 of the RoC.

## **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 First Nation (Reserve): 45 km
- Mishkeegogamang First Nation (Reserve): 148 km
- Pikangikum First Nation (Reserve): 128 km
- 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, 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 (BIF), and coarse pebble conglomerates. Devaney (2001a) 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 (2001a) 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 metal leaching and acid rock drainage (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 and contingencies. Some of the programs undertaken in the past and present are described below.

#### Historical Geochemistry Assessment Program

Minesite Drainage Assessment Group (A Division of Morwijk Enterprises Ltd.) was engaged to undertake an initial assessment of ARD potential and this 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.
- Approximately 36% of samples were theoretically predicted to eventually become acidic after some lag time that required kinetic testing to be further evaluated. This included both ore-grade and waste-grade samples, mostly from the Portage Zone.
- Kinetic tests were recommended to confirm or reject these predictions.

SGS was engaged to prepare two (2) representative composite ore samples that were carefully selected for metallurgical testing. These samples were subjected to static tests followed by kinetic testing (2 humidity cells) that lasted 168 weeks. Chem-Dynamics was engaged to interpret the data and findings 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 (2) samples suggest the samples will ultimately turn acidic after more than 60 and 100 years, respectively.
- Under neutral pH conditions, metal leaching was low to negligible.

#### Current Geochemistry Assessment Program

A comprehensive program for geochemistry assessment of the waste rock and tailings commenced in late 2019 and is continuing into 2020. The geochemistry program includes the following program phases:

Phase 1: Geochemistry gap assessment

Phase 2: Phase 1A geochemical characterization, static testing of waste rock, pit walls, ore

Phase 2: Phase 1B geochemical characterization, leachate extraction testing of waste rock and pit walls

Phase 2: Phase 1C geochemical characterization and kinetic testing of waste rock, pit walls and ore (42 weeks)

Phase 3: Phase 2A geochemical characterization, static testing and leachate extraction testing of tailings

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)
- Laboratory humidity cell tests (HCT's) on sample subset (n=10)

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

### **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 onsite 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 (5) weather stations surrounding the Springpole Site from Canadian Climate Normals 1951 to 1980 (Environment Canada, 1982a, 1982c, 1982c). 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. This is 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 historical 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 EA Report/EIS 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>	2020-2007

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 undertaking 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 EA Report/EIS 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<sup>2.5</sup>);
  - Particulate less than 10 microns (PM<sup>10</sup>);
- Diesel particulate matter;
- Carbon monoxide;
- Sulphur oxides;
- Nitrogen oxides; and
- Volatile organic compounds.

Baseline greenhouse gas data (summarised in kilo tonnes of carbon dioxide equivalents) will also be assessed.

An air quality Work plan/Technical Work Plan (ambient air quality monitoring program) with technical details will be developed in consultation with government agencies with regards to air quality monitoring for the proposed Undertaking. <https://www.canada.ca/en/health-canada/services/publications/healthy-living/guidance-evaluating-human-health-impacts-air-quality.html>

### **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. 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 when preparing the Environmental Assessment (EA) for the proposed Springpole Gold Project:

- Noise Limits: shall comply with the MECP noise limits in:
  - Publication NPC-115, “Construction Equipment”;
  - Publication NPC-118, “Motorized Conveyances”; and
  - Publication NPC-300, “Environmental Noise Guideline, Stationary and Transportation Sources – Approval and Planning, Publication NPC-300”, August, 2013.
- Noise Screening: shall be prepared in accordance with:
  - Primary Noise Screening Method Guide, <https://www.ontario.ca/page/primary-noise-screening-method-guide>; and
  - Secondary Noise Screening Method Guide, <https://www.ontario.ca/page/secondary-noise-screening-method-guide>.
- Noise Reports: shall be prepared in accordance with:
  - Publication NPC-233, "Information to be Submitted for Approval of Stationary Sources of Sound", October, 1995; and
  - 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 Environmental Assessment and Approvals Branch, Version 2.1, April 2011

Noise evaluation of the undertaking will consider all significant noise sources, both existing and proposed, for the facility under assessment, including but not limited to the following sources of noise from the proposed operations:

- a) New transmission lines resulting from the project;
- b) Fixed or mobile mechanical equipment;
- c) Ventilation equipment utilized in buildings; and

d) Vehicular activities, such as the movement of transport trucks, haul trucks, tanker trucks, front end loaders, etc., as well as any unloading/loading activities associated with these vehicles including but not limited to the use of truck-mounted blowers or pumps.

The following vibrational study items will be considered when preparing the Environmental Assessment (EA) for the proposed Springpole Gold Project:

- Vibration Limits: shall comply with 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.

The following address will be considered for methodologies to assess the health impact on air quality due to the Project: <https://www.canada.ca/en/health-canada/services/publications/healthy-living/guidance-evaluating-human-health-impacts-noise.html>

Baseline noise, vibration, and light data is not available and on-site measurements are planned in 2020 to address this data gap. 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 EA Report/EIS, and utilized to assess potential environmental effects of the Undertaking. Light pollution associated with artificial lighting may result in disturbance to some nocturnal and/or crepuscular species at risk that forage at night. FMG understand the potential effects due to light pollution associated with artificial lighting throughout each component of the Undertaking. Light studies will be completed during the EA process and included in the EA Report/EIS.

### **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 and 2013). All three lakes had similar trends and were characterized as having total organic concentrations (TOC), Total Kjeldahl Nitrogen (TKN), and total phosphorous levels above the Provincial Sediment Quality Guidelines (PSQG) (MOE 2008). 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 2,477.5 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 MNR'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 onsite hydrology data will be compared to the Water Survey of Canada hydrometric station located on the Cat River 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; however, FMG understands that this data is subject to further assessments of inherent watersheds.

The Undertaking could impact surface water hydrology by altering stream flows, channel morphology, and glaciers. Such effects may occur during the Construction, Operation, Closure, and Post-closure phases. Alteration of surface water hydrology could potentially affect receptor VCs that have linkages with surface water hydrology. These receptor VCs include surface water quality, aquatic resources, fish and fish habitat, terrestrial ecology, wetlands, navigation, commercial and non-commercial land use, and current use of lands and resources for traditional purposes.

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 onsite 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 EA Report/EIS.

FMG will consult with MECP and other relevant regulatory agencies regarding the hydrology baseline program, to help ensure that sufficient data is being collected that meets ministry expectations.

#### 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). To date, water quality results indicate that the local surface waters generally meet PWQOs in the baseline condition for almost all parameters analyzed, apart from mercury and phosphorous which were noted to be naturally elevated above PWQO during 2011 and 2012.

The PWQOs are chemical and physical indicators that have been 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 EA Report/EIS. 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 ground water 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 PSA. 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 (7) 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 waste rock area and five piezometers and drive points were installed in the TMA. Ground Penetrating Radar (GPR) surveys were conducted in selected areas of the proposed waste 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 that exceeded ODWS criteria 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 EA Report/EIS and future environmental approvals. FMG will develop programs to predict pit water quality for the LOM, closure and post-closure and assess pit flooding in terms of associated environmental effects, mitigation measures and contingencies. 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 flooded pit.
- Sensitivity analysis for operations, closure and post-closure phases.
- 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 EA Report/EIS and its supporting documentation

#### 6.3.9.2 Groundwater Quality

Pinchin Environmental mobilized to the Project Site in 2013 and installed overburden monitoring wells 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, North Rock Environmental completed sampling at these five (5) overburden groundwater monitoring wells (MW1 to MW5) and at six (6) 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 strictly apply to the baseline groundwater condition;

- Ontario Drinking Water Quality Standards (ODWQSs, O. Reg. 169/03)
- Incorporation of the reasonable use concept into MOEE groundwater management activities, Guideline B-7.
  - Will be included in the EA Report/EIS and will help to establish background criteria based on adequate background data that has been collected.

FMG will continue to consult with MECP’s Northern Region Technical Support Section as the plans for these baseline studies are being developed.

Groundwater sampling methodologies, sampling locations and results of groundwater quality analyses will be provided in the EA Report/EIS 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 with C. Portt and Associates to provide the necessary data to inform any future consultation, planning, EA or permitting for the Project. 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 PSA;
- Collect baseline data sets for the selected waterbodies that meet the requirements of Section 27.1 of the *Metal Mining Effluent Regulations*, recent EIS Guidelines for metal mining projects issued pursuant to CEAA 2012, and fisheries offsetting plans;
- 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 (MNRF, 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 (3) categories based on the size or type of aquatic system:

- First category: 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**.

Second category: Small unnamed lakes within and around the PSA, 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.

- Third category: 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 species-at-risk (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 EA Report/EIS.

**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

Species	Lake		
	Springpole	Birch	Seagrave
Northern Pike	X	X	X
Yellow Perch	X	X	X
Rock Bass	X		
White Sucker	X	X	X
Burbot	X	X	X
Lake Herring		X	X
Shorthead Redhorse		X	
Greater Redhorse		X	
Emerald Shiner		X	
Blacknose Shiner		X	
Spottail Shiner		X	
Iowa Darter		X	
Log Perch		X	
Mottled Sculpin		X	

**Table 6.3.3 Fish Catch in Small Waterbodies**

Small Waterbody (refer to Figure 6.3.11)	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.

#### 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.

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, Northern Pike, etc.) 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 contaminants of concern in the environment is mercury (Hg), 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 EA Report/EIS.

#### 6.3.10.3 Benthic Communities

Studies were completed by DST (2012 and 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 PSA since 2011. The 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 completed by DST (2012 and 2013), and KBM (2019) summarized all the terrestrial work done to 2019, and all of these will be appended in the EA Report/EIS as part of the terrestrial technical report.

#### 6.3.11.1 Species at Risk

The SARs baseline considerations for the EIS, data analysis, and metrics to be collected and additional data gaps to be fulfilled are given below in **Table 6.3.5**.

FMG will provide additional information in the EA Report/EIS 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 SARA (Federal)
- Species Status under ESA (Provincial)
- Conservation Ranking (i.e., N-Rank, S-Rank)

- Information Source(s) used to identify potential occurrence within the area of the Project

FMG understands to fully understand the impacts and/or benefits of one alternative versus another, all relevant metrics and evaluators for SAR should be considered. FMG will include a complete list of appropriate indicators for these species identified, including caribou, and this information will be provided in the EA Report/EIS.

During the EA process, FMG will work with both provincial and federal agencies to provide guidance on additional information pertaining to the metrics to be collected and the data analysis methods in order to guide FMG to produce the information required to evaluate the impact of the Project on the species listed in **Table 6.3.5** provides a preliminary list of the SAR baseline considerations and metrics anticipated to be included (or similar) in the EA Report/EIS.

**Table 6.3.5 Preliminary Species at Risk (SAR) Baseline Considerations**

<b>Species at Risk (SAR)</b>		
<b>Migratory Birds</b>	<i>Species at Risk (SAR) targeted:</i>	Canada Warbler, Olive-sided Flycatcher, Bank Swallow, Barn Swallow, Rusty Blackbird
	<i>Baseline consideration for the EA Report/EIS:</i>	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 EA Report/EIS 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.
	<i>Metrics to be collected:</i>	Number of species observed will be summarized by point count, ecosite, and habitat category. Nesting Surveys.
	<i>Data Analysis:</i>	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.
<b>Nightjars</b>	<i>Species at Risk (SAR) targeted:</i>	Eastern Whip-poor-will, Common Nighthawk
	<i>Baseline consideration for the EA Report/EIS:</i>	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 EA Report/EIS will include a description of: a) birds and their habitats that are found or are 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.
	<i>Metrics to be collected:</i>	Species presence/absence and survey location/ecosite will be summarized. Habitat assessments, breeding surveys

<b>Species at Risk (SAR)</b>		
	<i>Data Analysis:</i>	EWPW survey data will simply be summarized/descriptive statistics.
<b>Marsh Bird Monitoring</b>	<i>Species at Risk (SAR) targeted:</i>	Yellow Rail, Least Bittern, Rusty Blackbird, Short-eared Owl, Black Tern
	<i>Baseline consideration for the EA Report/EIS:</i>	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 EA Report/EIS will include a description of: a) birds and their habitats that are found or are 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.
	<i>Metrics to be collected:</i>	Species observed (targeting focal marsh bird species) will be summarized by survey location, ecosite, and habitat category.
	<i>Data Analysis:</i>	Marsh bird survey data will simply be summarized/descriptive statistics.
<b>Waterfowl</b>	<i>Species at Risk (SAR) targeted:</i>	Horned Grebe, American White Pelican, Black Tern
	<i>Baseline consideration for the EA Report/EIS:</i>	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 EA Report/EIS will include a description of: a) birds and their habitats that are found or are 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.
	<i>Metrics to be collected:</i>	Species observed will be summarized by location, abundance (Occupancy), and habitat category. Habitat assessments.
	<i>Data Analysis:</i>	The waterfowl/beaver survey data will simply be summarized/descriptive statistics.
<b>Caribou Boreal</b>	<i>Species at Risk (SAR) targeted:</i>	Caribou Boreal
	<i>Baseline consideration for the EA Report/EIS:</i>	Baseline data will provide, "plant and animal species (abundance, distribution and diversity) and their habitats, with a focus on species at risk that are of social, economic, cultural or scientific significance." 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 of species at risk that may occur in the project area, or be affected by the project."
	<i>Metrics to be collected:</i>	Observations of individuals or signs (i.e., tracks). Aerial/ground surveys.

<b>Species at Risk (SAR)</b>		
	<i>Data Analysis:</i>	Observations will be spatially plotted to illustrate their locations relative to the Project, summarized/ descriptive statistics, and to determine animal densities where possible.
<b>Vegetation</b>	<i>Species at Risk (SAR) targeted:</i>	SAR and provincially rare plants
	<i>Baseline consideration for the EA Report/EIS:</i>	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 species at risk 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."
	<i>Metrics to be collected:</i>	The field surveys serve to ground-truth the Forest Resource Inventory ecosite classifications for the Project. Field data will be compared to ecosite indicators.
	<i>Data Analysis:</i>	Vegetation survey data will be summarized to create a master list of all plant species present in the vegetation LSA.
<b>Wetlands</b>	<i>Species at Risk (SAR) targeted:</i>	SAR and provincially rare plants
	<i>Baseline consideration for the EA Report/EIS:</i>	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 species at risk 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."
	<i>Metrics to be collected:</i>	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.
	<i>Data Analysis:</i>	All data collected during the wetland surveys will contribute to the OWES scoring of the wetlands, as described to the left.
<b>Bats</b>	<i>Species at Risk (SAR) targeted:</i>	Little Brown Myotis, Northern Myotis, Tri-colored Bat

<b>Species at Risk (SAR)</b>		
	<i>Baseline consideration for the EA Report/EIS:</i>	Baseline data will provide, "plant and animal species (abundance, distribution and diversity) and their habitats, with a focus on species at risk 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." 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 of species at risk that may occur in the project area, or be affected by the project." Additional bat hibernaculum screening. If warranted, bat roost habitat assessments, bat acoustic surveys.
	<i>Metrics to be collected:</i>	Recordings will be analysed using Kaleidoscope Pro (Wildlife Acoustics, 2019) or similar. Presence/absence, relative abundance and diversity will be summarized.
	<i>Data Analysis:</i>	Bat survey data will be used to identify which species are present in the Wildlife LSA and to estimate their relative abundance.
<b>Wildlife</b>	<i>Species at Risk (SAR) targeted:</i>	Wolverine
	<i>Baseline consideration for the EA Report/EIS:</i>	Baseline data will provide, "plant and animal species (abundance, distribution and diversity) and their habitats, with a focus on species at risk 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." 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 of species at risk that may occur in the project area, or be affected by the project."
	<i>Metrics to be collected:</i>	All wildlife observations will be catalogued and summarized. Presence/absence, relative abundance and diversity will be summarized. Aerial surveys.
	<i>Data Analysis:</i>	Wildlife camera observations will simply 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, Species at Risk 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 (OLT) for the portions of the study area that had FRI data. The OLT uses Landscape Scripting Language, which is a proprietary tool for

Geographic Information Systems (GIS) developed by the MNRF. The planning ranges for the Caribou Boreal can be seen in **Figure 6.3.13**. 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 2011, 2012) related to SAR are summarized below. Current and additional baselines studies will be appended in the EA Report/EIS as supporting documentation. These studies will include but not be limited to information on survey methodologies, dates, and extent.

##### Eastern Whip-poor-will

- Springpole Site is located outside current known range.
- No birds were observed by DST during Whip-poor-will surveys; they were also not observed in the Wildlife LSA during the baseline terrestrial field program, and do not appear to be present in the PSA.
- During studies, it was found that there is potential suitable habitat in the PSA; however, no Whip-poor-wills were found during all the surveys to date. Additional studies were done in 2019 and the results will be included in the EA Report/EIS.
- 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 (MNRF 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 EA Report/EIS.

##### Wolverine

- Tracks of one individual observed on Springpole Lake in February 2011.
- Winter use has been confirmed through track observations, no known denning sites.
- Not a lot of information available.

##### Northern Myotis/Little Brown Myotis

- Five (5) out of the six (6) monitoring locations where ultrasonic recorders were deployed detected Northern Myotis and four (4) of the six (6) 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 system are suitable habitats for these species and are present at the PSA, therefore, there is a potential that individuals are using some trees as roost trees in the PSA.

### Bat Hibernacula

- The likelihood of encountering bat hibernacula within the PSA and Wildlife LSA was assessed through a desktop mapping exercise. The results of the mapping were then reviewed by several people with expert knowledge of the PSA 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 EA Report/EIS.

### Caribou Boreal

- The Undertaking is located within the Churchill Caribou Range (**Figure 6.3.14**).
- Caribou prefer large contiguous "intact" conifer dominated stands, islands, and peninsulas. This habitat is present at the Springpole Site, north of Springpole Arm in particular, and is regarded as a significant subrange habitat feature.
- Historically, caribou have wintered east and south of Springpole Lake, then disperse northward and southwestward during the snow-free season, likely for calving.
- 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.
- Preliminary setbacks from significant habitat features are presented in **Figure 4.1.1**. However, the subrange habitat features identified in **Figure 4.1.1** 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 EA Report/EIS. FMG understands that where impacts cannot be avoided, an ESA authorization will be required.

FMG is anticipating to create an overall benefit for caribou and potentially for other SAR that are identified as present. Measures may, but are not necessarily limited to, include:

- 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 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 the previous studies regarding 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 (0-0.2 per km<sup>2</sup>) and the wildlife management objectives in this area focus on caribou (MNR 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 (**Figure 6.3.16**). 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 (*Fraxinus nigra*), or cedar swamps on very rich sites). None of these stands have been found to occur within the study area (**Figure 6.3.17**).
- Moose calving areas: There are several moose calving sites located within the study area, outside of the Springpole Site.
- Moose aquatic feeding areas ("MAFAs"): Two (2) MAFAs occur within the study area but are outside the Undertaking footprint (**Figure 6.3.18**).
- 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 MNRF (2000).

- Bobcat
- Northern Long-eared bat
- 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
- Prairie Spikemoss

Additional habitat and values maps can be seen in **Figures A** through **E**, 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 PSA 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 at the PSA in areas of historical exploration.

Soils for the Project 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 1m in thickness. In this region, soils are predominately grey wooded, podsoils 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 PSA 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 PSA are listed below:

- Deciduous Forests
- Mixedwood Forests
- Coniferous Forests
- Deciduous Swamp
- Mixedwood Swamps
- Coniferous Swamps

A field campaign was undertaken by DST Consulting Engineers 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 6.3.19**).

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 NHIC 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 First 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 First Nation: Slate Falls First 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 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 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 .

Metis Nation of Ontario: The Métis Nation of Ontario (MNO) was established in 1993 to represent communities that are a part of the Métis Nation, and has federal recognition of having the right to self-government. There are presently over 15,000 registered Metis 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.

## **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 Sustainable Forest License (SFL) for the Trout Lake Forest and is active in the region. The completed approved extension of the Wenasaga Road would connect with the southeast portion of the LSA (**Figures 1.1.1.**).

There are numerous tourism businesses operating in the area of the Wenasaga 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 in **Figures 4.1.1**. 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 one archaeological site located within the PSA, on the south shore of the east arm of Springpole Lake and two other archaeological sites are located near the northern border of the PSA.

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. Recommendations in the reports include requirements for additional archaeological fieldwork at 11 locations where fieldwork identified archaeological resources.

Gaps in the existing data include:

- Reports on Stage 1 assessments are absent;

- No detailed mapping of archaeological potential areas across the PSA;
- No mapping or description of archaeological resources identified as requiring Stage 2 assessment;
- Unclear documentation raises questions about the validity and robustness of previous work;
- Indigenous community interest in, and input to, the assessment process and outcomes is required.

The archaeological assessment is partly completed for Springpole site, but this work is not fully documented. Additional work is required to develop a comprehensive archaeological baseline dataset. This baseline should:

- Identify archaeological components including the following as appropriate:
  - o Accurately map archaeological sites, previous archaeological assessments of the property;
  - o Prepare a comprehensive evaluation of archaeological potential for the property
  - o Identify information gaps;
  - o Review proposal with affected Indigenous groups, and;
  - o Complete necessary property inspection to confirm archaeological potential.
- Identify potential changes to environment:
  - o Map areas of proposed development (“designated project” area).
- Predict and evaluate likely effects on archaeological components.
- Identify mitigation measures:
  - o Make recommendations for areas of no anticipated effect, and;
  - o Develop detailed recommendations for areas where effects are anticipated.
- Review mapping and recommendations:
  - o With Ontario Ministry of Tourism, Culture and Sport for compliance with OHA, and;
  - o Affected First Nations for feedback on resources, potential effects and mitigation.

As this work is ongoing, additional Stage 2 – 4 assessment and mitigation on archaeological resources identified can be completed in advance of development. Additional Stage 2 – 4 assessment and mitigation will be considered during the EA process on an ‘as needed’ basis.

GCU, and now 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 EA Report/EIS.

## 6.7 Description of the Built Environment

Seasonal residences are present on Birch Lake, which is upstream of the PSA, as well as south of the PSA on Johnson Island (refer to **Figure 6.2.2**).

There are numerous 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. Remote tourism lakes in the general vicinity of the Project Site include Birch, Seagrave, Bertha, Deaddog, Gull, Fawcett and Christina (refer to **Figure 4.1.2**).

Domtar currently holds the SFL for the Trout Lake Forest and is active in the region. The planned extension of the Wenasaga 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 Wenasaga 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 EA Report/EIS.

## 6.8 Ongoing and Future Studies

Baseline studies and technical data reports are currently underway. A final and more detailed description of the environment will be provided in the EA Report/EIS, based on the studies, tests, surveys and mapping that will be undertaken during the EA process. An overview of the previous and currently planned 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** and will have opportunities to participate in consultation and engagement regarding the baseline environmental conditions during consultation meetings in their respective communities. 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 COI.

FMG will develop

s/Technical Work Plans for various subject matters, that will outline the scope of work to be completed during the EA process. FMG will consult and liaison with various provincial and federal agencies to ensure that the Work plans/Technical Work Plans meet the EA requirements for each subject matter. Ongoing and future baseline studies and their applicable technical reports will be included as supporting documentation in the EA Report/ EIS. These technical reports are anticipated to address the following aspects;

- Soil and Terrain Features
- Wildlife

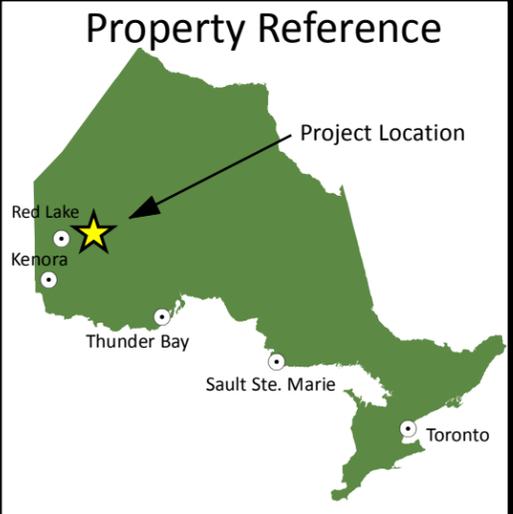
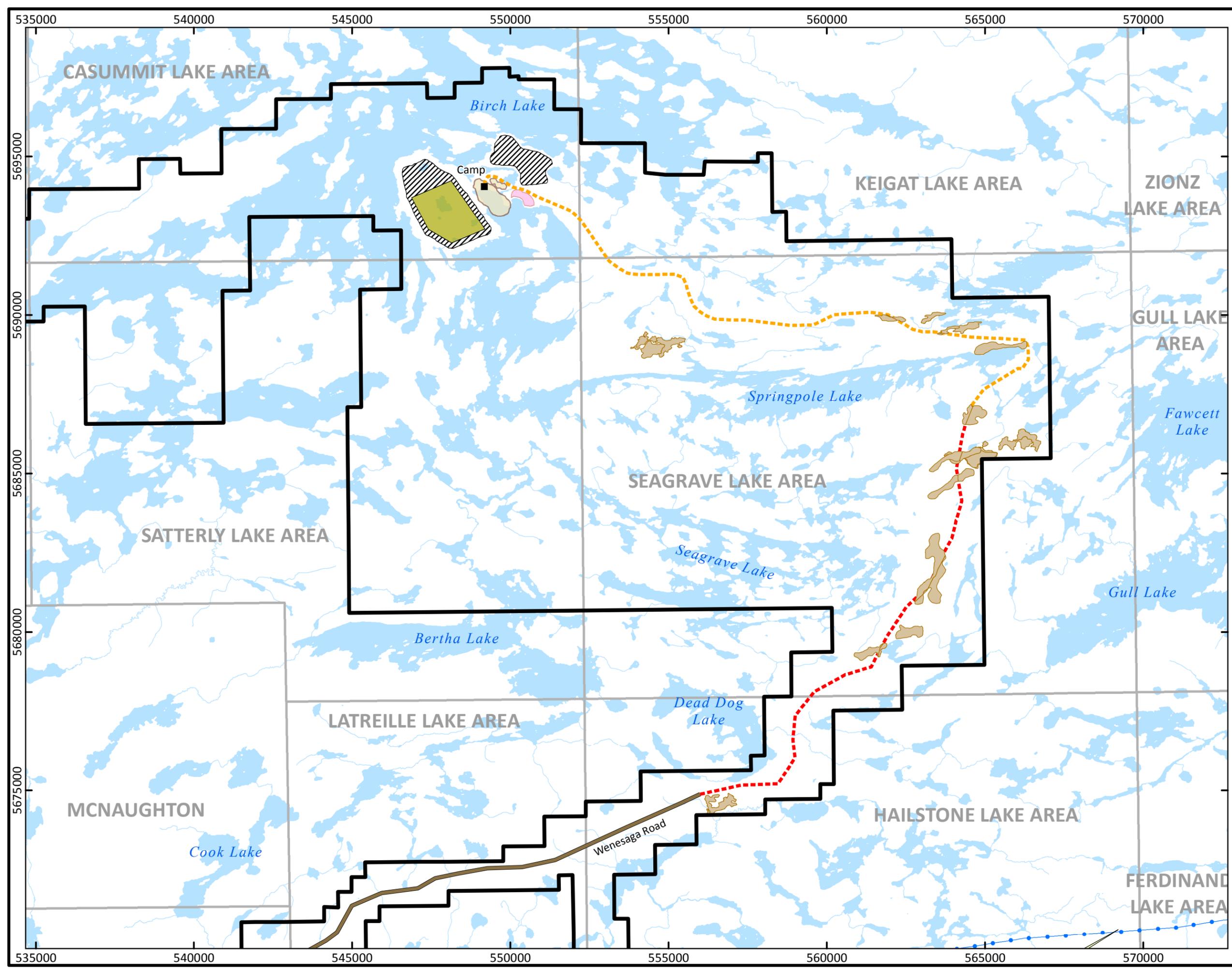
- Terrestrial Environment
- ARD/Metal Leaching
- Groundwater
- Surface Water
- Geotechnical
- Species at Risk
- Atmospheric Environment
- Fish and Aquatic Habitat
- Wetlands
- Socio Economic Conditions
- Traditional Knowledge
- Archaeology and Heritage Resources

**Table 6.8.1 Previous and Potential Future Baseline Studies**

Study Topic	Information to be Collected	Previous Baseline Studies (2019)	Potential Future Baseline Studies (2020–2021)	Anticipated Opportunity for Indigenous Participation
Climate	Precipitation, Evaporation, Pressure, Wind Speed and Direction	x	x	
Vegetation and Wetlands	Field surveys for classification and extent	x	x	x
Acid Rock Drainage and Metal Leaching (ARD/ML)	Geochemical analysis and rate predictions	x	x	
Soil Survey	Characterization of soils	x	x	
Wildlife Surveys (refer to the SARs in <b>Table 6.3.5</b> )	Plant and animal surveys for species abundance, distribution and diversity	x	x	x
Fish and Aquatic Habitat	Tagging, surveying and tissue analysis	x	x	x
Bathymetric Survey	Water depth using bathymetry instrumentation	x	x	
Benthic Invertebrate Community Survey	Community abundance, distribution and movements	x	x	x

<b>Study Topic</b>	<b>Information to be Collected</b>	<b>Previous Baseline Studies (2019)</b>	<b>Potential Future Baseline Studies (2020–2021)</b>	<b>Anticipated Opportunity for Indigenous Participation</b>
Hydrogeology	Flow regimes, bulk hydraulic conductivity, interactions, chemistry, site characterization	x	x	x
Surface Water Quality Monitoring	Surface water chemistry	x	x	x
Hydrology	Modelling, streamflows, water levels, climate	x	x	x
Ground Water Quality Monitoring	Groundwater chemistry	x	x	x
Atmospheric Assessments, Noise, Vibration and Light	Modelling using atmospheric parameters, climate	x	x	
Air Quality (e.g., Particulate, etc.)	Particulate and air quality analysis	x	x	
Community Consultation and Engagement	Community suggestions, concerns and feedback	x	x	x
Cultural Heritage Resources: Archaeological Resources	Evidence of past human activity	x	x	x
Cultural Heritage Resources: Built Heritage Resources and Cultural Heritage Landscapes	Cultural and historical land use	x	x	x
Socioeconomic Assessment	Collection and analysis of complicated social and economic processes	x	x	x
Visual aesthetics	Public and Indigenous surveys	x	x	x
Traditional Knowledge and Land Use (TK/TLU)	Ability to practise culture and lifestyle, and value of land	x	x	x
Non-Traditional Knowledge and Land Use	Open house consultation and surveys	x	x	

## 6.9 Figures



- Camp
- Wenesaga Road
- - - Wenesaga Road Extension
- · - · - Proposed Access Road
- - - Existing Power Line
- Township Boundary
- Springpole Property Boundary
- Aggregate Source
- Tailings Management Facility
- ▨ Waste Storage Facility
- Open Pit
- Plant Site & Shops

Mine Layout from Springpole PEA (SRK, 2019)

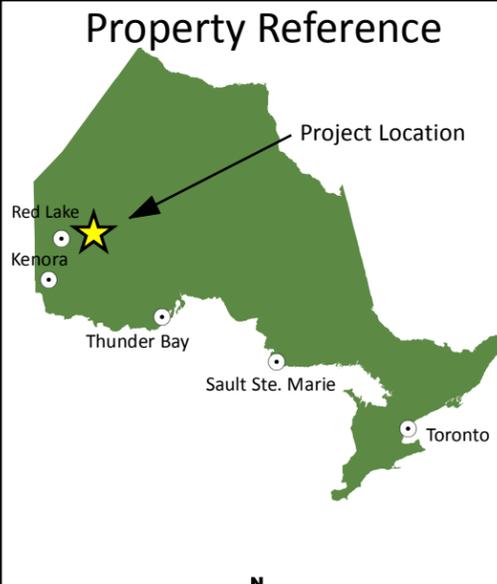
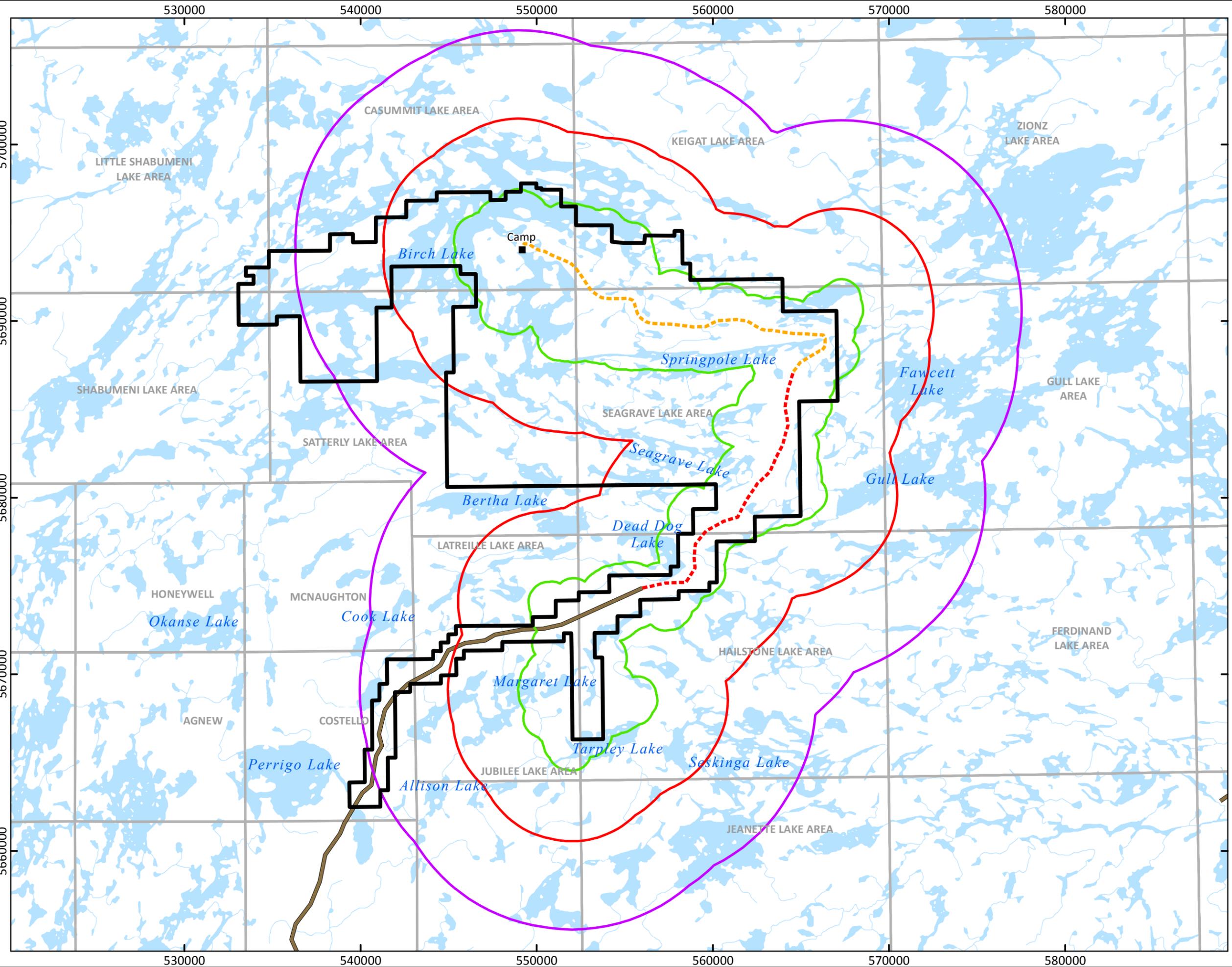


**Springpole Gold Project**  
 Project Study Area (PSA)  
 Figure 6.1.1

Kenora District, Ontario

July 2020 NAD83, UTM zone15





- Camp
- Wenesaga Road
- - - Wenesaga Road Extension
- - - Proposed Access Road
- Township Boundary
- Springpole Property Boundary
- Ungulate LSA
- Wildlife LSA
- Vegetation LSA

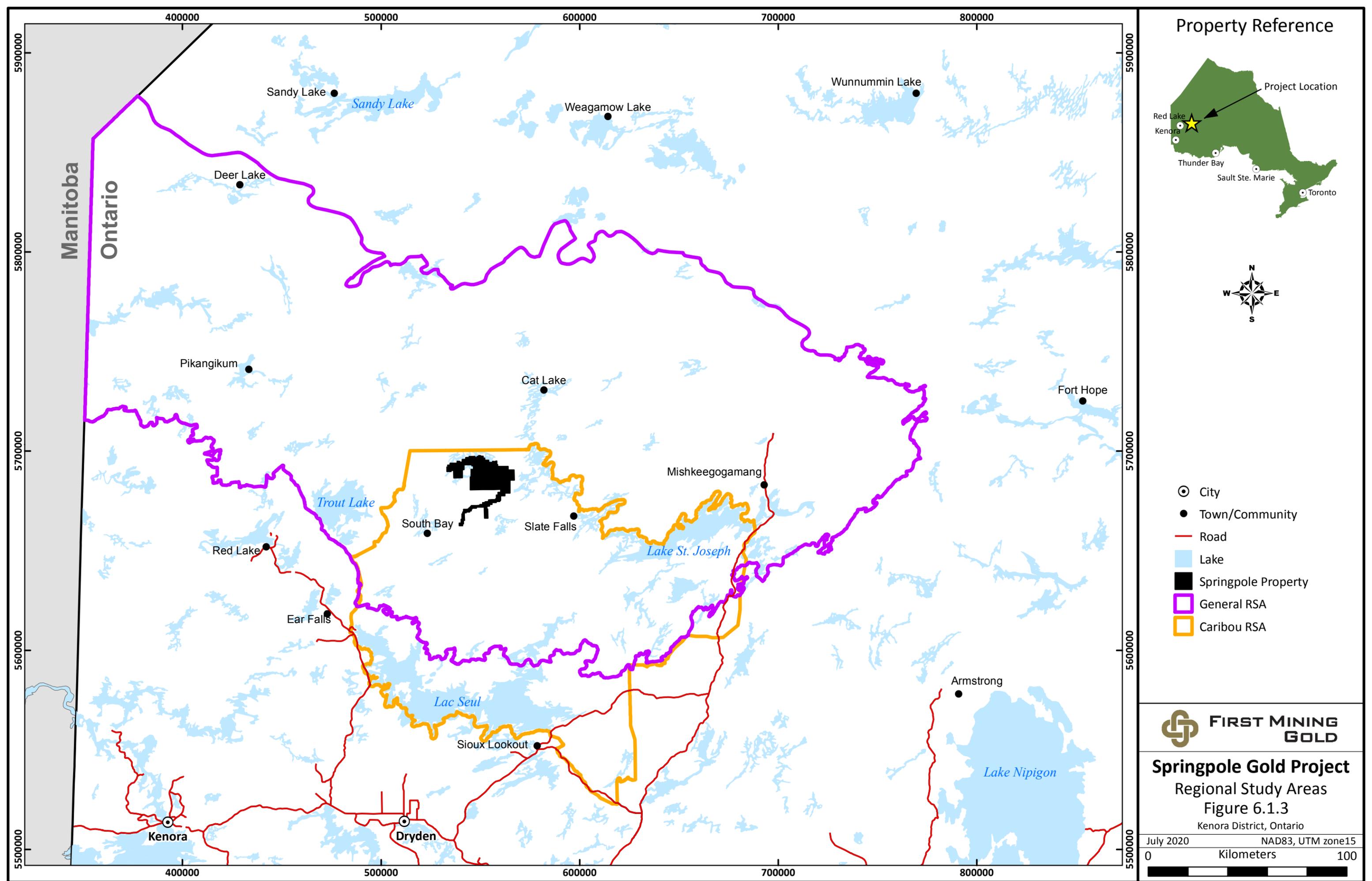

**FIRST MINING GOLD**

**Springpole Gold Project**  
 Local Study Areas  
 Figure 6.1.2  
 Kenora District, Ontario

July 2020 NAD83, UTM zone15

0 Kilometers 10





Property Reference



- City
- Town/Community
- Road
- Lake
- Springpole Property
- General RSA
- Caribou RSA



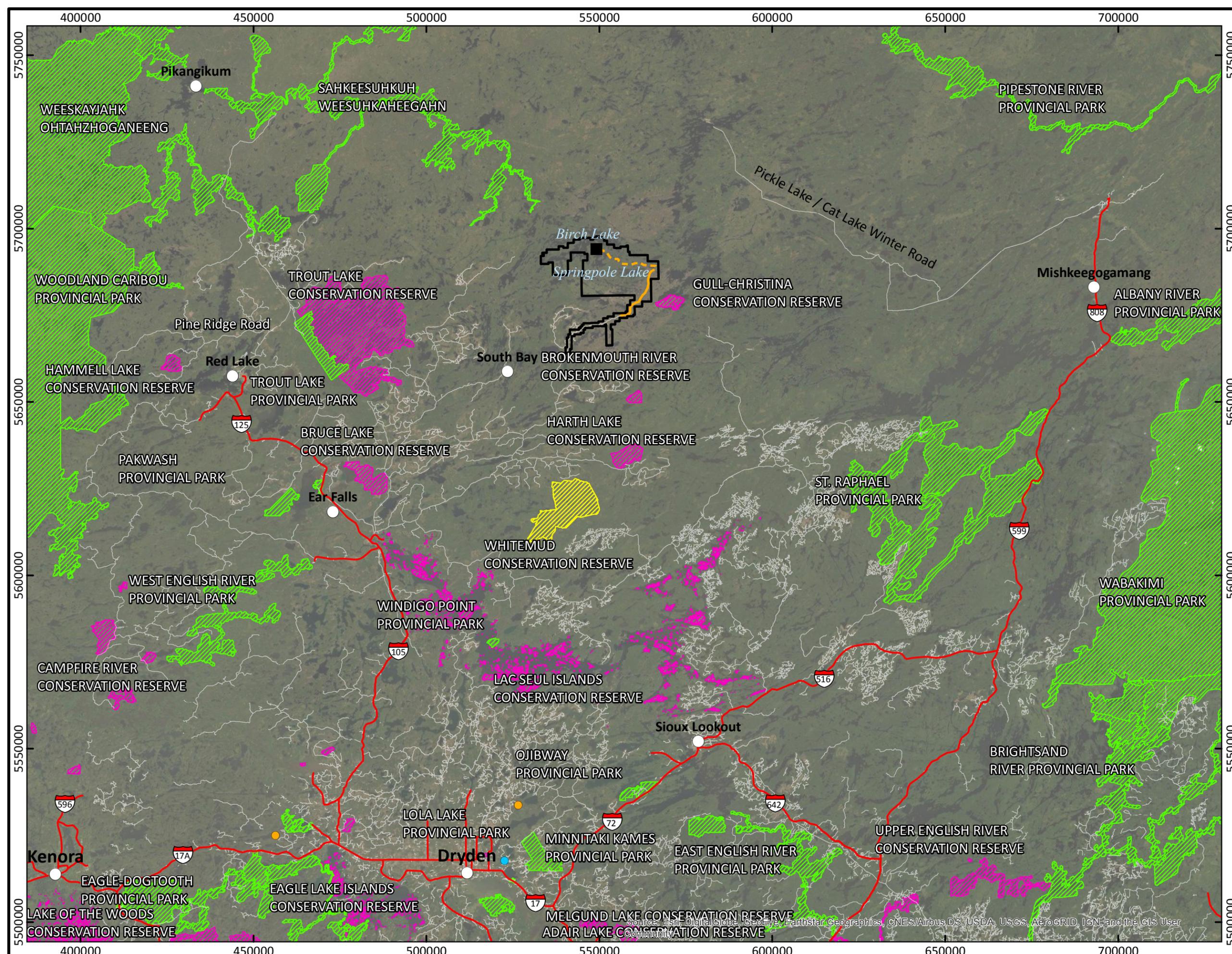
**Springpole Gold Project**  
 Regional Study Areas  
 Figure 6.1.3

Kenora District, Ontario

July 2020 NAD83, UTM zone 15

0 Kilometers 100





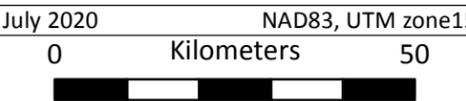
Property Reference



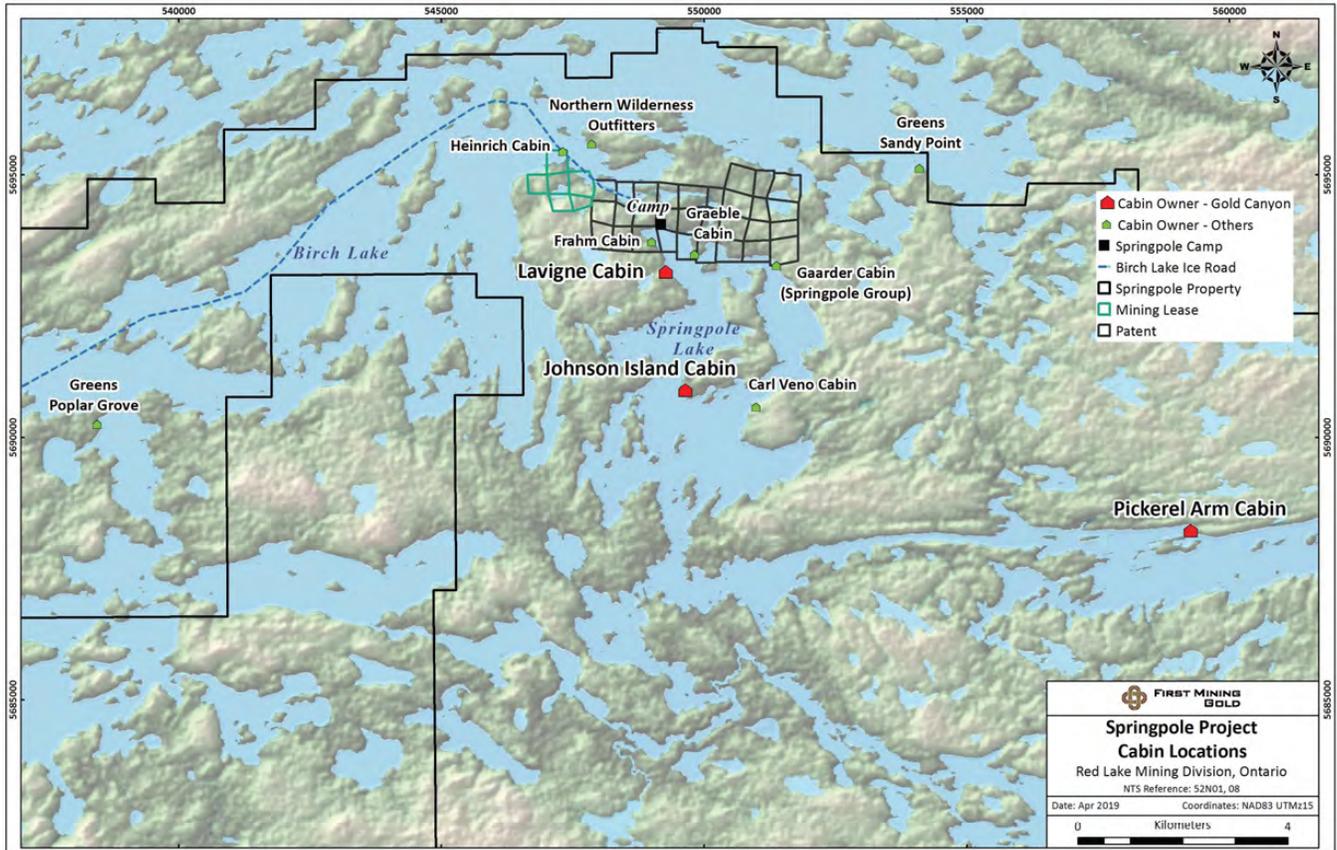
- Springpole Camp
- - - Proposed Access Road
- - - Wenesaga Road Extension
- City / Town / Community
- Road
- Highway
- Significant Valley
- Significant Woodland
- ▨ Whitemud River ANSI
- ▨ Provincial Park - Regulated
- ▨ Conservation Reserve
- Springpole Property

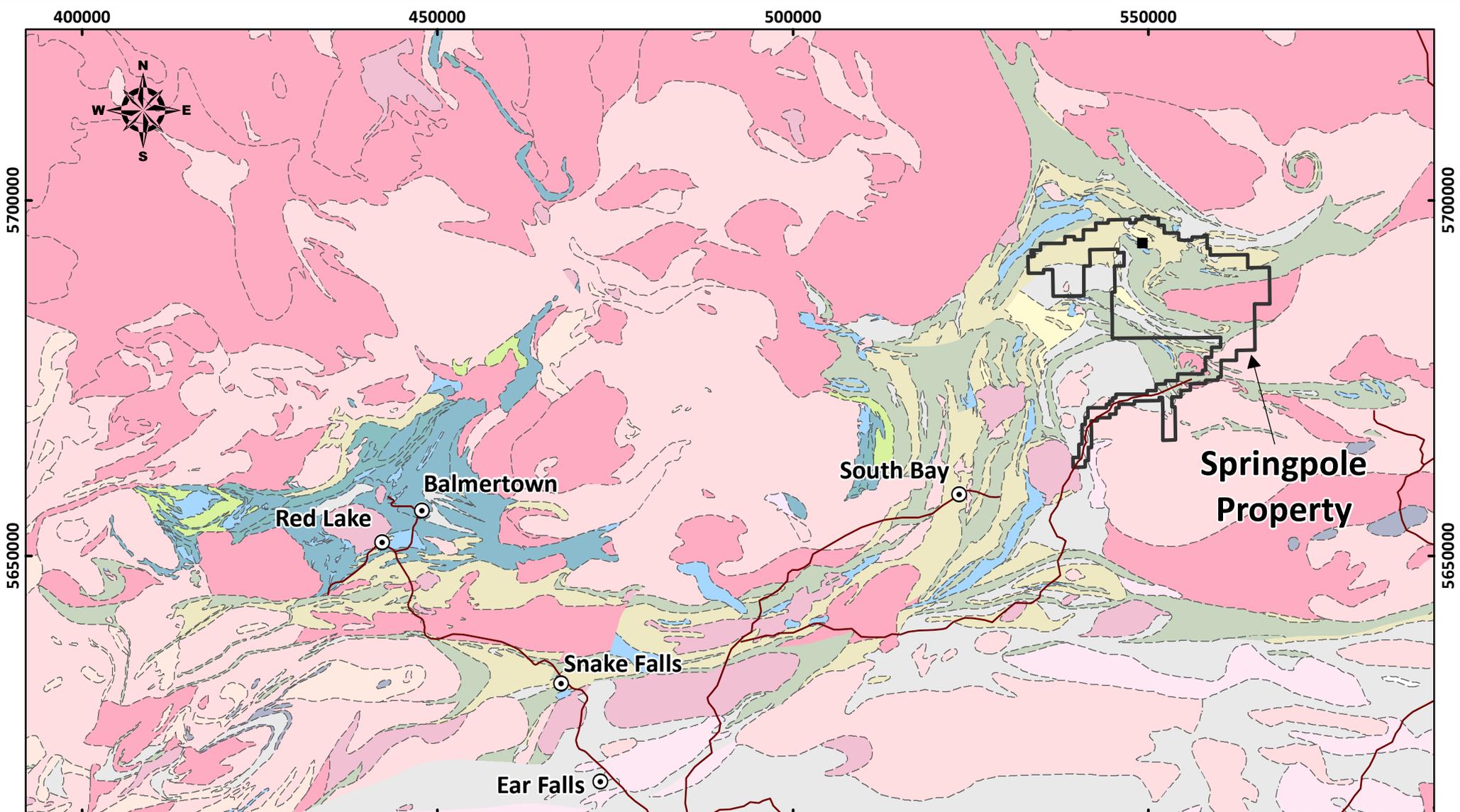


**Springpole Gold Project**  
 Protected Areas  
 Figure 6.2.1  
 Kenora District, Ontario



**Figure 6.2.2 Seasonal Residences and Outfitters Near Project Site**





- 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

- Supercrustal 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

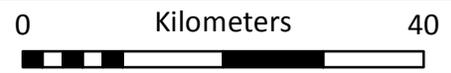
- Town / Community
- Camp Location
- Road
- Property Boundary



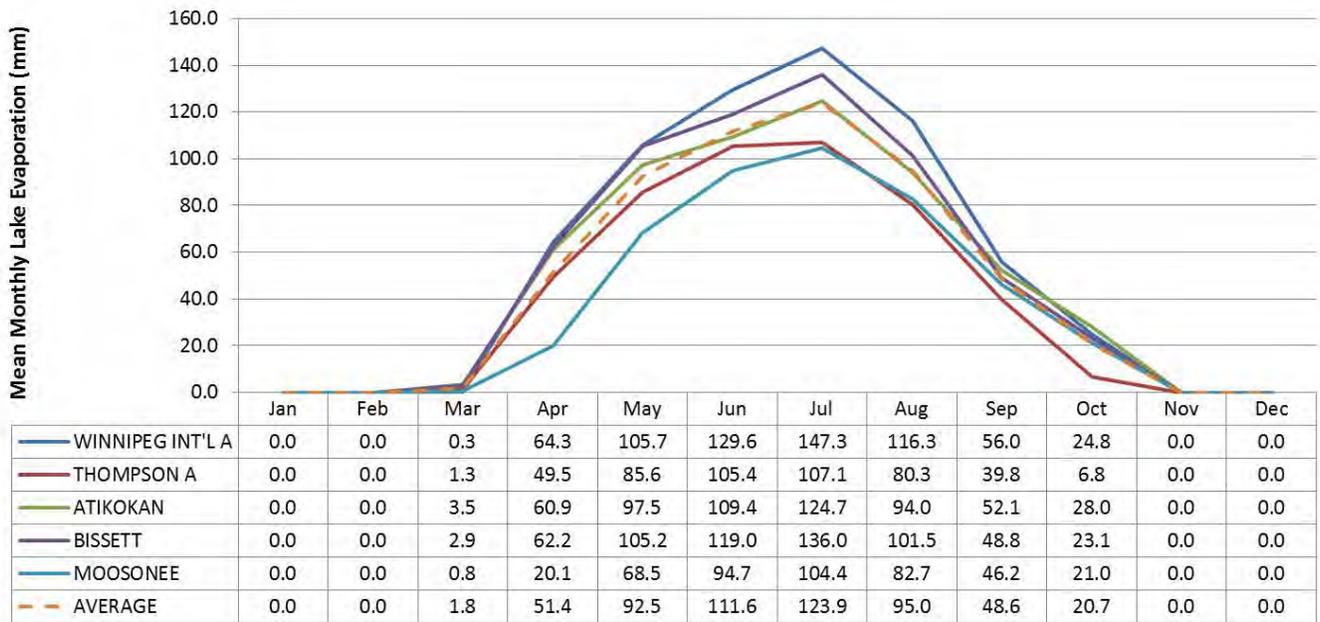
**Springpole Gold Project**  
**Regional Geology Map**  
 Figure 6.3.1

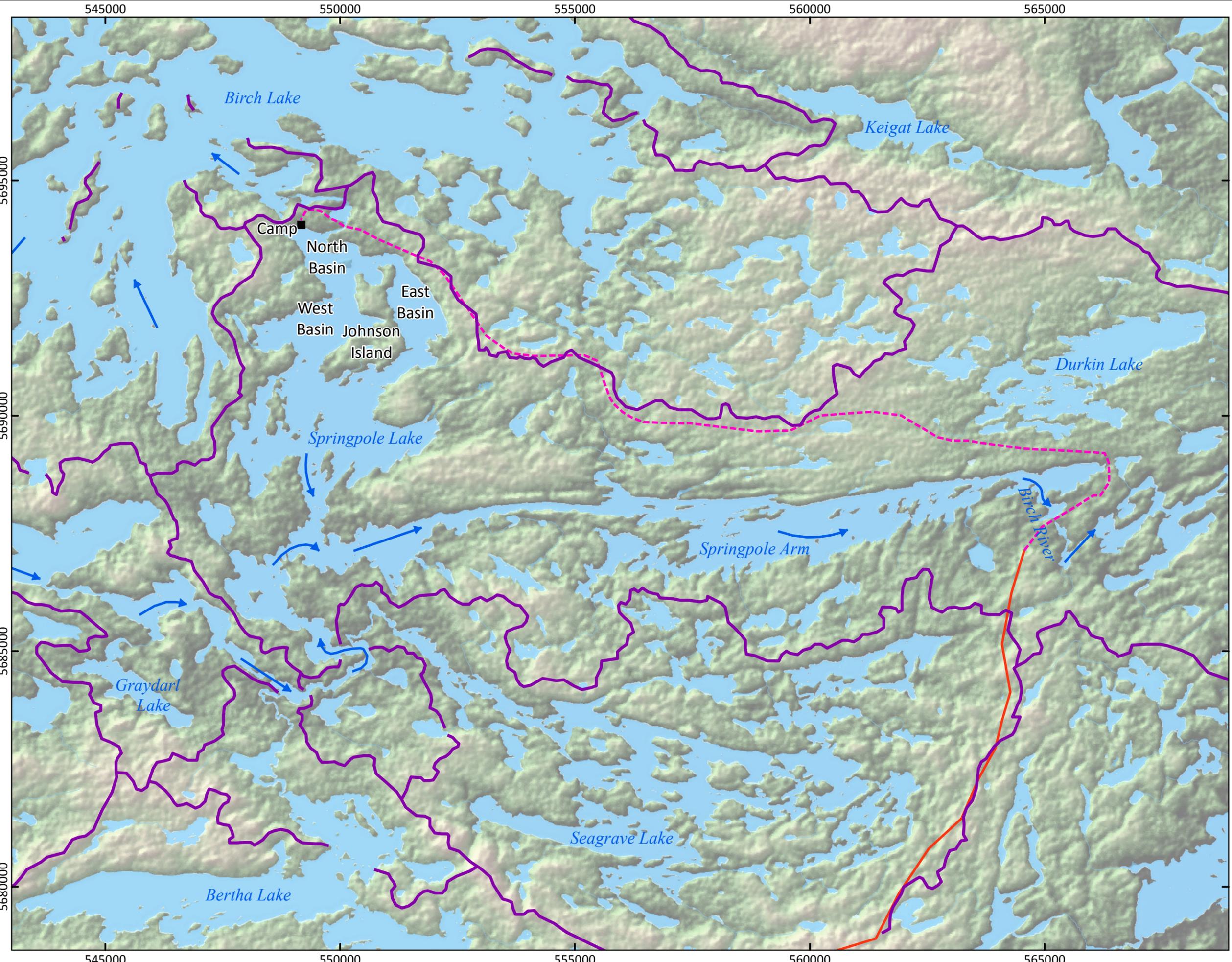
Kenora District, Ontario

July 2020      NAD83 UTMz15      Scale 1 : 750,000

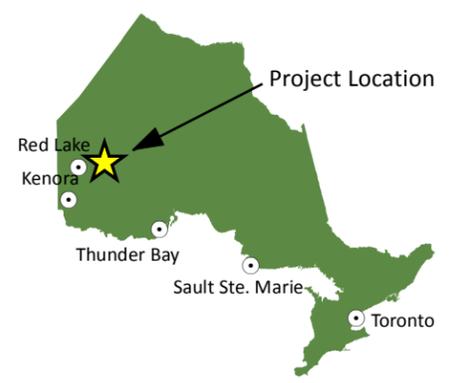


**Figure 6.3.2 Mean Monthly Lake Evaporation for Five Stations around the Springpole Site**





Property Reference



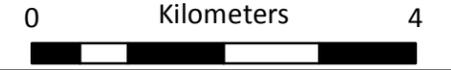
- Existing Camp Location
- - - Proposed Access Road to Springpole Gold Project
- FMP Approved All Weather Wenesaga Road Extension
- Watershed Boundary
- ➔ Water Flow

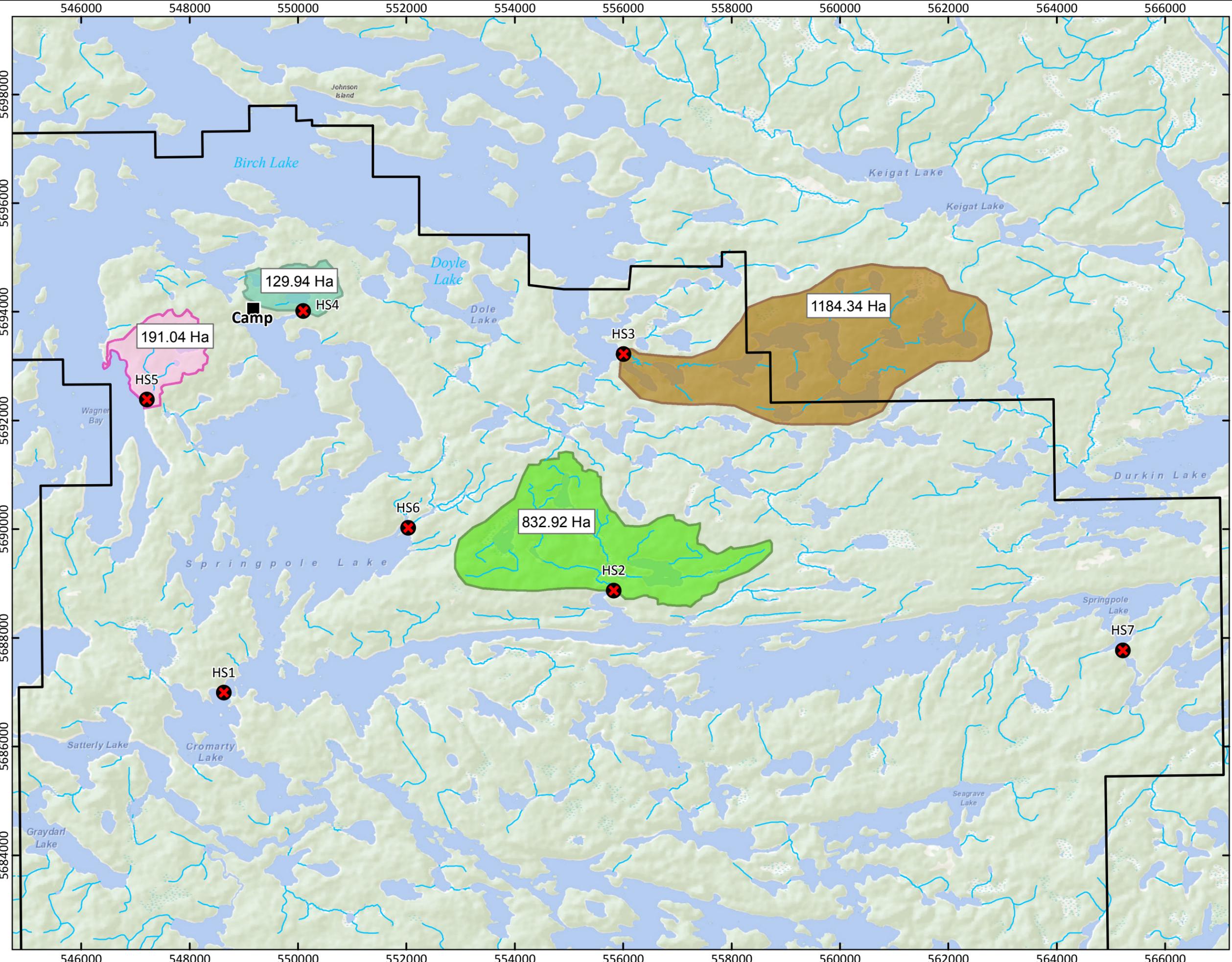


**Springpole Gold Project**  
Proximity to Surface Waters  
Figure 6.3.3

Kenora District, Ontario

July 2020 NAD83, UTM zone15





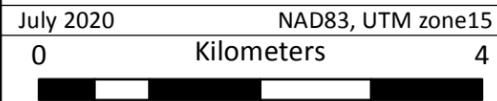
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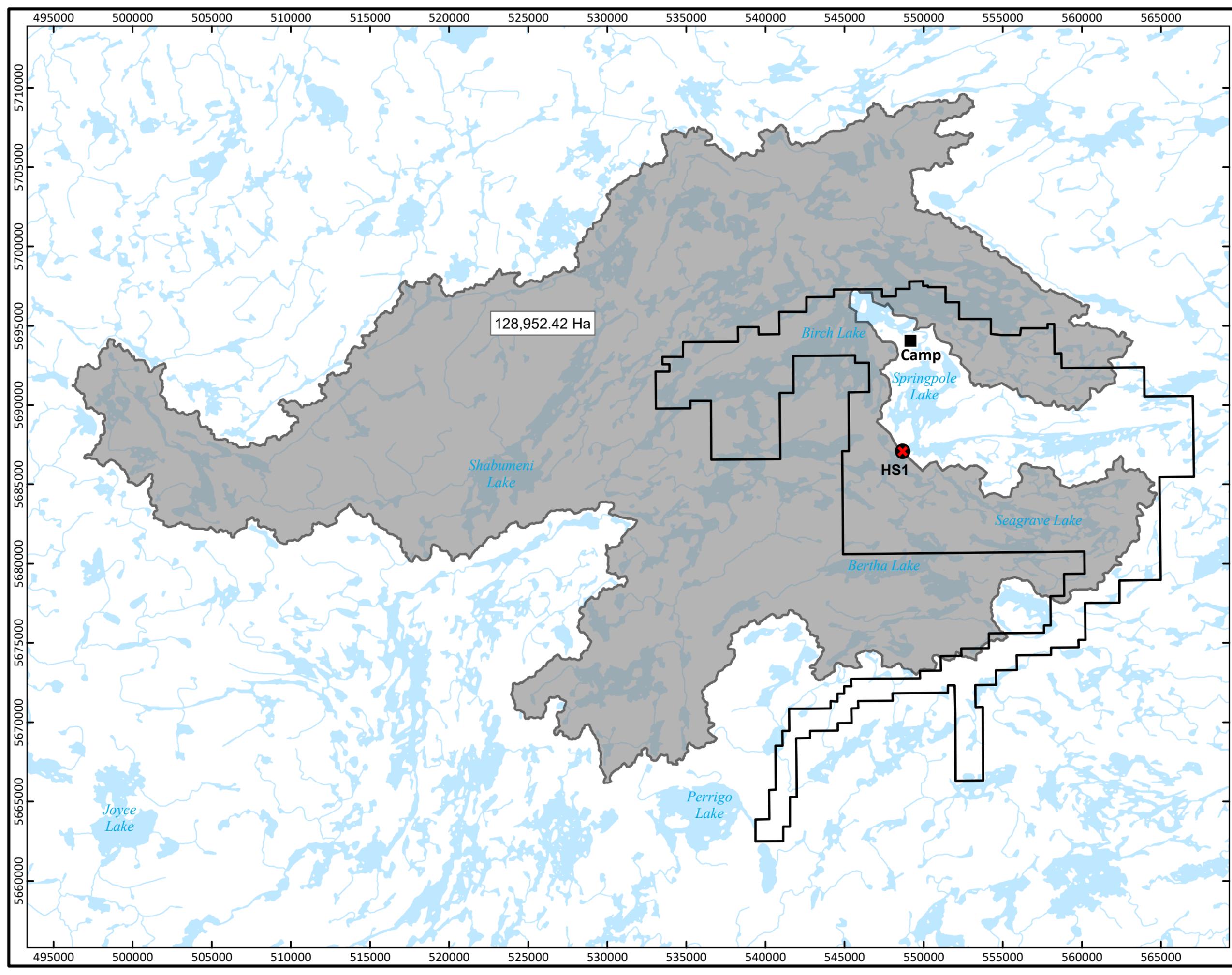


- Springpole Camp
- ⊗ Hydrological Sampling Location
- ▭ Springpole Property Boundary
- HS2 - Hydrostation Basin
- HS3 - Hydrostation Basin
- HS4 - Hydrostation Basin
- HS5 - Hydrostation Basin



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





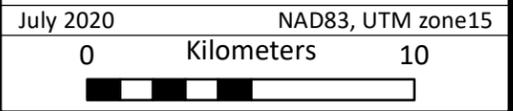
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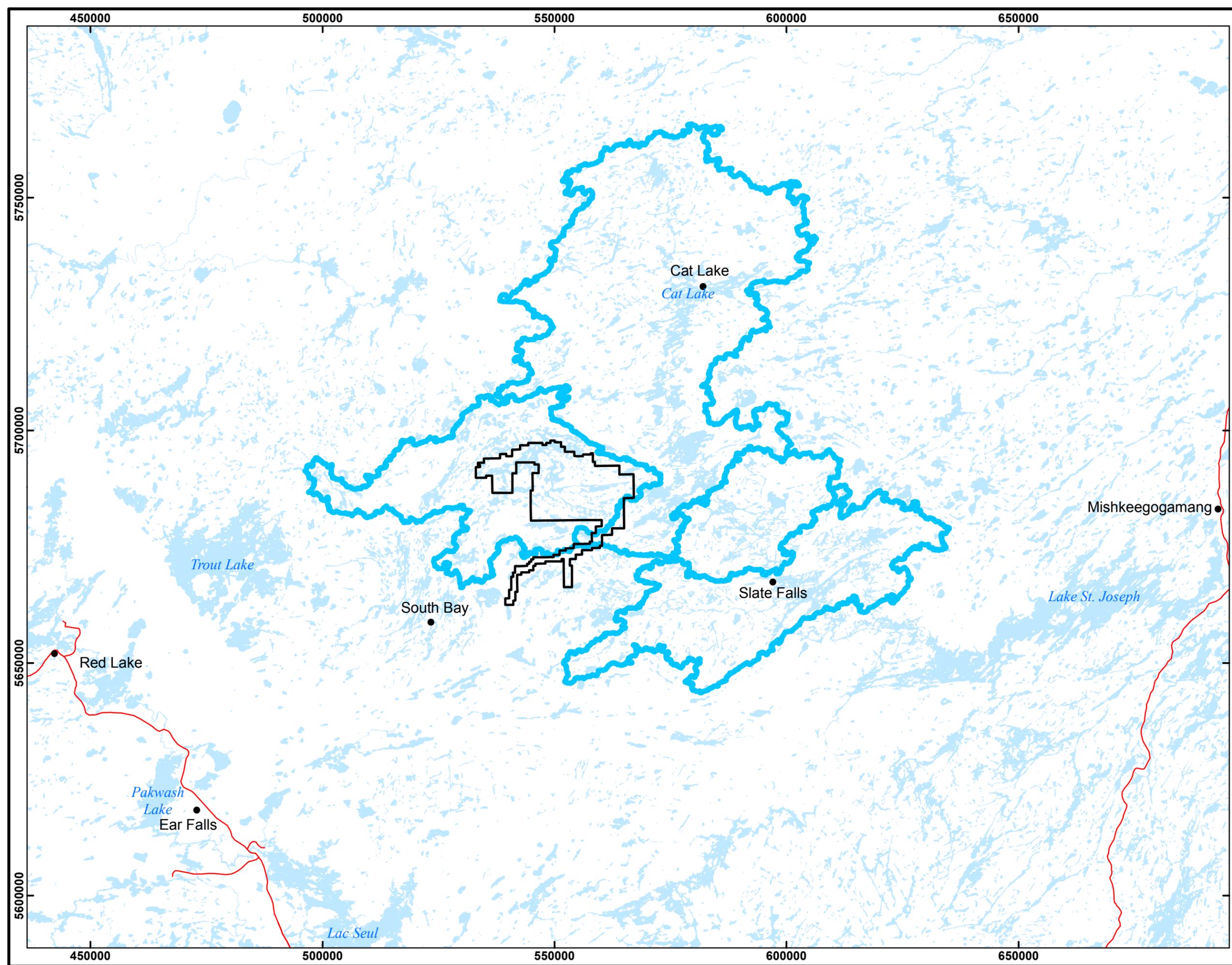


- Springpole Camp
- X Hydrological Sampling Location
- HS1 - Hydrostation Basin
- Water Body
- Springpole Property Boundary



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





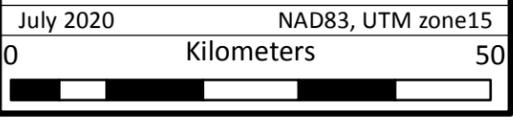
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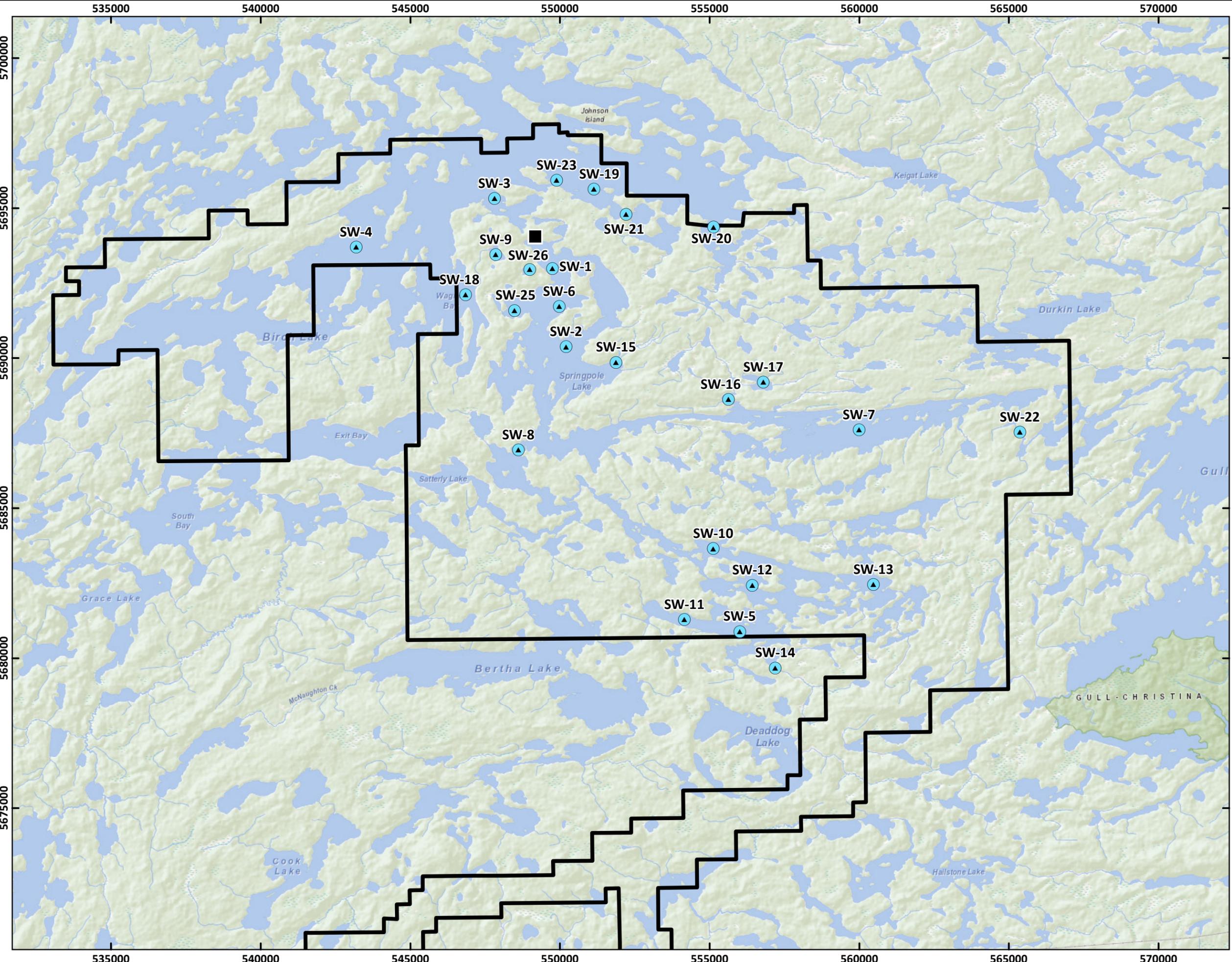


- Town / Community
- Road
- ▭ Watershed Boundary
- Water Body
- ▭ Springpole Property Boundary



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





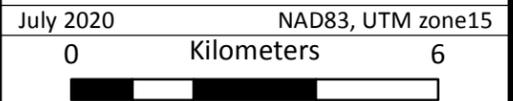
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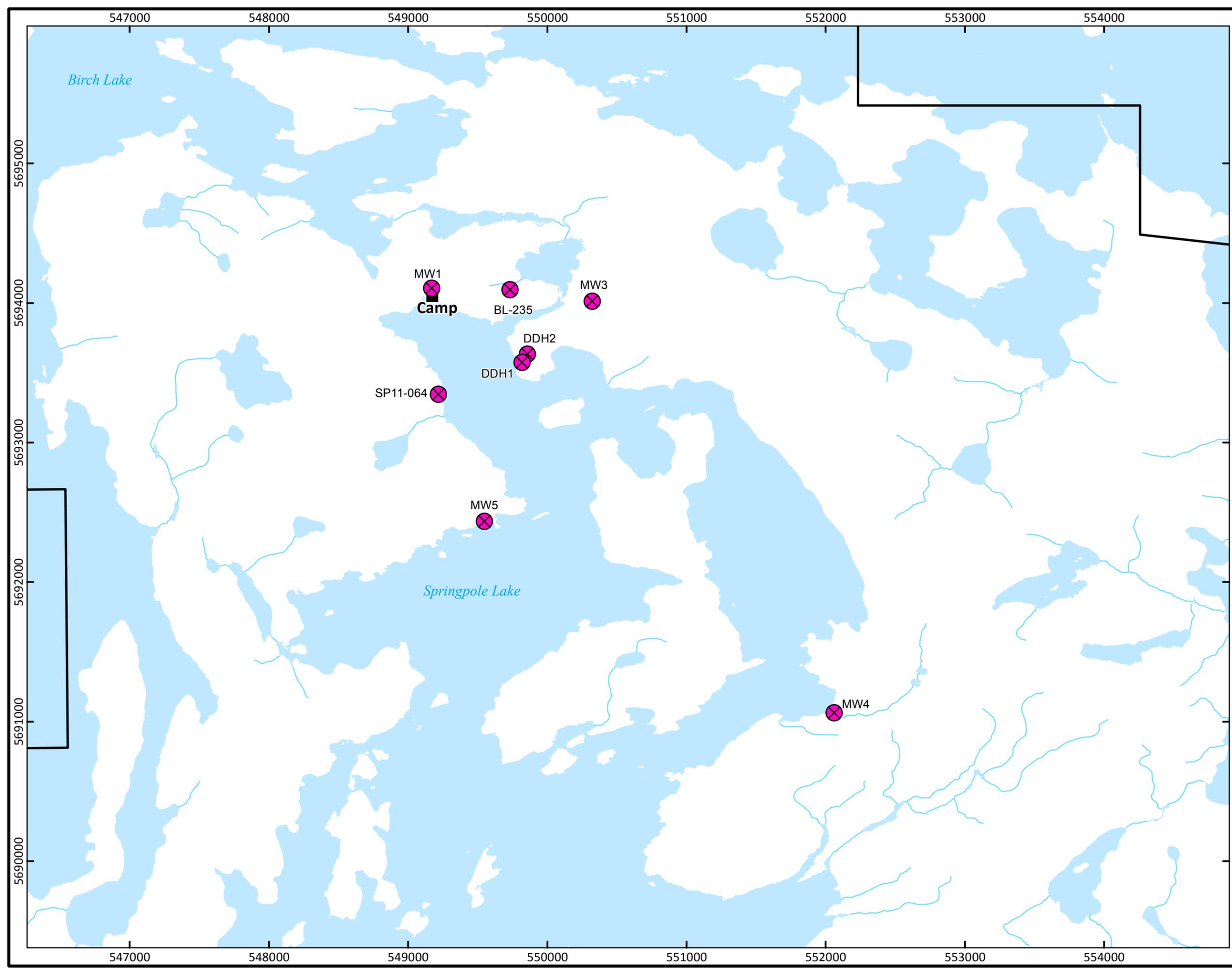


- Springpole Camp
- ▲ Surface Water Station
- Springpole Property Boundary



**Springpole Gold Project**  
 Surface Water Monitoring Stations  
 Figure 6.3.7  
 Kenora District, Ontario





Property Reference



-  Springpole Camp
-  Groundwater Monitoring Station
-  Springpole Property Boundary

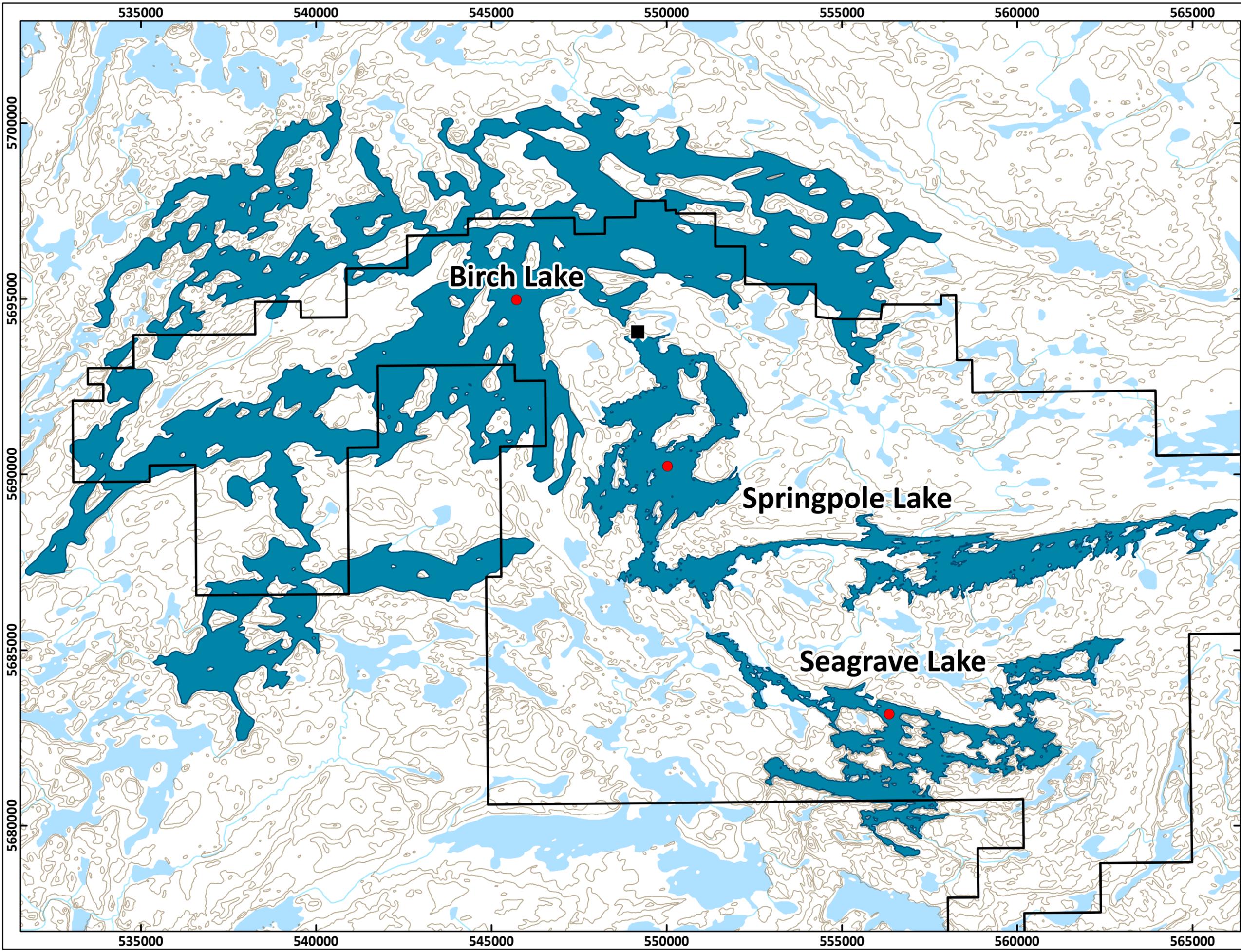


**Springpole Gold Project**  
Ground Water Monitoring Stations  
Figure 6.3.8

Kenora District, Ontario

July 2020 NAD83, UTM zone15





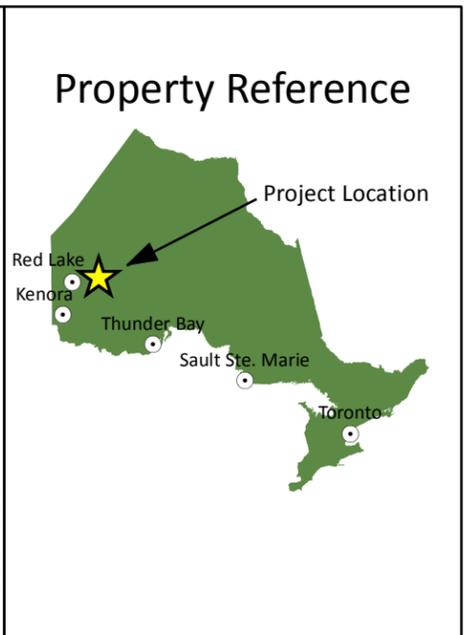
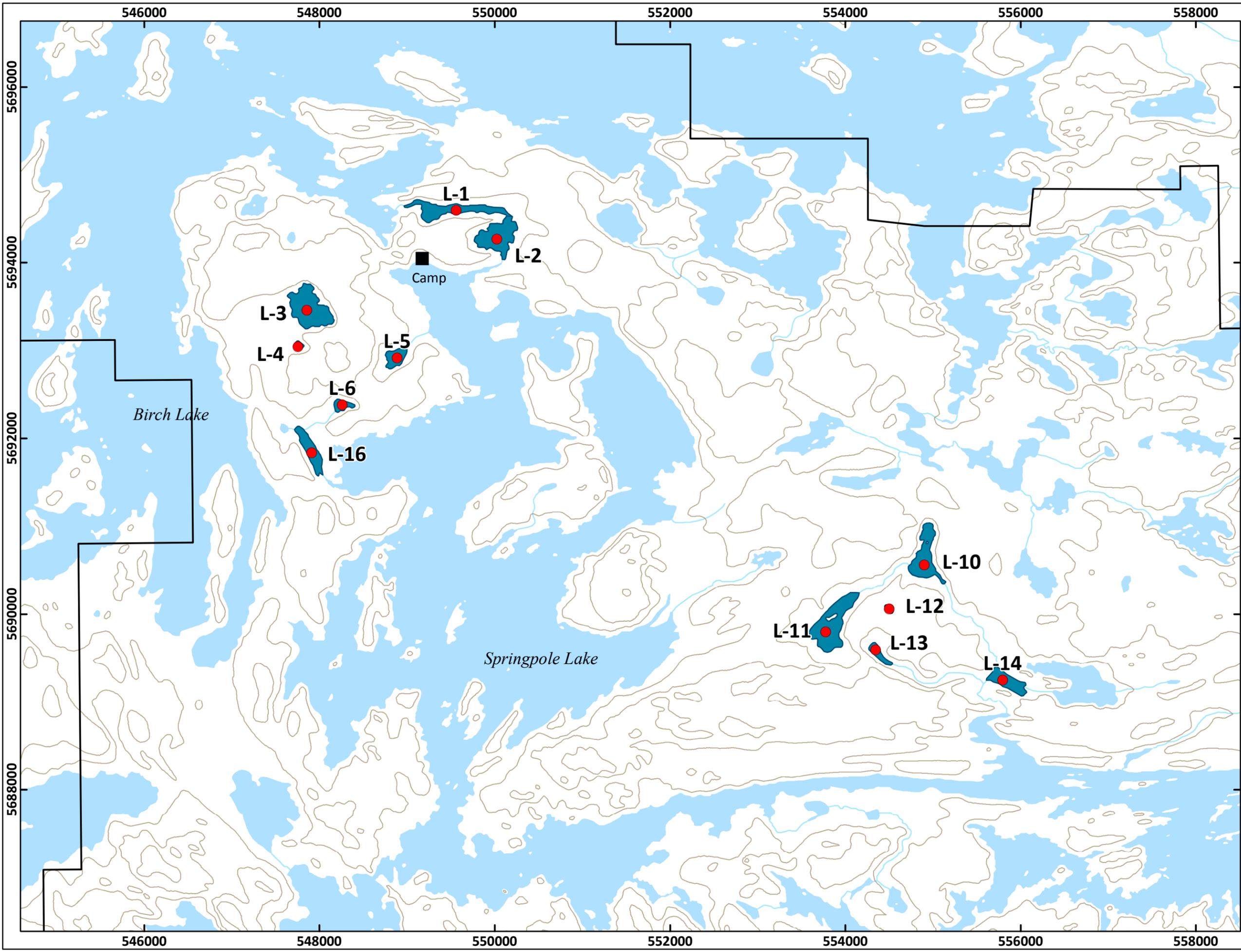
**Property Reference**

Red Lake  
Kenora  
Thunder Bay  
Sault Ste. Marie  
Toronto

Project Location

■ Camp Location  
 — Water Course  
 Water Body  
 Topographic Contour (10m Int)  
 ● Water Body Within Report  
 Large Water Body  
 Springpole Property Boundary

**FIRST MINING GOLD**  
**Springpole Gold Project**  
 Regional Context for  
 Fisheries Assessment  
**Figure 6.3.9**  
 Kenora District, Ontario  
 July 2020 NAD83, UTM zone15  
 0 Kilometers 5



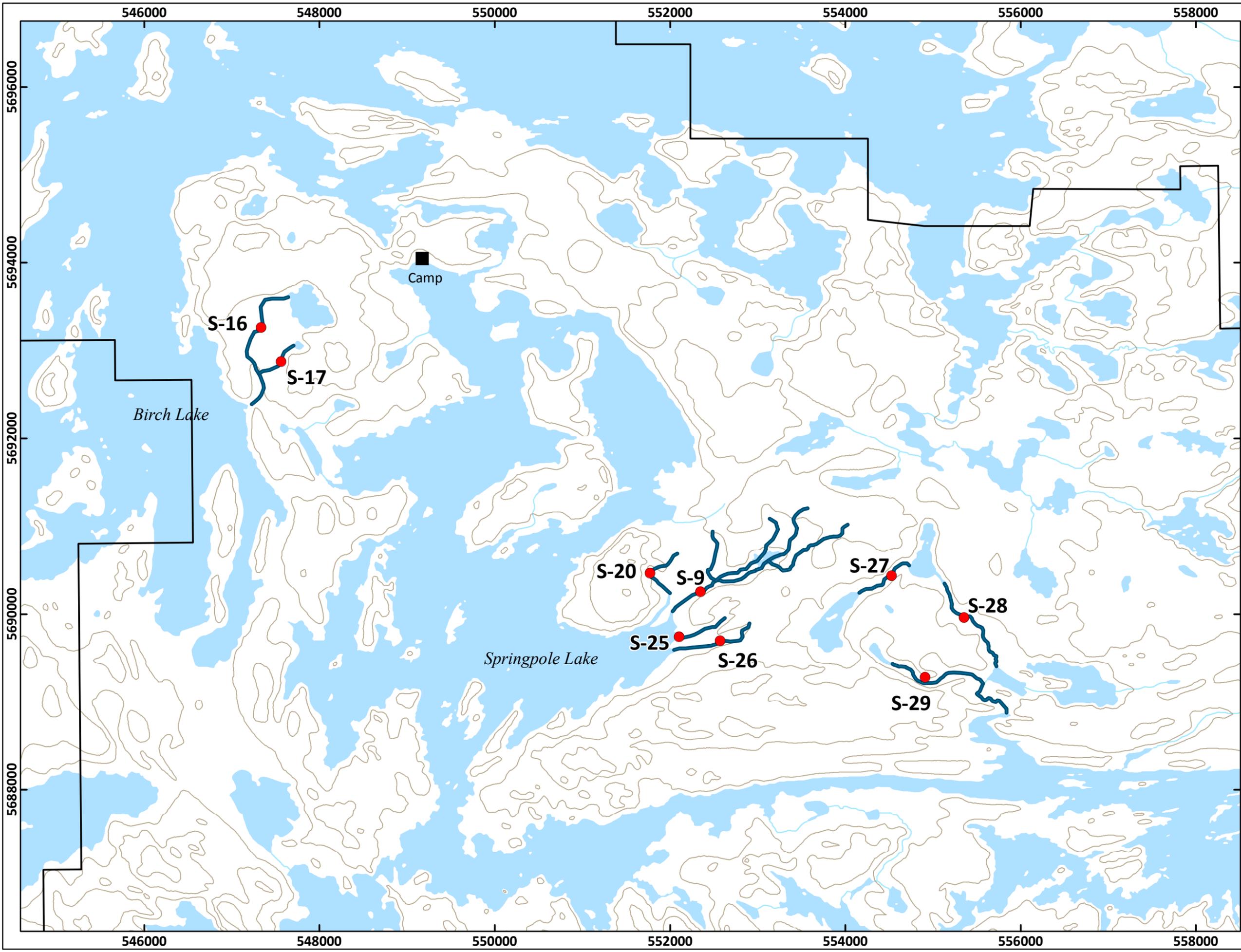
- Camp Location
- Water Course
- Water Body
- Topographic Contour (10m Int)
- Water Body Within Report
- Small Water Body
- Springpole Property Boundary

**FIRST MINING GOLD**

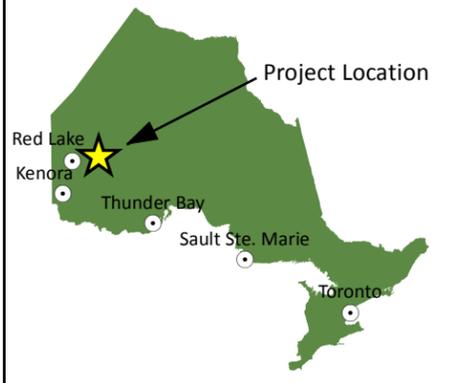
**Springpole Gold Project**  
**Small Water Bodies**  
**Figure 6.3.10**  
 Kenora District, Ontario

July 2020 NAD83, UTM zone15

0 Kilometers 2



Property Reference

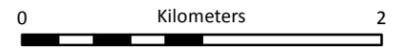


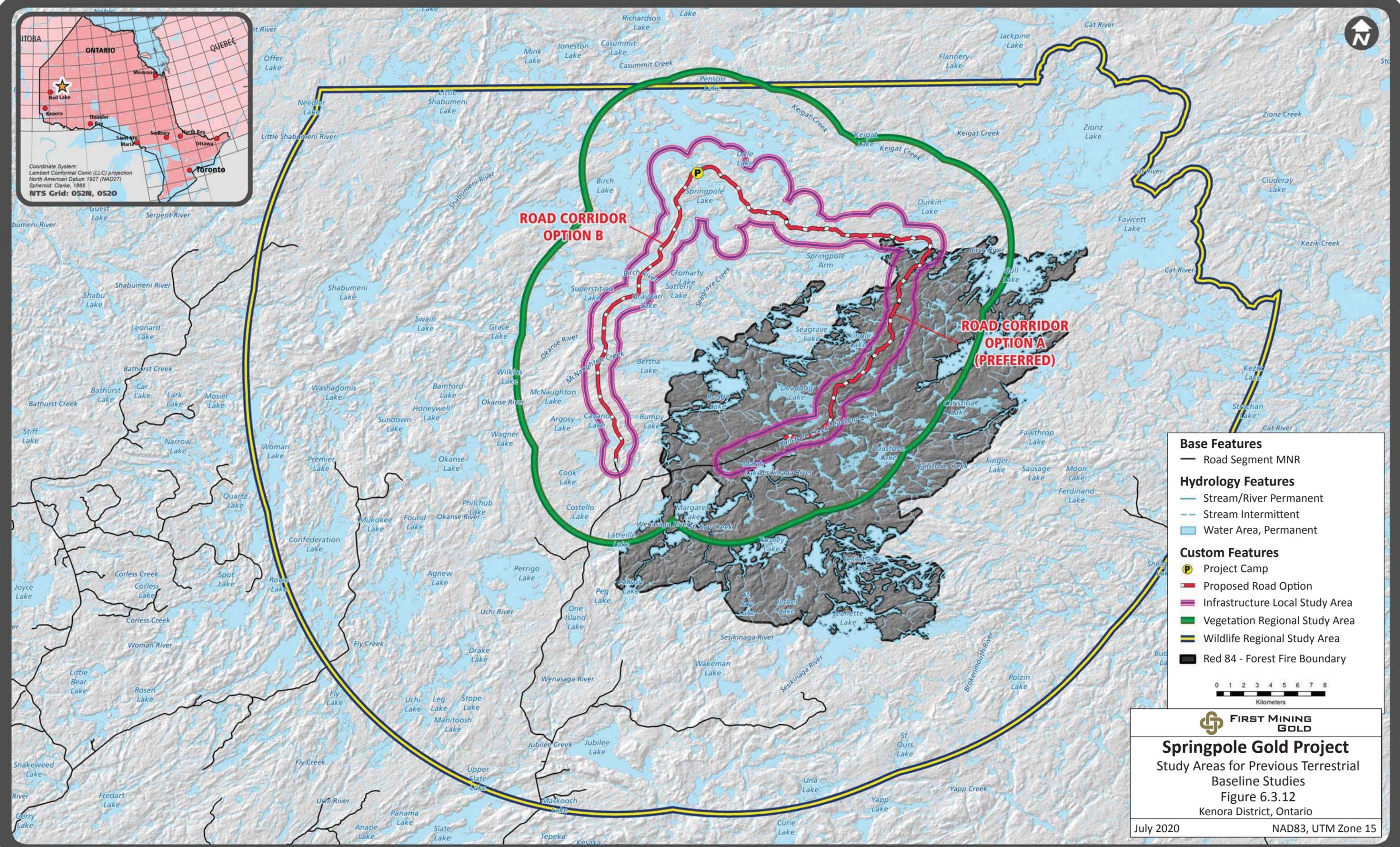
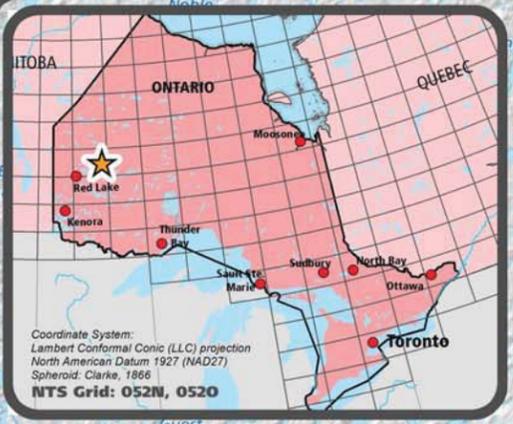
- Camp Location
- Water Course
- Water Body
- Topographic Contour (10m Int)
- Water Body Within Report
- Small Water Course
- Springpole Property Boundary



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

July 2020 NAD83, UTM zone15





**Base Features**

- Road Segment MNR

**Hydrology Features**

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

**Custom Features**

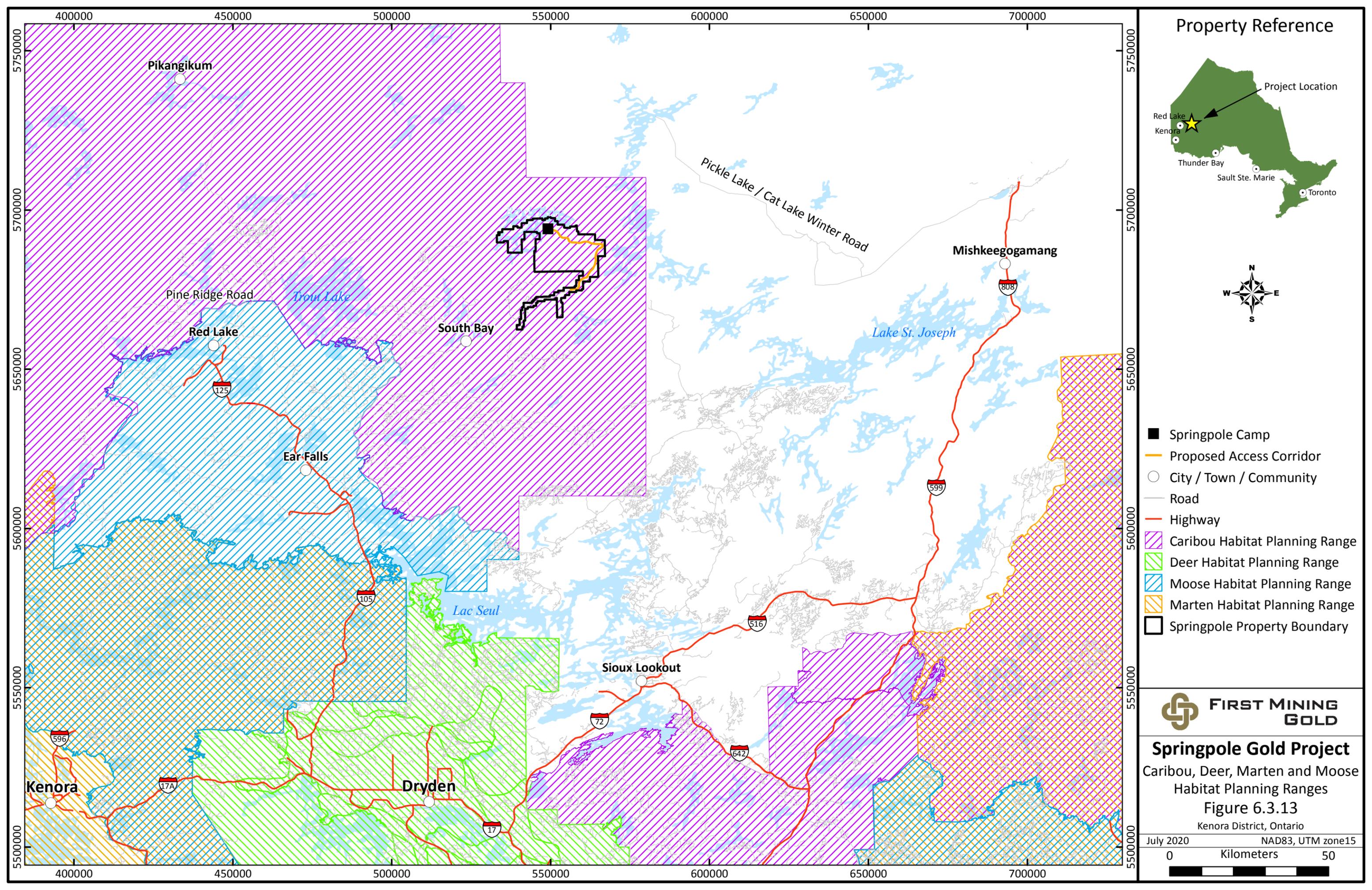
- P Project Camp
- - - Proposed Road Option
- Infrastructure Local Study Area
- Vegetation Regional Study Area
- Wildlife Regional Study Area
- Red 84 - Forest Fire Boundary

0 1 2 3 4 5 6 7 8  
Kilometers

**FIRST MINING GOLD**

**Springpole Gold Project**  
Study Areas for Previous Terrestrial  
Baseline Studies  
Figure 6.3.12  
Kenora District, Ontario

July 2020 NAD83, UTM Zone 15



Property Reference



- Springpole Camp
- Proposed Access Corridor
- City / Town / Community
- Road
- Highway
- ▨ Caribou Habitat Planning Range
- ▨ Deer Habitat Planning Range
- ▨ Moose Habitat Planning Range
- ▨ Marten Habitat Planning Range
- Springpole Property Boundary



**Springpole Gold Project**  
 Caribou, Deer, Marten and Moose  
 Habitat Planning Ranges  
 Figure 6.3.13  
 Kenora District, Ontario

July 2020 NAD83, UTM zone15  
 0 Kilometers 50



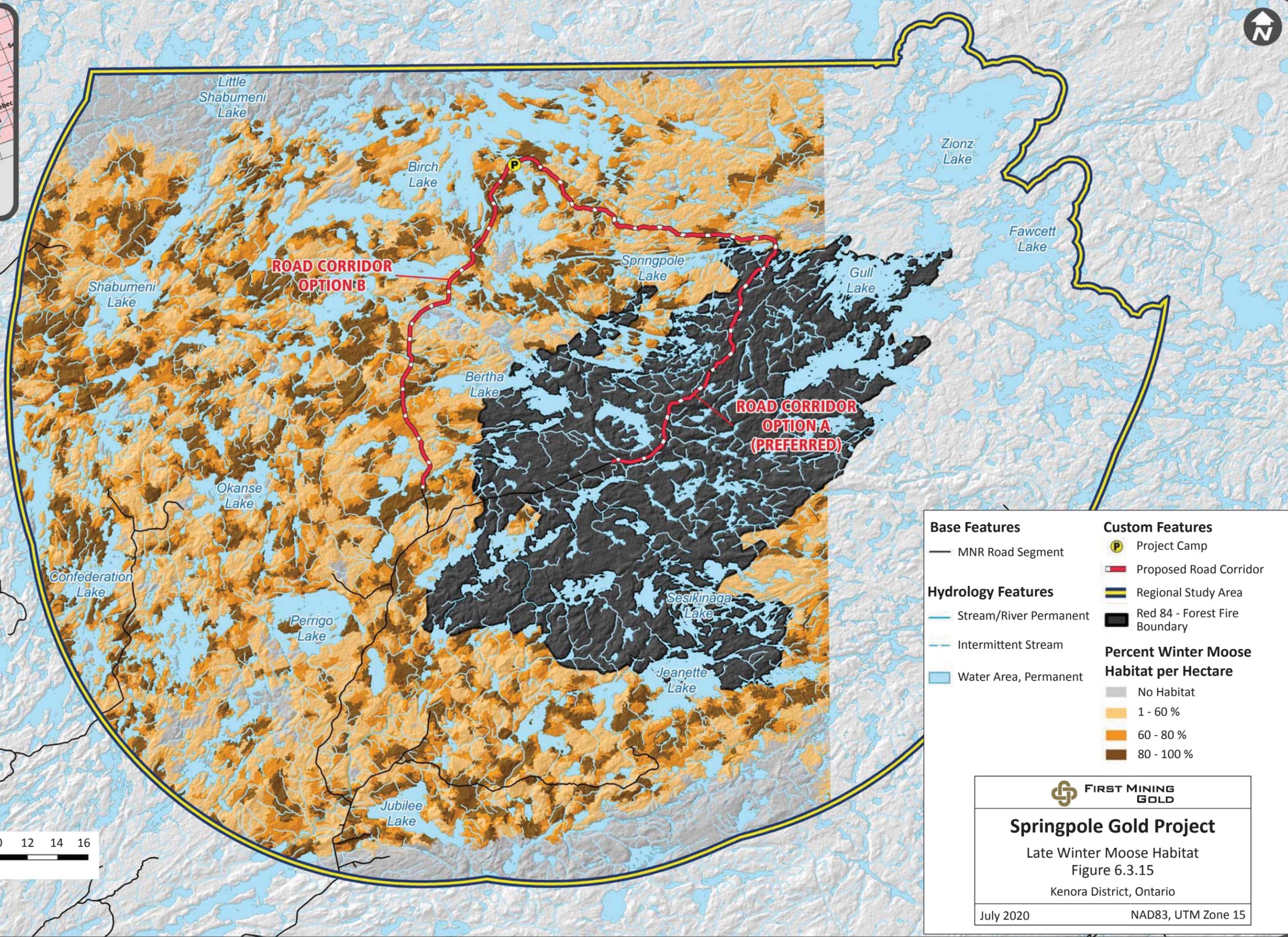
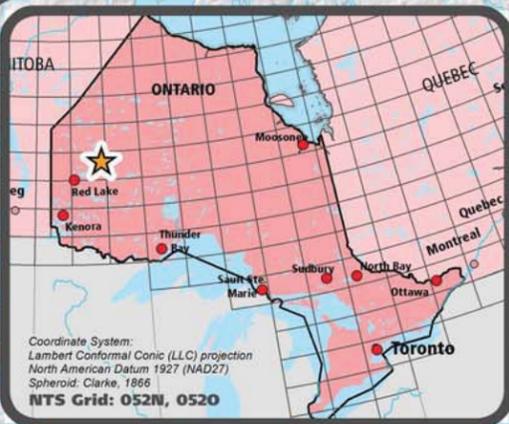
Property Reference



- City / Town
- Highway
- Lake
- Caribou Range
- ▭ Regional Study Area
- Springpole Property



**Springpole Gold Project**  
 Location of Study Area Within  
 Churchill Caribou Range  
 Figure 6.3.14  
 Kenora District, Ontario

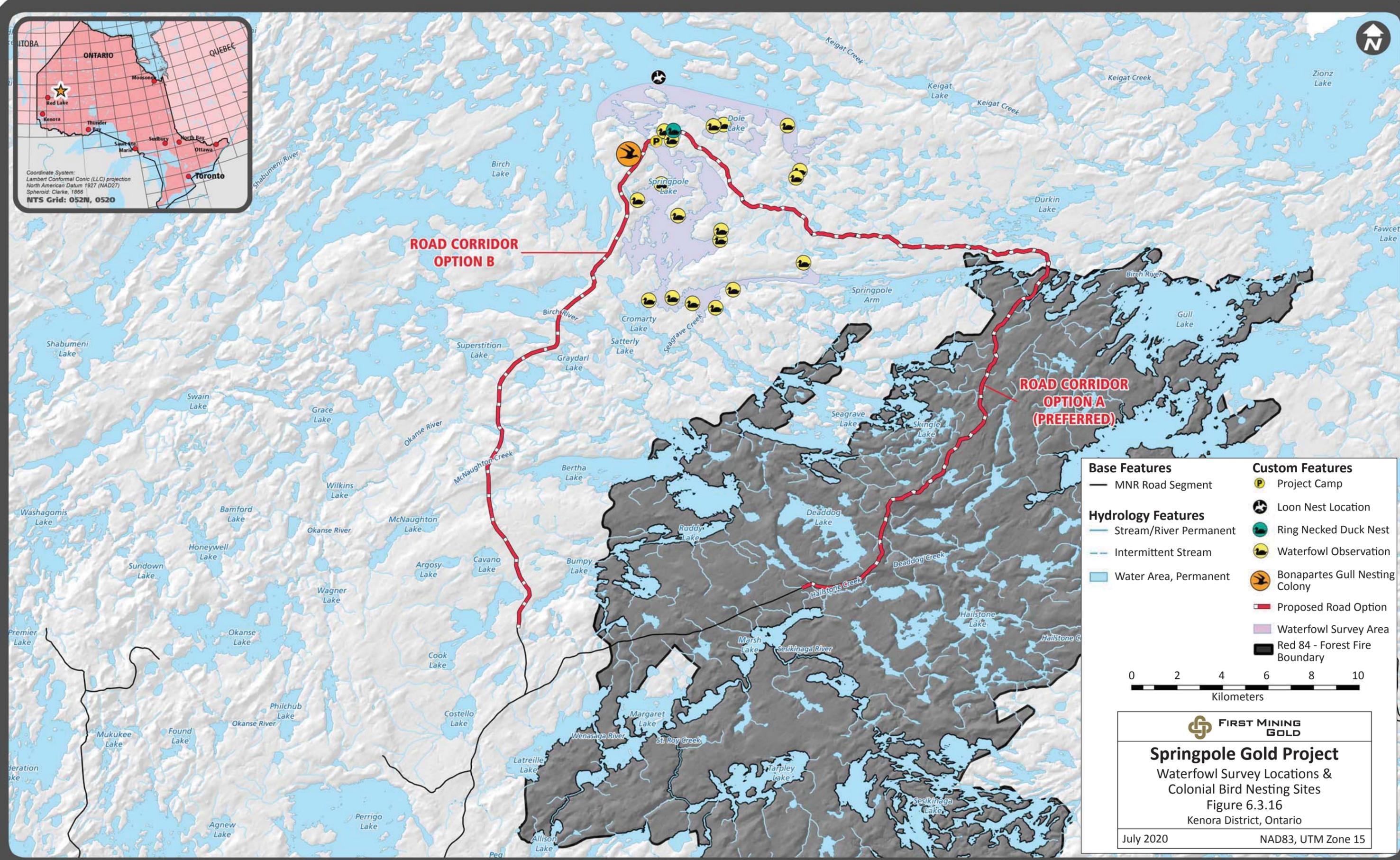
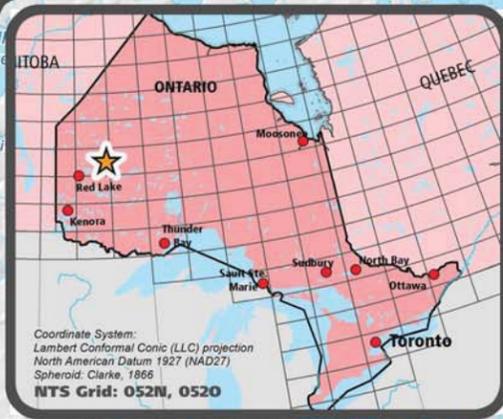


Base Features	Custom Features
— MNR Road Segment	Project Camp
Proposed Road Corridor	Regional Study Area
Stream/River Permanent	Red 84 - Forest Fire Boundary
Intermittent Stream	<b>Percent Winter Moose Habitat per Hectare</b>
Water Area, Permanent	No Habitat
	1 - 60 %
	60 - 80 %
	80 - 100 %

**FIRST MINING GOLD**

**Springpole Gold Project**  
Late Winter Moose Habitat  
Figure 6.3.15  
Kenora District, Ontario

July 2020 NAD83, UTM Zone 15

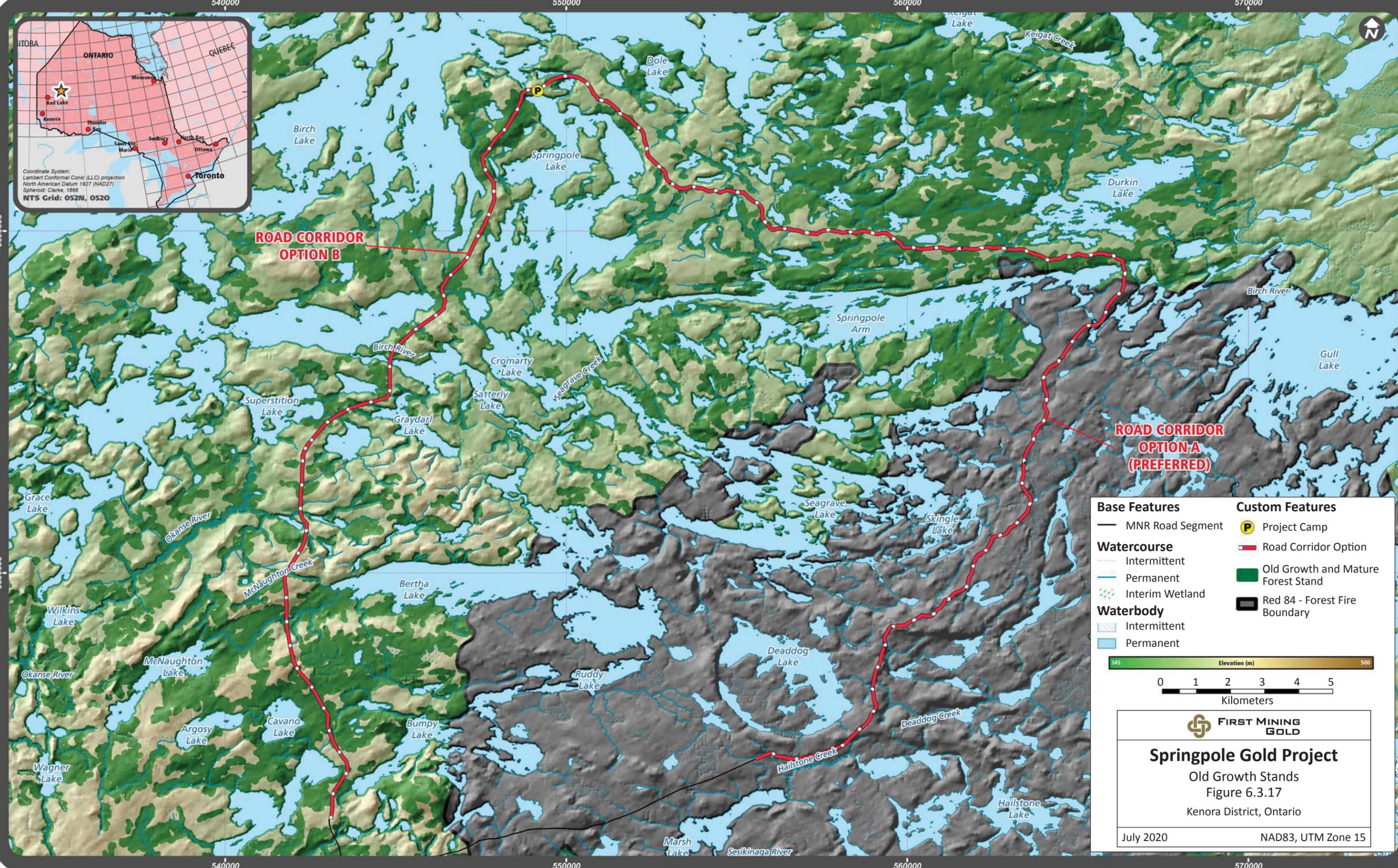


**FIRST MINING GOLD**

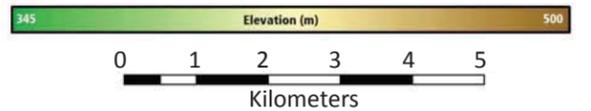
**Springpole Gold Project**  
Waterfowl Survey Locations & Colonial Bird Nesting Sites  
Figure 6.3.16  
Kenora District, Ontario

July 2020 NAD83, UTM Zone 15

AGIDOC: K0-02948 - GOLD CANYON RESOURCES MAP DOCUMENTS\BASELINE STUDY\2017\2017\_217\_OLD GROWTH STANDS.DXD



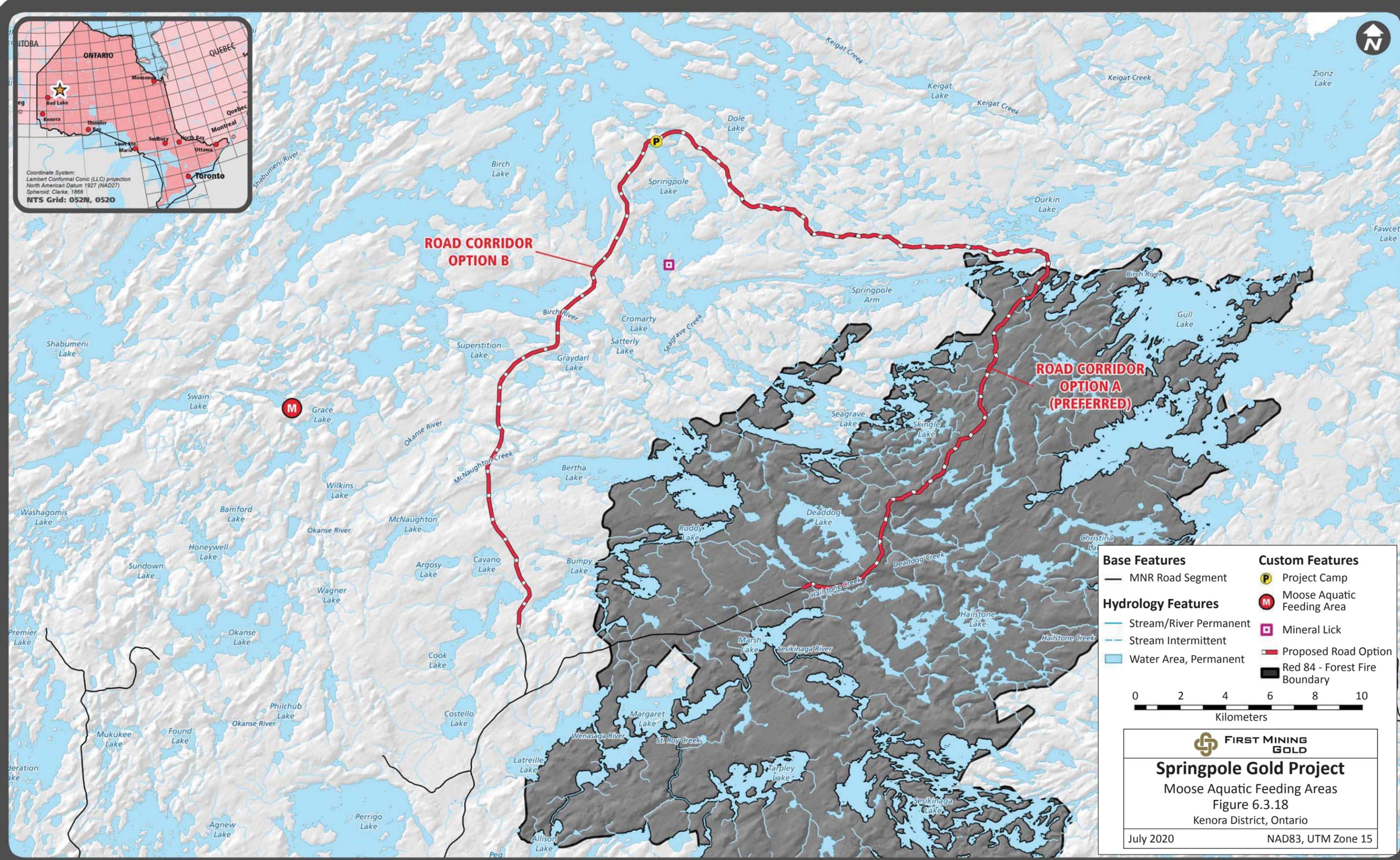
Base Features	Custom Features
— MNR Road Segment	Project Camp
<b>Watercourse</b>	Road Corridor Option
— Intermittent	Old Growth and Mature Forest Stand
— Permanent	Red 84 - Forest Fire Boundary
Interim Wetland	
<b>Waterbody</b>	
Intermittent	
Permanent	



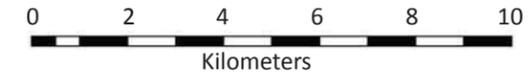
**FIRST MINING GOLD**

**Springpole Gold Project**  
Old Growth Stands  
Figure 6.3.17  
Kenora District, Ontario

July 2020 NAD83, UTM Zone 15



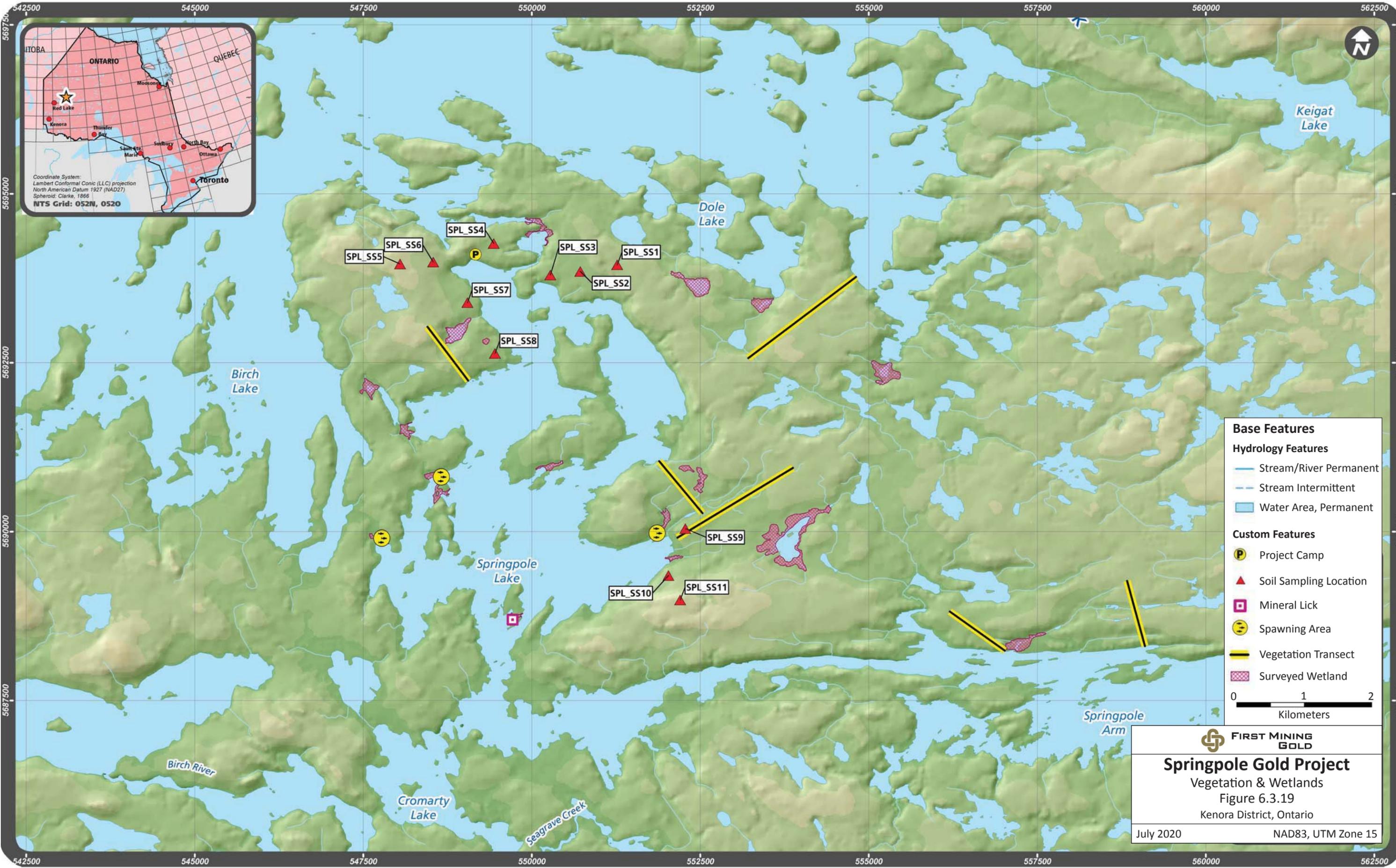
Base Features	Custom Features
— MNR Road Segment	<b>P</b> Project Camp
Stream/River Permanent	<b>M</b> Moose Aquatic Feeding Area
Stream Intermittent	Mineral Lick
Water Area, Permanent	Proposed Road Option
	Red 84 - Forest Fire Boundary



**FIRST MINING GOLD**

**Springpole Gold Project**  
Moose Aquatic Feeding Areas  
Figure 6.3.18  
Kenora District, Ontario

July 2020 NAD83, UTM Zone 15



**Base Features**

**Hydrology Features**

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

**Custom Features**

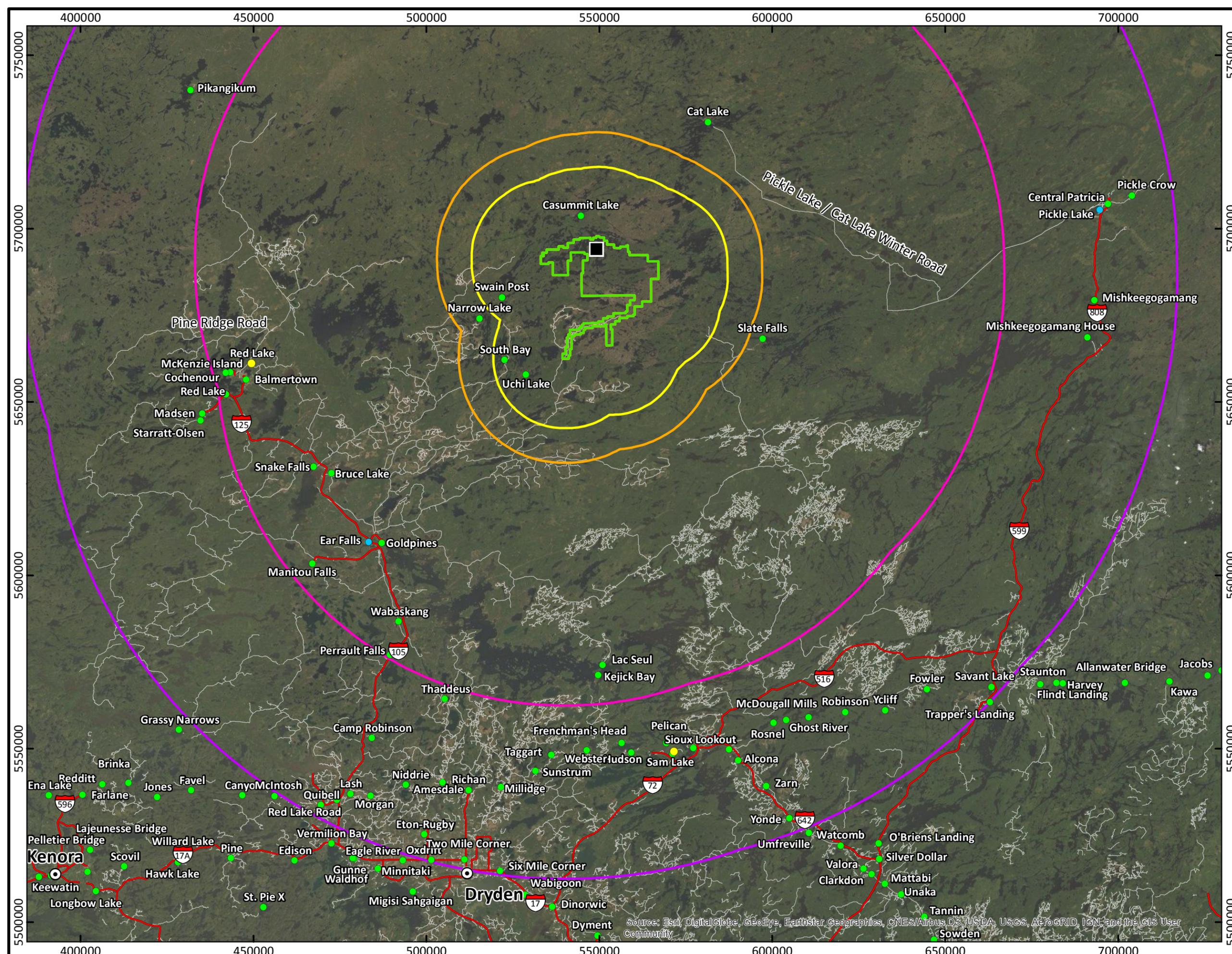
- Project Camp
- Soil Sampling Location
- Mineral Lick
- Spawning Area
- Vegetation Transect
- Surveyed Wetland

0 1 2  
Kilometers

**FIRST MINING GOLD**

**Springpole Gold Project**  
Vegetation & Wetlands  
Figure 6.3.19  
Kenora District, Ontario

July 2020 NAD83, UTM Zone 15



Property Reference



- Springpole Camp
- City
- Town
- Municipality
- Unincorporated Place
- Highway
- Road
- Springpole Property
- 20km Buffer
- 30km Buffer
- 100km Buffer
- 150km Buffer



**Springpole Gold Project**  
Settlements  
Figure 6.4.1

Kenora District, Ontario

July 2020 NAD83, UTM zone15



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

## 7 ASSESSMENT AND EVALUATION

The *Environmental Assessment Act* does not require a specific method or methods for the effects analysis. FMG evaluation method(s) chosen will be able to produce an assessment that is clear, logical, and traceable. The assessment and evaluation methodology will be further developed during the EA Report/EIS based on feedback received during consultation engagement activities, including on the ToR.

### 7.1 Alternatives Assessment and Evaluation Methodology

The alternatives assessment approach will be designed to meet the requirements of the provincial EA process (as well as the federal process, per the coordinated EA approach), whereby the Undertaking is defined through assessment and evaluation process. The defined project is then described in detail and assessed for potential effects in the EA Report/EIS.

The assessment of alternatives will be carried out at a level detailed enough to distinguish the relative merits of the different alternative methods. FMG will develop a decision-making framework to systematically evaluate alternatives to determine the best methods of undertaking components of the undertaking. The evaluation of the “alternative methods” of the Undertaking will generally involve, but may not be limited to, the following steps:

- Pre-screening a range of “alternative methods” for each key component will be developed and reviewed based on considerations of key environmental factors such as the potential impacts to the natural environment, potential cultural and socio-economic impacts and impacts to Aboriginal and Treaty rights; with a goal of identifying those feasible “alternative methods” that will be carried forward for formal evaluation. A reasonable number of feasible alternative methods will be assessed based on criteria and indicators to be detailed in the EA Report/EIS.
- Develop conceptual design aspects of “alternative methods” for the major components and any ancillary activities of the Undertaking.
- Carry out the studies as needed to be able to effectively assess the advantages and disadvantages of each alternative.
- Describe all components of the environment that are included in the Environmental Assessment Act definition and are affected by the Undertaking
- Evaluation of Alternative Methods: Using the developed criteria and indicators, FMG will carry out an evaluation of the “alternative methods” for the key components of the Undertaking. Additionally, FMG will identify the impacts to the environment, and develop measures that may be necessary to prevent, change or mitigate possible environmental effects of the “alternative methods”.
- Identify the preferred “alternative method”.
- Describe advantages and disadvantages of the preferred method using a comparative qualitative approach.

Alternative methods will receive a qualitative ranking according to criteria and indicators (see below), using professional judgement based on comparison with the other methods, such as the following:

- Major Advantage
- Advantage
- Neutral
- Disadvantage
- Major Disadvantage

The rankings will be recorded in a summary table of assessment criteria and indicators. The preferred “alternative method” will be the one with the preferred balance of merits (advantages and disadvantages). This decision may be subjective as the decision is based on the professional judgment exercised by the FMG team.

The evaluation process will be clear, logical and traceable, allowing anyone reviewing the EA to come to the same conclusions without any additional assumptions.

### **7.1.1 Criteria and Indicators**

Criteria and indicators for the assessment of alternatives will be developed for evaluating alternative methods. Proposed criteria and indicators will be presented during consultation engagement activities; input from this consultation will be included in the EA Report/EIS. FMG understands that each criterion should have one or more indicators that will identify how the potential environmental effects will be measured for each criterion. The indicators can be qualitative or quantitative in nature.

Examples of the proposed criteria and indicators for the alternatives assessment are provided in **Table 7.1.1**. The information provided in **Table 7.1.1** is preliminary, and the criteria and indicators are expected to evolve throughout the EA process following further analysis and input from Indigenous communities (First Nations and Métis), the public, government agencies, and other stakeholders. A commitment to refine these aspects has been included in **Table 8.1.1**.

Potential data sources for the assessment of alternatives are described in **Table 7.1.1** and could include:

- Baseline studies carried out for the undertaking and in the various study areas;
- Updated Preliminary Economic Assessment and future engineering studies;
- Community engagement and consultations including open houses and meetings;
- Municipal, Provincial, and Federal guidelines, reports, websites, and other sources;
- Statistic Canada’s census data and non-statistical data;

- Comments from property owners, business owners, municipal agencies, tourism associations, other stakeholders, and Indigenous communities; and
- Social media, websites, and idea exchange institutions.

**Table 7.1.1 Example Criteria and Indicators for Alternatives Assessment**

<b>Criteria</b>	<b>Indicators for the Assessment of Alternatives</b>	<b>Study(ies) to Address</b>	<b>Potential Data Sources</b>
<b>Natural Environment</b>			
Effect on atmospheric environment (air quality, GHGs, noise, ambient light)	<ul style="list-style-type: none"> <li>• Emission rates of greenhouse gases</li> <li>• Changes in ambient air quality compared to baseline data</li> <li>• Exceedances of air quality point of impingement standards</li> <li>• Changes in noise from baseline conditions</li> <li>• Changes in ambient light from baseline conditions</li> </ul>	Atmospheric Environment <ul style="list-style-type: none"> <li>• Noise;</li> <li>• Vibration;</li> <li>• Air; and</li> <li>• Ambient Light.</li> </ul>	<ul style="list-style-type: none"> <li>• Weather station data</li> <li>• Government (ECCC and MECP)</li> <li>• National Inventory Report: Greenhouse Gas Sources and Sinks in Canada</li> <li>• Baseline Studies               <ul style="list-style-type: none"> <li>• Air quality</li> <li>• Noise and Vibration</li> <li>• Ambient Light</li> </ul> </li> </ul>
Effect on fish and aquatic habitat	<ul style="list-style-type: none"> <li>• Quantity of fish habitat affected or displaced</li> <li>• Maintenance of water flows or conditions suitable for fish passage</li> <li>• Attainment of water quality guidelines for protection of aquatic life (or defensible alternative) Fish toxicity analysis on fish used for country food by Indigenous Peoples according to the safe consumption standards.</li> <li>• Water chemistry analysis of groundwater recharge to aquatic habitats</li> </ul>	Aquatic Resources: <ul style="list-style-type: none"> <li>• Fish toxicity</li> <li>• Fish and Fish Habitat Suitability Index</li> </ul>	<ul style="list-style-type: none"> <li>• Traditional and Ecological Knowledge</li> <li>• Baseline Studies               <ul style="list-style-type: none"> <li>• Aquatic Resources</li> <li>• Surface Water Quality</li> <li>• Hydrology</li> <li>• Hydrogeology</li> <li>• Riparian</li> </ul> </li> <li>• Government (MNR and DFO)</li> <li>• Commercial anglers/fishers</li> <li>• Species at Risk Registry</li> <li>• Ontario Commercial Fisheries Association</li> <li>• MECP</li> </ul>
Effect on wetlands	<ul style="list-style-type: none"> <li>• Calculations of habitat loss: total and/or specific habitat type</li> <li>• Maintenance of connectivity</li> </ul>	<ul style="list-style-type: none"> <li>• Vegetation and Wetlands Surveys</li> <li>• Hydrogeology (Modelling of Drawdown)</li> <li>• Hydrology</li> </ul>	<ul style="list-style-type: none"> <li>• Traditional and Ecological Knowledge</li> <li>• Baseline Studies               <ul style="list-style-type: none"> <li>• Riparian</li> <li>• Hydrology</li> </ul> </li> </ul>

Criteria	Indicators for the Assessment of Alternatives	Study(ies) to Address	Potential Data Sources
		<ul style="list-style-type: none"> <li>Riparian conditions</li> </ul>	<ul style="list-style-type: none"> <li>Hydrogeology</li> <li>Ducks Unlimited</li> <li>Government (MNRF)</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 related disturbance</li> <li>Maintenance of wildlife movement corridors / plant dispersion corridors</li> </ul>	<ul style="list-style-type: none"> <li>Terrestrial</li> <li>Surface Water</li> <li>Atmospheric</li> <li>Traditional and Ecological Knowledge</li> </ul>	<ul style="list-style-type: none"> <li>Traditional and Ecological Knowledge</li> <li>Baseline Studies <ul style="list-style-type: none"> <li>Terrestrial</li> <li>Surface Water</li> </ul> </li> <li>Species at Risk Registry</li> <li>Government (MNRF and MECP)</li> <li>Ontario Federation of Hunters and Anglers</li> <li>Red Lake Outfitters Inc.</li> <li>Traditional Ecological Knowledge</li> </ul>
Effect on SAR	<ul style="list-style-type: none"> <li>Sensitivity level of involved species (Endangered, Threatened, Special Concern) relative to the provincial and federal provisions</li> <li>Area, type and quality of SAR territories or habitat that would be displaced during the development and operational phases</li> <li>Potential for noise (or other harm and harassment) related disturbance</li> <li>Maintenance or provision of wildlife / fish movement corridors</li> </ul>	<ul style="list-style-type: none"> <li>Terrestrial</li> <li>SAR</li> </ul>	<ul style="list-style-type: none"> <li>Traditional Ecological Knowledge</li> <li>Species at Risk Registry</li> <li>Government (MNRF and MECP)</li> <li>Baseline Studies <ul style="list-style-type: none"> <li>SAR</li> </ul> </li> </ul>
Effects on Surface water	<ul style="list-style-type: none"> <li>Surface water levels and flows of water bodies and watercourses</li> </ul>	<ul style="list-style-type: none"> <li>Hydrology</li> <li>Hydrogeology</li> <li>Surface Water Quality</li> <li>Human Health</li> </ul>	<ul style="list-style-type: none"> <li>Traditional Ecological Knowledge</li> <li>Monitoring stations</li> <li>Baseline Studies <ul style="list-style-type: none"> <li>Hydrology</li> <li>Bathymetry</li> <li>Surface water quality monitoring</li> </ul> </li> <li>Government (MNRF and MECP)</li> </ul>
Effects on groundwater	<ul style="list-style-type: none"> <li>Exceedances of ground water quality guidelines</li> <li>Changes to groundwater levels in</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 <ul style="list-style-type: none"> <li>Groundwater monitoring</li> <li>Hydrogeology</li> </ul> </li> <li>Government (MECP)</li> </ul>

Criteria	Indicators for the Assessment of Alternatives	Study(ies) to Address	Potential Data Sources
	comparison to baseline conditions.		
<b>Social Environment</b>			
Effect on local residents and recreational activities	<ul style="list-style-type: none"> <li>Property valuations in nearby communities (Red Lake, Ear Falls, Sioux Lookout and Dryden)</li> <li>Number of new and lost income opportunities in nearby communities</li> <li>Number of new and lost income opportunities Indigenous Communities</li> <li>Number of income opportunities for local outfitters</li> <li>Amount of local access provided</li> <li>Potential for general disturbance and adverse effects on aesthetics</li> <li>Number of potential hunters and fishers occupying the area</li> <li>Potential for adverse health and safety effects</li> </ul>	<ul style="list-style-type: none"> <li>Socio-Economic</li> <li>Human Health</li> </ul>	<ul style="list-style-type: none"> <li>Traditional Ecological Knowledge</li> <li>Baseline Studies <ul style="list-style-type: none"> <li>Socioeconomic</li> <li>Human Health</li> <li>Archaeological</li> </ul> </li> <li>Statistic Canada</li> <li>Traditional Land Use Study</li> </ul>
Effect on infrastructure	<ul style="list-style-type: none"> <li>Amount of local and regional accessibility by land (roads)</li> <li>Capacity and reliability of power supply systems</li> <li>Ability to provide road access connectivity to an isolated Indigenous Community</li> </ul>	<ul style="list-style-type: none"> <li>Socio-Economic</li> <li>PFS</li> </ul>	<ul style="list-style-type: none"> <li>Traditional Ecological Knowledge</li> <li>Baseline Studies <ul style="list-style-type: none"> <li>Socioeconomic</li> </ul> </li> <li>Government (MNR and MTO)</li> <li>Watay Power</li> <li>Ontario Hydro/Hydro One</li> <li>Forest Industry</li> <li>Indigenous Communities</li> <li>Ministry of Infrastructure</li> </ul>
Effect on public health and safety	<ul style="list-style-type: none"> <li>Number of health problems caused by air quality</li> <li>Number of health problems related to drinking water quality</li> </ul>	<ul style="list-style-type: none"> <li>Socio-Economic</li> <li>Human Health</li> </ul>	<ul style="list-style-type: none"> <li>Traditional Ecological Knowledge</li> <li>Baseline Studies <ul style="list-style-type: none"> <li>Socioeconomic</li> <li>Human Health Risk Assessment</li> </ul> </li> <li>Air Quality</li> </ul>

Criteria	Indicators for the Assessment of Alternatives	Study(ies) to Address	Potential Data Sources
	<ul style="list-style-type: none"> <li>• Number of severe occupational accidents</li> <li>• Number of severe private accidents</li> <li>• Number of drinking water advisories</li> </ul>		<ul style="list-style-type: none"> <li>• Government (MECP and MOH)</li> <li>• Local Indigenous health organizations</li> </ul>
Effect on local businesses and economy	<ul style="list-style-type: none"> <li>• Economic opportunities generated by the undertaking</li> <li>• Continued access to areas used for natural resource harvesting</li> <li>• Improvement of GDP value added per capita</li> <li>• Number of new and lost economic opportunities because of project-related activities</li> </ul>	<ul style="list-style-type: none"> <li>• Socio-Economic</li> <li>• Human Health</li> </ul>	<ul style="list-style-type: none"> <li>• Baseline Studies               <ul style="list-style-type: none"> <li>• Socioeconomic</li> </ul> </li> <li>• Engineering studies</li> <li>• Commercial Outfitters</li> <li>• Bait harvesters</li> <li>• Trappers</li> <li>• Ministry of Economic Development, Job Creation and Trade</li> <li>• Statistics Canada</li> <li>• Local and Indigenous Economic Development office</li> </ul>
Effect of tourism and recreation	<ul style="list-style-type: none"> <li>• Volume or number of tourist arrivals</li> <li>• Volume of people arriving for recreational activities and opportunities</li> <li>• Status of wild species that are harvested</li> <li>• Number of commercial outfitters</li> <li>• Area of current recreational use that would be restricted or lost</li> <li>• Continued access to areas used for tourism</li> <li>• Potential for general disturbance and adverse effects to aesthetics</li> </ul>	<ul style="list-style-type: none"> <li>• Socio-Economic</li> <li>• Traditional Land Use</li> </ul>	<ul style="list-style-type: none"> <li>• Traditional Ecological Knowledge</li> <li>• MHSTCI</li> <li>• Statistics Canada</li> <li>• Baseline Studies               <ul style="list-style-type: none"> <li>• Socioeconomic</li> </ul> </li> <li>• Commercial Outfitters</li> <li>• Ministry of Economic Development, Job Creation and Trade</li> </ul>
Regional economy	<ul style="list-style-type: none"> <li>• Economic opportunities generated by the undertaking</li> <li>• Capital and operating costs</li> <li>• Number of existing health, education and family support services</li> </ul>	<ul style="list-style-type: none"> <li>• Socio-Economic</li> </ul>	<ul style="list-style-type: none"> <li>• Ministry of Economic Development, Job Creation and Trade</li> <li>• Baseline Studies               <ul style="list-style-type: none"> <li>• Socioeconomic</li> </ul> </li> <li>• Engineering Studies</li> <li>• Government (MECJCT)</li> <li>• Statistics Canada</li> </ul>

Criteria	Indicators for the Assessment of Alternatives	Study(ies) to Address	Potential Data Sources
	<ul style="list-style-type: none"> <li>Number of new or lost employment opportunities</li> <li>Number of businesses displaced or disrupted</li> </ul>		<ul style="list-style-type: none"> <li>Indigenous Economical Development Organizations.</li> <li>MHSTCI</li> </ul>
Effects on Indigenous traditional land 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> </ul>	<ul style="list-style-type: none"> <li>Socio-Economic</li> <li>Traditional Ecological Knowledge</li> <li>Traditional Land Use Study</li> <li>Archaeological</li> <li>Human Health</li> </ul>	Baseline Studies <ul style="list-style-type: none"> <li>Socioeconomic</li> <li>Traditional Ecological Knowledge</li> <li>Traditional Land Use Study</li> <li>Country Foods Study</li> <li>Aboriginal and Treaty Rights Information system</li> <li>Human Health Risk Assessment</li> </ul>
<b>Economic Environment</b>			
Effect on project financing	<ul style="list-style-type: none"> <li>Investor attractiveness or acceptable risk.</li> <li>Number of retail and institutional investors</li> </ul>	<ul style="list-style-type: none"> <li>Preliminary Economic Assessment</li> <li>Prefeasibility Studies</li> <li>Feasibility Studies</li> </ul>	<ul style="list-style-type: none"> <li>Preliminary Economic Assessment</li> <li>Prefeasibility Studies</li> <li>Feasibility Studies</li> <li>Canadian Institution of Mining</li> </ul>
Return on investment	<ul style="list-style-type: none"> <li>Provides a competitive or acceptable return on investment for the life of the Project</li> </ul>	<ul style="list-style-type: none"> <li>Preliminary Economic Assessment</li> <li>Prefeasibility Studies</li> <li>Feasibility Studies</li> </ul>	<ul style="list-style-type: none"> <li>Preliminary Economic Assessment</li> <li>Prefeasibility Studies</li> <li>Feasibility Studies</li> <li>Financial Institutions</li> <li>Canadian Institution of Mining</li> </ul>
Financial risk	<ul style="list-style-type: none"> <li>Provides, or is associated with, a preferred, manageable, or acceptable financial risk.</li> </ul>	<ul style="list-style-type: none"> <li>Preliminary Economic Assessment</li> <li>Prefeasibility Studies</li> <li>Feasibility Studies</li> </ul>	<ul style="list-style-type: none"> <li>Preliminary Economic Assessment</li> <li>Prefeasibility Studies</li> <li>Feasibility Studies</li> <li>Financial Institutions</li> <li>Canadian Institution of Mining</li> </ul>
<b>Cultural Environment</b>			
Effect 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>A change in land use such as rezoning a battlefield from open space to residential use</li> <li>Requirement to disturb or destroy built heritage resources or</li> </ul>	<ul style="list-style-type: none"> <li>Archaeological</li> <li>Built Heritage</li> <li>Traditional Land Use</li> </ul>	<ul style="list-style-type: none"> <li>MHSTCI</li> <li>Baseline Studies               <ul style="list-style-type: none"> <li>Socioeconomic</li> <li>Archaeological</li> </ul> </li> <li>Traditional Ecological Knowledge</li> <li>Traditional Land Use Study</li> <li>Ontario Hydrology Network</li> <li>Ontario Archaeological Society</li> <li>Canadian Archaeological Association</li> <li>Canadian Register of Historic Places</li> </ul>

Criteria	Indicators for the Assessment of Alternatives	Study(ies) to Address	Potential Data Sources
	cultural heritage landscapes		
Effects on archaeological resources	<ul style="list-style-type: none"> <li>Land disturbances or destruction of archaeological resources (such as change in grade that alters soils and drainage patterns that adversely affect an archaeological resource)</li> <li>Existence of archaeological resource</li> </ul>	<ul style="list-style-type: none"> <li>Socio-Economic</li> <li>Archaeological</li> <li>Traditional Land Use</li> </ul>	<ul style="list-style-type: none"> <li>MHSTCI</li> <li>Baseline Studies <ul style="list-style-type: none"> <li>Socioeconomic</li> <li>Archaeological</li> </ul> </li> <li>Traditional Ecological Knowledge</li> <li>Traditional Land Use Study</li> <li>Ontario Hydrology Network</li> <li>Ontario Archaeological Society</li> <li>Canadian Archaeological Association</li> <li>Canadian Register of Historic Places</li> </ul>
Effect on spiritual, ceremonial, and cultural heritage	<ul style="list-style-type: none"> <li>Destruction of known spiritual, ceremonial, cultural heritage sites</li> </ul>	<ul style="list-style-type: none"> <li>Archaeological Studies</li> <li>Socio-Economic <ul style="list-style-type: none"> <li>Traditional Ecological Knowledge</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>Baseline Studies <ul style="list-style-type: none"> <li>Socioeconomic</li> <li>Archaeological</li> </ul> </li> <li>Traditional Ecological Knowledge</li> <li>Traditional Land Use</li> </ul>
<b>Built Environment</b>			
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>Can be constructed and operated effectively</li> <li>Minimal construction risk and closure</li> <li>Proven at Industrial scale</li> <li>Meets the required industrial and government standards</li> <li>Must be suitable for the Project climate and terrain</li> <li>Must meet health and safety requirements</li> <li>Must not exceed acceptable risk levels</li> <li>New technologies supported by pilot plant or strong theoretical investigations or</li> </ul>	<ul style="list-style-type: none"> <li>PFS</li> <li>Trade-Offs</li> <li>Alternative Assessments</li> </ul>	<ul style="list-style-type: none"> <li>Engineering studies, including trade-off studies</li> </ul>

Criteria	Indicators for the Assessment of Alternatives	Study(ies) to Address	Potential Data Sources
	testing, with contingencies if and as required		
Serviceability	<ul style="list-style-type: none"> <li>Provides a guaranteed supply to the site with manageable potential for supply disruption, and/or contingencies available</li> </ul>	<ul style="list-style-type: none"> <li>Preliminary Economic Assessment</li> <li>Prefeasibility Studies</li> <li>Feasibility Studies</li> <li>Socio-Economic</li> </ul>	<ul style="list-style-type: none"> <li>Engineering studies, including trade-off studies</li> </ul>
Accessibility	<ul style="list-style-type: none"> <li>Accessible land base or infrastructure needed to support component development, operation, and closure</li> </ul>	<ul style="list-style-type: none"> <li>Preliminary Economic Assessment</li> <li>Prefeasibility Studies</li> <li>Feasibility Studies</li> </ul>	<ul style="list-style-type: none"> <li>MNRF</li> <li>Forest Industry</li> <li>MTO</li> <li>Environment Canada</li> <li>DFO</li> </ul>
Effect on public safety and security	<ul style="list-style-type: none"> <li>Status of safety and security risks to the general public</li> <li>Number of vehicle accidents</li> </ul>	<ul style="list-style-type: none"> <li>Socio-Economic</li> </ul>	<ul style="list-style-type: none"> <li>Public Safety Canada</li> <li>MTO</li> <li>MECP</li> <li>Baseline Studies and assessment</li> <li>Operation, construction, closure plans</li> <li>MOH</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>Water quality analysis adhering to CCME guidelines for the protection of aquatic life and PWQO</li> <li>Restoration of passive drainage systems</li> <li>Provision of habitats for vegetation and wildlife species, including SAR</li> </ul>	<ul style="list-style-type: none"> <li>Human Health</li> <li>Water Quality</li> <li>Air Quality</li> <li>Terrestrial</li> </ul>	<ul style="list-style-type: none"> <li>MECP</li> <li>MNRF</li> <li>CCME</li> <li>MOH</li> <li>Baseline Studies <ul style="list-style-type: none"> <li>Air Quality</li> <li>Water Quality</li> <li>Water Management</li> <li>Terrestrial</li> </ul> </li> </ul>
Effect on land use	<ul style="list-style-type: none"> <li>Potential opportunities for productive land uses following the completion of mining activities</li> </ul>	<ul style="list-style-type: none"> <li>Socio-Economic</li> <li>Traditional Land Use</li> </ul>	<ul style="list-style-type: none"> <li>Government Agencies (MNRF and ENDM)</li> <li>MEND Guidelines (ARD/ metal leaching)</li> <li>Traditional Land Use Study</li> </ul>

Criteria	Indicators for the Assessment of Alternatives	Study(ies) to Address	Potential Data Sources
	<ul style="list-style-type: none"> <li>• Considerations related to recreation and Traditional land use</li> </ul>		<ul style="list-style-type: none"> <li>• Traditional Ecological Knowledge</li> <li>• <i>Mining Act</i> and Rehabilitation Code</li> <li>• Conceptual closure plan</li> </ul>

## 7.2 Effects Assessment

FMG proposes to use a stepwise approach for the effects assessment. The effects assessment methodology is summarized below:

- Selection of Valued Components (VCs) for each discipline through consultation with communities that may be impacted, which includes indigenous communities, public and other stakeholders.
- Continue to establish baseline/pre-development conditions and setting through design and execution of baseline monitoring programs to collect relevant information required to support the assessment of effects.
- Refine spatial and temporal boundaries that are required for baseline data collection and Effects Assessment as needed.
- Identify potential interactions (effects) between the components of the undertaking and each VC during different phases (Construction and Development, Operations and Closure).
- Identify mitigation measures to reduce or eliminate potential effects;
- Assess the significance of any net effects;
- Identify monitoring measures for any significant impacts; and
- Identify and assess the significance of the cumulative effects.

### 7.2.1 Valued Components (VCs)

The scope of the EA will focus on the assessment of potential adverse environmental effects of the Undertaking on the identified VCs, to ensure that the environment, as per the definition under the EAA, will be considered. VCs are environmental attributes 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 is broad and includes the natural, social, economic, cultural, and built environments. The EA must consider the environment in this broad context to meet the requirements of the EAA.

FMG welcomes feedback from all interested parties regarding components of the environment that are of importance to them. Through ongoing consultation activities, FMG will gather additional input from Indigenous communities, non-Indigenous stakeholders, and other interested parties to supplement and/or review our identified preliminary list of VCs that will be finalized in the EA Report/EIS. During the EA process, potential adverse environmental effects to these VCs will be described for each phase of the undertaking.

A preliminary list of VCs has been developed and is provided in **Table 7.2.1**, along with a brief rationale for each VC. The preliminary 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.

FMG emphasizes that this list of potential VCs is preliminary, and that VCs will be refined with input from all stakeholders as consultation and engagement for the undertaking progresses.

**Table 7.2.1 Preliminary Potential Valued Components and Rationale**

Potential Valued Component	Rationale
Atmospheric Environment	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.
GHGs	Greenhouse gases has been selected as a VC in consideration of regulatory requirements and objectives.
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	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). This VC will address surface water quality, surface water quantity, and the relationship to ground water flow and ground water. It may be separated further, for example by individual surface water systems.
Groundwater Quality and Quantity	The Undertaking will require extraction of significant amount of groundwater and may have potential adverse effects to the groundwater regime.

Potential Valued Component	Rationale
Wildlife, Wildlife Habitat and Linkages	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 ecological, aesthetic, recreational, economic, and cultural importance. For the purposes of this assessment the term 'wildlife' refers to birds, mammals and amphibians (SAR such as Caribou Boreal and wolverine may be considered uniquely, per SAR VC below).
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. This VC includes fish that are part of a commercial, recreational or Indigenous fishery, and fish that support such a fishery, as defined in the <i>Fisheries Act</i> . 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.
Plant 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 critical role in supporting biodiversity and traditional use by Indigenous communities, as well as their contributions to ecosystem functions at a local and regional landscape.
SAR	Species at Risk are a particular component of the aquatic and terrestrial systems that have particular value, including at a regulatory level. Individual VCs may be identified for Endangered and Threatened species. Refer to <b>Table 6.3.5</b> for a more specific list of Species at Risk that may be considered as part of the VC.
Employment and Business	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.
Regional and Community Services and Infrastructure	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. The in-migration of Project workers and their families, Project-related business growth, and Project activities will increase demands for community services and infrastructure during the construction and operation phases, which has the potential to exceed present capacities.
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 and historical, 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.
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.
Environmental Health	This potential VC has an inherent importance to the wellbeing of humans, food security, the natural environment as well as the related environmental and safety regulatory requirements.

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

## 7.2.2 Baseline/Pre-development Conditions and Setting

The establishment of baseline or pre-development conditions is essential for the Effects Assessment. **Section 6** outlines the baseline studies which have been used to inform the description of the environment provided within this ToR, as well as the previous and potential future studies as currently planned (**Table 6.8.1**). FMG is planning to complete ongoing and proposed studies to establish the baseline/pre-development conditions.

## 7.2.3 Spatial and Temporal Boundaries

Spatial boundaries are required to focus the baseline data collection and the effects assessment. **Section 6.1** outlines the preliminary spatial boundaries identified to date. These studies may be revised or otherwise further clarified within the EA Report/EIS 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 will be further defined in the EA Report/EIS as engineering studies progress.

## 7.2.4 Preliminary Description of Potential Interactions, Effects, and Mitigation Measures

MOE (2014) 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 defined in the EA Report/EIS. An example that shows a list of preliminary potential environmental effects of select components of the undertaking has been developed and presented in **Table 7.2.2**. As required by the CEAA 2012 effects assessment and as per the coordinated EA process, FMG has included **Table D.1** in **Appendix D** to provide a preliminary overview of the likely adverse environmental effects of the Undertaking. These preliminary environmental effects have been considered in the provincial context.

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 are also summarized in **Table 7.2.2**.

**Table 7.2.2 Example of Preliminary Potential Effects**

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 three coffer dams on the Springpole Lake to isolate the mining operation;</li> <li>• Potential for aquatic species to be affected by the watercourse realignment 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>• Reduction in terrestrial habitat caused by the development of the open pits which are anticipated to become pit lakes at closure;</li> <li>• Reduction in baseflow to surface water features; and</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>
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 processing plant;</li> <li>• Increased localized sound emissions as a result of processing plant and maintenance operations;</li> <li>• Loss of local terrestrial habitat and/or quality of habitat, including habitat for SAR as a result of the buildings footprints;</li> <li>• Potential for terrestrial species disturbance due to construction and operations noise; and</li> <li>• Impacts associated with the proposed domestic sewage treatment plant and discharge.</li> </ul>
Mine Rock Area (MRA) 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 creek 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> </ul>

Project Component	Potential Effect
	<ul style="list-style-type: none"> <li>• Reduction in terrestrial habitat caused by the MRA footprint; and</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; and</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; and</li> <li>• Potential for effects to 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; and</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 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 of aesthetic value of the lake and surrounding area; and</li> <li>• Potential for increased risk for forest fires and increased cost to provincial government.</li> </ul>

**Table D.1 in Appendix D** identifies potential interactions and discusses how these potential interactions will be addressed in the EA Report/EIS, which will present a more realistic scenario that includes proposed mitigation and environmental management measures to avoid, reduce or eliminate potential Project-related environmental effects. **Table D.1 in Appendix D** also outlines potential mitigation measures based on preliminary Project planning and design and these will be refined to include a description of actions necessary to prevent or mitigate the effects upon the environment during the EA process. This commitment to refine the mitigation measures is included in **Table 8.1.1**

### 7.2.5 Assessment of Effects

The effects assessment will be completed in a structured manner that considers the potential effect, proposed mitigation, residual effect (after mitigation) and significance. The potential environmental effects of activities and components of the undertaking on each VC will be assessed using a standard framework. Mitigation refers to measures that are proposed to ameliorate negative effects, and include elements inherent in the design of the undertaking. Mitigation also includes compensation, such as for potential adverse effects to fish habitat to offset adverse effects. Compensation will also be considered where an effect cannot be avoided,

prevented or otherwise mitigated. Evaluation tables and matrices will be used to document the assessment.

The significance of the potential environmental effects will be determined after application of mitigation (i.e. the residual effect) and will be evaluated on the basis of defined assessment criteria.

Net effects after mitigation will be characterized by level for each VC using standard assessment criteria such as described below (to be refined in the EA Report/EIS):

- **direction:** the direction of an effect (i.e. beneficial, adverse, or neutral);
- **magnitude:** the severity of the effect;
- **geographical extent:** the extent the effect will be is quantified where reasonable;
- **duration:** the length of time that that an effect lasts on the VC;
- **frequency:** how often the effect is expected to occur;
- **reversibility:** the ability of the VC to recover to pre-disturbance conditions once the effect is removed; and
- **context:** the ecological and social context of the effect, is the VC able to accept the change brought on by the effect.

The overall significance of an effect will be derived based on the experience and professional judgement of the practitioner preparing the assessment, based on the contributing factor of each of the assessment criteria.

Where significant adverse effects are identified, the likelihood that they will occur will be presented. The degree of scientific uncertainty related to the data and methods used in the determination of likelihood and significance will be described.

### **7.2.6 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. The federal Reference Guide for Addressing Cumulative Environmental Effects (CEAA 1999) defines cumulative environmental effects as:

*“changes to the environment that are caused by an action in combination with other past, present, and future human actions”*

This document will be used to guide the cumulative effects assessment required by both provincial and federal processes. As stated in the ToR Code of Practise, proponents are encouraged to carry out qualitative assessments of potential cumulative impacts.

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 future foreseeable projects, which may have effects that could combine with the residual project effects to increase the level of effect on VCs. Input will be sought from Indigenous communities into 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 EA Report/EIS, and may not align with other defined study areas for the undertaking.

### **7.2.7 Other Effects to be Considered**

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

- the impacts of a project on climate change;
- the 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 assessed in the EA Report/EIS 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 (CEAA 2018), the EA Report/EIS will also consider the potential effects of accidents and malfunctions that could arise from the undertaking on the environment.

## 8 COMMITMENTS, MONITORING, AND FOLLOW-UP

### 8.1 Commitments

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

- impact management / mitigation measures;
- additional works and studies to be carried out;
- environmental monitoring;
- public consultation;
- contingency planning; and
- documentation and correspondence.

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

- impacts are appropriately mitigated;
- benefits are enhanced;
- compliance with existing legislation, consistency with provincial guidelines, and FMG's corporate policies is achieved; and
- compliance will be reported as per applicable regulatory requirements.

**Table 8.1.1 Preliminary Table of Commitments**

Section	Description	Commitment	Stage
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	EA
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 possible.	EA
3	Purpose of the Undertaking	Refine the purpose statement if required.	EA
4	Description of the Undertaking	Include the final description and rationale for the proposed undertaking following consideration and evaluation of alternatives.	EA
5.3.8	Preliminary Alternative Effluent Discharge Points	A detailed evaluation of alternative discharge points and configurations will be undertaken as part of the EA process	EA

<b>Section</b>	<b>Description</b>	<b>Commitment</b>	<b>Stage</b>
<b>4.2</b>	Project Phases	Refine the production schedule in the EA Report/EIS if required.	EA
<b>5.3.2</b>	Mine Water Management	FMG will develop on-site water management system that will be based on the water balance and hydrological modelling and included in EA Report/EIS	EA
<b>5.3.3</b>	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.	EA
<b>5.3.6</b>	Tailings Management	FMG will identify the CoC and from this an appropriate treatment method will be determined.	EA
<b>5.3.8</b>	Water Discharge	FMG will develop and implement receiver-based effluent criteria as well and short and long-term monitoring requirements for the Undertaking	EA
<b>6.1</b>	Description of the Environment	Include a more detailed description of the environment as more baseline data is collected throughout the EA process.	EA
		Refine and update the study areas, if necessary, in the EA	EA
<b>6.2</b>	Traditional Lands or Sites of Cultural Significance	FMG will complete or support completion of TEK/TLU studies and incorporate more consultation opportunities for collecting data during the EA.	EA
<b>6.3.4</b>	Climate	FMG will install a weather station at the Springpole Site	EA
<b>6.3.9</b>	Hydrogeology	FMG will continue to consult with MECP's Northern Region Technical Support Section as the plans for these baseline studies are being developed	EA
<b>6.8</b>	Indigenous Participation in Future Studies	FMG will include Indigenous communities to participate in field studies	EA
<b>7.1</b>	Identification of Criteria, Indicators and Data Sources	Refine the Criteria, Indicators and Data Sources	EA
<b>7.2.1</b>	Selection of Valued Components	FMG will gather additional input from Indigenous communities, non-Indigenous stakeholders, and other interested parties to supplement our list of valued components that will be finalized during the EA process	EA
<b>7.2.4</b>	Mitigation Measures in Future Studies	Refine to describe the actions necessary to prevent or mitigate the effects upon the environment	EA
<b>7.2.6</b>	Cumulative Effects Assessment	FMG will discuss how the results of the cumulative effects assessment informed the selection of the preferred alternative for the Undertaking	EA
<b>9</b>	Stakeholder distribution List	Update stakeholder distribution list as new stakeholders become known.	EA

<b>Section</b>	<b>Description</b>	<b>Commitment</b>	<b>Stage</b>
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	EA
<b>All Sections</b>	Updated Figures	All figures will be updated accordingly	EA

<b>Commitments Developed Through Consultation</b>		
<b>Description</b>	<b>Commitment</b>	<b>Stage</b>
Contingency Plan	Develop a contingency plan in the event of contamination of the watershed.	EA
TEK	FMG will involve Ojibway Nation of Saugeen in the development of the TEK study and its execution where needed.	ToR
Youth Project	Include Wabauskang post-secondary students to work with the environmental workers when they are on site where appropriate.	Ongoing
Consultation Plan	FMG will make a translator available for community meetings to help engage the elders and those who do not speak English.	ToR, EA
Consultation Plan	FMG will bring in experts to help explain the technical information when appropriate.	ToR, EA
Seismic Activity	FMG will include studies and information on how seismic activities will be monitored.	EA
Consultation Plan	Set up a Facebook page to help keep community members informed regarding the Undertaking.	Ongoing
Fencing	FMG will ensure safety on site by fencing of some of the site components where required and practical.	EA
Consultation Plan	Bring before and after pictures of other mines to consultation sessions to demonstrate reclamation.	ToR, EA
Employment and Training	FMG will provide training and use the local labour force when available and appropriate. FMG will support and/or provide training and education in local communities, where reasonable.	EA
Work Plans/Technical Work Plans	FMG will prepare work plans/technical work plans for various subjects during the EA process	EA
Consultation Plan	Revise the questionnaire used in communities meetings to reflect community values and allow for more than yes or no responses.	Done
Consultation Plan	Transportation should be made available for Elders to attend the consultation sessions for their community	ToR, EA

Consultation Plan	Provide hard copies of the presentation and other materials, also follow up as requested, and provide a summary of the comments and concerns raised by each community to their respective contact.	ToR, EA
Environmental Monitoring	Allow for a joint environmental monitoring program with Slate Falls First Nation and possibly an environmental monitoring committee for the COI where appropriate.	Monitoring, Follow-up, EA
External Experts	Permit communities to bring in external experts to review FMG's technical reports where appropriate and when warranted.	EA
Archaeology	Identify what sorts of measures FMG would suggest implementing to protect sites that contain pictographs.	EA
Heritage Resources and Cultural Heritage Landscapes	Identify what sorts of measures FMG would suggest implementing to protect sites/lands that are of cultural and heritage importance	EA
Land Use Plan	Review the existing LUP of Cat Lake and Slate Falls First Nations to include previously collected data in the ToR.	ToR
Mine Waste Disposal	FMG will prepare an assessment of alternatives for mine waste disposal and will consult with indigenous and government stakeholders, and the public	EA
Consultation Plan	Provide local radio advertisements for consultation sessions.	ToR/EA
Environmental	Provide information on the website about the process for capturing and relocating fish from the north basin.	ToR/EA
Employment	FMG will present a list of jobs that will be available when the mine opens during consultation sessions.	ToR/EA
Species at Risk	FMG will provide the Species at Risk Report to the MNO.	ToR/EA
Outreach	FMG will organize education packages for the school, including "Mining Matters" education program and organize a trip to the camp if there is interest where practical and when safe.	On Going

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.	ToR/EA
Road Access	FMG will work with communities and forestry industry to provide an all access road to the mine site.	ToR/EA
Environmental	No pesticide spraying would be completed as part of road construction unless legally required.	ToR/EA
Culturally Sensitive Environs	Indigenous communities will be consulted to determine culturally sensitive alternatives before removal of environs where required, taking into account legal requirements.	ToR/EA
Socio-Economic	FMG will implement a procurement process that encourages Indigenous and local suppliers.	ToR/EA
	FMG will work with potentially affected Indigenous communities to develop a plan to address potential negative socio-economic effects related to the undertaking.	ToR/EA

## 8.2 Monitoring and Follow-up Programs

During the preparation of the EA Report/EIS, a Monitoring Framework will be developed with consideration of comments raised by stakeholders and Indigenous communities for the post-EA phase to address all stages of the proposed undertaking (construction, operation, closure and decommissioning). Where appropriate, it will include compliance monitoring and effects monitoring. The existing environmental baseline monitoring network may be modified through the EA and environmental approval processes.

Based on the findings of the EA, the requirements for additional environmental monitoring to improve predictive capabilities or understanding of baseline conditions for the approvals phase will be identified. 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 EA Report/EIS.

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 may develop management plans for various components of the Undertaking, including but not limited to the following list of preliminary examples of management plans. These plans may be combined where appropriate and will be defined in the EA Report/EIS.

- Water Management and Monitoring Plan
- Emergency Response and Preparedness Plan
- Wildlife Management and Monitoring Plan
- Conceptual Waste Rock Management Plan
- Conceptual Waste Management Plan
- Conceptual Erosion and Sediment Control Plan
- Conceptual Greenhouse Gas Management and Monitoring Plan
- Conceptual Air Quality Management and Monitoring Plan
- Conceptual Spill Prevention Plan
- Conceptual Soil Management Plan
- Noise, Vibration and Airblast Control Management and Monitoring Plan
- Conceptual Explosives and Blasting Management Plan
- Conceptual Aquatic Management and Monitoring Plan
- Conceptual Biodiversity Management and Monitoring Plan
- Conceptual Vegetation, Invasive and Rare Plant Management Plan
- Conceptual Tailings Management Plan
- Conceptual Transportation and Access management plan
- Conceptual Wetlands monitoring Plan
- Conceptual Closure and Reclamation Plan
- Conceptual Hazardous Materials Management Plan
- ML/ARD Management Plan
- Conceptual Archaeology and Heritage Resources Management Plan

## 9 CONSULTATION

### 9.1 Overview

FMG recognizes the importance of consultation as an integral aspect of the Project. 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 Project on various components of the environment. This knowledge base will be used to prepare the required EAs. Combining and coordinating consultation and engagement efforts in the preparation and review of the EAs, as much as possible, 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, for all the EA processes. The Indigenous Consultation Plan, Public Consultation Plan and Government Agency Consultation Plan (Consultation Plans) (**Appendix E.1, E.2, and E.3**, respectively) will provide a strategy for these coordinated consultation and engagement efforts. These plans will be continually improved and modified based on the needs of and feedback from participants during the EA process. 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 has entered into a Voluntary Agreement in April 2018 with the MECP (previously known as the MOECC) to conduct an EA for the Project in accordance with the requirements of the EAA.

The first step in preparing the EA Report/EIS is consultation and engagement on and approval of this document, the ToR, to guide on what is to be assessed in the EA Report/EIS, 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 2014) and the industry's best practices. 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 2014) 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 EA Report/EIS 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);
- meeting statutory requirements; and
- meeting agreement/contractual 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 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 Project requires an EA. EIS Guidelines were issued for the Springpole Project on June 18, 2018.

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

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

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 EA Report/EIS for the Project, preparing the associated consultation plan, and supporting 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;
- Implement the Crown-delegated procedural aspects 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, 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 that issues and concerns received from Indigenous communities were considered in the preparation of the EA Report/EIS;
- Address and where possible, 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 EA Report/EIS is to engage a wide range of stakeholders through various methods to gather feedback on the Project 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 Project's undertaking. It requires providing information to and collaborating with the public, Indigenous communities, and government agencies in order to:

- Identify concerns that may arise from the undertaking;
- Create opportunities to develop FMG's commitments and responses to local input;
- Focus on and address real public concerns; and
- Provide appropriate information to the ministry to enable fair and balanced decision-making.

During the EA phases, input will be sought on baseline methods/results, the effects assessment, mitigation measures, monitoring, and management plans.

### **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 maximize the benefits of mining locally. Whenever possible, FMG partners with governments and civil society to help deliver more effective and sustainable community development programs.

FMG understands that Indigenous consultation is the foundation of positive community relations. Most importantly, 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 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 in design;
- Being open and transparent;
- Providing clear, concise and relevant information; and,
- Focusing timing of engagement and consultation activities at key decision milestones.

Public and agency consultation 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.

FMG plans for consultation and this Plan will guide activities, track progress and establish accountability.

### **9.2.3 Consultation Objectives**

Consultation for the Project will be guided by FMG's principles and the guiding principles of MECP's Code of Practice: Consultation in Ontario's Environmental Assessment Process (MOE 2014)". The objectives of FMG's consultation program are to:

- Ensure the Indigenous communities and interested persons/stakeholders have an adequate opportunity to understand the proposed Project, identify potential environmental impacts, and review/verify assessed impacts to Aboriginal or Treaty rights and interests;
- At each key EA milestone, identify, consider, and respond to feedback on the:
  - Consultation Plans;
  - Development, evaluation, and results of baseline or other studies;
  - Alternatives and evaluation methods of the alternatives;
  - Final selection of criteria and indicators;
  - Results of the selection of the preferred alternative;
  - Assessment and evaluation of the preferred undertaking;
  - Potential impacts and mitigation measures; and
  - Decommissioning/closure plan concepts.
- Demonstrate and discuss how comments previously heard were addressed;

- Demonstrate and discuss how project designs or management practices help to reduce or avoid any identified adverse impacts;
- If the proposed Project cannot be modified to reduce or avoid the impacts, provide an explanation that is supported by science;
- Discuss appropriate ways potential impacts could be managed or mitigated;
- Discuss appropriate ways that the Indigenous communities could be either accommodated or compensated for remaining impacts that cannot be avoided;
- Document and respond to any issues, concerns and interest raised throughout the consultation process; and
- Meet all regulatory requirements for consultation during the ToR and EA Report/EIS preparation.

FMG 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 interests through the sharing of traditional knowledge; and, that FMG will consider and incorporate, where appropriate, traditional knowledge into each Environmental Assessment decision making milestone. FMG will also provide opportunities for the Public and Agencies to be engaged at critical decision-making points and consider all 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 right, 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 seek 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 Métis Nation of Ontario (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. The Region 1 MNO has submitted a draft consultation protocol that FMG is currently reviewing in order to continue engagement activities with the MNO.

FMG will provide financial and technical support to communities to enable them to provide meaningful input and feedback. FMG will prepare and make available plain language documents to facilitate understanding of the various studies required as part of the EA.

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, FMG has made a preliminary assessment of potentially impacted Indigenous communities. The potentially affected or interested Indigenous communities 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 First 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 No. 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 No. 9 made a public declaration of the rights and principles of Nishnawbe Aski.

NAN's objectives are implementing advocacy and policy directives from NAN Chiefs-in-Assembly; advocating to improve the quality of life for the people in areas of education, lands, and resources, health, governance, and justice; improving the awareness and sustainability of traditions, culture, and language of the people through unity and nationhood; developing and implementing policies which reflect the aspirations and betterment of the people; and developing strong partnerships with other organizations.

NAN is a political territorial organization representing 49 First Nation communities within northern Ontario with a total population of membership (on and off reserve) estimated around 45,000 people. These communities are grouped by Tribal Council (Windigo First Nations Council (*including Slate Falls First Nation and Cat Lake First Nation*), Wabun Tribal Council, Shibogama First Nations Council, Mushkegowuk Council, Matawa First Nations, Keewaytinook Okimakanak, and Independent First Nations Alliance (including Lac Seul First Nation)) according to region. Six (6) of the 49 communities are not affiliated with a specific Tribal Council.

NAN encompasses James Bay Treaty No. 9 and Ontario's portion of Treaty No. 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.

NAN continues to work to improve the quality of life for the Nishnawbe Aski territory. Through existing partnerships and agreements with Treaty partners (governments of Canada and Ontario), NAN continues to advocate on behalf of the communities it represents for self-determination with functioning self-government.

### **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 No. 9 and Ontario's portion of Treaty No. 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

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**

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 MNR 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 will determine if Métis harvesting will be affected by the Project.

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

Overall, FMG has received direction from both Federal 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 First Nation
- Wabauskang First Nation
- Métis Nation of Ontario (MNO)  
Northwest Métis Council/Region 1 Consultation Committee
- 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 First 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 hearing out additional assertions of claim over the areas potentially impacted by the Project and will consult with any additional persons or communities identified or delegated by the MECP, the Agency, or other regulatory body.

**Table 9.3.1** provides a summary of the Indigenous communities that will be consulted with 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.	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 kilometres (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.
<p>Slate Falls First Nation</p> <p>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></p>	<p>Tribal Council: Windigo First Nations Political Territorial Organization: Nishnawbe-Aski Nation (NAN) Treaty #9</p>	<p>Community is located 120 km N of Sioux Lookout, on shore of Bamaji Lake. Slate Falls First Nation was recognized in 1985 as the Slate Falls Band #259 under the Indian Act.</p> <p>On December 14, 2018 Slate Falls First Nation received an Order-in-Council that sets aside lands to Slate Falls First Nation to finally achieve reserve status.</p> <p>On February 12, 2019 Slate Falls First Nation celebrated the "long-awaited reserve status".</p>
<p>Wabauskang First Nation</p> <p>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></p>	<p>Tribal Council: Bimose Tribal Council (BTC) Provincial Territorial Organization: Grand Council Treaty #3 (GCT3) Treaty #3</p>	<p>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.</p> <p>Wabauskang First Nation is a Saulteaux First Nation in northwestern Ontario and is a member of the Bimose Tribal Council and the Grand Council of Treaty 3.</p>
<p>Ojibway Nation of Saugeen</p> <p>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</p>	<p>Tribal Council: Unaffiliated Political Territorial Organization: Unaffiliated Treaty #3</p>	<p>Community is approximately 100 km N from Hwy 17 just east of Ignace along Hwy 599, then approx. 20 km NW of Savant Lake.</p>
<p>Mishkeegogamang FN</p> <p>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</p>	<p>Independent First Nation (not part of a Tribal Council) Political Territorial Organization: Nishnawbe-Aski Nation (NAN)</p> <p>Mishkeegogamang is a signatory to the James Bay Treaty No. 9</p>	<p>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.</p>
<p>Pikangikum First Nation</p> <p>Chief Amanda Sainnawap</p>	<p>Tribal Council (TC): Independent First Nations Alliance (IFNA) Political Territorial Organization (PTO): Nishnawbe-Aski Nation (NAN) Treaty #5</p>	<p>Pikangikum is approx. 100 km NW of Red Lake, on E shores of Pikangikum Lake at the Berens River.</p> <p>PTO: Nishnawbe Aski Nation TC: Independent First Nations Alliance</p>

Indigenous Organization	Governance Organization	Brief Description
c/o Band Office PO Box 323 Pikangikum, ON P0V 2L0 Telephone: 807 733 5536 Fax: 807 773 5536		
Métis Nation of Ontario – Northwest Métis Council, Region 1 MNO President: Margaret Froh Suite 100 – 66 Slater Street, Ottawa, Ontario K1P SH1 Telephone: 613-798-1488 Toll-free: 1-800-263-4889 Fax: 613-722-4225 MNO Regional 1 President: Ronald Robinson 34B King St Dryden, ON P8N 1B3 Phone: 807-223-8082 Fax: 807-223-8083 www.Métisnation.org	Northwest Métis Council is in 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 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 First 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 First 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			Chief Executive Officer: Mathew Hoppe Thunder Bay Office: 1151 Barton Street, Unit 203 Thunder Bay, ON P7B 5N3

Provincial Territorial Organization	Affiliated Communities	Treaties Affiliated	Contact Information
Alliance (IFNA)			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 First 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.

On September 6, 2019, STPN asked FMG to kick start an Impact Benefit Agreement (IBA) in place of the PDEA. The IBA negotiations are in progress and FMG and the STPN have had two meetings in Hudson, Ontario on September 30, 2019 and October 29, 2019. A third meeting was held on November 21, 2019 with the STPN with the inclusion of Mishkeegogamang First Nation and Wabauskang First Nation at the table. The five communities have expressed an interest to move forward in the negotiations together.

FMG also has provided support to the Métis Nation of Ontario (Métis Region 1)'s Consultation Committee and their members during the EA and Terms of Reference reviews. Consideration for further agreements and capacity support will be determined as consultation advances with other potentially affected First Nations and Métis.

FMG bears the cost 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 participants to participate meaningfully in the Project and EAs.

## 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 Project Site;
- Non-government organizations and groups 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 possible. 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

Environmental Non-Government Organizations (ENGOS):

- Mining Watch Canada
- Northwatch
- Canadian Parks and Wilderness Society (Wildlands League)

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, including the Government Review Team (GRT) and municipal representatives and planners.

In early 2018, ENDM helped to organize an inter-agency meeting regarding the Project. 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 GRT will be undertaken to provide updates, share information and seek alignment on Project plans. 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
- 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 (OEB) and Independent Electricity System Operator (IESO)
- Ontario Provincial Police (OPP)
- Provincial Parliament representatives

### **Federal Government:**

- Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC)
- Canadian Environmental Assessment Agency (the Agency)
- Environment and Climate Change Canada (ECCC)
- Federal Parliament representatives
- Fisheries and Oceans Canada (DFO)
- Health Canada (HC)
- Major Projects Management Office (MPMO)

- Natural Resources Canada (NRC)
- Transport Canada (TC)

**Municipal Governments:**

- The Township of Ear Falls
- Municipality of Sioux Lookout
- Municipality of Red Lake
- The City of Dryden

**9.6 Consultation and Engagement Activities**

FMG initiated consultation activities to all interested and affected stakeholders to provide information about the Undertaking, the EA processes to be followed, and to identify and consider concerns and issues. 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 Class EA processes; and,
- share information about the Undertaking and gather feedback on the Project Description.

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 Terms of Reference 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. FMG has revised the ToR to address any comments, issues and concerns before the final copy of the ToR is submitted. FMG will continue to collect any comments, issues and concerns throughout the entire EA process. The RoC has been updated to reflect the results of the engagement and consultation activities about the ToR.

The complete record of information that was gathered from all stakeholders, including Indigenous communities, can be found in the RoC. The document includes all FMG consultation efforts to date including a communications log, meeting minutes and reports from engagement activities with Indigenous communities, government agencies, and municipalities, a summary of comments and responses, and the presentation that was delivered to each stakeholder. The RoC also includes some historic consultation carried out by the previous tenure owner, Gold Canyon (GCU), prior to the voluntary agreement and is included in Section 2.1 Historic Consultation of the RoC. FMG will group and describe the consultation and engagement activities described in subsection 9.6, including all further activities during the EA process, where possible, by community, government agency, etc.

### **9.6.1 Consultation with Indigenous Communities**

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 EA process for the Access Corridor Project.

GCU engaged the First Nations of Cat Lake, Slate Falls, and Lac Seul, who were identified to GCU by the Crown in 2009 as the affected First Nations with respect to the Access Corridor Project. On 22 May 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.

In January 2017 the First Nations of Cat Lake, Slate Falls and Lac Seul entered into a Shared Territory Protocol agreement. These three (3) First Nations are known collectively as the Shared Territory Protocol Nations (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.

Historic comments from 2013 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, means of engagement), but relevant information will be tracked in an Engagement Log going forward.

GCU also completed introductory meetings with Wabauskang First Nation. 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. GCU had an introductory meeting with the MNO to provide information about the Project and has provided notification of the project to the Lands and Resources Branch of the MNO. FMG is also committed to providing update meetings on the Project as it progresses.

The preliminary consultation has been helpful to identify issues associated with the development of the Project into a mine and this is regarded as a starting point for future discussions. 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 is intended to allow FMG to identify and consider potential concerns and issues of Indigenous communities 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 at this stage was to:

- Establish a good working relationship with all interested 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 Description and/or any of the information discussed.

**Table 9.6.1** outlines the engagement activities that FMG has held to conduct thorough consultation with Indigenous communities including the names of the communities, the date and type of engagement held and a brief description of the purpose of the engagement. All consultation was done face-to-face and in group presentations conducted in community town halls with food (provided by FMG), and an open discussion following the presentation involving members of the Indigenous community. The engagement report and meeting minutes for each activity can be found in the RoC.

### **Table 9.6.1 List of Consultation Opportunities with Indigenous Communities.**

Community	Date	Type of Engagement	Purpose of Engagement
<b>Cat Lake First Nation</b>	December 1, 2017	Open House	Discuss an overview of proposed project and environmental work done to date. <b>Refer to Section 2 of the RoC</b>
	July 24, 2018	Open House	Discuss overview of proposed project, EA process and Environmental Studies. <b>Refer to Section 2 of the RoC</b>
	October 24, 2019	Meeting with Chief and Council	Road Access Options. <b>Refer to Section 3 of the RoC</b>
	February 04, 2020	Community Meeting	Project Overview, Draft ToR, Indigenous Consultation, EA Baseline Studies, Alternative Methods. <b>Refer to Section 2 and 6 of the RoC</b>
	February 19, 2020	Meeting with Chief and Council	Project Overview, Draft ToR, Indigenous Consultation, EA Baseline Studies, Alternative Methods. Access Corridor. <b>Refer to Section 3 of the RoC</b>
	March 08, 2020	Meeting	Access Corridor Options. <b>Refer to Section 3 of the RoC</b>
	April 01, 2020	Meeting with Chief and Council and Windigo Advisors	Access Corridor Options. <b>Refer to Section 3 of the RoC</b>
<b>Lac Seul First Nation</b>	January 11, 2017	Meeting with Barry King	STPN, Negotiation Protocol. <b>Refer to Section 2 of the RoC</b>
	September 17, 2018	Public Meeting	Discuss overview of proposed project, EA process and Environmental Studies. <b>Refer to Section 2 of the RoC</b>
	September 18, 2018	Meeting with Chief	Consultation. <b>Refer to Section 2 of the RoC</b>
	December 14, 2018	Public Meeting	Discuss overview of proposed project, EA process and Environmental Studies, Economic Benefits. <b>Refer to Section 2 of the RoC</b>
	November 13, 2019	Public Meeting	Project Overview, Draft ToR, Indigenous Consultation, EA Baseline Study Results. <b>Refer to Section 2 of the RoC</b>
	March 10, 2020	Meeting with Rep.	Consultation. <b>Refer to Section 2 of the RoC</b>
	March 25, 2020	Meeting with Rep.	Consultation. <b>Refer to Section 2 of the RoC</b>
<b>Metis Nation of Ontario</b>	January 8, 2019	Meeting with MNO Reps	Project Overview. <b>Refer to Section 2 of the RoC</b>
	March 03, 2020	Meeting with MNO Rep.	Discuss MNO's budget, future meetings. Handed Draft ToR on USB stick. <b>Refer to Section 2 of the RoC</b>
	April 03, 2020	Meeting with MNO Reps.	Consultation. <b>Refer to Section 2 of the RoC</b>

	April 24, 2020	Meeting with MNO Rep.	Project Update - Project Overview, Draft ToR, Consultation, EA Baseline Studies, Alternative Methods. <b>Refer to Section 2 of the RoC</b>
<b>Mishkeegogamang First Nation</b>	May 15, 2018	Meeting with Chief and Council	Discuss overview of proposed project and environmental work done to date. <b>Refer to Section 2 of the RoC</b>
	September 12, 2018	Meeting with Chief and Council	Project Overview. <b>Refer to Section 2 of the RoC</b>
	March 03, 2020	Meeting with Council and Community Rep's	Project Overview, Draft ToR, Indigenous Consultation, EA Baseline Studies, Alternative Methods. <b>Refer to Section 2 of the RoC</b>
<b>Ojibway Nation of Saugeen</b>	September 18, 2018	Meeting with Chief and Council	Project Overview. <b>Refer to Section 2 of the RoC</b>
	July 11, 2019	Open Forum	Saugeen gave a community update. <b>Refer to Section 2 of the RoC</b>
	December 16, 2019	Meeting with Chief and Council and Legal Rep.	Project Overview, Draft ToR, Indigenous Consultation, EA Baseline Studies, Alternative Methods. <b>Refer to Section 2 of the RoC</b>
<b>Pikangikum First Nation</b>	December 6, 2018	Meeting with Chief and Council	Project Overview, Economic Benefits. <b>Refer to Section 2 of the RoC</b>
<b>Slate Falls First Nation</b>	February 20, 2018	Open House	Discuss overview of proposed project and environmental work done to date. <b>Refer to Section 2 and 6 of the RoC</b>
	April 24, 2018	Open House	Project overview, Consultation process and TEK integration, EA processes, environmental work done to date, Draft ToR. <b>Refer to Section 2 and 6 of the RoC</b>
	September 20, 2018	Meeting with Chief and Council	Review of Shared Territory Protocol Agreement. <b>Refer to Section 2 of the RoC</b>
	October 24, 2018	Open House	Discuss overview of proposed project, EA process and Environmental Studies. <b>Refer to Section 2 and 6 of the RoC</b>
	May 3, 2019	Open House	Corporate Presentation February 2018, Springpole Project overview. <b>Refer to Section 2 and 6 of the RoC</b>
	December 11, 2019	Community Meeting	Project Overview, Draft ToR, Indigenous Consultation, EA Baseline Studies, Alternative Methods. <b>Refer to Section 2 and 6 of the RoC</b>

	April 29, 2020	Meeting with Lands and Resources Rep.	Consultation. <b>Refer to Section 2 of the RoC</b>
<b>STPN</b>	January 23, 2019	Meeting	Pre-Development Exploration Agreement Negotiation. <b>Refer to Section 2 of the RoC</b>
	October 29, 2019	Meeting	Project Overview, Draft ToR, Indigenous Consultation, EA Baseline Studies, Alternative Methods; Impact Benefit Agreement Negotiation. <b>Refer to Section 2 and 3 of the RoC</b>
	November 21, 2019	Meeting	Project Overview, Draft ToR, Indigenous Consultation, EA Baseline Studies, Alternative Methods; Impact Benefit Agreement Negotiation. <b>Refer to Section 2 and 3 of the RoC</b>
	April 03, 2020	Meeting with Legal Rep.	Impact Benefit Agreement Negotiation; EA Process; Consultation. <b>Refer to Section 2 of the RoC</b>
	April 28, 2020	Meeting	Impact Benefit Agreement Negotiation; EA Process; Consultation. <b>Refer to Section 2 of the RoC</b>
<b>Wabauskang First Nation</b>	December 14, 2017	Meeting with Leadership and Consultants	Introductory Meeting. <b>Refer to Section 2 of the RoC</b>
	February 21, 2018	Open House	Discuss overview of proposed project and environmental work done to date. <b>Refer to Section 2 of the RoC</b>
	December 12, 2018	Meeting with Chief and Council	Project overview, Consultation process, EA processes, Environmental permitting, access corridor. <b>Refer to Section 2 of the RoC</b>
	January 24, 2019	Meeting with Chief and Council, Lands and Resource Rep	Project Overview. <b>Refer to Section 2 of the RoC</b>
	February 06, 2020	Meeting with Chief	Consultation. <b>Refer to Section 2 of the RoC</b>
<b>Windigo Tribal Council</b>	April 3, 2019	Meeting	Economic Development Opportunities. <b>Refer to Section 2 of the RoC</b>
<b>Cat Lake FN, Wabauskang FN</b>	October 2, 2017	Notice	Exploration Permit Application/ Geotechnical Drilling. <b>Refer to Section 4 of the RoC</b>
<b>Cat Lake, Slate Falls, MNR</b>	May 25, 2018	Meeting	Land Use Planning and Implementation, TK/TLU. <b>Refer to Section 2 of the RoC</b>
<b>All</b>	August 29, 2019	Notice	Commencement of the ToR. <b>Refer to Section 4 of the RoC</b>

<b>Cat Lake, Slate Falls, Lac Seul, Wabauskang, Mishkeegogamang, Saugeen, Pikangikum, Metis Nation of Ontario</b>	May 05, 2020	Notice	Exploration Permit Application/ Geotechnical Drilling. <b>Refer to Section 4 of the RoC</b>
<b>Cat Lake, Slate Falls, Lac Seul, Wabauskang, Mishkeegogamang, Saugeen, Pikangikum, Metis Nation of Ontario</b>	May 07, 2020	Notice	Permit to Take Water Application/Drill Program. <b>Refer to Section 4 of the RoC</b>

Various forms of information were provided to each community throughout each session to ensure a solid understanding of the Undertaking. FMG has provided visual aids including a physical 3D model of the Springpole Project Site, containing interactive pieces indicating the location of the waste 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. The model also depicts what the open pit might look like and where the gold ore is located. Another visual aid of an animation video was presented on a projector or a TV screen that walked through what the site might look like at various stages of the construction and development process.

The second purpose of these engagement activities was to allow 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
- Baseline Results posters:
  - Fisheries
  - Water Quality

As of December 2019, the presentation material was updated to include more recent EA Baseline Study results and the Draft Terms of Reference, including the Indigenous Consultation Plan. This presentation can be found in the RoC.

Copies of draft ToR were mailed (electronic and hard copies) to each Indigenous community for review and comments. FMG will notify each Indigenous community of the availability of the ToR review prior to final submission.

### **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. Although FMG does not have detailed records from this consultation to provide herein, based on GCU records, the issues and concerns and supportive comments that have been identified during the exploration phase consultation are summarized in RoC Table 4.3.1; Consultation with Public Stakeholders. Although these comments and concerns were identified for the Access Corridor Project, they are helpful to scope issues for the current Springpole Project 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, 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 open house meetings were advertised locally through radio announcements and local newspaper ads. The open houses consisted of the physical and visual 3D displays as previously described, 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
- Baseline Results posters:
  - Fisheries
  - Water Quality

**Table 9.6.2** lists the date, location, and purpose of each public stakeholder engagement activities carried out by FMG. Copies of the ToR have been made available to the public for review and additional open house meetings will be scheduled to provide opportunities for consultation. Once comments are received from the ToR, they will be incorporated and addressed in the drafting of the final amendments to the ToR. FMG's plan to consult with the Public can be found in **Appendix E.2 Proposed Public Engagement Plan**.

### **Table 9.6.2 List of Public Stakeholder Engagement Activities**

Location	Date	Type of Engagement	Purpose of Engagement
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> <li>• <b>Refer to Section 2 of the RoC</b></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> <li>• <b>Refer to Section 2 of the RoC</b></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> <li>• <b>Refer to Section 2 of the RoC</b></li> </ul>
Sioux Lookout, Arena	June 26 – 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> <li>• <b>Refer to Section 2 of the RoC</b></li> </ul>
	August 08, 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> <li>• <b>Refer to Section 2 of the RoC</b></li> </ul>
	August 09, 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> <li>• <b>Refer to Section 2 of the RoC</b></li> </ul>
Thunder Bay, Valhalla Inn	April 2, 2019 - April 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>

			<ul style="list-style-type: none"> <li>• <b>Refer to Section 2 of the RoC</b></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> <li>• <b>Refer to Section 2 of the RoC</b></li> </ul>
Wabauskang FN Lac Seul FN Thunder Bay SLKT	September 4, 2018	Notice sent by mail	Commencement of ToR <b>Refer to Section 4 of the RoC</b>

### 9.6.3 Consultation with Government Agencies

Consultation with government agencies has been conducted in order to ensure regulations are followed and to gain advice on how to conduct various documentation and other aspects of the project. **Table 9.6.3** illustrates the various meetings FMG has held with the identified agencies, municipalities and townships with the date and the general purpose of each meeting. The meeting detail notes can be found in the RoC.

Copies of the ToR were submitted to the MECP for review and have been returned with preliminary comments. These comments have been used to inform the final ToR.

**Table 9.6.3 List of Engagement Activities with Government Agencies, Municipalities and Townships**

Agencies	Date	Purpose of Engagement
Ear Falls	November 27, 2017	<ul style="list-style-type: none"> <li>• General overview of the Springpole Project</li> <li>• <b>Refer to Section 2 and 3 of the RoC</b></li> </ul>
MOECC CEAA	April 30, 2018	<ul style="list-style-type: none"> <li>• EIS Guidelines</li> <li>• List of communities to consult</li> <li>• <b>Refer to Section 2 and 3 of the RoC</b></li> </ul>
MNRF	May 11, 2018	<ul style="list-style-type: none"> <li>• Land Use Planning</li> <li>• <b>Refer to Section 2 of the RoC</b></li> </ul>
CEAA MECP (EAB) FMG	October 2, 2018	<ul style="list-style-type: none"> <li>• To discuss timelines related to the RA process</li> <li>• To provide an overview of the federal EA process</li> <li>• To discuss certain sections of the Final EIS Guidelines</li> <li>• <b>Refer to Section 2 and 3 of the RoC</b></li> </ul>
MNRF	October 10, 2018	<ul style="list-style-type: none"> <li>• Endangered Species Act</li> <li>• <b>Refer to Section 2 and 3 of the RoC</b></li> </ul>
CEAA MECP	November 22, 2018	<ul style="list-style-type: none"> <li>• To discuss Indigenous consultation for the Springpole Project</li> <li>• To discuss the list of Indigenous communities to consult</li> <li>• <b>Refer to Section 2 and 4 of the RoC</b></li> </ul>

Agencies	Date	Purpose of Engagement
PDAC SLKT Mayor SLKT EDO	March 4, 2019	<ul style="list-style-type: none"> <li>To discuss the access road</li> <li><b>Refer to Section 2 and 3 of the RoC</b></li> </ul>
CEAA MECP (EAB) ENDM	March 5, 2019	<ul style="list-style-type: none"> <li>To provide an overall project update</li> <li>To discuss coordination of federal and provincial EA process for the Springpole Gold Project</li> <li>To provide an update on activities related to public and Indigenous engagement</li> <li><b>Refer to Section 2 and 3 of the RoC</b></li> </ul>
CEAA MECP (Regional, EAB) DFO HC TC DST KBM	March 26, 2019	<ul style="list-style-type: none"> <li>Discuss the proposed road access</li> <li><b>Refer to Section 2 and 3 of the RoC</b></li> </ul>
CEAA MECP (EAB, other district and regional offices) DFO HC TC DST KBM ENDM MNRF NRCAN	March 26, 2019	<ul style="list-style-type: none"> <li>To discuss the Springpole Project, Environmental Baseline Studies, Access Road, Community Consultation and Engagement, EA Timeline and Anticipated Regulatory Approvals and potential Permits</li> <li><b>Refer to Section 2 and 3 of the RoC</b></li> </ul>
Red Lake Mayor and Planning Department	December 3, 2019	<ul style="list-style-type: none"> <li>Project update</li> <li><b>Refer to Section 2 and 3 of the RoC</b></li> </ul>
Ear Falls Mayor and Deputy Mayor		<ul style="list-style-type: none"> <li>Project update</li> <li><b>Refer to Section 2 and 3 of the RoC</b></li> </ul>
SLKT Mayor and town Council	December 4, 2019	<ul style="list-style-type: none"> <li>Project update</li> <li><b>Refer to Section 2 and 3 of the RoC</b></li> </ul>
MECP	July 17, 2019	<ul style="list-style-type: none"> <li>To discuss timelines related to the ToR Review Process</li> <li>To provide an overview of the Provincial EA process</li> <li>To discuss and highlight certain sections of the ToR</li> <li><b>Refer to Section 2 and 3 of the RoC</b></li> </ul>
	December 12, 2019	<ul style="list-style-type: none"> <li>Springpole Project Update. Received input on permitting and EA requirements.</li> <li><b>Refer to Section 2 and 3 of the RoC</b></li> </ul>
	December 12, 2019	<ul style="list-style-type: none"> <li>Springpole Project Update. Received input on permitting and EA requirements.</li> <li><b>Refer to Section 2 and 3 of the RoC</b></li> </ul>

<b>Agencies</b>	<b>Date</b>	<b>Purpose of Engagement</b>
	January 01, 2020	<ul style="list-style-type: none"> <li>Springpole Project – 2020 Program.</li> <li><b>Refer to Section 2 and 3 of the RoC</b></li> </ul>
	January 30, 2020	<ul style="list-style-type: none"> <li>Springpole Project – 2020 Program.</li> <li><b>Refer to Section 2 and 3 of the RoC</b></li> </ul>
IAAC	February 07, 2020	<ul style="list-style-type: none"> <li>Springpole Project – 2020 Program.</li> <li><b>Refer to Section 2 and 4 of the RoC</b></li> </ul>
	February 13, 2020	<ul style="list-style-type: none"> <li>Project Update.</li> <li><b>Refer to Section 2 of the RoC</b></li> </ul>
	March 03, 2020	<ul style="list-style-type: none"> <li>Project Update</li> <li>Baseline Studies</li> <li>Indigenous Consultation.</li> <li><b>Refer to Section 2 and 3 of the RoC</b></li> </ul>
	March 04, 2020	<ul style="list-style-type: none"> <li>IAAC Open House.</li> <li><b>Refer to Section 2 of the RoC</b></li> </ul>
	April 03, 2020	<ul style="list-style-type: none"> <li>Project Update</li> <li>Changes to the Project Layout</li> <li>Indigenous Consultation.</li> <li><b>Refer to Section 2 and 3 of the RoC</b></li> </ul>
	April 15, 2020	<ul style="list-style-type: none"> <li>Changes to the Project Layout</li> <li>Indigenous Consultation.</li> <li><b>Refer to Section 2 and 3 of the RoC</b></li> </ul>
	April 23, 2020	<ul style="list-style-type: none"> <li>Project Update</li> <li>Changes to the Project Update.</li> <li><b>Refer to Section 2 and 3 of the RoC</b></li> </ul>
IAAC MECP (EAB)	April 08, 2020	<ul style="list-style-type: none"> <li>EIS</li> <li>Indigenous Consultation</li> <li><b>Refer to Section 2 and 3 of the RoC</b></li> </ul>
ECCC	April 20, 2020	<ul style="list-style-type: none"> <li>MDMER Schedule 2</li> <li><b>Refer to Section 2 and 3 of the RoC</b></li> </ul>
IAAC	April 23, 2020	<ul style="list-style-type: none"> <li>Project Update</li> <li>Changes to the Project Update</li> <li><b>Refer to Section 2 and 3 of the RoC</b></li> </ul>

#### 9.6.4 Consultation with Government Agencies

Since the Notice of Commencement of the draft ToR on August 29, 2018, FMG has worked with Indigenous communities, public stakeholders, and government agencies to provide consultation opportunities throughout the preparation of the ToR. FMG has continued to provide updates about the Undertaking and the EA process that is to be followed and has encouraged all stakeholders to provide issues and concerns related to the Undertaking during consultation. FMG has provided

opportunities for persons to provide input which has informed development of the ToR. Since the inception of the of the project in 2015 and during consultation and engagement activities, FMG has continued to abide by its core values:

- Honesty, Respect, Humility, Fairness
- Participation & Engagement
- Caring for our Lands
- Avoiding and minimizing disturbances
- Returning disturbances to a natural state
- Doing more than laws and regulations require
- Doing the right thing
- We Listen
- Caring for our Past, our Present and our People

This has allowed FMG to continue building positive working relationships with Indigenous communities, public stakeholders, and agencies identified.

On July 24, 2018, FMG held an open house meeting in Cat Lake, ON where we encouraged community participation and engagement, and discussed overview of the proposed project and EA process. FMG announced its intentions to commence work on the ToR as required by the provincial EA process.

FMG undertook consultation and engagement activities even prior to the submission of the Notice of Commencement. A record of these engagement activities is given in the Record of Consultation and Record of Communication. The previous owners of the property (2010 to 2015), Gold Canyon, invited Cat Lake and Slate Falls for site tours.

Consultation activities since the notice of commencement of the draft ToR was distributed to communities and agencies is included in **Table 9.6.4** below, along with the purpose of each engagement.

**Table 9.6.4 List of Consultation Opportunities for the ToR**

Date	Community	Type of Engagement	Purpose and Documentation
July 24, 2018	Cat Lake First Nation	Open House	Discuss overview of proposed project, EA process and Environmental Studies, notified community of FMG's intentions to start on the ToR. <b>Refer to</b>

			<b>Section 2 and 3 of the RoC</b>
August 29, 2018	All	Notice	Commencement of the ToR. <b>Refer to Section 2 and 4 of the RoC</b>
September 17, 2018	Lac Seul First Nation	Public Meeting	Discuss overview of proposed project, EA process and Environmental Studies. <b>Refer to Section 2 and 6 of the RoC</b>
September 12, 2018	Mishkeegogamang First Nation	Meeting with Chief and Council	Project Overview, baseline studies, Forest Management Plan. <b>Refer to Section 2 of the RoC</b>
October 24, 2018	Slate Falls First Nation	Open House	Discuss overview of proposed project, EA process and Environmental Studies. <b>Refer to Section 2 of the RoC</b>
December 12, 2018	Wabauskang First Nation	Meeting with Chief and Council	Project overview, Consultation process, EA processes, Environmental permitting, access corridor. <b>Refer to Section 2 of the RoC</b>
December 14, 2018	Lac Seul First Nation	Public Meeting	Discuss overview of proposed project, EA process and Environmental Studies, Economic Benefits. <b>Refer to Section 2 and 6 of the RoC</b>
January 8, 2019	Metis Nation of Ontario	Meeting with MNO Reps	Project Overview, EA process and Environmental Studies. <b>Refer to Section 2 of the RoC</b>
January 24, 2019	Wabauskang First Nation	Meeting with Chief and Council, Lands and Resource Rep	Project Overview, EA process and Environmental Studies. <b>Refer to</b>

			<b>Section 2 of the RoC</b>
May 3, 2019	Slate Falls First Nation	Open House	Corporate Presentation February 2018, Springpole Project overview, EA process and Environmental Studies. <b>Refer to Section 2 and 6 of the RoC</b>
August 08, 2019	Sioux Lookout, Arena	Open House at the Trade and Craft Show during Blue Berry Festival	Provide a visual overview of the Undertaking (ToR) Review and Comment of presented materials. <b>Refer to Section 2 of the RoC</b>
August 09, 2019	Sioux Lookout, Area	Open House at the Trade and Craft Show during Blue Berry Festival	Provide a visual overview of the Undertaking (ToR). Review and Comment of presented materials. <b>Refer to Section 2 of the RoC</b>
September 18, 2019	Lac Seul FN, Events Centre	Open House at the Lac Seul Elder's and Youth Gathering Event	Provide a visual overview of the Undertaking (ToR) Review and Comment of presented materials. <b>Refer to Section 2 of the RoC</b>
September 19, 2019	Lac Seul FN, Events Centre	Open House at the Lac Seul Elder's and Youth Gathering Event	Provide a visual overview of the Undertaking (ToR) Review and Comment of presented materials. <b>Refer to Section 2 of the RoC</b>
October 29, 2019	STPN	Meeting	Project Overview, Draft ToR, Indigenous Consultation, EA Baseline Studies, Alternative Methods; Impact Benefit Agreement Negotiation. <b>Refer to Section 2 and 4 of the RoC</b>
November 13, 2019	Lac Seul First Nation	Public Meeting	Project Overview, Draft ToR, Indigenous Consultation, EA

			Baseline Study Results. <b>Refer to Section 2 and 6 of the RoC</b>
November 21, 2019	STPN	Meeting	Project Overview, Draft ToR, Indigenous Consultation, EA Baseline Studies, Alternative Methods; Impact Benefit Agreement Negotiation. <b>Refer to Section 2 and 4 of the RoC</b>
December 11, 2019	Slate Falls First Nation	Community Meeting	Project Overview, Draft ToR, Indigenous Consultation, EA Baseline Studies, Alternative Methods. <b>Refer to Section 2 and 6 of the RoC</b>
December 16, 2019	Ojibway Nation of Saugeen	Meeting with Chief and Council and Legal Rep.	Project Overview, Draft ToR, Indigenous Consultation, EA Baseline Studies, Alternative Methods. <b>Refer for Section 2 and 3 of the RoC</b>
February 04, 2020	Cat Lake First Nation	Community Meeting	Project Overview, Draft ToR, Indigenous Consultation, EA Baseline Studies, Alternative Methods. <b>Refer to Section 2 of the RoC</b>
February 19, 2020	Cat Lake First Nation	Meeting with Chief and Council	Project Overview, Draft ToR, Indigenous Consultation, EA Baseline Studies, Alternative Methods. Access Corridor. <b>Refer to Section 2 and 4 of the RoC</b>
March 03, 2020	Metis Nation of Ontario	Virtual Meeting with MNO Rep.	Discuss MNO's budget, future meetings. Handed Draft ToR on USB stick. <b>Refer to Section 2 and 4 of the RoC</b>

March 03, 2020	Mishkeegogamang First Nation	Virtual Meeting with Council and Community Rep's	Project Overview, Draft ToR, Indigenous Consultation, EA Baseline Studies, Alternative Methods. <b>Refer to Section 2 of the RoC</b>
April 24, 2020	Metis Nation of Ontario	Virtual Meeting with MNO Rep.	Project Update - Project Overview, Draft ToR, Consultation, EA Baseline Studies, Alternative Methods. <b>Refer to Section 2 of the RoC</b>
May 21, 2020	Metis Nation of Ontario	Virtual Meeting with R1CC Committee	Project Update - Project Overview, Draft ToR, Consultation, EA Baseline Studies, Alternative Methods. <b>Refer to Section 2 and 6 of the RoC</b>

## 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 by each community and municipality have been recorded with the corresponding response from FMG and provided in the RoC.

### 9.7.1 Input from Indigenous Communities

**Table 9.7.1** summarizes the comments and concerns raised by the Indigenous Communities through the engagement activities listed in **Table 9.6.1**. The comments and concerns are organized by topic and by the communities that expressed the concerns. The topics include:

- Physical Environment
  - Hydrology and climate
  - Water quality
  - Geochemistry
  - Noise and vibrations
  - Air quality
- Biological Environment
  - Aquatic biology
  - Ecological Health
  - Terrestrial biology

- Human Environment
  - Traditional Knowledge and land Use
  - Archaeological Resources
  - Consultation
  - Human Health
  - Socioeconomics
  - Visual aesthetics
- EIS/EA methodology
  - Various disciplines

The comments and concerns raised during the community consultation sessions were received either in person, or through questionnaires that were provided in hard copy at each session. These questionnaires allowed individuals to take the questions home to think about the material and submit their questions by mail or delivered in person. Emails were also provided to those who chose to submit questions through email.

FMG used this input to help guide the information presented in this Terms of Reference by considering the values and concerns that were raised by each community. Most of the concerns were satisfied with an explanation of reasoning and scientific findings, where others provided direction on what needs to be included in the EA Report/EIS. For example, the Ojibway Nation of Saugeen asked how FMG is prepared to handle a disaster if toxins make it into the watershed system. Because this concern was raised, FMG will now incorporate a contingency plan in the EA Report/EIS to account for such events. 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 Traditional Ecological Knowledge/Land Use Study that will be completed in the EA. Studies of this nature have not yet commenced and have not been included in this ToR.

**Table 9.7.1 Summary of Comments and Concerns of Indigenous Communities**

\*Refers to multiple communities sharing the same concerns

Community	Comments/Concerns	Response from FMG	Comment Reference in RoC	ToR Reference
<b>Physical Environment: Hydrology and Climate</b>				
Wabauskang First Nation	Draining Springpole Lake (the Bay)	Effects of draining Springpole Lake will be discussed in the EA FMG will dewater the bay in a controlled dewatering fashion	Page 200 Comment #12 Page 201 Comment #21 December 12, 2018	4.1 Description of the Undertaking 4.2.1 Construction Phase
	Length and time to fill the open pit following closure	Open pit will fill in approximately 5-10 years following closure. This will be determined using hydrological and hydrogeological modelling	Page 201 Comment #18 December 12, 2018  Page 211 Comment#10 Comment #11 January 24, 2019	4.2.3 Closure Phase
	Mine water requirements	Maximum freshwater removal rate will be determined during the Permit to Take Water application phase. Water will be required to supplement recycled site water and provide for equipment washing, potable and fire reserve requirement.		4.2.1 Construction Phase Subsection 5.3.7 Water Sourcing Section 11.2 Required Provincial Approvals
	Success rate of realignments of the Springpole Lake and Nearby waterbodies.	Realignments can be extremely successful when planned and built thoroughly with a goal to mimic baseline conditions	Page 169 Comment #12 December 14, 2017	5.3.9 Watercourse Realignments
Metis Nation of Ontario	Recycling and reuse of water	Maximized recycling and minimized freshwater requirements	Page 207 Comment #27 January 08, 2019	5.3.7 Water Sourcing
	Effects of hydrological changes at the site	FMG will make all efforts to ensure that surface water flow will be	Page 205 Comment #4	6.3.8 Hydrology

Community	Comments/Concerns	Response from FMG	Comment Reference in RoC	ToR Reference
		comparable to baseline levels at closure	Page 206 Comment #18 Page 208 Comment #33 Page 209 Comment #43 January 08, 2019	
	Planning for high rainfall and snow amounts	Design of storage ponds, dams and realignments considers flood and snowmelt events FMG will undertake hydrological assessment studies to model operational and closure flood events (1:20/1:50/1:100/1:1000)	Page 208 Comment #37 January 08, 2019	Subsection 5.3.2 Mine Water Management 4.2.1 Construction Phase
	More clarity requested regarding point of effluent discharge and the water management plan	Additional information on points of effluent discharge and the water management plan will be provided in response to communities' comments during consultations	Page 206 Comment #13 Comment #16 Comment #18 Page 207 Comment #19 January 08, 2019	5.3.8 Water Discharge
	Watershed – will there be a change of depth to the watershed once draining?	Controlled discharge / volume will be monitored. FMG will install lake level monitoring systems to ensure regular water levels on the lake are not exceeded.	Page 206 Comment # 18 January 08, 2019	4.2.1 Construction Phase
	During construction phase of the project: How will FMG accurately monitor the lake draining during freeze ups? During winter season?	FMG will develop lake dewatering management plans that will include monitoring water levels on the downstream of the coffer dams. Lake dewatering during the winter season will be evaluated in terms its effectiveness and impacts on the	Page 209 Comment #37 January 08, 2019	4.2.1 Construction Phase

Community	Comments/Concerns	Response from FMG	Comment Reference in RoC	ToR Reference
		fish for both the upstream and downstream of the coffer dams.		
	Concern about water quality: When the lake is drained, where is the water going? Will it affect the water level of Springpole?	The water will be pumped to the main part of the lake	Page 205 Comment #4 January 08, 2019	4.2.1 Construction Phase
Lac Seul First Nation	Watercourse realignments	The realignments flow system will be designed to maintain a hydrological gradient and watershed areas that are intended to minimize changes to those investigated under existing conditions. The alignment will be undertaken to ensure minimal impact to the environment.	Page 203 Comment #2 Comment #3 Comment #4 December 14, 2018	5.3.9 Watercourse Realignments
	Success rate of realignments of the Springpole Lake and Nearby waterbodies.	Realignments can be extremely successful when planned and built thoroughly with a goal to mimic baseline conditions	Page 203 Comment #2 Comment #3 December 14, 2018  Page 217 Comment #10 November 13, 2019	5.3.9 Watercourse Realignments

Community	Comments/Concerns	Response from FMG	Comment Reference in RoC	ToR Reference
<b>Physical Environment: Water Quality</b>				

Community	Comments/Concerns	Response from FMG	Comment Reference in RoC	ToR Reference
Wabauskang First Nation	Use of water in the TMF to aid fill of the pit at closure	Given the location of the TMF relative to the open pit, pumping would be required to transfer water to the pit for a substantial distance and this will be costly. Water from the mine rock area collection ponds and site drainage will be used to assist in the filling of the open pit of deemed to meet water quality Objectives.	Page 200 Comment #10 Page 201 Comment #18 December 12, 2018	4.2.3 Closure Phase
	What are plans for water quality and monitoring process after closure?	The closure plan will outline all the required monitoring. It will likely consist of monitoring wells surrounding the tailings pond and pumps that return any leaching back into the pond or into a water treatment plant	Page 201 Comment #18 December 12, 2018	4.2.3 Closure Phase
Metis Nation of Ontario	Acid Rock Drainage (ARD) within the mine rock areas	We are currently characterizing the mine rock for ARD and ML Mine rock not expected to be acid generating Based on the preliminary ARD/ML results	Page 206 Comment #11 Page 208 Comment #40 January 08, 2019	5.3.3 Mine Rock and Overburden Management 6.3.3 Geochemistry
	Would the bottom of the open pit lake be saline?	The bottom of the open pit lake is likely to have higher concentrations of dissolved solids than the water at surface Concentrations will not likely increase to levels that would be 'saline'	Page 208 Comment #33 Comment #34 January 08, 2019	Subsection 6.3.9.1 Hydrogeology
	Will methyl mercury be an issue with TMF seepage?	Mercury is not anticipated to be a contaminant of concern (CoC) FMG will determine the Contaminates of Concern (CoC)	Page 209 Comment #41 January 08, 2019	5.3.6 Tailings Management

Community	Comments/Concerns	Response from FMG	Comment Reference in RoC	ToR Reference
	Effects on water quality in local communities	Water quality predications will be undertaken as part of a water quality assessment Efforts will be made to ensure water quality is expected to be similar to baseline conditions The communities downstream of the project are located ways back from the site	Page 206 Comment #16 Page 209 Comment #42 January 08, 2019	Table 7.1.5 Effects to the Human Environment
	Acid Rock Drainage (ARD) within the mine rock areas	We are currently characterizing the mine rock for ARD and ML Mine rock not expected to be acid generating Based on the preliminary ARD/ML results	Page 206 Comment #11 Page 208 Comment #40 January 08, 2019	5.3.3 Mine Rock and Overburden Management 6.3.3 Geochemistry
	Effects from TMF seepage	All seepage will be collected from the TMF waste rock dumps and plant site will be collected and discharged to the TMF See page from the TMF will be pumped back to the TMF	Page 206 Comment #13 Comment #16 January 08, 2018	5.3.6 Tailings Management
	Concerns about the environment and effects on water quality	Water quality predictions will be undertaken as part of the water quality effects prediction Water quality is expected to be like baseline conditions	Page 206 Comment #17 Comment #18 Page 207 Comment #19 Page 208 Comment #37 Page 209 Comment #41 Comment #43 January 08, 2019	Subsection 6.3.9.1 Hydrogeology Table 6.8.1 Previous and Potential Future Baseline Studies Subsection 6.3.8.2 Surface Water Quality

Community	Comments/Concerns	Response from FMG	Comment Reference in RoC	ToR Reference
	Contaminated lakes – this is a concern for the MNO.	Ammonia from the explosives – blasting management plan will be in place; treatment of ammonia is challenging but FMG will do the best management practise in this situation.	Page 209 Comment #42 January 8, 2019	Table 7.2.2 Preliminary Summary of Potential Effects

Community	Comments/Concerns	Response from FMG	Comment Reference in RoC	ToR Reference
<b>Physical Environment: Water Quality</b>				
Mishkeegogamang First Nation	Potential water quality effects of mine water discharge	FMG has carefully considered and will continue to assess how best to mitigate potential Project effects on water and water quality from both an environmental protection culturally sensitive perspective Best management practices will be incorporated as appropriate Discharge water quality will meet the provincial and federal effluent discharge limits	Page 177 Comment #10 May 15, 2018	5.3.8 Water Discharge
	Understanding of key issues with discharge water quality	Discharge water quality will meet the provincial Water Quality Objectives (PWQO) and federal MMER effluent discharge limits In the event that low water flows in the receptor for some parameters, a mixing zone may be required to meet provincial (PWQO) and federal surface water quality objectives.	Page 177 Comment #10 May 15, 2018  Page 188 Comment #3 Page 189 Comment #10 Comment #13 September 12, 2018	5.3.8 Water Discharge
	Number of water samples taken to date	Many samples of surface water have been analyzed for water quality parameters In 2018, additional samples have since been collected and will continue to be collected.	Page 188 Comment #3 Page 189 Comment #9 September 12, 2018	6.8 Ongoing and Future Studies

Community	Comments/Concerns	Response from FMG	Comment Reference in RoC	ToR Reference
Lac Seul First Nation	Potential water quality effects of mine water discharge	FMG has carefully considered and will continue to assess how best to mitigate potential Project effects on water and water quality from both an environmental protection culturally sensitive perspective Best management practices will be incorporated as appropriate Discharge water quality will meet the provincial and federal effluent discharge limits	Page 203 Comment #2 Comment #3 December 14, 2018	5.3.8 Water Discharge
	Understanding of key issues with discharge water quality	Discharge water quality will meet the provincial Water Quality Objectives (PWQO) and federal MMER effluent discharge limits In the event that low water flows in the receptor for some parameters, a mixing zone may be required to meet provincial (PWQO) and federal surface water quality objectives.	Page 203 Comment #2 Comment #3 December 14, 2018	5.3.8 Water Discharge
	Effects on water quality in local communities	Water quality predications will be undertaken as part of a water quality assessment Efforts will be made to ensure water quality is expected to be like baseline conditions The communities downstream of the project are located ways back from the site	Page 219 Comment #22 November 13, 2019	Table 7.1.5 Effects to the Human Environment

Community	Comments/Concerns	Response from FMG	Comment Reference in RoC	ToR Reference
	Effects from TMF seepage	All seepage will be collected from the TMF waste rock dumps and plant site will be collected and discharged to the TMF Seepage from the TMF will be pumped back to the TMF	Page 228 Comment #1 November 13, 2019	5.3.6 Tailings Management
<b>Physical Environment: Water Quality</b>				
Lac Seul First Nation	Potential for TMF accidents and malfunctions	Risk of spills to other water bodies will be minimal Safeguard in our accidents and malfunctions plan will ensure a plan of actions as in place for immediate implementation if required.	Page 216 Comment #1 November 13, 2019	5.3.6 Tailings Management
	Effects on Water	FMG and contractors will continue to carefully consider how best to mitigate potential Project effects on water and water quality from both an environmental protection and culturally sensitive perspective Best management practices will be incorporated as appropriate.	Page 203 Comment #2 Comment #3 December 14, 2018  Page 216 Comment #4 November 13, 2019	5.3.2 Mine Water Management
	Concerns about the environment and effects on water quality	Water quality predictions will be undertaken as part of the water quality effects prediction Water quality is expected to be like baseline conditions	Page 203 Comment #2 Comment #3 December 14, 2018  Page 216 Comment #4 November 13, 2019	6.3.9.1 Hydrogeology  7.2 Effects Assessment (Table 7.2.2)

Community	Comments/Concerns	Response from FMG	Comment Reference in RoC	ToR Reference
	How will the water be monitored during and after mine operation?	Water will be monitored based on the legislated schedule that will include frequency, parameters, minimum detection limit (MDL), etc.	Page 203 Comment #3 December 14, 2018	6.3.8.2 Surface Water Quality, 6.3.9.1 Hydrogeology, Section, 8.2 Monitoring and Follow-up Programs
Cat Lake First Nation	Effects on water quality in local communities	Water quality predications will be undertaken as part of a water quality assessment Efforts will be made to ensure water quality is expected to be like baseline conditions The communities downstream of the project are located ways back from the site	Page 179 Comment #2 Comment #4 Page 189 Comment #14 Page 183 Comment #15 Page 184 Comment #18 Page 185 Comment #21 July 24, 2018	Table 7.2.5 Effects to the Human Environment
	Effects on Water	FMG and contractors will continue to carefully consider how best to mitigate potential Project effects on water and water quality from both an environmental protection and culturally sensitive perspective Best management practices will be incorporated as appropriate.	Page 186 Comment #25 July 24, 2018	5.3.2 Mine Water Management
	Concerns about the environment and effects on water quality	Water quality predictions will be undertaken as part of the water quality effects prediction Water quality is expected to be like baseline conditions	Page 184 Comment #18 Page 185 Comment #21 July 24, 2018	6.3.9.1 Hydrogeology  7.2 Effects Assessment (Table 7.2.2)

Community	Comments/Concerns	Response from FMG	Comment Reference in RoC	ToR Reference
	How will you guarantee that there is no underground water seepage with that barrier that you guys are going to put in? how are you going to monitor the ground water?	Drilled a few holes 3 months ago and it showed that the rock is very hard, very non-critical, beneath those coffer dams. We don't believe that the water is going to go underneath those dams even if it rained. There is going to be water inside that area from rainfall, the open pit will be like a funnel, so we are going to have to pump into the water treatment centre.	Page 182 Comment #14 Pg. 183 Comment #15 July 24, 2018	6.3.9.1 Hydrogeology, 6.3.9.2 Groundwater Quality
<b>Physical Environment: Geochemistry</b>				
Wabauskang First Nation	Effect of Acid Rock Drainage (ARD)	A testing and sampling program will be carried out to ensure that the water management infrastructures are constructed in ground that is non-acid generating	Page 200 Comment # 9 Page 201 Comment #18 Comment #19 December 12, 2018  Page 211 Comment #16 January 24, 2019	5.3.3 Mine Rock and Overburden Management, 6.3.3 Geochemistry
	Lack of segregation of Potentially Acid Generating (PAG) material.	Potentially acid generating rock samples are randomly distributed without geological control. Non-potentially acid generating material has an excess of acid neutralization capacity Mixing isolated potentially acid generating material and non-potentially acid generating material will result in an overall acid neutralizing stockpile	Page 200 Comment # 9 Page 201 Comment #18 Comment #19 December 12, 2018  Page 211 Comment #16 January 24, 2019	5.3.3 Mine Rock and Overburden Management, 6.3.3 Geochemistry

Community	Comments/Concerns	Response from FMG	Comment Reference in RoC	ToR Reference
	Is there any acid rock drainage, how will you deal with the tailings?	The baseline studies have not yet been completed to determine if there will be any acid generating material. In the case where the waste material is acid generating, there are option for preventing or continuing the contamination. The baseline studies and the feasibility study will determine the bet method for managing the tailings, but some options may include capping or submerging the material.	Page 200 Comment #10 December 12, 2018	5.3.3 Mine Rock and Overburden Management, 6.3.3 Geochemistry
Cat Lake First Nation	Waste Rock – Where is that waste going? The type of the stuff to remove the waste, what can cyanide do? The stuff that you are going for drilling.	Blasting creates ammonium residual in the water that collects at the bottom of the pit and that water will be pumped to the treatment facility where we would remove the ammonia and the cyanide	Page 180 Comment #9 July 24, 2018	5.3.3 Mine Rock and Overburden Management

Community	Comments/Concerns	Response from FMG	Comment Reference	ToR Reference
<b>Physical Environment: Geochemistry</b>				
Metis Nation of Ontario	Effect of Acid Rock Drainage (ARD)	A testing and sampling program will be carried out to ensure that the water management infrastructures are constructed in ground that is non-acid generating	Page 206 Comment #11 Comment #13 Page 208 Comment #40 Page 209 Comment #41 January 08, 2019	5.3.3 Mine Rock and Overburden Management, 6.3.3 Geochemistry
	Lack of segregation of Potentially Acid Generating (PAG) material.	Potentially acid generating rock samples are randomly distributed without geological control. Non-potentially acid generating material has an excess of acid neutralization capacity Mixing isolated potentially acid generating material and non-potentially acid generating material will result in an overall acid neutralizing stockpile	Page 206 Comment #11 Comment #13 Page 208 Comment #40 Page 209 Comment #41 January 08, 2019	5.3.3 Mine Rock and Overburden Management, 6.3.3 Geochemistry
	Acid rock concern	Some of the ore is acid generating and hence the tails will be acid generating. FMG will come up with Management Plans for the waste rock ad tailings in order to control ARD.	Page 206 Comment # 11 January 8, 2019	5.3.3 Mine Rock and Overburden Management,

Community	Comments/Concerns	Response from FMG	Comment Reference	ToR Reference
Mishkeegogamang First Nation	Where are the proposed tailing are going to be, what is the terrain like? If there is too much weight in the tailings pond because of the muskeg-like terrain, what would happen	Issues raised include tailing management facility stability issues, environmental concerns. FMG will design the TMF to ensure that the receiving environment is not impacted. A follow up with Chief David will be needed and his concerns will be considered when designing the tailings management facility	Page 189 Comment #12 September 12, 2018	5.3.6 Tailings Management,
<b>Physical Environment: Noise and Vibrations</b>				
Metis Nation of Ontario	Request to provide ground vibration isopleths	Vibration will be modelled, and isopleths will be developed for the LSA and the RSA	Page 209 Comment #47 January 8, 2019	6.3.6 Noise and Vibration
	Noise from blasting – the noise from blasting activity – affect natural habitat in or around the area	Noise monitoring is part of the studies	Page 209 Comment #46 January 8, 2019	6.3.6 Noise and Vibration
	Noise concern – traffic and machine noise – could cause a concern for local hunters and trappers.	Noise control will be part of the EA	Page 209 Comment #47 January 8, 2019	6.3.6 Noise and Vibration

Community	Comments/Concerns	Response from FMG	Comment Reference	ToR Reference
Cat Lake First Nation	So how are you going to address the seismic activity within that system, how are you going to monitor that? You need to put this in because most mines when they work on drilling and blasting, there is going to be some sort of activity. I think you should put that in.	We don't have plans yet, but we must	Page 183 Comment #16 July 24, 2018	6.3.6 Noise and Vibration
<b>Physical Environment: Air Quality</b>				
Metis Nation of Ontario	Study of dust and exhaust levels in and around the Project area	Air quality effects assessment will include dust and exhaust emissions for the LSA and RSA NOx (which originate from exhaust) is expected to be below regulatory limits	Page 209 Comment #46 January 8, 2019	6.3.5 Air Quality
Wabauskang First Nation	Could ash from the mine project reach Wabauskang? (dust)	Air and dust monitors will be there. Blasting creates dust. No dust will reach Wabauskang	Page 210 Comment #3 January 24, 2019	6.3.5 Air Quality
<b>Biological Environment: Aquatic Biology</b>				

Community	Comments/Concerns	Response from FMG	Comment Reference	ToR Reference
Wabauskang First Nation	Disturbance to Springpole Lake	Habitat will be created in other areas of the watershed to offset the loss of aquatic habitat Efforts will be made to ensure that the habitat will be suitable for local fish Offsetting has been carried out successfully in many other projects	Page 173 Comment #10 Comment #11 Comment #12 February 21, 2018  Page 201 Comment #24 December 12, 2018	6.3.10 Aquatic Environment
	Fish – habitat loss and offsetting habitat /compensation	All habitat within the waterbodies affected will be included in the Fisheries Act authorization for the Project as a loss of habitat (Section 35) FMG will be working with the Department of Fisheries and Oceans (DFO) to outline analysis of how the Potential measures will offset harm to fish. FMG will be working with DFO using impact assessment results in the EIS/Draft EA Report	Page 173 Comment #10 Comment #11 Comment #12 February 21, 2018  Page 201 Comment #24 December 12, 2018	6.3.10 Aquatic Environment
	What is the percentage of the loss of fish in the bay once the draining starts?	The fish will be removed from the bay before the drainage begins. Some mortality will occur during the capture.	Page 201 Comment #24 December 12, 2018	Table 7.2.2 Preliminary Summary of Potential Effects (Open Pit Mining)

Community	Comments/Concerns	Response from FMG	Comment Reference	ToR Reference
Metis Nation of Ontario	Disturbance to Springpole Lake	Habitat will be created in other areas of the watershed to offset the loss of aquatic habitat Efforts will be made to ensure that the habitat will be suitable for local fish Offsetting has been carried out successfully in many other projects	Page 205 Comment #4 Page 206 Comment #13 Comment #14 Comment #15 Page 207 Comment #19 Comment #21 Page 209 Comment #42 Comment #49 January 08, 2019	6.3.10 Aquatic Environment,

Community	Comments/Concerns	Response from FMG	Comment Reference	ToR Reference
<b>Biological Environment: Aquatic Biology</b>				
Metis Nation of Ontario	Effects of blasting on fish in and around the Springpole Lake	Will not kill or damage fish May affect small spawning area Loss of spawning area will be offset	Page 206 Comment #13 Comment #14 Comment #15 January 08, 2019	Table D.1, Potential Mitigation and/or Management, Table 7.2.2
	Effects of moving fish from Lake to other lakes during lake dewatering	Fish in Springpole Lake have access to other lakes downstream It will be therefore safe to transfer them	Page 206 Comment #15 Page 207 Comment #19 Comment #21 January 08, 2019	Table D.1, Potential Mitigation and/or Management, Table 7.2.2
	Effect of fish relocation	The productive capacity of the lakes and streams that fish will be relocated to will have a high habitat suitability index Additional baseline studies will be undertaken	Page 206 Comment #15 Page 207 Comment #19 Comment #21 January 08, 2019	Table D.1, Potential Mitigation and/or Management, Table 7.2.2, 6.8 Ongoing and Future Studies, 11.2 Provincial Approvals,
	Consumption of fish from Lake versus fish relocation	Protection of fish is required by the Fisheries Act and provincial regulations The ministry of Natural Resources may permit other uses of the fish FMG will consult interested communities to get their input on this	Page 206 Comment #15 Page 207 Comment #19 Comment #21 January 08, 2019	Table D.1, Potential Mitigation and/or Management, 6.3.10.2 Fish Usability, 11.2 Provincial Approvals, 11.3 Federal Approvals
	Completeness of baseline data presented EIS to support the EA/EIS preparation	FMG is confident that the level of baseline data collection is enough to support the impact assessment. However, some additional data collection will continue to support permit applications.	Page 206 Comment #15 January 08, 2019	6.3.10 Aquatic Environment

Community	Comments/Concerns	Response from FMG	Comment Reference	ToR Reference
	Do you have potential offset plans?	All habitat within the waterbodies affected will be included in the Fisheries Act authorization for the Project as a loss of habitat (Section 35) FMG will be working with the Department of Fisheries and Oceans (DFO) to outline analysis of how the Potential measures will offset harm to fish. FMG will be working with DFO using impact assessment results in the EIS/Draft EA Report	Page 207 Comment #21 January 8, 2019	6.3.10 Aquatic Environment Table D.1, Potential Mitigation and/or Management
Slate Falls First Nation	Effects of blasting on fish in and around the Springpole Lake	Will not kill or damage fish May affect small spawning area Loss of spawning area will be offset		Table D.1, Potential Mitigation and/or Management, Table 7.2.2, 6.8 Ongoing and Future Studies
Ojibway Nation of Saugeen	Effects of moving fish from Lake to other lakes during lake dewatering	Fish in Springpole Lake have access to other lakes downstream It will be therefore safe to transfer them	Page 225 Comment #1 Comment #2 Comment #3 December 16, 2019	Table D.1, Potential Mitigation and/or Management, 6.3.10 Aquatic environment, Table 7.2.2 6.8 Ongoing and future studies, 11.2 Provincial Approvals
Lac Seul First Nation	Consumption of fish from Lake versus fish relocation	Protection of fish is required by the Fisheries Act and provincial regulations The ministry of Natural Resources may permit other uses of the fish FMG will consult interested communities to get their input on this	Page 203 Comment #3 November 13, 2019	Table D.1, Potential Mitigation and/or Management, 6.3.10.2 Fish Usability, 11.2 Provincial Approvals, 11.3 Federal Approvals



Community	Comments/Concerns	Response from FMG	Comment Reference	ToR Reference
<b>Biological Environment: Aquatic Biology</b>				
Cat Lake First Nation	Consumption of fish from Lake versus fish relocation	Protection of fish is required by the Fisheries Act and provincial regulations The ministry of Natural Resources may permit other uses of the fish FMG will consult interested communities to get their input on this	Page 180 Comment #10 July 24, 2018	Table D.1, Potential Mitigation and/or Management, 6.3.10.2 Fish Usability, 11.2 Provincial Approvals, 11.3 Federal Approvals
<b>Biological Environment: Terrestrial Biology</b>				
Wabauskang First Nation	Potential transmission line corridor alternatives	Transmission lines selection will be based on many factors including effects on wildlife.	Page 199 Comment #5 December 12, 2018	Table 7.2.2
	Lack of specific mitigation measures for potential Project-related terrestrial effects	As required, detailed mitigation measures specific to the effects on the terrestrial environment will be developed in cooperation with both provincial and federal regulators, as part of the permitting process Mitigation measures will meet provincial and federal requirements.	Page 201 Comment # 23 Page 200 Comment # 8 December 12, 2018  Page 210 Comment #1 January 24, 2019	Table D.1, Potential Mitigation and/or Management 7.2 Effects Assessment

Community	Comments/Concerns	Response from FMG	Comment Reference	ToR Reference
	Lack of wildlife monitoring program	FMG is committed to monitoring interactions with wildlife at the Project Site FMG will undertake impact assessment regarding effects on wildlife. Monitoring program will be needed when there are identified risk, levels of uncertainties and extensive mitigation measures required to mitigate potential effects.	Page 201 Comment # 23 Page 200 Comment #8 December 12, 2018  Page 210 Comment #1 January 24, 2019	6.3.11 Terrestrial Environment Page 6-35 Table 6.3.5 Species at Risk (SAR) Baseline Condition
	Cumulative effects on wildlife considering future expansions and other projects in the area	Cumulative effects will be considered in more detail in the EIS FMG is not planning any expansions FMG is not aware of any projects in and around the project LSA/RSA	Page 201 Comment # 23 Page 200 Comment #8 December 12, 2018  Page 210 Comment #1 January 24, 2019	6.3.11 Terrestrial Environment
	Protection of wildlife	FMG will optimize Project design to minimize potential disturbances to wildlife FMG has consulted and will continue to consult local stakeholders to facilitate understanding of potential effects and proposed management	Page 201 Comment # 23 Page 200 Comment #8 December 12, 2018  Page 210 Comment #1 January 24, 2019	6.3.11 Terrestrial Environment

Community	Comments/Concerns	Response from FMG	Comment Reference	ToR Reference
	Road access – proposed road and if studies are completed. Concern for wildlife (moose) on the proposed road. Concern for the environment (Mother Earth). Sees a need to protect the environment throughout this process.	The road access corridor will be included in the effects assessment. The assessment will include all major components and appurtenances in terms their effects on the aquatic environment and terrestrial environment.	Page 210 Comment #1 January 24, 2019	7.2 Effects Assessment, 5.3.1 Identification of Alternative Methods
	Concern for Bees, species at risk; do you know for sure they are up there? Are bee's part of that?	Wildlife studies will include all the SAR and other species.	Page 210 Comment #5 January 24, 2019	Table 6.3.5 Species at Risk (SAR) Baseline Condition
	Where are you going to put the waste rock? Can't you move it (from current location), why can't you put the waste rock back (into the pit)?	David explained the cost to move waste rock.	Page 210 Comment #8 January 24, 2019	5.3.1 Identification of Alternative Methods

Community	Comments/Concerns	Response from FMG	Comment Reference	ToR Reference
<b>Biological Environment: Terrestrial Biology</b>				
Wabauskang First Nation	Clarification of baseline study methodology pertaining to vegetation community location	Plant community mapping was initially completed as a desktop exercise using information from the Forest Resource Inventory (FRI) Habitats with potential to support plant species at risk have been identified. Mapping of upland and wetland plant communities were ground-truthed and detailed plant species inventories was undertaken.	Page 211 Comment #8 December 12, 2018	6.3.11 Terrestrial Environment  Table 6.8.1 Ongoing and Future Baseline Studies
	Project protocol for wildlife interaction on-site	Project staff will not be allowed to hunt or fish while on-site Wildlife awareness information will be included in regular safety and environmental inductions.	Page 200 Comment #8 December 12, 2018  Page 210 Comment #2 January 24, 2019	
Metis Nation of Ontario	Potential measures to mitigate Species at Risk (SAR)	Detailed mitigation measures will be presented in the EA and a monitoring plan will be developed in cooperation with the Ministry of Natural Resources and Forestry (MNR) and EC to address potential instances where protected species are encountered within the Project footprint Detailed mitigation measures and a detailed monitoring plan will be outlined in a mitigation/management plan.	Page 207 Comment #20 Comment #21 Comment #22 Comment #23 Page 209 Comment #44 Comment #46 January 08, 2019	Table 6.3.5 Species at Risk (SAR) Baseline Condition

Community	Comments/Concerns	Response from FMG	Comment Reference	ToR Reference
Metis Nation of Ontario	Potential transmission line corridor alternatives	Transmission lines selection will be based on many factors including effects on wildlife.	Page 205 Comment #6 Page 206 Comment #10 Page 207 Comment #26 January 08, 2019	5.3.14 Power Supply  5.3.1 Identification of Alternative Methods
	Protection of wildlife	FMG will optimize Project design to minimize potential disturbances to wildlife FMG has consulted and will continue to consult local stakeholders to facilitate understanding of potential effects and proposed management	Page 207 Comment #20 Comment #21 Comment #22 Comment #23 Page 209 Comment #44 Comment #46 January 08, 2019	6.3.11 Terrestrial Environment
	Clarification of baseline study methodology pertaining to vegetation community location	Plant community mapping was initially completed as a desktop exercise using information from the Forest Resource Inventory (FRI) Habitats with potential to support plant species at risk have been identified. Mapping of upland and wetland plant communities were ground-truthed and detailed plant species inventories was undertaken.	Page 205 Comment #8 January 08, 2019	6.3.11 Terrestrial Environment  Table 6.8.1 Ongoing and Future Baseline Studies
	Project protocol for wildlife interaction on-site	Project staff will not be allowed to hunt or fish while on-site Wildlife awareness information will be included in regular safety and environmental inductions.	Page 207 Comment #20 Comment #21 Comment #22 Comment #23 Page 209 Comment #44 Comment #46 January 08, 2019	Section 8.2 Wildlife Management and Monitoring Plan

Community	Comments/Concerns	Response from FMG	Comment Reference	ToR Reference
	Concern for bird species such as Owls and Eagles, is there any studies or reports on these species?	FMG will develop Wildlife Management Plans that will include Species at Risk (SAR), owls and eagles. FMG will complete terrestrial surveys related to thee species	Page 207 Comment #20 January 8, 2019	6.3.11 Terrestrial Environment  Section 8.2, Wildlife Management and Monitoring Plan
	Caribou Concern: What about the caribou migration and if there are any caribou on or near the Project Site? Has the government shared data with FMG about the Caribou Migration Route?	FMG will conduct baseline studies to establish caribou and other wildlife species habitats including their migration routes. In addition, FMG will prepare wildlife management plan that will cover individual valued ecosystem components related to wildlife.	Page 207 Comment #22 January 8, 2019	6.3.11 Terrestrial Environment – Woodland Caribou  Section 8.2, Wildlife Management and Monitoring Plan

Community	Comments/Concerns	Response from FMG	Comment Reference	ToR Reference
Slate Falls First First Nation	Protection of wildlife	FMG will optimize Project design to minimize potential disturbances to wildlife FMG has consulted and will continue to consult local stakeholders to facilitate understanding of potential effects and proposed management	Page 174 Comment #6 April 24, 2018  Page 194 Comment #3 October 24, 2018  Page 213 Comment #7 Comment #12 Page 214 Comment #20 May 03, 2019	6.3.11 Terrestrial Environment  Section 8.2, Wildlife Management and Monitoring Plan
<b>Biological Environment: Terrestrial Biology</b>				

Community	Comments/Concerns	Response from FMG	Comment Reference	ToR Reference
Mishkeegogamang First Nation	Clarification of baseline study methodology pertaining to vegetation community location	Plant community mapping was initially completed as a desktop exercise using information from the Forest Resource Inventory (FRI) Habitats with potential to support plant species at risk have been identified. Mapping of upland and wetland plant communities were ground-truthed and detailed plant species inventories was undertaken.	Page 176 Comment #3 Page 177 Comment #7 Comment #10 May 15, 2018  Page 188 Comment #6 Page 189 Comment #12 Comment #15 September 12, 2018	6.3.11 Terrestrial Environment  Table 6.8.1 Ongoing and Future Baseline Studies  Section 8.2, Conceptual Vegetation, Invasive and Rare Plant Management Plan
<b>Biological Environment: Ecological Health</b>				
Metis Nation of Ontario	Potential for methyl mercury effects on fish	Human and ecological health risk assessment will be undertaken for all relevant pathways FMG fish tissue will be a part of the undertaken monitoring program	Page 206 Comment #14 January 8, 2019	6.3.10 Aquatic Environment Table 7.2.2
	Fish and water concern: concern for the water located near the tailings ponds, what is the pond right now? Have there been any studies done at these ponds where the tailings will be located?	FMG is working on the tailings and site wide water management plan and designs. In addition, FMG is undertaking soils. HydroG and geotechnical baseline studies for design considerations and siting of the infrastructures	Page 206 Comment #13 January 8, 2019	6.3.10 Aquatic Environment 6.3.9.1 Hydrogeology 6.3.8.1 Hydrology
	Concern for fish, what will happen to the fish, they spawn up river – is this going to be affected?	FMG to acquire fish reports from Gold Canyon. Studies have been done since 2015 but will need to confirm with additional baseline studies	Page 206 Comment #14 January 8, 2019	6.3.10 Aquatic Environment, Table D.1, Potential Mitigation and/or Management, Section 8.2, Conceptual Aquatic Management and Monitoring Plan

Community	Comments/Concerns	Response from FMG	Comment Reference	ToR Reference
Wabauskang	Chemical usage, what chemicals will be used in the milling process?	Cyanide will be used in the milling process to extract the gold from the ore.	Page 199 Comment #2 December 12, 2018	5.3.4 Ore Processing Page 5-8
<b>Human Environment: Traditional Land Use</b>				
Wabauskang First Nation	Effects of fishing, camping, hunting, etc.	There will be some effects, but with mitigation in place they are not expected to prevent people from enjoying these activities in the area. The nearby community (Cat Lake) from Springpole Lake is located 42 km North.	Page 201 Comment #23 December 12, 2018	Table 7.1.4 Effects to the Physical and Biological Environments Evaluation Criteria and Indicators  7.2 Effects Assessment
	Long-term effects on the environment	Environmental effects of the Project will be evaluated to determine the potential significant impacts. FMG will continue to consult with local Indigenous communities about mitigation and monitoring of environmental effects.	Page 199 Comment #6 Page 200 Comment #8 Page 202 Comment #27 December 12, 2018	7.2 Effects Assessment (Table 7.2.1)
Metis Nation of Ontario	Long-term effects on the environment	Environmental effects of the Project will be evaluated to determine the potential significant impacts. FMG will continue to consult with local Indigenous communities about mitigation and monitoring of environmental effects.	Page 209 Comment #52 January 08, 2019	7.2 Effects Assessment  8.2 Monitoring and Follow-up Programs  Table 8.1.1 Table of Commitments
	Gaps pertaining to Métis traditional land uses and prediction of effects	Impacts on Indigenous people (First Nations and Métis) will be adequately assessed within the EA.	Page 207 Comment #30 Page 208 Comment #36 Page 209 Comment #52 January 08, 2019	

Community	Comments/Concerns	Response from FMG	Comment Reference	ToR Reference
	Cultural areas of interest – has the ministry identified any cultural areas of significance near the project?	FMG seeks MNO's TEK study for this aspect. MNO – It will take 6 months to complete this report for FMG	Page 207 Comment #29 January 8, 2019	6.6.1 Archeology and Cultural Heritage
Lac Seul First Nation	Effects of fishing, camping, hunting, etc.	There will be some effects, but with mitigation in place they are not expected to prevent people from enjoying these activities in the area. The nearby community (Cat Lake) from Springpole Lake is located 42 km North.	Page 216 Comment #7 Page 219 Comment #24 Comment #25 November 13, 2019	Table 7.1.4 Effects to the Physical and Biological Environments Evaluation Criteria and Indicators  7.2 Effects Assessment (Table 7.2.1)
	Long-term effects on the environment	Environmental effects of the Project will be evaluated to determine the potential significant impacts. FMG will continue to consult with local Indigenous communities about mitigation and monitoring of environmental effects.	Page 204 Comment #11 December 14, 2019  Page 219 Comment #22 Comment #25 November 13, 2019	7.2 Effects Assessment  8.2 Monitoring and Follow-up Programs Table 8.1.1 Table of Commitments

Community	Comments/Concerns	Response from FMG	Comment Reference	ToR Reference
<b>Human Environment: Traditional Land Use</b>				
Lac Seul First Nation	The impacts from this Project will be felt well beyond the immediate Project area and will be cumulative in the long run	FMG maintains an open dialogue with the Indigenous communities located in the vicinity of the Project area and further information will be provided to address their concerns. Further information to cumulative effects will be addressed in the EIS.	Page 219 Comment #25 December 13, 2019	7.2 Effects Assessment  8.2 Monitoring and Follow-up Programs Table 8.1.1 Table of Commitments
	Environmental conditions post-closure	Additional analysis to confirm the effects predictions and impact assessments results in the EIS / Draft EA Report will be undertaken. Environmental effects of the Project fully evaluated. FMG will continue to consult with local Indigenous communities about mitigation and monitoring of environmental effects.	Page 219 Comment #25 December 13, 2019	7.2 Effects Assessment  8.2 Monitoring and Follow-up Programs  Table 8.1.1 Table of Commitments
Slate Falls First Nation	Removal of culturally sensitive environs	Indigenous communities will be consulted to determine the most culturally sensitive options for removal	Page 171 Comment #4 February 20, 2018	Table 8.1.1 Table of Commitments

Community	Comments/Concerns	Response from FMG	Comment Reference	ToR Reference
	<p>The impacts from this Project will be felt well beyond the immediate Project area and will be cumulative in the long run</p>	<p>FMG maintains an open dialogue with the Indigenous communities located in the vicinity of the Project area and further information will be provided to address their concerns Further information to cumulative effects will be addressed in the EIS</p>	<p>Page 213 Comment #11 Comment #12 Page 214 Comment #18 Comment #19 Page 215 Comment #22 May 03, 2019</p> <p>Page 220 Comment #1 Page 221 Comment #7 Page 224 Comment #23 December 11, 2019</p>	<p>7.2 Effects Assessment</p> <p>8.2 Monitoring and Follow-up Programs</p> <p>Table 8.1.1 Table of Commitments</p>
	<p>Environmental conditions post-closure</p>	<p>Additional analysis to confirm the effects predictions and impact assessments results in the EIS / Draft EA Report will be undertaken. Environmental effects of the Project fully evaluated. FMG will continue to consult with local Indigenous communities about mitigation and monitoring of environmental effects.</p>	<p>Page 213 Comment #11 Comment #12 Page 214 Comment #18 Comment #19 Page 215 Comment #22 May 03, 2019</p> <p>Page 220 Comment #1 Page 221 Comment #7 December 11, 2019</p>	<p>7.2 Effects Assessment</p> <p>8.2 Monitoring and Follow-up Programs</p> <p>Table 8.1.1 Table of Commitments</p>

Community	Comments/Concerns	Response from FMG	Comment Reference	ToR Reference
<b>Human Environment: Archaeological Resources</b>				
Metis Nation of Ontario	Distinction between Métis and First Nation pre-contact archaeological sites	The archaeologist indicated that there are no Métis pre-contact archaeological sites, however, FMG will re-confirm this. Later sites are all early mining camps	Page 207 Comment #28 Comment #29 January 08, 2019	6.6.1 Archeology and Cultural Heritage

Community	Comments/Concerns	Response from FMG	Comment Reference	ToR Reference
<b>Human Environment: Human Health</b>				
Metis Nation of Ontario	Effects of methyl mercury on fish populations and related human consumption	Human and ecological health risk assessment will consider all relevant pathways FMG will add monitoring program.	Page 209 Comment #41 January 08, 2019	6.3.10 Aquatic Environment Table 7.2.2
	Water: What about drinking water at the facility (operation stage)	Site wide potable water will be made available throughout the site.	Page 207 Comment #27 January 8, 2019	5.3.12.3 Domestic Sewage
Slate Falls First Nation	Effects of methyl mercury on fish populations and related human consumption	Human and ecological health risk assessment will consider all relevant pathways FMG will add monitoring program.	Page 222 Comment #12 Comment #15 Page 223 Comment #22 December 11, 2019	6.3.10 Aquatic Environment Table 7.2.2

<p>Wabauskang</p>	<p>What is the closure plan? How will you return the site to its natural state?</p>	<p>The closure plan will be developed by a 3<sup>rd</sup> party. They will determine the parameter that will need to be addressed. The closure plan along with a bond will be required to be submitted before any construction can begin. This type of project will require long term maintenance and monitoring which will be included in the plan.</p>	<p>Page 199 Comment #6 December 12, 2018</p>	<p>5.3.16 Mine Closure  Section 8.2 Monitoring and Follow-up Programs</p>
<p><b>Human Environment: Socioeconomics</b></p>				

<p>Wabauskang First Nation</p>	<p>Effects and benefits of Project-related employment and business opportunities</p>	<p>FMG will implement a procurement process that encourages indigenous people and local suppliers FMG will support employment for local community members</p>	<p>Page 202 Comment #26 December 12, 2018</p> <p>Page 169 Comment # 11 December 14, 2017</p> <p>Page 172 Comment #1 February 21, 2018</p> <p>Page 200 Comment #14 Comment #15 Page 201 Comment #16 Page 202 Comment #26 December 12, 2018</p> <p>Page 211 Comment #12 January 24, 2019</p>	<p>9.6 Consultation and Engagement Activities</p> <p>7.2.2 Effects Assessment Table 7.2.2</p>
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	<p>Effects and benefits of training and education opportunities</p>	<p>FMG will support and/or provide training and education in local communities, where possible.</p>	<p>Page 202 Comment #26 December 12, 2018</p> <p>Page 169 Comment # 11 December 14, 2017</p> <p>Page 172 Comment #1 February 21, 2018</p> <p>Page 200 Comment #14 Comment #15 Page 201 Comment #16 Page 202 Comment #26 December 12, 2018</p> <p>Page 211 Comment #12 January 24, 2019</p>	<p>9.6 Consultation and Engagement Activities</p> <p>Table 8.1.1 Table of Commitments</p>
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	<p>Management and monitoring of socio-economic effects</p>	<p>FMG is committed to developing and implementing a socio-economic / community management plan. FMG will work with potentially affected Indigenous communities to develop a plan to address potential socio-economic Project-related effects. FMG, together with interested communities, will work collaboratively to seek help and assistance from government agencies and will exercise best efforts to utilize existing services available locally and regionally.</p>	<p>Page 169 Comment #11 December 14, 2017</p> <p>Page 200 Comment #15 Page 202 Comment #26 Comment #27 December 12, 2018</p>	<p>9.6 Consultation and Engagement Activities</p> <p>7.22 Effects Assessment</p> <p>8.2 Monitoring and Follow-Up</p>
	<p>What are the economic benefits of resource extraction for First Nations?</p>	<p>We are still in the preliminary stages for entering into agreements, but when the feasibility studies are complete, FMG can begin negotiations for Impact Benefit Agreements or other collaboration agreements. Other benefits include employment and increased traffic through the area may increase economic gain to the community. Training community members will also provide transferrable skills that can be used beyond the life of the mine.</p>	<p>Page 202 Comment #26 December 12, 2018</p>	<p>9.6 Consultation and Engagement Activities</p> <p>Effects Assessment Table 7.2.2</p>

Community	Comments/Concerns	Response from FMG	Comment Reference	ToR Reference
<b>Human Environment: Socioeconomics</b>				
Wabauskang First Nation	Job and business opportunities for Indigenous peoples Access to and from the Project Site	FMG is committed to providing contracting employment and training opportunities FMG considers providing bus transportation to Indigenous community members FMG will work with Indigenous communities to further address these concerns FMG will work with the community of Cat Lake and the government to assist in the planning of a road extension to Springpole	Page 200 Comment #15 Page 202 Comment #26 Comment #27 December 12, 2018  Page 169 Comment #11 December 14, 2017	9.6 Consultation and Engagement Activities  Table 8.1.1 Table of Commitments  Table 7.2.2
	Local business opportunities	FMG will implement a procurement process that encourages indigenous and local suppliers.		9.6 Consultation and Engagement Activities  Table 8.1.1 Table of Comittments  7.2.2 Effects Assessment  6.4 Description of the Scioial Environment

Community	Comments/Concerns	Response from FMG	Comment Reference	ToR Reference
Lac Seul First Nation	Effects and benefits of Project-related employment and business opportunities	FMG will implement a procurement process that encourages indigenous people and local suppliers FMG will support employment for local community members	Page 190 Comment #2 Comment #7 Comment #8 September 17, 2018  Page 204 Comment #9 December 14, 2018  Page 217 Comment #12 Page 218 Comment #18 Comment #20 November 13, 2019	9.6 Consultation and Engagement Activities  7.2.2 Effects Assessment Table 7.2.2
	Job and business opportunities for Indigenous peoples Access to and from the Project Site	FMG is committed to providing contracting employment and training opportunities FMG considers providing bus transportation to Indigenous community members FMG will work with Indigenous communities to further address these concerns FMG will work with the community of Cat Lake and the government to assist in the planning of a road extension to Springpole	Page 190 Comment #2 Comment #7 Comment #8 September 17, 2018  Page 204 Comment #9 December 14, 2018  Page 217 Comment #12 Page 218 Comment #18 Comment #20 November 13, 2019	9.6 Consultation and Engagement Activities  Table 8.1.1 Table of Commitments  Table 7.2.2

Community	Comments/Concerns	Response from FMG	Comment Reference	ToR Reference
	Talked about economic benefits and how the agreement must be open and opportunity for economic benefits over time if more minerals are found later	Typical IBA's consist of the following: Financial component; contracts; employment and training; environmental provisions, etc.	Page 204 Comment #9 December 14, 2018	9.6 Consultation and Engagement Activities
	How is this going to benefit the Lac Seul First Nation Community	Benefits outlined: local employment opportunities; impact benefit agreement will provide a monetary value to the STPN; participation in studies; training opportunities – transferrable skills.	Page 218 Comment #18 November 13, 2019	9.6 Consultation and Engagement Activities
Slate Falls First Nation	Effects and benefits of training and education opportunities	FMG will support and/or provide training and education in local communities, where possible.	Page 171 Comment #3 February 20, 2018  Page 195 Comment #4 Page 197 Comment #13 Page 198 Comment #23 October 24, 2018  Page 214 Comment #17 May 03, 2019  Page 223 Comment #16 Comment #18 Comment #19 December 11, 2019	9.6 Consultation and Engagement Activities  Table 8.1.1 Table of Commitments

Community	Comments/Concerns	Response from FMG	Comment Reference	ToR Reference
	<p>Job and business opportunities for Indigenous peoples Access to and from the Project Site</p>	<p>FMG is committed to providing contracting employment and training opportunities FMG considers providing bus transportation to Indigenous community members FMG will work with Indigenous communities to further address these concerns FMG will work with the community of Cat Lake and the government to assist in the planning of a road extension to Springpole</p>	<p>Page 171 Comment #3 February 20, 2018</p> <p>Page 195 Comment #4 Page 197 Comment #13 Page 198 Comment #23 October 24, 2018</p> <p>Page 214 Comment #17 May 03, 2019</p> <p>Page 223 Comment #16 Comment #18 Comment #19 December 11, 2019</p>	<p>9.6 Consultation and Engagement Activities</p> <p>Table 8.1.1 Table of Commitments</p> <p>Table 7.2.2</p>

Community	Comments/Concerns	Response from FMG	Comment Reference	ToR Reference
Cat Lake First Nation	Visual effects and consultation related to visual effects of the Project	The project is in a remote area. Effects of the project on the visual land scape during the operational phase will be perceptible to some receptor locations, but it is not anticipated to affect enjoyment of the view scape.	Page 180 Comment #7 Comment #8 July 24, 2018	7.2.2 Effects Assessment 5.3.3 Mine Rock and Overburden Management  Table 6.8.1 Previous and Potential Future Baseline Studies  Table 7.1.5 Effects to the Human Environment Criteria and Indicators
<b>Human Environment: Socioeconomics</b>				
Ojibway Nation of Saugeen	Management and monitoring of socio-economic effects	FMG is committed to developing and implementing a socio-economic / community management plan. FMG will work with potentially affected Indigenous communities to develop a plan to address potential socio-economic Project-related effects. FMG, together with interested communities, will work collaboratively to seek help and assistance from government agencies and will exercise best efforts to utilize existing services available locally and regionally.	Page 193 Comment #12 Comment #13 Comment #14 September 18, 2018  Page 227 Comment #15 December 16, 2019	9.6 Consultation and Engagement Activities  8.1 Commitments

Community	Comments/Concerns	Response from FMG	Comment Reference	ToR Reference
Metis Nation of Ontario	Local business opportunities	FMG will implement a procurement process that encourages indigenous and local suppliers.	Page 209 Comment #50 Comment #51 January 08, 2019	9.6 Consultation and Engagement Activities  Table 8.1.1 Table of Comittments  7.2.2 Effects Assessment  6.4 Description of the Social Environment
<b>Human Environment: Visual Aesthetics</b>				
Slate Falls First Nation	Visual effects on receptors and from land near the Project	Project features will not be visible form areas in the local study area		7.2.2 Effects Assessment 5.3.3 Mine Rock and Overburden Management  6.8.1 Previous and Potential Future Baseline Studies  Table 7.1.5 Effects to the Human Environment Criteria and Indicators
Cat Lake First Nation	Visual effects on receptors and from land near the Project	Project features will not be visible form areas in the local study area	Page 180 Comment #7 Comment #8 July 24, 2018	7.2.2 Effects Assessment 5.3.3 Mine Rock and Overburden Management  6.8.1 Previous and Potential Future Baseline Stuidies  Table 7.1.5 Effects to the Human Environment Criteria and Indicators

Community	Comments/Concerns	Response from FMG	Comment Reference	ToR Reference
<b>EIS/EA Methodology: Various Disciplines</b>				
Metis Nation of Ontario	Coffer Dams Maintenance	FMG will develop maintenance and monitoring programs to ensure that the coffer tailings dams are not compromised structurally. The surveillance programs will include regular inspections and monitoring	Page 206 Comment #17 January 8, 2019	4.2 Project Phases  4.1 Description of the Undertaking  8 Commitments, Monitoring and Follow-up
	Waste Rock and Reclamation – what is the process for this? Will it be returned to the pit after mine life? Is there a concern for contamination?	Water treatment plant for water quality monitoring during mine life	Page 206 Comment #12 January 8, 2019	5.3.3 Mine Rock and Overburden Management Section 8.2 Monitoring and Follow-Up, Conceptual Waste Rock Management Plan
Mishkeegogamang First Nation	There is a concern about oxygen and cyanide – how will this be involved in the mill process?	If cyanide concentrations are above the legal limit, then FMG will build a cyanide destruction plant to deal with the problem. Oxygen, levels in the pit when flooded will be studied. FMG will follow-up as far as oxygen concentrations at depth are concerned.	Page 189 Comment #14 September 12, 2018	Appendix E20, Conceptual Hazardous Materials Management Plan
Lac Seul First Nation	How will the bay be drained?	The bay will be drained after installation of 3 impermeable coffer dams. The fish will be captured and removed from the bay and pumps will begin discharging the water in location that will determine through the EA studies. The dewatering process will take roughly 1.5 years to ensure minimal impacts to the downstream environment.	Page 203 Comment #4 December 14, 2018	4.1 Description of the Undertaking  4.2.1 Construction Phase  Table 4.2.1 Project Development and Production Schedule  5.3.8 Water Discharge

Community	Comments/Concerns	Response from FMG	Comment Reference	ToR Reference
Cat Lake First Nation	In your presentation, you said a 5-year closure and reclamation, is there going to be money set aside for that, so that the First Nation's will know that there is money there at Springpole to go back to restore the land?	It is a legal requirement of the government when we submit our closure plan (financial assurance).	Page 186 Comment #24 July 24, 2018	4.2.3 Closure Phase

## 9.7.2 Input from Public Stakeholders

Consultation with public stakeholders listed in **Section 9.4** through the activities listed in **Table 9.7.2** resulted in the following comments and issues.

**Table 9.7.2 Summary of Early Consultation with Public Stakeholders**

Issues and Concerns	GCU Response
<ul style="list-style-type: none"> <li>• Project proponent needs a good neighbour policy;</li> <li>• Impacts on outfitters and their employees due to loss of remoteness value;</li> <li>• Environmental degradation and water quality;</li> <li>• Width of access corridor and effect on view scape;</li> <li>• Avoid creating new access to remote lakes;</li> <li>• Noise from road building;</li> <li>• Traffic volume &amp; timing;</li> <li>• Opportunities for working together;</li> <li>• Social issues created in Cat Lake First Nation as a result of all-weather access road to their community (drug smuggling);</li> <li>• Noise and light pollution from the work site disturbs fishing outpost guests;</li> <li>• Impacts to fish habitat, particularly in the vicinity of the Birch River crossing;</li> <li>• Impact to water quality in Springpole and Birch Lakes during exploration and mining phases of the Project;</li> <li>• Increased access to the area resulting in increased break-ins and vandalism of remote cabins;</li> <li>• Impacts to caribou and their habitat; and</li> <li>• Increased angling pressure on Springpole Lake due to Project personnel.</li> </ul>	<ul style="list-style-type: none"> <li>• No opposition to the Project, if Outfitters are not unreasonably impacted;</li> <li>• Project would be good for economy in the region and would create more of a tax base;</li> <li>• Commitment to a net overall benefit for the environmental and biological values in the region is acknowledged;</li> <li>• A land-based access corridor would provide improved safety for workers accessing the Project;</li> <li>• Stakeholders want to see the Project proceed, which would be good for the local area;</li> <li>• One route servicing two (2) industries (mining and forestry) is an efficient and effective way to reduce potential cumulative impact in this area;</li> <li>• The proposed access road is in a good location and will be good for the area;</li> <li>• The proposed road corridor is located well for Cat Lake in relation to their future construction of an all-weather road; and</li> <li>• Interest in job opportunities at the Project.</li> </ul>

### 9.7.3 Input from Government Agencies

Input from government agencies was collected through various meetings listed in **Table 9.6.3**, and mainly consisted of advice on consultation methods and the development of the ToR. Detailed meeting records can be found in the RoC.

## 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 EA Report/EIS, as applicable. The EA Report/EIS 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.

As much as possible, consultation and engagement on both the Provincial and Federal EAs will be coordinated in terms of timing and jointly held activities. If the Minister of the Environment approves the ToR, the following activities are planned for the development of the EAs 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 three (3) 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;
- Make available copies of draft EIS 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 draft EIS and final EA Report 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; and
- Maintain FMG's website to provide Project information and a link for direct feedback.

**Table 9.8.1** outlines the consultation tools and engagement milestones planned to support the preparation and review of the EA and stated consultation purpose and objectives for government agencies, Aboriginal communities and public.

**Table 9.8.1 Consultation Tools and Activities Planned to Support Preparation and Review of the EA**

Approximate Date	Consultation and Engagement Milestones
	<p>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); approach to the development and evaluation of 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:</p>
018-Spring 2020	<ul style="list-style-type: none"> <li>• Notice of Commencement of ToR</li> <li>• Newsletters:</li> <li>• Open Houses (open houses and/or presentations to be held in Cat Lake, Slate Falls, Lac Seul, Mishkeekogamang, Pikangikum, Ojibway Nation of Suageen, Wabauskang, MNO, Sioux Lookout, Red Lake, Ear Falls)</li> <li>• Aboriginal Meetings/Working Groups               <ul style="list-style-type: none"> <li>o Q3 2019 - Aboriginal Community Meeting(s): Environmental Baseline</li> <li>o Q1 2020 TK Studies with key Aboriginal communities who wish to participate</li> </ul> </li> <li>• Government Review Team Working Group Meetings (may include but not be</li> <li>• ECCC Meeting               <ul style="list-style-type: none"> <li>o Q2 2019 - Project introduction/update, current data collection and methods, data gaps, potential for supplemental data collection</li> </ul> </li> <li>• Draft ToR</li> <li>• Virtual Zoom Meetings</li> </ul>
Fall 2020 - Winter 2021	<ul style="list-style-type: none"> <li>• Notice of Commencement of an Environmental Assessment</li> <li>• Newsletters:               <ul style="list-style-type: none"> <li>o Q3 - Project Update Newsletter (ToR submission, environmental baseline)</li> <li>o Q4 - Project Update Newsletter (summary of open house and comments/responses)</li> </ul> </li> </ul>

	<ul style="list-style-type: none"> <li>• Open Houses (open houses and/or presentations to be held in Cat Lake, Slate Falls, Lac Seul, Mishkeekogamang, Pikangikum, Ojibway Nation of Suageen, Wabauskang, MNO, Sioux Lookout, Red Lake, Ear Falls)</li> <li>o Q3 and Q4 - Public and Aboriginal Open House: Alternatives, Valued Components, Criteria/Indicators and Preliminary Preferred Alternatives</li> <li>• Aboriginal Meetings/Working Groups. The following is a general outline only, it is expected that once meetings/working groups are established the priorities of each working group will need to be modified to meet the needs of each aboriginal community as appropriate:             <ul style="list-style-type: none"> <li>o Q3 and Q4 - Aboriginal Community Meeting(s): VCs/Indicators/Criteria</li> <li>o Q3 and Q4 - Aboriginal Community Meeting(s): Effects/Mitigation</li> </ul> </li> <li>• Government Review Team Working Group Meetings (may include but not be limited to; atmospheric, terrestrial, water and fish/fish habitat). The following is a general outline only, it is expected that once working groups are established the priorities of each working group will need to be modified appropriately:             <ul style="list-style-type: none"> <li>o Q1 2021- Review of baseline reports and next steps.</li> <li>o Q1/Q2 2021- Confirm evaluation method, alternatives discussion, VC's/criteria/indicators.</li> <li>o Q2 2021 - Alternatives evaluations, effects, mitigations.</li> </ul> </li> <li>• Intergovernmental Meeting (Federal and Provincial Agencies)</li> <li>o Q4 2020- Project Update, Baseline Studies and Effects, Alternatives )</li> <li>• Municipal Meeting(s)</li> </ul>
<p>Winter 2021- Summer 2021</p>	<p>Notice of Draft EA Review Period</p> <ul style="list-style-type: none"> <li>o Q2 2021 - Public and Aboriginal Open House: Present draft EA: effects and mitigations</li> <li>• Q2 - Project Update Newsletter (Project update, summary of open houses (comments/responses))</li> </ul> <ul style="list-style-type: none"> <li>• Ongoing Aboriginal Meetings/Working Groups</li> <li>• Ongoing Government Review Team Working Group 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>
<p>Following submission of EA</p>	<p>Ongoing meetings with MECP and CEAA as required to coordinate federal and provincial EA decisions to the extent practical</p>

	<ul style="list-style-type: none"> <li>• Confirmation of EA submission to Aboriginal communities and description of anticipated decision timelines</li> <li>• Ongoing Aboriginal 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>
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FMG has developed three (3) Consultation Plans (**Appendix E**) to guide Indigenous and stakeholder consultation and engagement 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 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.

FMG’s approach to consultation, the capacity of support provided to each community, the methods of reaching out and the tools and techniques FMG will utilize to ensure meaningful consultation can take place is all included in the plan. The timing of when each community should be consulted with is also included and is intended to align with the EA Process milestones to ensure adequate consultation is completed throughout the process. Each round of engagement activities will include meetings, materials and consultation tools that will correspond with the following EA phases:

- Round 1 – General Information
- Round 2 – Baseline Studies
- Round 3 – Effects Assessment
- Round 4 – Selection and Evaluation of Alternatives
- Round 5 – Mitigation Measures and Monitoring

Details about the specific topics and information shared at each round of engagement can be found in **Section 2.5 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 as outlined in **Subsection 9.7.3**. FMG's approach to consultation, the capacity of support provided to each community, the methods of reaching out and the tools and techniques FMG will utilize to ensure meaningful consultation can take place is all included in the plan. The timing of when each community should be consulted with is also included and is intended to align with the EA Process milestones to ensure adequate consultation is completed throughout the process. Each round of engagement activities will include meetings, materials and consultation tools that will correspond with the following EA phases:

- Round 1 – General Information
- Round 2 – Baseline Studies
- Round 3 – Effects Assessment
- Round 4 – Selection and Evaluation of Alternatives
- Round 5 – Mitigation Measures and Monitoring

Details about the specific topics and information shared at each round of engagement can be found in **Section 2.5 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. The plan was developed with the input of the government agencies as outlined in **Subsection 9.7.3**. FMG's approach to consultation, the capacity of support provided to each community, the methods of reaching out and the tools and techniques FMG will utilize to ensure meaningful consultation can take place is all included in the plan. The timing of when each community should be consulted with is also included and is intended to align with the EA Process milestones to ensure adequate consultation is completed throughout the process. Each round of engagement activities will include meetings, materials and consultation tools that will correspond with the following EA phases:

- Round 1 – General Information
- Round 2 – Baseline Studies
- Round 3 – Effects Assessment
- Round 4 – Selection and Evaluation of Alternatives
- Round 5 – Mitigation Measures and Monitoring

Details about the specific topics and information shared at each round of engagement can be found in **Section 2.5** of **Appendix E.3**.

## **10 FLEXIBILITY TO ACCOMMODATE NEW CIRCUMSTANCES**

The description of the Undertaking provided in this ToR is preliminary and will be finalized during the EA process. During the course of implementing the work proposed in this ToR, FMG may encounter new circumstances that may require adjustments to aspects of the Undertaking, including: the description of the Undertaking, study areas, consultation approaches, alternatives to be considered, studies to be carried out, and criteria to compare alternatives.

## 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 Required Provincial Approvals**

<b>Permit/License</b>	<b>Applicable Act</b>	<b>Responsible Agency</b>	<b>Description</b>
<b>Permit to Take Water</b>	<i>Ontario Water Resources Act</i>	<i>MECP</i>	<i>Springpole Lake tributaries fresh water takings.</i>
	<i>Ontario Water Resources Act</i>	<i>MECP</i>	<i>Mine dewatering of North Basin and open pit</i>
	<i>Ontario Water Resources Act</i>	<i>MECP</i>	<i>Other areas (construction minor takings, milling operations, perimeter pumping wells, dewatering aggregate sources below water table, tailings storage area construction, aquifer testing).</i>
<b>Environmental Compliance Approval</b>	<i>Ontario Water Resources Act</i>	<i>MECP</i>	<i>Industrial and Domestic Sewage</i>
	<i>Ontario Water Resources Act</i>	<i>MECP</i>	<i>Mine/mill water treatment discharging into the environment (tailings, pit water, run-off etc.).</i>
	<i>Environmental Protection Act</i>	<i>MECP</i>	<i>Air/Noise, including but not limited to air emissions and noise, such as mill processes, on-site works, and haul trucks.</i>
	<i>Environmental Protection Act</i>	<i>MECP</i>	<i>Waste Disposal, for operation of a landfill or waste transfer site.</i>
<b>Work Permit/Letter of Authority</b>	<i>Lakes and Rivers Improvement Act, Public Lands Act</i>	<i>MNR</i>	<i>Access roads and water crossings</i>
	<i>Lakes and Rivers Improvement Act, Public Lands Act</i>	<i>MNR</i>	<i>Tailings Management Facility</i>
	<i>Lakes and Rivers Improvement Act, Public Lands Act</i>	<i>MNR</i>	<i>Various</i>
<b>Land Use Permit / Sale</b>	<i>Public Lands Act</i>	<i>MNR</i>	<i>To obtain tenure for long-term facilities on Crown land, such as for a transmission line,</i>

Permit/License	Applicable Act	Responsible Agency	Description
<b>of Crown Land / License of Occupation (lake bottom)</b>			<i>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. Consultation with MNRF planned regarding tenure for lake bottom where main pit is located.</i>
<b>Forest Resource License</b>	<i>Crown Forest Sustainability Act</i>	<i>MNRF</i>	<i>Clear merchantable timber (if any).</i>
<b>Authority to Haul</b>	<i>Crown Forest Sustainability Act</i>	<i>MNRF</i>	<i>Hauling of merchantable timber (if any).</i>
<b>ESA Authorization</b>	<i>Endangered Species Act</i>	<i>MECP</i>	<i>Killing, harming or harassing of a member of a species at risk and/or damaging or destroying species at risk habitat</i>
<b>Aggregate Resource License</b>	<i>Aggregate Resource Act</i>	<i>MNRF</i>	<i>Extraction of aggregate for construction purposes.</i>
<b>Various Permits</b>	<i>Various</i>	<i>MNRF</i>	<i>Scientific collection permits (including fish collection, and salvage), authorization of wildlife interference.</i>
<b>Entrance Permit and Encroachment Permit</b>	<i>Public Transportation and Highway Improvement Act; Highway Traffic Act</i>	<i>MTO</i>	<i>May not be applicable as no major road upgrades are planned at this time.</i>
<b>Closure Plan</b>	<i>Mining Act</i>	<i>ENDM</i>	<i>For mine construction/production including that related to the eventual decommissioning of the Springpole Gold Project.</i>
<b>Clearance Letter</b>	<i>Heritage Act</i>	<i>MTCS</i>	<i>Confirmation that appropriate archeological studies and mitigation, if required have been completed for the Project.</i>

- (1) Class EA process would be required pursuant to MNRF (2003) and Ontario Regulation 116/01 (Electricity Projects Regulation), but these will be replaced by the voluntary provincial individual EA

### 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 Required Federal Approvals**

Permit/License	Applicable Act	Responsible Agency	Description
Harmful Alteration, Disruption or Destruction of Fish Habitat,	<i>Fisheries Act</i>	Fisheries and Oceans Canada	Based on sensitivity analysis of fish and fish habitat, authorization may be required for: <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</li> <li>• Mine dewatering groundwater effects that would cause fish disruption to watercourses supporting fisheries.</li> </ul>
Works in Navigable Waters	<i>Navigation Protection Act (formerly Navigable Waters Protection Act)</i>	Transport Canada	Alteration of navigable waters (e.g., coffer dam in Springpole Lake) and crossing of navigable waters with transmission line and access road(s).
Schedule 2 Listing, Metal Mining Effluent Regulation	<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 Mine Effluent Regulation, pursuant to the Fisheries Act. Potential areas of impact include tailings storage and waste 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 6 and Section 7. If facility is owned by licensed explosives contractor, permit will be issued to them.
Migratory Birds	<i>Migratory Birds Convention Act</i>	Environment and Climate Change Canada	Prohibition, harm, or disturbance to migratory birds.
Transportation of Dangerous Goods	<i>Transportation of Dangerous Goods Act</i>	Transport Canada	Permits of equivalent level of safety.
Species at Risk	<i>Species at Risk Act</i>	Environment and Climate Change Canada	Affects caused by the Project to species as listed under <i>Schedule 1 of the 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 Agreement**



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.**



John Sferrazza  
Manager, Permitting and Environmental  
Assessments



Chris Osterman  
Chief Executive Officer

First Mining Finance Corporation


**First Mining Finance Corp.**

MEMO

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.

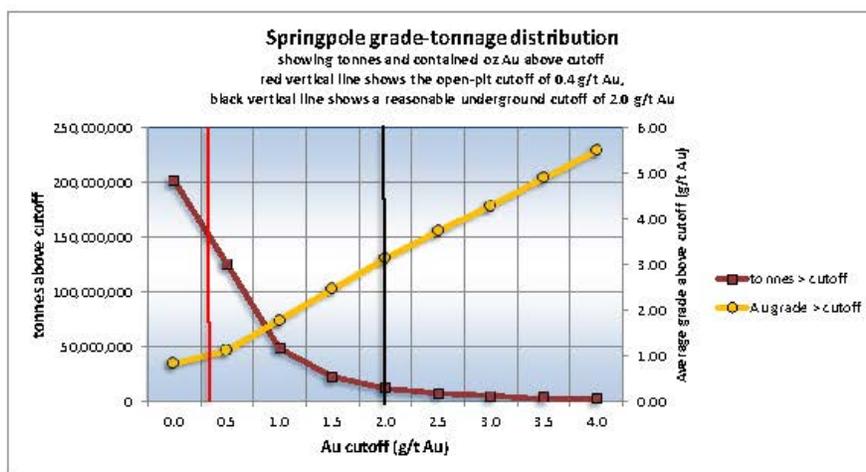
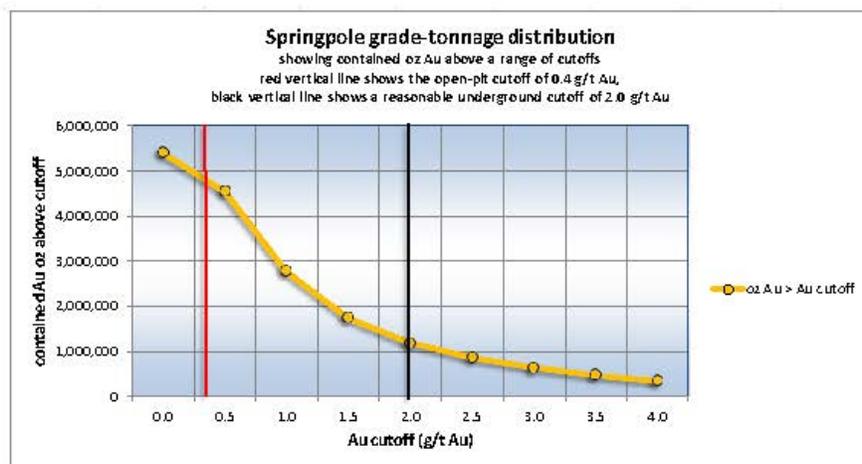


Figure 1: Grade tonnage distribution by cutoff


**First Mining Finance Corp.**

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.

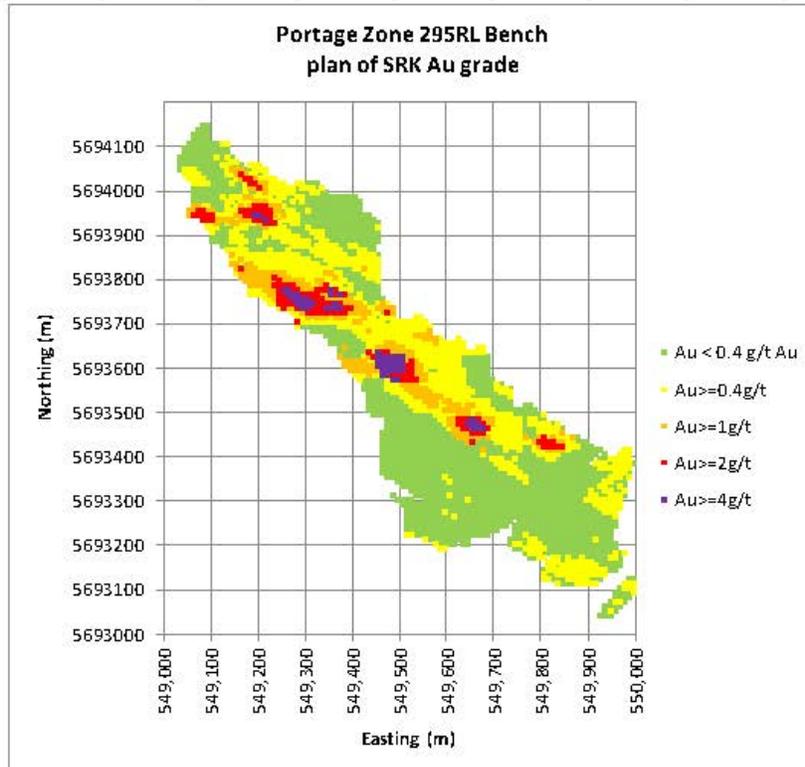
 **First Mining Finance Corp.**

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-tonnage 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

 **First Mining Finance Corp.**

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

Environmental Assessment and  
Permissions Branch

136 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

136, avenue St. Clair Ouest  
Rez-de-chaussée  
Toronto ON M4V 1P5  
Tél.: 416 314-8001  
Télex.: 416 314-8452

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.

2009 (2811/93)

- 2 -

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

2020 (2011/10)

- 3 -

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

2020 (201 1113)

## 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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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.

2069 (2011/10)

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

2069 (2011/10)

- 3 -

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.

2069 (2011/10)

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.

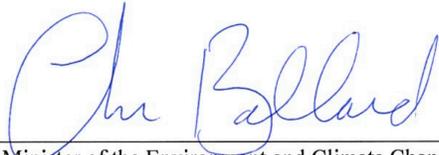
Whereas the Proponent is a person, other than a person referred to in clause 3(a) of the *Environmental Assessment Act*, who carries out, proposes to carry out or is the owner or person having charge, management or control of an enterprise or activity or a proposal, plan or program in respect of an enterprise 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.

## Pikangikum 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  
Toronto ON M4V 1P5  
Tel.: 416 314-8001  
Fax: 416 314-8452

Ministère de l'Environnement et  
de l'Action en matière de  
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Direction des évaluations et des  
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Tél : 416 314-8001  
Télééc. : 416 314-8452



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**

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.

2069 (2011/10)

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

2069 (2011/10)

- 3 -

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.

2089 (2011/10)

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.

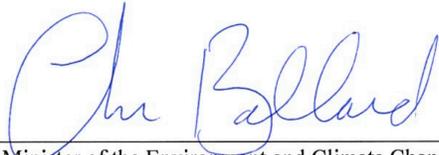
Whereas the Proponent is a person, other than a person referred to in clause 3(a) of the *Environmental Assessment Act*, who carries out, proposes to carry out or is the owner or person having charge, management or control of an enterprise or activity or a proposal, plan or program in respect of an enterprise 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.

## 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  
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 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.

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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

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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,

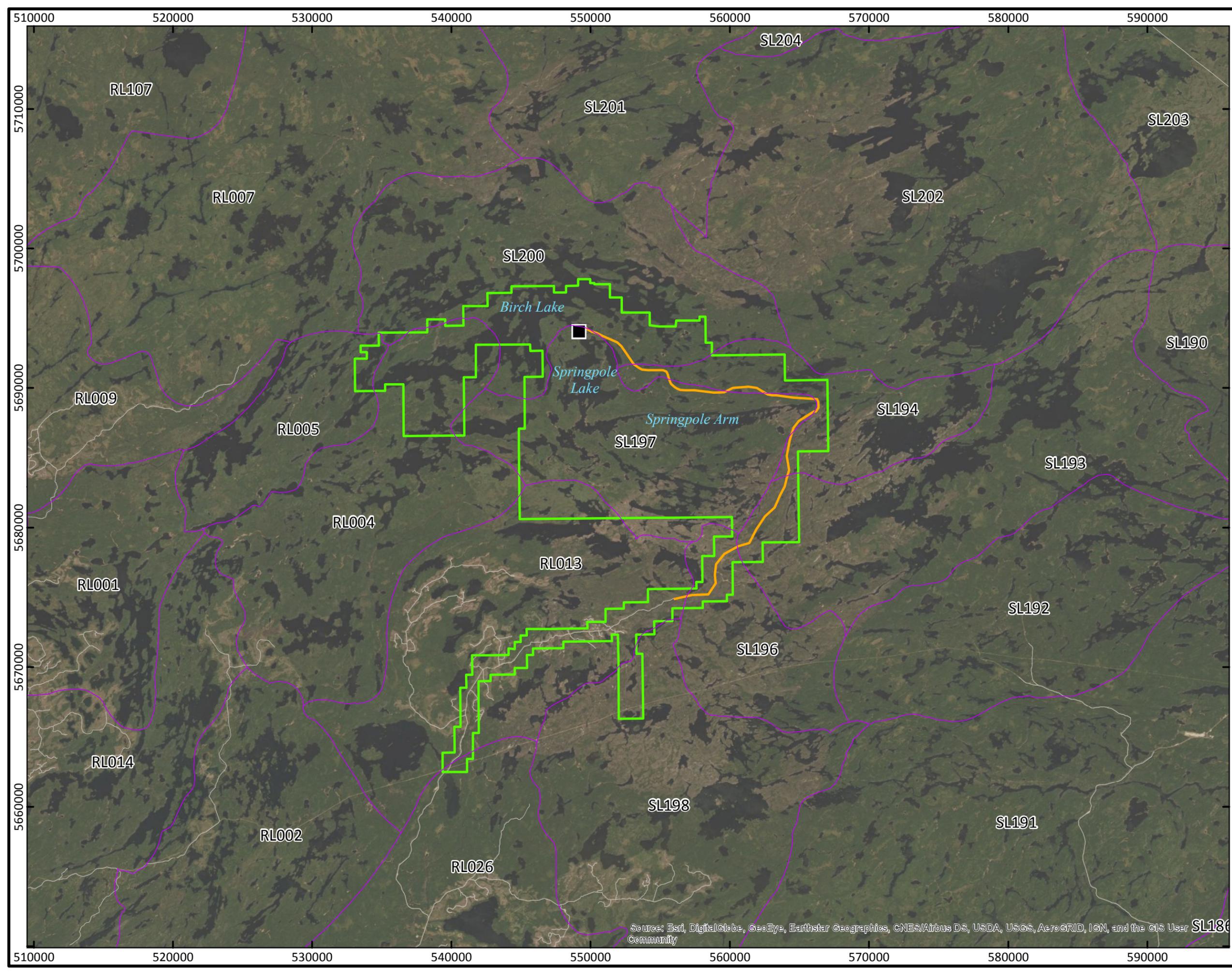


Kathleen O'Neill  
Director  
Environmental Assessment and Permissions Branch

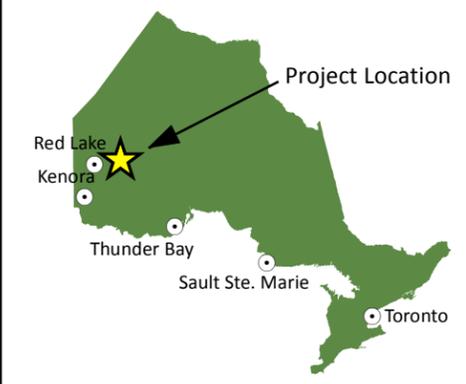
c: Ronnie Theriault, Ministry of Northern Development and Mines  
Myles Perchuk, Ministry of Natural Resources and Forestry  
Amy Sen, Canadian Environmental Assessment Agency  
John Sferrazza, First Mining Gold Corp.

## Appendix B

### Figures



Property Reference



- Springpole Camp
- Access Corridor
- Road
- Trapline Area
- Springpole Property Boundary



**Springpole Gold Project**  
 Trapline Areas  
 Figure A

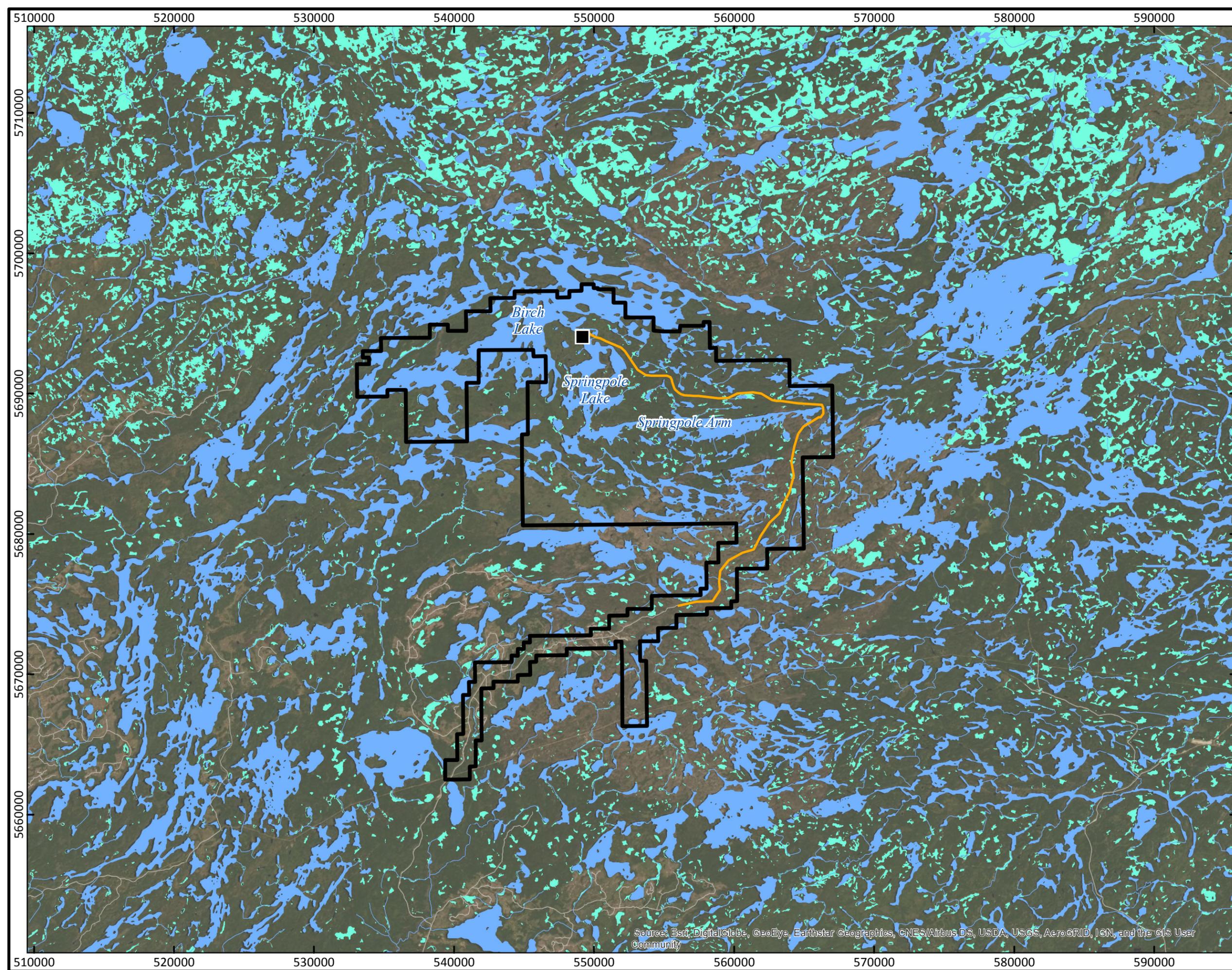
Kenora District, Ontario

July 2020 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



- Springpole Camp
- Access Corridor
- Watercourse
- Water Body
- Wetland
- Springpole Property Boundary



**Springpole Gold Project**  
Regional Wetlands  
Figure B

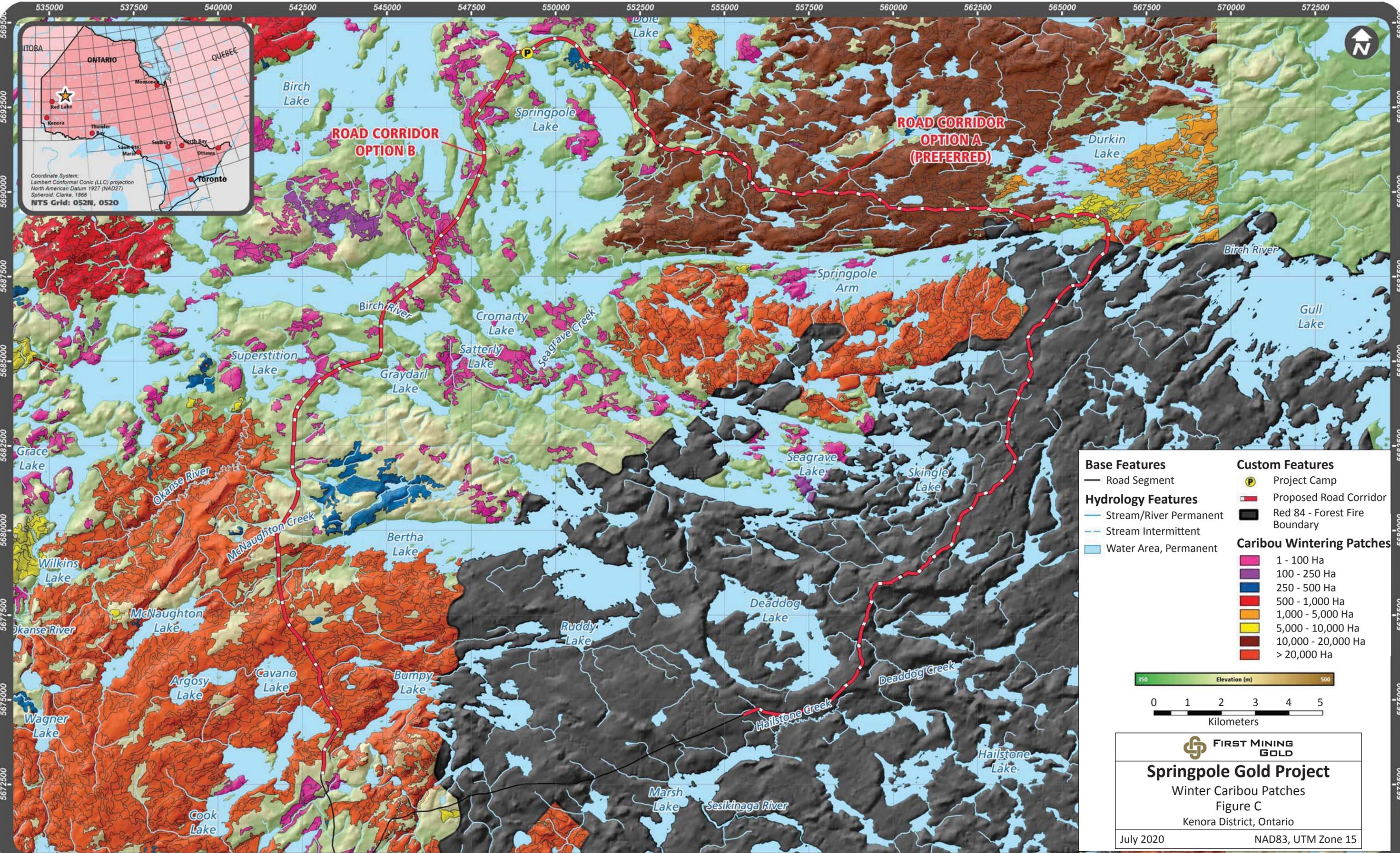
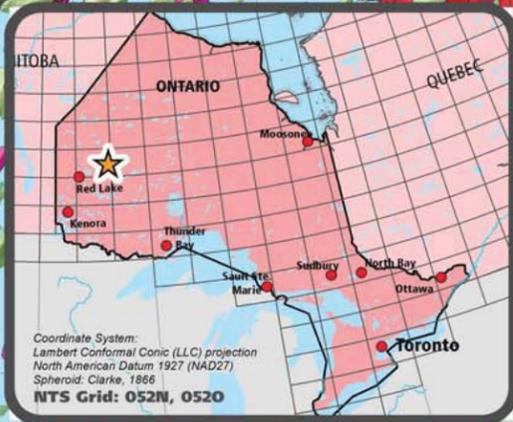
Kenora District, Ontario

July 2020 NAD83, UTM zone15

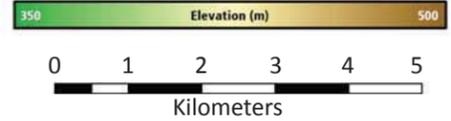
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Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community



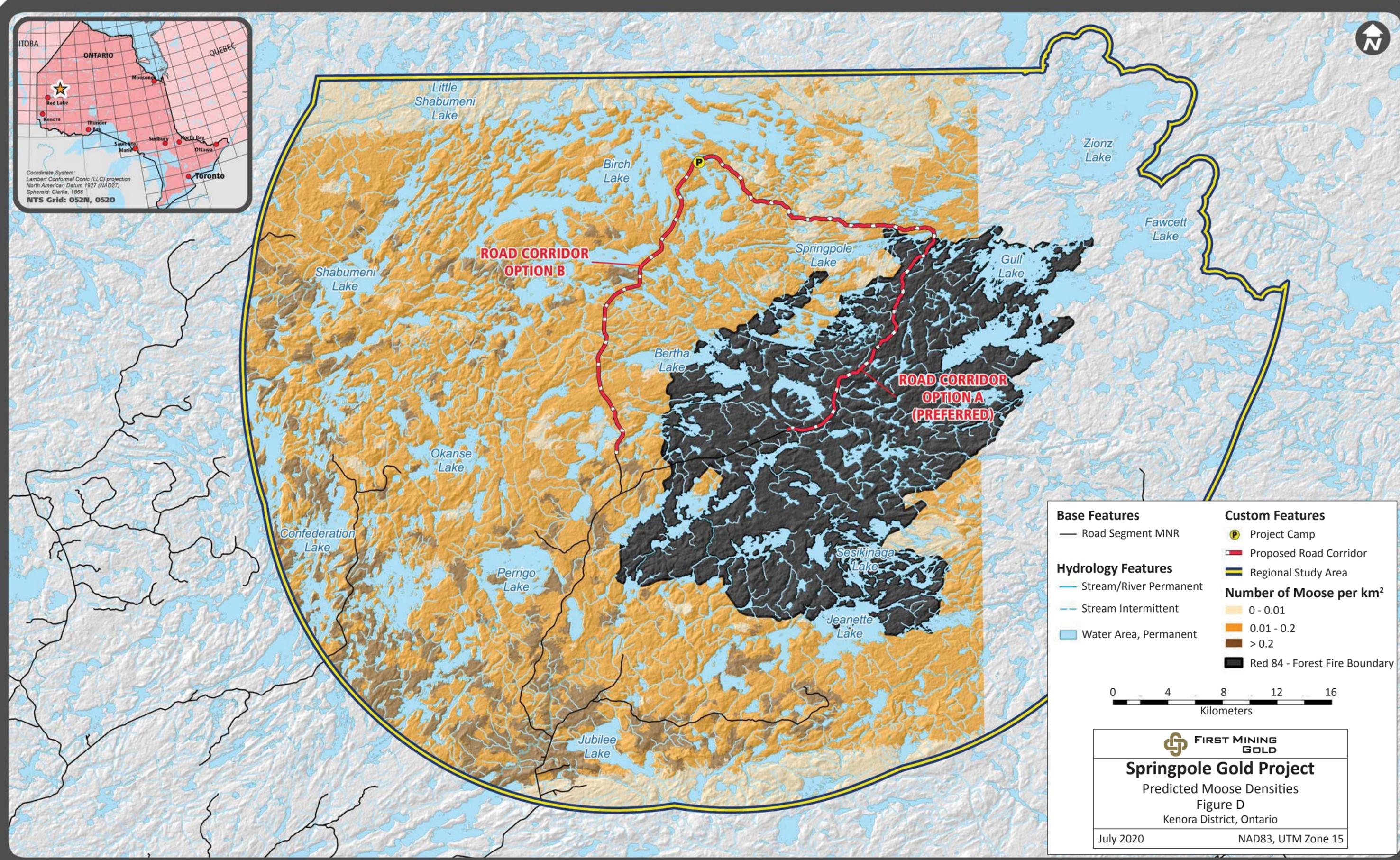
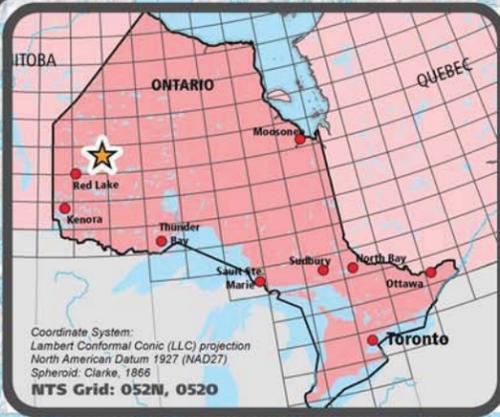
<b>Base Features</b>	<b>Custom Features</b>
— Road Segment	Project Camp
<b>Hydrology Features</b>	Proposed Road Corridor
Stream/River Permanent	Red 84 - Forest Fire Boundary
Stream Intermittent	
Water Area, Permanent	<b>Caribou Wintering Patches</b>
	1 - 100 Ha
	100 - 250 Ha
	250 - 500 Ha
	500 - 1,000 Ha
	1,000 - 5,000 Ha
	5,000 - 10,000 Ha
	10,000 - 20,000 Ha
	> 20,000 Ha



**FIRST MINING GOLD**

**Springpole Gold Project**  
Winter Caribou Patches  
Figure C  
Kenora District, Ontario

July 2020 NAD83, UTM Zone 15



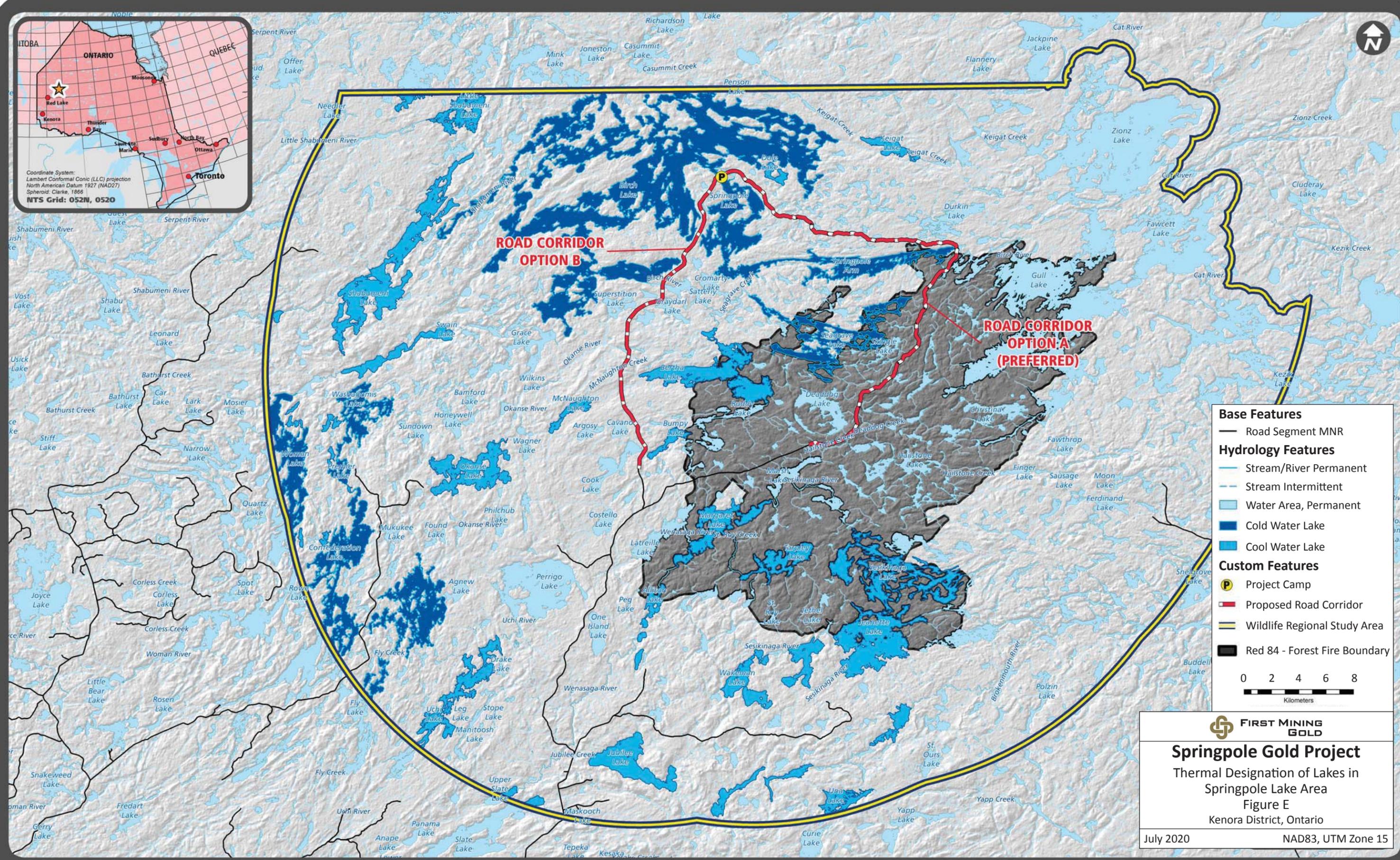
<b>Base Features</b>	<b>Custom Features</b>
— Road Segment MNR	Project Camp
	Proposed Road Corridor
<b>Hydrology Features</b>	Regional Study Area
Stream/River Permanent	<b>Number of Moose per km<sup>2</sup></b>
Stream Intermittent	0 - 0.01
Water Area, Permanent	0.01 - 0.2
	> 0.2
	Red 84 - Forest Fire Boundary



**FIRST MINING GOLD**

**Springpole Gold Project**  
Predicted Moose Densities  
Figure D  
Kenora District, Ontario

July 2020 NAD83, UTM Zone 15



**Base Features**

- Road Segment MNR

**Hydrology Features**

- Stream/River Permanent
- - - Stream Intermittent
- Water Area, Permanent
- Cold Water Lake
- Cool Water Lake

**Custom Features**

- P** Project Camp
- Proposed Road Corridor
- Wildlife Regional Study Area
- Red 84 - Forest Fire Boundary

0 2 4 6 8  
Kilometers

**FIRST MINING GOLD**

**Springpole Gold Project**  
Thermal Designation of Lakes in  
Springpole Lake Area  
Figure E  
Kenora District, Ontario

July 2020 NAD83, UTM Zone 15

**Figure F: View of Birch River Crossing Location (Looking North)**



**Figure G: View of Birch River Crossing – North Abutment**



**Figure H: View of Birch River Crossing – South Abutment**



**Figure I: Example of Clear Span Bridge**



**Appendix C**  
**Workforce Requirements**

## C.1 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.mihir.ca/careers>.

**Table C.1 Summary of Potential Operations Phase Positions <sup>(1)</sup>**

Department	Position	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.

- Education requirements are based on MNDM publication titled "*Occupations in Mineral Exploration and Mining*"

**Appendix D**  
**Mitigation Table**

**Table D.1 Environmental Effects of the Project Related to Section 5 of CEAA 2012 and Sections 17-19 of the Prescribed Information for the Description of Designated Project Regulations**

Applicable Valued Component <sup>(2)</sup>	Potential Environmental Interaction <sup>(3)</sup>	Potential Mitigation and/or Management <sup>(4)</sup>	How Potential Environmental Interactions Will be Addressed in EIS
<p><b>Fish and Fish Habitat Surface Water</b></p>	<p>The Project Site contains several fish-bearing watercourses and waterbodies (refer to <b>Section 6.3.11</b>). Routine Project activities could result in changes to fish and fish habitat as defined in section 2(1) of the <i>Fisheries Act</i> due to the potential environmental interactions listed below.</p> <ul style="list-style-type: none"> <li>➤ The Project has potential to adversely affect fish if Project-related hydrological and/or hydrogeological changes affect the quality or quantity of fish habitat.</li> <li>➤ Liquid discharges from the Project have potential to adversely affect fish habitat and fish health if they cause a reduction in water quality in receiving waters frequented by fish. Discharge or seepage of mining effluents has potential to cause changes to surface water and sediment quality that could potentially lead to indirect or direct effects on fish (<i>i.e.</i> toxicity, bioaccumulation, avoidance behaviour to a chemical gradient, alteration of planktonic and benthic communities). The exposure and weathering of some mine materials may also cause degradation of fish habitat due to acid generation and/or leaching of contaminants into waters frequented by fish.</li> <li>➤ Construction, excavation, and</li> </ul>	<ul style="list-style-type: none"> <li>➤ Design for limitation of construction footprint to the extent practical to minimize loss of fish habitat and disturbance of riparian areas.</li> <li>➤ Design for installation of culverts to prevent the creation of barriers to fish movement, and maintenance of bank full channel functions and habitat functions. These measures include: <ul style="list-style-type: none"> <li>a. embedment</li> <li>b. re-instatement of low flow channel and native substrates</li> <li>c. proper sizing</li> <li>d. maintenance of adequate channel slope</li> </ul> </li> <li>➤ Design for avoidance of in-water work during applicable DFO and MNRF restricted activity timing windows.</li> <li>➤ Design for limitation of the duration of all in-water work to the extent practical and conducting in-stream work during periods of lower flow to the extent practical, to allow work in water to be isolated from flows and to avoid wet, windy, and rainy periods that may increase erosion and sedimentation.</li> <li>➤ Design for undertaking all in-water activities, or installation of associated in-water structures, such that interference with fish passage, reduction in channel width, or reduction in flows is limited.</li> <li>➤ Design for planning of activities and works in waterbodies such that loss or disturbance to</li> </ul>	<ul style="list-style-type: none"> <li>➤ Potential Project-related environmental effects on fish and fish habitat will be assessed primarily in the context of the Fish and Fish Habitat VC but will also be indirectly considered in the context of the Surface Water VC.</li> <li>➤ The assessment will include the identification of standard and VC-specific mitigation measures to reduce or eliminate Project-related environmental effects; characterization of residual Project-related environmental effects; and determination of the significance of residual Project-related environmental effects.</li> <li>➤ The EIS will also consider accidental events and assess the potential effects of an accidental spill or release to the environment on the Fish and Fish Habitat VC and Surface Water VC.</li> <li>➤ The assessment will be</li> </ul>

	<p>dewatering and/or infilling of waterbodies have potential to cause injury or mortality to fish. This includes the temporary dewatering of the north basin of Springpole Lake for the life of the mine, the temporary dewatering of aggregate extraction areas and the overprinting of the water bodies within the TMF and waste rock pile footprints.</p> <ul style="list-style-type: none"> <li>➤ Alterations to stream channels have potential to cause injury or mortality to fish, as well as to affect fish mobility and fish habitat.</li> <li>➤ If any blasting occurs near fish-bearing waters, vibration from the detonation of explosives have potential to cause injury or mortality to fish.</li> <li>➤ An accidental spill or release to the environment originating from a Project activity or component would have potential to result in changes to fish and fish habitat, including: <ul style="list-style-type: none"> <li>➤ Injury, mortality, and/or reduced health for fish.</li> <li>➤ Reduced availability and quality of fish habitat (including water quality).</li> <li>➤ Physical work in water, such as the installation of an effluent diffuser, a freshwater pump intake, water crossings and the coffer dams in Springpole Lake.</li> </ul> </li> <li>➤ Section 2(1) of SARA defines 'aquatic species' as comprising fish and marine plants as defined under sections 2(1) and 47 of the <i>Fisheries Act</i>, respectively. The Project is not</li> </ul>	<p>aquatic habitat is limited and sensitive habitats are avoided to the extent practical.</p> <ul style="list-style-type: none"> <li>➤ Design for activities near water such that materials such as fuels, lubricants, paint, blasting agents, rust solvents, degreasers, grout, or other chemicals do not enter a waterbody.</li> <li>➤ Design for treating and handling building material used in water in a manner to prevent the release or leaching of substances into the water that may be deleterious to fish.</li> <li>➤ Plan for prompt stabilization of shorelines/banks disturbed by activities associated with the Project to prevent erosion and/or sedimentation, preferably through revegetation with native species appropriate for the site</li> <li>➤ Design for qualified environmental professional to confirm that applicable permits for relocating fish are obtained and to capture fish trapped within an isolated/enclosed area at the work site and relocate them to an appropriate location in the same waters (<i>i.e.</i> fish removals from North Basin of Springpole Lake and small waterbodies that will be overprinted).</li> <li>➤ Design for avoidance of use of explosives in or near water where possible, and compliance with DFO's <i>Guidelines for the Use of Explosives in or Near Canadian Fisheries Waters</i> (Wright and Hopky 1998) if blasting is undertaken near fish-bearing waters</li> <li>➤ Design of sewage treatment plant and water management facilities to treat effluent to levels that will not be acutely toxic in the effluent, will not have chronic toxicity outside</li> </ul>	<p>based on desktop information, the judgement of the Project Team and the subject matter experts (Fish and Fish Habitat VC, Surface Water VC), and the results of relevant environmental baseline studies carried out in support of the EIS, including associated baseline field data.</p>
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	<p>expected to result in any changes to aquatic species as defined under SARA other than fish (i.e., the Project will not result in any changes to marine plants) due to the lack of any anticipated potential interaction between the Project and the marine environment. However, the potential Project- related changes to fish habitat identified above include potential changes to freshwater aquatic plants as components of fish habitat.</p> <ul style="list-style-type: none"> <li>➤ Reduced water quality in Springpole Lake; loss or alteration of potential fish spawning habitat (e.g., sedimentation and reduced flows), temporary removal of north basin of Springpole Lake, removal of small water bodies within Project footprint.</li> <li>➤ Site drainage and erosion from exposed soils; effluent treatment and discharge; containment of accidental spills; water taking; stream/water crossings (access road, power line and haul roads)</li> <li>➤ Increased flows in Springpole Lake; sedimentation as a result of site exposed soils and erosion on site; alteration and loss of wetlands in the project area to support the siting of infrastructure</li> <li>➤ Temporary removal of north basin of Springpole Lake, removal of small water bodies within Project footprint. Sedimentation as a result of site exposed soils and erosion on site; increased flows in Springpole Lake.</li> </ul>	<p>the mixing zone, and will meet applicable federal and provincial guidelines outside the mixing zone.</p> <ul style="list-style-type: none"> <li>➤ Design for pipeline intake and outlet structures to prevent entrainment or impingement of fish and to prevent scour erosion.</li> <li>➤ Design for water intake structures in accordance with DFO's</li> <li>➤ <i>Freshwater Intake End-of-Pipe Fish Screen Guideline</i> (DFO 1995).</li> <li>➤ Design for limitation of access to waterbodies and banks to protect riparian vegetation and limit bank erosion.</li> <li>➤ Design for use of temporary crossing structures or other practices to cross streams or waterbodies with steep and highly erodible banks and beds (e.g., dominated by organic materials and silts).</li> <li>➤ Design for operation of machinery on land (above the high-water mark), on ice, or from a floating barge whenever possible, in a manner that limits disturbance to the banks and bed of the waterbody.</li> <li>➤ Plan for maintenance of equipment to be used in water in a clean condition, free of fluid leaks and aquatic invasive species</li> <li>➤ Plan for washing, refueling, and servicing machinery and storing fuel and other materials for the machinery in such a way as to prevent deleterious substances from entering the water</li> <li>➤ Plan for development and implementation of Project-specific environmental management plans and monitoring programs, including a Surface Water Monitoring and Management Plan, an Erosion and Sediment Control Plan</li> </ul>	
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		<p>and development of Emergency Response and Spill Prevention and Contingency Plans for implementation in the event of an accident or malfunction.</p> <ul style="list-style-type: none"> <li>➤ Plan for development and implementation of a Project-specific Explosives Management Plan to reduce risk of lethal or sub-lethal effects on fish, changes in bank stability and composition, and sedimentation.</li> <li>➤ Plan for implementation of any additional mitigation measures outlined for the Surface Water VC.</li> <li>➤ Design for detoxification of cyanide (used to process the ore and extract gold) in effluent prior to discharge to TMF.</li> <li>➤ Minimize Project footprint; avoid permanent waterbodies to the extent practical and implement fishery offsetting plan where this is not practical.</li> <li>➤ Engineer ore and rock placement facilities to contain runoff for treatment; accidental spill contingency plans to avoid releasing contaminants reaching a natural waterbody; fuel and other hazardous materials storage and handling; buffer zones and erosion control practices.</li> </ul>	
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Applicable Valued Component <sup>(2)</sup>	Potential Environmental Interaction <sup>(3)</sup>	Potential Mitigation and/or Management <sup>(4)</sup>	How Potential Environmental Interactions Will be Addressed in EIS
<p><b>Wildlife and Wildlife Habitat</b></p>	<p>The Project Site may provide habitat for various species of migratory birds (refer to <b>Section 6.3.12</b>). Routine Project activities could result in changes to migratory birds as defined in section 2(1) of MBCA due to the following potential interactions with the environment:</p> <ul style="list-style-type: none"> <li>➤ If conducted during the breeding bird season, site preparation activities (e.g., clearing and grubbing) have potential to cause injury or mortality to migratory birds, their nestlings, and their eggs, as well as to damage or destroy their nests. Project construction also has potential to result in alteration or loss of habitat for migratory birds.</li> <li>➤ Noise, vibration, and air emissions (e.g., dust) during Project construction and operation have potential to adversely affect habitat quality for migratory birds and could cause behavioural effects (e.g., avoidance / displacement).</li> <li>➤ Artificial night lighting during Project operation has potential to attract and/or disorient nocturnally migrating birds and could cause an increased risk of injury or mortality from exhaustion and/or collisions with Project infrastructure. Any migratory birds attracted to the Project site by artificial night lighting could also be exposed to other threats such as predation or</li> </ul>	<ul style="list-style-type: none"> <li>➤ Design for use of down-lighting, a technique of directing night lighting downward, to reduce light effects on wildlife adjacent to the Project Site.</li> <li>➤ Design for scheduling vegetation clearing and site preparation activities outside the breeding period for migratory birds. If activities that could result in incidental take cannot be avoided, FMG will develop and implement a Project-specific Bird Nest Mitigation Plan that outlines how risk of incidental take will be managed in accordance with ECCC guidance. This plan would be developed in consultation with ECCC and MNRF.</li> <li>➤ Plan for flagging environmentally sensitive areas (e.g., roosts, stick nests, etc.) prior to clearing and construction, and evaluation of the features for additional mitigation measures (e.g., setbacks).</li> <li>➤ Plan for retention of actual or potential habitat trees where safe and technically feasible to do so. If removal is required, removal activities will be scheduled, to the extent practical, outside the core maternity roosting season for birds and bats. If habitat tree removal or general tree clearing is required during the maternity roosting period, a qualified biologist will review the trees to decide on occupancy before removal.</li> <li>➤ Plan for maintenance of the Project Site in a manner that reduces the risk that wildlife will encounter potential hazards, such as ropes,</li> </ul>	<ul style="list-style-type: none"> <li>➤ Potential Project-related environmental effects on migratory birds will be assessed primarily in the context of the Wildlife and Wildlife Habitat VC.</li> <li>➤ The assessment will include the identification of standard and VC-specific mitigation measures to reduce or eliminate Project-related environmental effects; characterization of residual Project-related environmental effects; and determination of the significance of residual Project-related environmental effects.</li> <li>➤ The EIS will also consider accidental events and will assess the potential effects of an accidental spill or release to the environment on the Wildlife and Wildlife Habitat VC.</li> <li>➤ The assessment will be based on desktop information, the judgement of the subject matter expert for the Wildlife and Wildlife Habitat VC, and the</li> </ul>

	<p>interactions with Project vehicles and equipment.</p> <ul style="list-style-type: none"> <li>➤ An accidental spill or release to the environment originating from a Project activity or component would have potential to result in changes to migratory birds, including:</li> <li>➤ Injury, mortality, and/or reduced health for migratory bird species.</li> <li>➤ Reduced availability and quality of migratory bird habitat.</li> <li>➤ The potential environmental effects described above for migratory birds could affect secure species as well as species at risk protected under SARA.</li> <li>➤ Potential adverse effects to SAR include direct or indirect mortality, reduced or loss of habitat, and reduced occurrence</li> </ul>	<p>wires and holes.</p>	<p>results of environmental baseline studies carried out in support of the EIS, including associated baseline field data (e.g., Birds, Acoustics, and Ambient Lighting technical data reports).</p>
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Applicable Valued Component <sup>(2)</sup>	Potential Environmental Interaction <sup>(3)</sup>	Potential Mitigation and/or Management <sup>(4)</sup>	How Potential Environmental Interactions Will be Addressed in EIS
<b>Atmospheric Environment</b> <b>Surface Water</b>	<ul style="list-style-type: none"> <li>➤ The Project, located within the Province of Ontario, will be situated on lands that are comprised of patented land (mining and surface rights), leased land and mining claims held by FMG.</li> <li>➤ Due to the location of the Project, it is not anticipated to result in any changes to the environment on federal lands. The Project is not located near any provincial, federal, territorial or national borders. The Project is located more than 30 km to the nearest federal lands at Cat Lake First Nation (reserve land) and Slate Falls First Nation (settlement land, not Federal Reserve land at this time). The Project does not affect any major waterway with direct connectivity to other jurisdictions.</li> </ul>	<p>Implement any required mitigation measures outlined for the Atmospheric Environment VC and the Surface Water VC.</p>	<ul style="list-style-type: none"> <li>➤ Potential Project-related environmental effects on federal lands will be assessed primarily in the context of the Atmospheric Environment VC and the Surface Water VC.</li> <li>➤ The EIS will not assess any other environmental effects occurring on federal lands due to the lack of anticipated interaction between the Project and any other aspect of the environment on federal lands.</li> <li>➤ The EIS will also consider accidental events and assess the potential effects of an accidental spill or release to the environment on the Atmospheric Environment VC and Surface Water VC.</li> <li>➤ The assessment will be based on desktop information, the judgement of the Project team and the subject matter experts (Atmospheric Environment VC; Surface Water VC), and the results of relevant environmental baseline studies carried out in support of the EIS, including associated baseline field data. Air quality modelling to be conducted in support of the EIS will include the modelling of acid deposition or speciated volatile organic compounds, as these are considered to be pathways for Project-related environmental effects.</li> </ul>

Applicable Valued Component <sup>(2)</sup>	Potential Environmental Interaction <sup>(3)</sup>	Potential Mitigation and/or Management <sup>(4)</sup>	How Potential Environmental Interactions Will be Addressed in EIS
<b>Atmospheric Environment</b> <b>Surface Water</b>	<ul style="list-style-type: none"> <li>➤ The Manitoba provincial border is located approximately 200 km west of the Project Site. This is the shortest distance between the Project and any transboundary lands.</li> <li>➤ Due to the location of the Project, it is not anticipated to result in any changes to the environment in a province other than Ontario or outside of Canada. The Project is not located near any provincial, federal, territorial or national borders. The Project is located more than 200 km from the Manitoba border and more than 300 km from the United States border. The Project does not affect any major waterway with direct connectivity to other jurisdictions.</li> <li>➤ The direction of surface water flow from the Project Site is away from the Manitoba border, thereby reducing the potential for transboundary environmental effects on water.</li> <li>➤ The prevailing wind direction primarily comes from the northwest and secondarily from the west. Atmospheric emissions associated with the Project are therefore considered generally unlikely to be transported into Manitoba to a measurable degree.</li> <li>➤ With the exception of potential transboundary environmental effects</li> </ul>	<p>Implement any required mitigation measures outlined for the Atmospheric Environment VC and the Surface Water VC.</p>	<ul style="list-style-type: none"> <li>➤ Potential Project-related environmental effects on federal lands will be assessed primarily in the context of the Atmospheric Environment VC and the Surface Water VC.</li> <li>➤ The EIS will not assess any other environmental effects occurring on federal lands due to the lack of anticipated interaction between the Project and any other aspect of the environment outside the province of Ontario.</li> <li>➤ The assessment will include the identification of standard and VC-specific mitigation measures to reduce or eliminate Project-related environmental effects; characterization of residual Project-related environmental effects; and determination of the significance of residual Project-related environmental effects.</li> <li>➤ The EIS will also consider accidental events and assess the potential effects of an accidental spill or release to the environment on the Atmospheric Environment VC and Surface Water VC.</li> <li>➤ The assessment will be based on desktop information, the professional judgement of the EA Study Team, and the results of relevant environmental baseline studies carried out in support of the EIS, including associated baseline field data. Air quality modelling to be conducted in support of the EIS will include the modelling of acid deposition or speciated volatile organic compounds, as these are considered to be pathways for Project-related environmental</li> </ul>

	<ul style="list-style-type: none"> <li>➤ on the atmospheric environment associated with Project-related emissions of criteria air contaminants and greenhouse gases, the Project is not expected to result in any changes to the environment that would occur on federal lands, in another province, or outside of Canada. An accidental spill or release to the environment originating from a Project activity or component would similarly not be expected to result in any environmental effects occurring on federal or transboundary lands given the separation distance and the extent of the potential accidental release (e.g., fire).</li> <li>➤ The Project will have potential adverse environmental effects restricted to the Province of Ontario</li> <li>➤ The Project will create atmospheric emissions from the combustion of fossil fuels for vehicle and equipment operations as well as fugitive dust emissions. Power to the Project will be provided by a transmission from the existing Hydro One grid south of the Project site.</li> <li>➤ Potential reduction in baseflow to surface water bodies due to mine dewatering and other groundwater takings</li> </ul>		<p>effects.</p>
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Applicable Valued Component <sup>(2)</sup>	Potential Environmental Interaction <sup>(3)</sup>	Potential Mitigation and/or Management <sup>(4)</sup>	How Potential Environmental Interactions Will be Addressed in EIS
<p><b>Traditional Land and Resource Use</b></p> <p><b>Employment and Business</b></p> <p><b>Regional and Community Services and Infrastructure</b></p>	<p>The Project Site is used by various Indigenous land and resource users. Routine Project activities could result in the following changes to the environment that have potential to affect health and socio-economic conditions for Indigenous communities:</p> <ul style="list-style-type: none"> <li>➤ Project activities and components have potential to affect the availability of lands and resources for commercial or recreational fishing and hunting/trapping activities and/or other recreational uses currently carried out by Indigenous communities.</li> <li>➤ Project-related requirements and the influx of Project personnel could increase the demand for local services and infrastructure, thereby potentially affecting the quality or availability of these amenities for Indigenous (and non-Indigenous) residents of the region.</li> <li>➤ The Project has potential to adversely affect human health if liquid discharges from the Project degrade the quality of water resources or if Project-related hydrologic changes affect the quality or quantity of surface water resources (there are no known local users of ground water in the watershed). Effluent discharge from the Project will affect water quality in the receiving waterbody, which could affect downstream water users of water for drinking purposes.</li> <li>➤ Air, noise, and light emissions from the Project have potential to disturb nearby</li> </ul>	<ul style="list-style-type: none"> <li>➤ Implement any required mitigation measures outlined for the following VCs: Traditional Land and Resource Use; Employment and Business; Regional and Community Services and Infrastructure.</li> <li>➤ Implement engineered runoff and seepage collection system to prevent uncontrolled water discharges, and implementation of a treatment system to ensure water discharges meet effluent criteria that are protective of the receiving waterbody and downstream users. This will protect downstream water users who may use water as a raw water source for drinking water purposes.</li> </ul>	<ul style="list-style-type: none"> <li>➤ Potential Project-related environmental effects on health and socio-economic conditions for Indigenous and non-Indigenous communities will be assessed in the context of the following VCs: Traditional Land and Resource Use; Employment and Business; Regional and Community Services and Infrastructure.</li> <li>➤ The assessment will include the identification of standard and VC-specific mitigation measures to reduce or eliminate Project-related environmental effects; characterization of residual Project-related environmental effects; and determination of the significance of residual Project-related environmental effects.</li> <li>➤ The EIS will also consider accidental events and will assess the potential effects of an accidental spill or release to the environment on these VCs.</li> <li>➤ A Human Health and Ecological Risk Assessment (“HHERA”) will be undertaken as the Project progresses. The HHERA will be completed using standard risk assessment protocols in use in Canada and Ontario. Calculations consistent with regulatory expectations and requirements will be completed and, where local receptor assumptions (e.g., land-use patterns, country food consumption rates, etc.) are unavailable, parameters recommended by Health Canada and ECCC will be</li> </ul>

	<p>human receptors and pose a nuisance.</p> <ul style="list-style-type: none"> <li>➤ Emission and dispersion of chemicals from Project activities have the potential to affect air quality, as well as soil and surface water quality (through deposition), which could potentially affect human health (e.g., through contamination of drinking water resources or species of fish, wildlife, or plants that are consumed by Indigenous or non- Indigenous communities).</li> <li>➤ The Project is also expected to have economic benefits, including training, employment, and contracting opportunities, for Indigenous and non-Indigenous communities.</li> <li>➤ The expenditures and employment associated with Project activities will affect local, regional, and provincial economic conditions through all phases of the Project. In addition to having positive economic effects, the Project could adversely affect labour and economy, for example by contributing to local or regional labour shortages or interacting negatively with the economic activities of other sectors, such as tourism or forestry.</li> </ul>		<p>used to characterize human and ecological receptor interactions with the local environment.</p> <ul style="list-style-type: none"> <li>➤ The assessment will be based on desktop information; traditional knowledge, the judgement of the Project team and subject matter experts; the results of the HHERA; the results of environmental baseline studies carried out in support of the EIS, including associated informant interviews and baseline field data.</li> </ul>
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Applicable Valued Component <sup>(2)</sup>	Potential Environmental Interaction <sup>(3)</sup>	Potential Mitigation and/or Management <sup>(4)</sup>	How Potential Environmental Interactions Will be Addressed in EIS
<p style="text-align: center;"><b>Heritage Resources Traditional Land and Resource Use</b></p>	<p>Archaeological and heritage resources have potential to occur at the Project Site.</p> <p>Routine Project activities could result in the following changes to the environment that have potential to affect the physical and cultural heritage of Indigenous or non-Indigenous communities, and/or to affect any structure, site, or thing of historical, archaeological, paleontological or architectural significance to Indigenous or non- Indigenous communities:</p> <ul style="list-style-type: none"> <li>➤ Although the Project will be designed to avoid ground disturbance at sites where resources of cultural, historical, archaeological, paleontological, or architectural significance are known to be located, there is potential for Project-related ground disturbance (including excavation and blasting) to occur where previously unrecorded resources may be present. Such resources, if present, could be disturbed, damaged or destroyed by the Project.</li> <li>➤ An accidental spill or release to the environment originating from a Project activity or component could result in changes to the environment that could affect physical and cultural heritage, or</li> </ul>	<ul style="list-style-type: none"> <li>➤ Setbacks have been established around known archaeological sites to minimize potential effects due to physical disturbance (refer to <b>Figure 4.1.1</b>). Further mitigation measures will be developed during the EA process.</li> <li>➤ Design for licensed archaeologist to undertake archaeological and heritage values assessment in accordance with Ontario Ministry of Heritage, Sport, Tourism, and Culture Industries (“MHSTCI”) guidelines.</li> <li>➤ Design for a licensed archaeologist to undertake any salvage of architectural and/or historical resources that may be required</li> <li>➤ Plan for training of staff in the recognition of basic archaeological artifacts such as Indigenous material culture, and Euro-Canadian material culture and on the potential and documented historic use and occupation of the Project Site.</li> <li>➤ Effective implementation of a Chance Find Procedure and training of all staff. Components of the procedure are listed below. <ul style="list-style-type: none"> <li>e. Notifying the MHSTCI and ceasing all Project-related ground disturbance within a 20 m radius of where the suspected archaeological resources is found, pending further direction from the MHSTCI.</li> <li>f. Retaining a licensed archaeologist</li> </ul> </li> </ul>	<ul style="list-style-type: none"> <li>➤ Potential Project-related effects will be assessed in the context of the Heritage Resources VC as well as the Traditional Land and Resource Use VC.</li> <li>➤ The assessment will include the identification of standard and VC-specific mitigation measures to reduce or eliminate Project-related environmental effects; characterization of residual Project-related environmental effects; and determination of the significance of residual Project-related environmental effects.</li> <li>➤ The EIS will also consider accidental events and, will assess the potential effects of an accidental spill or release to the environment on the Heritage Resources VC.</li> <li>➤ Archaeological values assessment work was undertaken in 2012 to 2013 with participation of local First Nation technicians. Supplemental work will be undertaken to fill any data gaps during the EA process.</li> </ul>

	<p>resources of historical, archaeological, paleontological, or architectural significance for Indigenous and non- Indigenous communities.</p> <p>➤ Effluent discharge and water withdrawal could potentially affect water levels in areas of shoreline sites. This is not anticipated given the large lake surface area and watershed areas compared to the water withdrawals and discharges.</p>	<p>approved or designated by the Historic Resources Branch to conduct further investigation if required (in consultation with the MHSTCI).</p> <p>g. Notifying designated contact people at First Nations.</p> <p>h. Leaving the remains and any associated artifacts in place and undisturbed until the arrival of personnel designated by the MHSTCI and Ontario Provincial Police as appropriately qualified to take further action with respect to the exhumation and removal of human remains and associated artifacts</p>	<p>➤ The assessment will be based on desktop information, the judgement of Project team and the subject matter expert (Licensed Professional Archaeologist), the results of the supplemental archaeological assessment including associated field data.</p>
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Applicable Valued Component <sup>(2)</sup>	Potential Environmental Interaction <sup>(3)</sup>	Potential Mitigation and/or Management <sup>(4)</sup>	How Potential Environmental Interactions Will be Addressed in EIS
<p style="text-align: center;"><b>Traditional Land and Resource Use Environmental Health</b></p>	<ul style="list-style-type: none"> <li>➤ The Project Site is used and has the potential to be used for traditional purposes by Indigenous land and resource users. The Project may therefore require access to, use or occupation of, or the exploration, development and production of lands and resources currently used for traditional purposes by Indigenous communities.</li> <li>➤ Routine Project activities could result in the following changes to the environment that have potential to affect the current use of lands and resources for traditional purposes by Indigenous communities:</li> <li>➤ Project activities and components have potential to affect the availability of lands (including travel routes) and resources currently used by Indigenous communities for traditional purposes such as fishing, hunting/trapping, and gathering.</li> <li>➤ The influx of Project personnel could increase the recreational demand for lands and resources that are currently used by Indigenous communities for traditional purposes, thereby potentially affecting the quality or availability of these lands and resources for Indigenous communities.</li> <li>➤ The Project has potential to adversely affect the quality or availability of fish species of traditional importance to</li> </ul>	<ul style="list-style-type: none"> <li>➤ Design for obtaining all necessary patents, mining leases, licences of occupation, land use permits and staked claims in areas that are overlapped by the Project.</li> <li>➤ Design for use of signage around the perimeter of the Project to alert local land and resource users of the presence of the Project and its facilities.</li> <li>➤ Design for use of only as much lighting as is necessary for safe and efficient Project activities, use of directional light fixtures to avoid the transmission of light outside of the Project Site and positioning of portable lighting equipment to limit visibility at nearby receptors to the extent feasible.</li> <li>➤ Design for installation of noise mitigation measures (e.g., muffler systems) on construction and other mobile equipment, and proper maintenance of equipment</li> <li>➤ Design for completion of all timber removal in accordance with Ontario's <i>Crown Forest Sustainability Act</i>.</li> <li>➤ Design for engagement of local land and resource users to address, to the extent possible, issues related to the removal and inaccessibility of lands and resources within the Project Site.</li> <li>➤ Design for engagement of local boaters to address navigation issues as well as access and safety issues related to navigation along watercourses affected by the Project, including consultation regarding the need to provide marked portages to circumvent obstructions.</li> </ul>	<ul style="list-style-type: none"> <li>➤ Potential Project-related environmental effects on the current use of lands and resources for traditional purposes by Indigenous communities will be assessed in the context of the Traditional Land and Resource Use VC and the Environmental Health VC.</li> <li>➤ The assessment will include the identification of standard and VC-specific mitigation measures to reduce or eliminate Project-related environmental effects; characterization of residual Project-related environmental effects; and determination of</li> </ul>

	<p>Indigenous communities (including species that are currently fished by Indigenous harvesters for traditional purposes) if liquid discharges from the Project degrade the quality of fish habitat.</p> <ul style="list-style-type: none"> <li>➤ Air, noise, and light emissions from the Project have potential to disturb wildlife species of traditional importance to Indigenous communities and affect their movement, thereby potentially affecting their availability for current use by Indigenous communities (e.g., hunting/trapping). This could potentially include furbearers (e.g., marten, fox, wolf, etc.) and ungulates such as moose.</li> <li>➤ Emission and dispersion of chemicals from Project activities have the potential to affect air quality, as well as soil and surface water quality (through deposition). Thus, the Project has potential to adversely affect the quality or availability of fish, wildlife, and plant species of traditional importance to Indigenous communities (including species that are currently fished, hunted/trapped, and gathered by Indigenous communities for traditional purposes) if the Project results in the degradation of their habitats or the contamination of these resources.</li> <li>➤ Effluent discharge from the Project will affect water quality in the receiving waterbody, which could affect downstream water users.</li> <li>➤ An accidental spill or release to the environment originating from a Project activity or component would have</li> </ul>	<ul style="list-style-type: none"> <li>➤ Design for implementation of work schedules for Project construction workers (12 hours per day, seven days per week) will deter workers from hunting and fishing locally outside of working hours during a shift.</li> <li>➤ Design for prohibition of workers from engaging in recreational land and resource at the Project Site during all Project phases.</li> <li>➤ Design for selection of equipment and/or design of acoustical enclosures to limit overall noise emissions.</li> <li>➤ Design for prohibition of employees from bringing firearms or fishing gear to site to limit competition for wildlife and fish species of value to land and resource users.</li> <li>➤ Plan for consideration of land and resource uses during preparation of the Closure Plan</li> <li>➤ Plan for communication of Project activities, locations and timing throughout construction, operation and closure to affected land and resource users, interest groups, the provincial government, and local authorities leading up to construction and throughout the life of the Project.</li> <li>➤ Implement engineered runoff and seepage collection system to prevent uncontrolled water discharges, and implementation of a treatment system to ensure water discharges meet effluent criteria that are protective of the receiving waterbody and downstream users. This will protect downstream water users who may use water as a raw water source for drinking water purposes.</li> <li>➤ Design for implementation of one or more of the below listed mitigation measures for plant harvesting sites within the Project Site. <ul style="list-style-type: none"> <li>○ avoidance through Project design</li> </ul> </li> </ul>	<p>the significance of residual Project-related environmental effects.</p> <ul style="list-style-type: none"> <li>➤ The EIS will also consider accidental events and will assess the potential effects of an accidental spill or release to the environment on the Traditional Land and Resource Use VC.</li> <li>➤ Supplemental traditional knowledge and traditional use and occupancy studies are anticipated to be required during the EA process.</li> <li>➤ The assessment will be based on desktop information, the judgement of the Project team, the results of the above noted traditional knowledge and use studies and the results of primary data collection including interviews and</li> </ul>
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	<p>potential to result in changes to the environment that could affect the current use of lands and resources for traditional purposes by Indigenous communities.</p>	<ul style="list-style-type: none"> <li>○ avoidance through timing of Project activities and potential scheduling of construction during periods of least effect.</li> </ul>	<p>baseline field data.</p>
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Applicable Valued Component <sup>(2)</sup>	Potential Environmental Interaction <sup>(3)</sup>	Potential Mitigation and/or Management <sup>(4)</sup>	How Potential Environmental Interactions Will be Addressed in EIS
<b>Fish and Fish Habitat</b> <b>Wildlife and Wildlife Habitat</b>	<p>Various federal authorities may need to exercise a power or perform a duty or function to allow the Project to proceed. Routine Project activities could result in the following other changes to the environment directly related or necessarily incidental to a federal authority's exercise of a power or performance of a duty or function in support of the Project:</p> <ul style="list-style-type: none"> <li>➤ If a licence, certificate, or permit from NRCan is required under the Explosives Act, the potential changes to the environment that would be directly related or necessarily incidental to this regulatory approval would be limited to the potential effects summarized above that could result from Project-related blasting.</li> <li>➤ If authorization from DFO is required under section 35(2) of the <i>Fisheries Act</i> for serious harm to fish that are part of a commercial, recreational or Aboriginal ("CRA") fishery or that support a CRA fishery, the potential changes to the environment that would be directly related or necessarily incidental to this regulatory approval are limited to the potential effects summarized above with respect to fish and fish habitat, socio-economic conditions (i.e., potential Project-related effects on the abundance or distribution of commercially or recreationally important fish species), and Indigenous traditional use (i.e. potential Project-related effects on the abundance or distribution of traditionally important fish species).</li> <li>➤ 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 Mine Effluent Regulation, pursuant to the Fisheries Act. Potential areas of impact include tailings management facility ("TMF") and waste rock repositories.</li> <li>➤ If a permit from ECCC is required under section 19 of the <i>Migratory Birds Convention Act</i> for the collection of migratory birds, their nests, or their eggs, the potential changes to the</li> </ul>	<p>Plan for implementation of any required mitigation measures outlined for the Fish and Fish Habitat, and Wildlife and Wildlife Habitat VCs.</p> <ul style="list-style-type: none"> <li>➤ Integrate mitigation and management into Project design.</li> </ul>	<ul style="list-style-type: none"> <li>➤ Other potential changes to the environment directly related or necessarily incidental to a federal authority's exercise of a power or performance of a duty or function in support of the Project will be assessed in the context of the Fish and Fish Habitat and Wildlife and Wildlife Habitat VCs.</li> <li>➤ The assessment will include the identification of standard and VC-specific mitigation measures to reduce or eliminate Project-related environmental effects; characterization of residual Project-related environmental effects; and determination of the significance of residual Project-related environmental effects.</li> <li>➤ The EIS will also consider accidental events and, will assess the potential effects of an accidental spill or release to the environment on the Fish and Fish Habitat and Wildlife and Wildlife</li> </ul>

	<p>environment that would be directly related or necessarily incidental to this regulatory approval would be limited to disturbance of migratory birds, their nests, or their eggs; potential injury or mortality of collected migratory birds; and potential damage or destruction of collected nests and eggs.</p> <p>If a permit from ECCC or DFO is required under section 73(1) of SARA for engaging in activities affecting a SARA-listed aquatic and/or migratory bird species and/or their residences (e.g., nests), the potential changes to the environment that would be directly related or necessarily incidental to this regulatory approval would be limited to the potential effects summarized above with respect to fish, fish habitat, and migratory birds.</p>		<p>Habitat VCs.</p> <ul style="list-style-type: none"> <li>➤ The assessment will be based on desktop information, the professional judgement of the EA Study Team, and the results of relevant environmental baseline studies, including associated baseline field data.</li> </ul>
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<b>Applicable Valued Component<sup>(2)</sup></b>	<b>Potential Environmental Interaction <sup>(3)</sup></b>	<b>Potential Mitigation and/or Management <sup>(4)</sup></b>	<b>How Potential Environmental Interactions Will be Addressed in EIS</b>
<p><b>Groundwater Quality and Quantity</b></p>	<ul style="list-style-type: none"> <li>➤ Potential reduction in baseflow to surface water bodies due to mine dewatering and other groundwater takings</li> <li>➤ Impact on groundwater pathways</li> <li>➤ Reduction in water quality in Springpole lake</li> <li>➤ Increased groundwater flow into Springpole and Birch Lake caused by mounding due to TMF and WRA</li> <li>➤ Potential risks to groundwater quality due to ML/ARD, spills, blasting, domestic sewage and waste disposal</li> <li>➤ Potential effects to groundwater users</li> </ul>	<ul style="list-style-type: none"> <li>➤ Continuous groundwater level monitoring</li> <li>Installation of back pumping wells around open pit to reduce or eliminate groundwater flow into Springpole Lake caused by mounding</li> <li>➤ Collection and separation of contact and non-contact water</li> <li>➤ Water treatment</li> </ul>	<ul style="list-style-type: none"> <li>➤ Potential project related effects on groundwater and surface water will be assessed and will also be indirectly considered in the context of groundwater VC.</li> <li>➤ The EIS will also consider accidental events and assess the potential effects to the groundwater caused by an extensive spill released to the environment.</li> <li>➤ The assessment will include the identification of standard of standard and VC, specifically</li> </ul>

		<ul style="list-style-type: none"> <li>➤ Water mitigation designed for avoidance</li> <li>➤ Leachate collection systems</li> <li>➤ Drainage ditches</li> <li>➤ Settling Ponds</li> <li>➤ Utilization of remediation technologies for spills</li> <li>➤ Surface water monitoring and management plan</li> <li>➤ Erosion and sediment control plan</li> <li>➤ Emergency spill and prevention plan</li> <li>➤ Design for detoxification of cyanide in effluent prior to discharge</li> <li>➤ Minimize project footprint</li> </ul>	<p>mitigation measures to reduce or eliminate project related environmental effects.</p> <ul style="list-style-type: none"> <li>➤ Characterization of residual project related environmental effects and determination and significance of project related environmental effects.</li> <li>➤ Potential project related effects on health and socio-economic conditions for indigenous and non-indigenous communities.</li> <li>➤ Assessment will be based on desktop information, the professional judgement of the EA team and the results of relevant environment baseline studies including associated baseline field data.</li> </ul>
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(3) Prescribed Information for the Description of Designated Project Regulations.

- Refer to **Table 7.2.1** for list of the currently proposed Valued Components. The Valued Components that are carried into the EA process will be refined based on feedback from First Nations, government agencies and stakeholders.
- Interactions discussed are without any mitigation or management to avoid, reduce or eliminate adverse effects.

Mitigation measures listed in the table are preliminary and will be refined during EA process

## Appendix E

### Consultation and Engagement Plans for the EA

## Appendix E.1

### Proposed Indigenous Consultation Plan

## **E.1.1 INDIGENOUS CONSULTATION PLAN FOR THE EA**

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 life of the Project. 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:

- Proposed consultation methods;
- How input will be obtained;
- Key decision-making milestones and feedback process; 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. Indigenous communities will be engaged in a discussion regarding how they wish to be consulted before this Plan is finalized. Communities will have an opportunity to provide input on potential consultation activities before they are carried out.

### **E.1.1.1 Stakeholder Identification for Indigenous Groups**

Following the voluntary agreement between the provincial government and FMG, a list of potentially impacted communities was provided by MOECC now known as MECP. Upon receipt of the list from MECP, FMG created a master multi-stakeholder matrix for each community (Chief and Council). The master multi-stakeholder matrix can be found in **Table F.1** in **Appendix F** and the list from MECP includes the following communities:

- Lac Seul First Nation
- Cat Lake First Nation
- Slate Falls First Nation
- Ojibway Nation of Saugeen
- Wabauskang First Nation
- Mishkeegogamang First Nation
- Métis Nation of Ontario
- Pikangikum First Nation

FMG intends to continue consultation through the EA process with a wide range of stakeholders, including but not limited to those identified in E.1.1.1. 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.

#### E.1.1.2 Consultation Activities and Implementation

In the preparation and review of the Provincial EA, Indigenous communities will be asked to participate throughout the preparation of the EA process.

All communities were informed on August 29, 2018 about notice of commencement of 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 encourages Indigenous communities and will continue to encourage and support the communities to be involved in the collection of environmental baseline data.

Consultations that have occurred to date are documented in the Record of Consultation and Praxis Data Management Program. The consultations during the ToR focused on review of the Project components, EA Process, environmental and socio-economic baseline studies, alternative assessment and methods for preparation of the EA Report/EIS. The objectives is 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 and review of the Draft EA Report/EIS. These FMG-led consultation activities are described below and include:

- Consultation purpose and objectives;
- Consultation tools and activities; and
- Notification requirements (for Provincial EA only, as Federal notices are the responsibility of the Agency).

The consultation on the EA will be organized based on the EA process including baseline, effects assessment, and mitigation and monitoring.

#### E.1.1.3 Indigenous Consultation Approach

Consultation will take place through the leadership of each Indigenous community, or through delegated individuals or Tribal Councils. It is also important to involve members of these communities outside of consultation and engagement activities. Consultation activities that seek to broadly engage the Indigenous community will assist in identifying issues that are unknown to Individual leadership or dissenting views amongst the Indigenous community. Inclusive consultation also helps build support for the Project.

The focus of Indigenous consultation and engagement activities will be primarily on those potentially affected Indigenous communities. 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 highest levels of decision-making within each of the Indigenous communities, which in the case of First Nations will be the Band Chief and Council or the Tribal 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 (Regional 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 understanding of the various studies required in the EA.

#### E.1.1.4 Participant Support

FMG is 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 offered capacity support to these communities for technical review of the PDEA document.

FMG also has provided support to the Métis Nation of Ontario (Métis Region 1) Consultation Committee and their members during the EA and ToR reviews.

Consideration for further agreements and capacity support will be determined as consultation advances with other potentially affected Indigenous communities.

FMG bears the cost associated with providing information about the Project and the EA processes to Indigenous communities that is in a format that is accessible and for conducting any meetings or information sessions that build an understanding of the Project so that Indigenous participants may meaningfully participate in the Project and EAs.

### E.1.1.5 Methods of Reaching Out to Indigenous Communities

FMG intends to reach out to Indigenous communities as follows:

- *Contact lists* – FMG has created a contact list of all participating Indigenous groups, which will be maintained throughout the duration of the Undertaking.
- *Issues Scoping Meetings* – FMG will continue to meet with Indigenous communities throughout the development of the Undertaking.
- *Engagement in Environmental Baseline Studies* – FMG will engage Indigenous Environmental Monitors 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. The Environmental Monitor solicits and recruit community participation in engagement activities in a manner that supports the needs of the community. A key role of the Environmental Monitor is to communicate environmental findings to community leadership for consideration on mitigation/ support decisions. FMG will continue engagement throughout the EA process as appropriate.
- *Resource Sharing Committees* – FMG is determining the interest in the formation of resource sharing committees to facilitate discussions with Indigenous communities. Possible considerations may include traditional knowledge, environment, and/or education and training. The decision to form committees and determine potential focus of discussions will be determined with the communities as the Undertaking progresses.
- *Engagement in TK/TLU Studies* – TK/TLU studies will be facilitated by the respective Environmental Monitor in each community.
- *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 - organized 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 Draft Documents (environmental baseline reports and EA/EIS)* – FMG will circulate copies of draft documents for review and comment. Where

possible, these documents will be provided to Indigenous communities prior to public release. FMG will work with Indigenous communities to determine appropriate timelines. FMG will review and gather feedback on results of baseline studies, evaluation and election of alternatives, potential effects and 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.
- *General Meetings/Presentation* – FMG will continue to undertake face-to-face meetings/presentations with communities and/or Chief and Council, as appropriate, through the EA process.
- *Newsletter* – FMG will continue to 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.

FMG will use the methods mentioned above to notify and collect feedback from interested persons.

Throughout the consultation process, including the ToR stage, 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 all indigenous communities how its issues, concerns and interests and identified relevant impacts are considered, addressed, or incorporated in the environmental assessment 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.

Input received through consultation and responses completed are given in **Table 9.7.1**. Inputs and comments given in **Table 9.7.1**, received through consultation at the ToR stage were used to refine the Consultation Plans for the EA process.

### E.1.1.6 Consultation Tools and Techniques

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 & 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.

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 **Tables E.1.1.6** and **E.1.1.7**

**Table E.1.1.6 Description of Overall and Planned Consultation and Engagement Activities**

Approximate Date	Consultation Activity	Description	Milestones
August 2018- On-going	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>	<ul style="list-style-type: none"> <li>Commencement of the ToR               <ul style="list-style-type: none"> <li>Draft ToR</li> <li>ToR submission and acceptance</li> </ul> </li> <li>Commencement of the EA</li> <li>Consultation for the EA Report/EIS               <ul style="list-style-type: none"> <li>baseline, effects assessment, mitigation, and monitoring</li> </ul> </li> </ul>
Aug 2018- On-going	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>	<ul style="list-style-type: none"> <li>Commencement of the ToR               <ul style="list-style-type: none"> <li>Draft ToR</li> <li>ToR submission and acceptance</li> </ul> </li> </ul>
August 2018- On-going	Community Updates Newsletters, Brochures, Discussion Papers.	<p>“FMG press” newsletter which includes Project updates and FAQs. Flyers 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</p>	<ul style="list-style-type: none"> <li>Commencement of the EA</li> <li>Consultation for the EA Report/EIS               <ul style="list-style-type: none"> <li>baseline, effects assessment,</li> </ul> </li> </ul>

Approximate Date	Consultation Activity	Description	Milestones
		communities' websites. This extends to information on web sites and other forms of social media.	mitigation, and monitoring
August 2018- On-going	Advertisement s/Articles	Articles mainly in the local paper for information on key issues, specific events, and programs and to invite feedback.	
August 2018- On-going	Email Distribution List	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.	
Summer and Fall 2020	Workshop and Focus Group	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.	
2017- On-going	Questionnaire s/Surveys	Outline or paper-based questionnaire requesting feedback on a specific issue or project.	
2017- On-going	Public Submissions	Written correspondence received from the community (usually addressed to government) following the announcement of a project or a release of information.	
2012- On-going	Community Communicatio ns	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.	
2018- On-going	Project Website	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.	

Approximate Date	Consultation Activity	Description	Milestones
		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.	<ul style="list-style-type: none"> <li>• Consultation for the EA Report/EIS               <ul style="list-style-type: none"> <li>○ baseline, effects assessment, mitigation, and monitoring</li> </ul> </li> </ul>
2017 – On-going	Open House/Information Session,  Exhibitions, Display	An open house for community members to drop in. Presence at community events such as career fairs & 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.	
2018 – On-going	Community Consultation Group	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.	
2017 – On-going	Community Partnership or Sponsorship	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.  Participate in various community events such as Pow Wow, Festivals (2019 Blueberry Festival – Sioux Lookout), Career Fairs, etc.	

Approximate Date	Consultation Activity	Description	Milestones
On-going	Complaints Management Mechanism	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.	<ul style="list-style-type: none"> <li>• Commencement of the ToR <ul style="list-style-type: none"> <li>○ Draft ToR</li> <li>○ ToR submission and acceptance</li> </ul> </li> <li>• Commencement of the EA</li> <li>• Consultation for the EA Report/EIS</li> </ul>
On-going	Manned Telephone Line and Email Address	A telephone 'hotline' and dedicated community email are useful tools for communities to ask for information, raise issues or make comments on the mine operations.	<ul style="list-style-type: none"> <li>○ baseline, effects assessment, mitigation, and monitoring</li> </ul>
On-going	Group Presentation	Meetings held with individual Chief and Councils, MNO and the First Nations Working Group. All interactions will be recorded.	
Summer 2020 – On-going	Information Center	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.	
On-going	Off-Community Meetings	Presentation and feedback gathering activities where there are identified concentrations of Indigenous Community members living in local communities.	
On-going	Community Survey	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.	
	Mail-in-Card	Pre-paid postcard with areas for contact information for further	<ul style="list-style-type: none"> <li>• Commencement of the ToR <ul style="list-style-type: none"> <li>○ Draft ToR</li> </ul> </li> </ul>

Approximate Date	Consultation Activity	Description	Milestones
On-going		information, space for questions or concerns, and the senders contact information. All respondents' concerns will be recorded	<ul style="list-style-type: none"> <li>○ ToR submission and acceptance</li> </ul>
Summer 2020	Store Displays	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 Indigenous Nation community.	<ul style="list-style-type: none"> <li>● Commencement of the EA</li> <li>● Consultation for the EA Report/EIS               <ul style="list-style-type: none"> <li>○ baseline, effects assessment, mitigation, and monitoring</li> </ul> </li> </ul>
2018- On-going	Negotiation	<p>Ongoing negotiations with STPN (Lac Seul First Nation, Cat Lake First Nation and Slate Falls First Nation) regarding an Exploration Agreement/ IBA.</p> <p>Negotiation with other Indigenous Communities: Wabauskang First Nation, Pikangikum First Nation, Mishkeegogamang First Nation, Ojibway Nation of Saugeen and the Métis Nation of Ontario regarding level of consultation required. All interactions will be recorded.</p>	
On-going	Radio	FMG to utilize local radio to promote the project and to provide updates and information regarding upcoming public meetings, etc.	

**Table E.1.1.7 Summary of the Tools and Techniques Employed in Consultation and Engagement Activities**

Tools	Distributing Information	Seeking Information	Receiving Information	Incorporating Feedback
One-On-One Meetings	X	X	X	X
Site Tours	X	X	X	X
Community Updates, Newsletters, Brochures, Discussion Papers	X	X		X
Advertisements	X			X
Email Distribution List	X			X
Workshops and Focus Groups	X	X	X	X
Questionnaires/Surveys		X		X
Public Submissions		X	X	
Community Correspondence	X		X	X
Project Websites	X			X
Open House, Exhibitions, Displays	X	X	X	
Community Information Sessions	X			X
Community Consultation Forum	X	X	X	X
Community Partnerships or Sponsorship	X	X	X	
Complaints Management Mechanism		X	X	
Manned Telephone Line and Email Address	X	X	X	X
Group Presentation	X	X	X	X
Community Event Participation	X	X	X	X
Community Survey	X	X	X	

#### E.1.1.7 Community Consultation and Engagement Activity Timing

The following activities are planned to support the preparation and review of the EA and stated consultation objectives.

Community consultation and engagement meetings commenced on July 24, 2018. Overall, FMG held meetings with the following interested Communities:

- Lac Seul First Nation: Community meeting and meetings with Chief and Council
- Cat Lake First Nation: Community meeting
- Slate Falls First Nation: Community meeting and meeting with Chief and Council
- Ojibway Nation of Saugeen: Meeting with the Chief and Council
- Wabauskang First Nation: Meeting with Chief and Council

- Mishkeegogamang First Nation: Meeting with Chief and Council
- Métis Nation of Ontario: Meeting with Regional 1 Consultation Committee

**Table E.1.1.8** outlines the Consultation Activity Timing and **Table E.1.1.9** outlines the consultation tools and engagement milestones planned to support the preparation and review of the EA and stated consultation purpose and objectives for interested stakeholders.

**Table E.1.1.8 Consultation and Engagement Activity Timing**

Activity	Timing	Purpose	Distribution/Participants
Consultation and Engagement Meetings	Summer, 2019 to Fall, 2020	To consult and engage Indigenous communities about the Project Status and Progress on the EA(s)	Indigenous communities
Newsletters (Quarterly)	Winter, 2019/2020; Spring, 2020; Summer, 2020	To update and inform Indigenous communities about the Project Status and Progress on the EA(s). Newsletters will highlight information about upcoming public meetings, and to encourage feedback through the Project website, dedicated e-mail address, or through direct contact with FMG staff.	Mailed to Project mailing list including all Indigenous communities involved in the Project to date. Available on Project website and at meetings/open houses.
Plain Language Fact Sheet: Baseline Studies Summaries	Winter, 2019; Summer, 2020	To provide plain language information about the Project's environmental baseline studies	Mailed to Project mailing list including all Indigenous communities involved in the Project to date. Copies will be made available for community members if requested by community leadership (such as copies placed in Band offices; or distributed to membership by mail). Available on Project website and at meetings/open houses
Notices	Prior to community consultation events and for notice of commencement or submissions as required by regulation	To provide notice of Indigenous community consultation events or as required to inform Indigenous groups and other interested parties about the EA process (e.g., Notice of Commencement of an EA)	Posted in local newspapers and in Indigenous communities. Mailed to Project mailing list including all Indigenous participants involved in the Springpole Project to date.
Off-Reserve Meetings	Winter, 2019/2010; Spring, 2020; Summer, 2020	Presentation and feedback gathering activities where there are identified concentrations of	Identified Indigenous community members in local communities outside

Activity	Timing	Purpose	Distribution/Participants
		Indigenous community members living in local communities	their First Nation Community

**Table E.1.1.9 Consultation Tools and Activities Planned to Support Preparation and Review of the EA for the Indigenous Consultation Plan**

Approximate Date	Consultation and Engagement Milestones
	<p>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); approach to the development and evaluation of 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:</p>
Winter 2019 – Spring 2020	<p><b>Round 1 – General Information:</b>  <i>Objective: to update the communities on the ToR and EA timeline and the Project as well as receive feedback on the Indigenous Consultation Plan</i></p> <ul style="list-style-type: none"> <li>➤ Notice of Commencement of an Environmental Assessment</li> <li>➤ Notice of upcoming Open House and meeting dates</li> <li>➤ Newsletters to be distributed: <ul style="list-style-type: none"> <li>i. Project Update Newsletter (ToR submission, environmental baseline)</li> <li>j. Project Update Newsletter (summary of past open house and comments/responses)</li> <li>k. Consultation Plan</li> </ul> </li> </ul> <p><b>Round 2 – Baseline Studies:</b>  <i>Objective: to identify, consider, and respond to feedback on the development, evaluation, and results of baseline or other studies.</i></p> <ul style="list-style-type: none"> <li>➤ One-on-One meetings to be held (at each Indigenous Community): <ul style="list-style-type: none"> <li>l. Topics to be discussed: Valued Components, species (e.g., plants, animals, etc.) of importance to communities, specific criteria/indicators for evaluating baseline studies, TKU</li> <li>m. Documents to present: Proposed Valued Components, fish baseline study, baseline data so far</li> </ul> </li> <li>➤ Group Presentations to be held (at each Indigenous Community): <ul style="list-style-type: none"> <li>n. Topics to be discussed: Valued Components, species (e.g., plants, animals, etc.) of importance to communities, specific criteria/indicators for evaluating baseline studies, TKU</li> <li>o. Documents to present: Proposed Valued Components, fish baseline study, baseline data so far.</li> </ul> </li> </ul>

Approximate Date	Consultation and Engagement Milestones
<p>Winter 2019 – Spring 2020</p>	<p><b>Round 3 – Selection and Evaluation of Alternatives:</b>  <i>Objective: to identify, consider, and respond to feedback on the alternatives and evaluation methods of the alternatives, the results of the selection of the preferred alternative and final selection of criteria indicators.</i></p> <ul style="list-style-type: none"> <li>➤ One-on-One meetings to be held (at each Indigenous Community): <ul style="list-style-type: none"> <li>p. Topics to be discussed: Project Components, TKU and TLU, criteria/indicators, Alternatives to the Undertaking</li> <li>q. Documents to present: Effects and Mitigation, Project Components, Alternatives to the Undertaking</li> </ul> </li> <li>➤ Group Presentations to be held (at each Indigenous Community): <ul style="list-style-type: none"> <li>r. Topics to be discussed: Project Components, TKU and TLU, criteria/indicators, Alternatives to the Undertaking</li> <li>s. Documents to present: Effects and Mitigation, Project Components, Alternatives to the Undertaking</li> </ul> </li> </ul> <p><b>Round 4 – Effects Assessment:</b>  <i>Objective: to identify, consider, and respond to feedback on the effects assessment and evaluation of the preferred Undertaking.</i></p> <ul style="list-style-type: none"> <li>➤ One-on-One meetings to be held (at each Indigenous Community): <ul style="list-style-type: none"> <li>t. Topics to be discussed: Project Components, TKU and TLU, criteria/indicators and Preliminary Preferred Alternatives</li> <li>u. Documents to present: Effects and Mitigation, Project Components and their potential effects on the environment, Draft EA</li> </ul> </li> <li>➤ Group Presentations to be held (at each Indigenous Community): <ul style="list-style-type: none"> <li>v. Topics to be discussed: Project Components, TKU and TLU, criteria/indicators and Preliminary Preferred Alternatives</li> <li>w. Documents to present: Effects and Mitigation, Project Components and their potential effects on the environment</li> </ul> </li> </ul> <p><b>Round 5 – Mitigation Measures and Monitoring</b>  <i>Objective: to identify, consider, and respond to feedback on potential impacts, mitigation and monitoring measures.</i></p> <ul style="list-style-type: none"> <li>➤ One-on-One meetings to be held (at each Indigenous Community): <ul style="list-style-type: none"> <li>x. Topics to be discussed: Project Components, TKU and TLU, criteria/indicators and Preliminary Preferred Alternatives</li> <li>y. Documents to present: Effects and Mitigation, Project Components and their Potential effect to the environment, Alternatives to the Undertaking</li> </ul> </li> <li>➤ Group Presentations to be held (at each Indigenous Community): <ul style="list-style-type: none"> <li>z. Topics to be discussed: Project Components, TKU and TLU, criteria/indicators and Preliminary Preferred Alternatives</li> <li>aa. Documents to present: Effects and Mitigation, Project Components and their Potential effect to the environment,</li> </ul> </li> </ul>

Approximate Date	Consultation and Engagement Milestones
	Alternatives to the Undertaking
Summer 2020	<ul style="list-style-type: none"> <li>➤ Notice of Draft EA Review Period</li> <li>➤ Newsletters to be distributed:               <ul style="list-style-type: none"> <li>bb. Project update, summary of meetings, and presentation (comments/responses)</li> </ul> </li> <li>➤ Ongoing Indigenous Meetings/Working Groups</li> <li>➤ Notice of Submission of EA to MECP.</li> </ul>
Following submission of EA	<ul style="list-style-type: none"> <li>➤ Confirmation of EA submission to Indigenous communities and description of anticipated decision timelines</li> <li>➤ Ongoing Indigenous Meetings, if required</li> </ul>

## E.1.2 PLAN NOTICES, ISSUE TRACKING AND EVALUATION

### E.1.2.1 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
- 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.

***Circulation of Draft Documents:*** FMG will circulate the draft documents associated with the EA (i.e., draft EA document, ToR, etc.) to all Indigenous communities who have been identified by MECP for review and comment. This is collectively is termed as “Information Sharing Opportunities”. Through the Information Sharing Opportunities, FMG will gather concerns and interests and potentially relevant impacts raised by any of the Indigenous communities to develop appropriate measures.

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.

These notices will also be given to local municipalities (including elected officials), potentially affected Indigenous communities, and 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. 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 as well as having bilingual attendees at all public and Indigenous events.

#### E.1.2.2 Issues Tracking and Resolution

FMG is maintaining an electronic record (Praxis database) 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 (written or verbal) 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 will make every effort to address and resolve the concern directly with the Indigenous communities.

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 dispute. 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.

#### E.1.2.3 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; and
- Recording verbal feedback provided from participants and through the Project website.

Evaluation criteria will be developed prior to consultation events and may be results-based and/or process-based and will be developed using best practices. Results-based criteria measure whether a defined objective or goal has been met. Process-based criteria measure how the consultation process was implemented. The types of evaluation criteria used will differ depending on the consultation activity. The evaluations will be undertaken in a phased approach prior to completing consultations related to baseline studies, effects assessment, and mitigation measures.

### **E.1.3 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.

## Appendix E.2

### Proposed Public Engagement Plan

## **E.2.1 PUBLIC ENGAGEMENT PLAN FOR THE EA**

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 life of the Project. 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:

- Proposed consultation methods;
- How input will be obtained;
- Key decision-making milestones and feedback process; 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, Indigenous communities 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.

### **E.2.1.1 Identification for Public Stakeholders**

According to the Code of Practice 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 **E.2.1.1**. 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.

#### E.2.1.2 Consultation Activities and Implementation

In the preparation and review of the Provincial and Federal EAs, 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 and Praxis Data Management Program. The consultations focused on review of the Undertaking, EA Process, environmental and socio-economic baseline studies and development of the ToR. The objectives are 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 and review of the ToR and Draft EA. These FMG-led consultation activities are described below and include:

- Consultation purpose and objectives;
- Consultation tools and activities; and
- Notification requirements (for Provincial EA only, as Federal notices are the responsibility of the Agency).

The consultation on the EA will be organized based on the EA process including baseline, alternatives assessment, effects assessment, and mitigation and monitoring.

#### E.2.1.3 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 sessions that build an understanding of the Project so that any interested individuals or groups may meaningfully participate in the Project and EAs.

#### E.2.1.4 Methods of Reaching Out to the Public

FMG intends to reach out to the Public as follows:

- *Contact lists* – FMG has created a contact list of all interested stakeholders, which will be maintained throughout the duration of the Undertaking.
- *Issues Scoping Meetings* – FMG will continue to meet with all interested stakeholders throughout the development of the Undertaking.
- *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 Draft Documents (environmental baseline reports and EA/EIS)* – FMG will circulate copies of draft documents for review and comment. Efforts will be made to make the documents available on the Project website. Where possible, these documents will be provided all interested stakeholders prior to public release. FMG will work with all interested stakeholders to determine appropriate timelines. FMG will review and gather feedback on results of baseline studies, evaluation and election 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.
- *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 continue to 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
- FMG will use the methods mentioned above to notify and collect feedback from interested persons.

Throughout the consultation process, including the ToR stage, 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 all public stakeholders' issues, concerns and interests and identified relevant impacts are considered, addressed, or incorporated in the environmental assessment 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.

Input received through consultation and responses completed are given in **Table 9.7.2**. Inputs and comments given in **Table 9.7.2**, received through consultation at the ToR stage were used to refine the Consultation Plans for the EA process.

#### E.2.1.5 Consultation Tools and Techniques

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.

Consultation and engagement will continue for the life of the Springpole project and where necessary, beyond. The form of this consultation will include activities as detailed below in **Tables E.2.1.5** and **E.2.1.6**

**Table E.2.1.5 Description of Consultation and Engagement Activities**

Approximate Date	Consultation Activity	Description	Milestones
August 2018- On-going	One-on-One Meetings	Meetings held between the Company and Stakeholders from the community to discuss aspects of the Springpole project, permitting, baseline studies Development and mining operations.  All interactions will be recorded.	<ul style="list-style-type: none"> <li>• Commencement of the ToR               <ul style="list-style-type: none"> <li>○ Draft ToR</li> <li>○ ToR submission and acceptance</li> </ul> </li> <li>• Commencement of the EA</li> <li>• Consultation for the EA Report/EIS</li> </ul>
Aug 2018- On-going	Site Tours	Community tours to provide an understanding of the size and layout of the Project.	<ul style="list-style-type: none"> <li>○ baseline, effects assessment, mitigation, and monitoring</li> </ul>
August 2018- On-going	Community Updates Newsletters, Brochures, Discussion Papers.	“FMG press” newsletter which includes Project updates and FAQs. Flyers 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.	
August 2018- On-going	Advertisements/Articles	Articles mainly in the local paper for information on key issues, specific events and programs and to invite feedback.	
August 2018- On-going	Email Distribution List	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.	
2017- On-going	Questionnaires/Surveys	Outline or paper-based questionnaire requesting	<ul style="list-style-type: none"> <li>• Commencement of the ToR</li> </ul>

Approximate Date	Consultation Activity	Description	Milestones
		feedback on a specific issue or project.	<ul style="list-style-type: none"> <li>○ Draft ToR</li> <li>○ ToR submission and acceptance</li> </ul>
2017- On-going	Public Submissions	Written correspondence received from the community (usually addressed to government) following the announcement of a project or a release of information.	<ul style="list-style-type: none"> <li>● Commencement of the EA</li> <li>● Consultation for the EA Report/EIS</li> </ul>
2012- On-going	Community Communications	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.	<ul style="list-style-type: none"> <li>○ baseline, effects assessment, mitigation, and monitoring</li> </ul>
2018- On-going	Project Website	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. FMG to develop a Springpole webpage with contact information for FMG and government resource and potentially interactive platform. All interactions will be recorded.	
2017 – On-going	Open House/Information Session, Exhibitions, Display	An open house in for community members to drop in. Presence at community events such as career fairs & 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	

Approximate Date	Consultation Activity	Description	Milestones
		requested by the community.	
2018 – On-going	Community Consultation Group	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.	<ul style="list-style-type: none"> <li>• Commencement of the ToR               <ul style="list-style-type: none"> <li>○ Draft ToR</li> <li>○ ToR submission and acceptance</li> </ul> </li> <li>• Commencement of the EA</li> <li>• Consultation for the EA Report/EIS               <ul style="list-style-type: none"> <li>○ baseline, effects assessment, mitigation, and monitoring</li> </ul> </li> </ul>
2017 – On-going	Community Partnership or Sponsorship	<p>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.</p> <p>Participate in various community events such as Festivals (2019 Blueberry Festival – Sioux Lookout), Career Fairs, etc.</p>	
On-going	Complaints Management Mechanism	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	

Approximate Date	Consultation Activity	Description	Milestones
		communicated to the community.	
On-going	Manned Telephone Line and Email Address	A telephone 'hotline' and dedicated community email are useful tools for communities to ask for information, raise issues or make comments on the mine operations.	<ul style="list-style-type: none"> <li>• Commencement of the ToR <ul style="list-style-type: none"> <li>○ Draft ToR</li> <li>○ ToR submission and acceptance</li> </ul> </li> <li>• Commencement of the EA</li> <li>• Consultation for the EA Report/EIS <ul style="list-style-type: none"> <li>○ baseline, effects assessment, mitigation, and monitoring</li> </ul> </li> </ul>
Summer 2020 – On-going	Information Center	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.	
On-going	Municipal Council Meeting	Formal presentation by FMG to interested municipal councils. All interactions recorded.	
On-going	Municipal Public Meetings	Formal presentation/information session by FMG at public meetings in each interested municipality. All interactions recorded.	
On-going	Community Survey	Voluntary survey to elicit feedback from the public. All responses will be recorded.	
Summer 2020	Mail-in-Card	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	

Approximate Date	Consultation Activity	Description	Milestones
2018- On-going	Store Displays	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.	<ul style="list-style-type: none"> <li>• Commencement of the ToR               <ul style="list-style-type: none"> <li>○ Draft ToR</li> <li>○ ToR submission and acceptance</li> </ul> </li> <li>• Commencement of the EA</li> </ul>
On-going	Radio	FMG to utilize local radio to promote the project and to provide updates and information regarding upcoming public meetings, etc.	<ul style="list-style-type: none"> <li>• Consultation for the EA Report/EIS               <ul style="list-style-type: none"> <li>○ baseline, effects assessment, mitigation, and monitoring</li> </ul> </li> </ul>

**Table E.2.1.6 Summary of the Tools and Techniques Employed in Consultation and Engagement Activities**

Tools	Distributing Information	Seeking Information	Receiving Information	Incorporating Feedback
One-On-One Meetings	x	x	x	x
Site Tours	x	x	x	x
Community Updates, Newsletters, Brochures, Discussion Papers	x	x		x
Advertisements	x			x
Email Distribution List	x			x
Workshops and Focus Groups	x	x	x	x
Questionnaires/Surveys		x		x
Public Submissions		x	x	
Community Correspondence	x		x	x
Project Websites	x			x
Open House, Exhibitions, Displays	x	x	x	
Community Information Sessions	x			x
Community Consultation Forum	x	x	x	x
Community Partnerships or Sponsorship	x	x	x	
Complaints Management Mechanism		x	x	
Manned Telephone Line and Email Address	x	x	x	x
Group Presentation	x	x	x	x

Tools	Distributing Information	Seeking Information	Receiving Information	Incorporating Feedback
Community Event Participation	x	x	x	x
Community Survey	x	x	x	
Municipal Council Meeting	x	x	x	x
Municipal Public Meetings	x	x	x	x

### E.2.1.6 Community Consultation and Engagement Activity Timing

**Table E.2.1.7** outlines the consultation activity timing and **Table E.2.1.8** outlines the consultation tools and engagement milestones planned to support the preparation and review of the EA and stated consultation purpose and objectives for interested stakeholders.

**Table E.2.1.7 Consultation and Engagement Activity Timing**

Activity	Timing	Purpose	Distribution/Participants
Consultation and Engagement Meetings	Summer, 2019 to Fall, 2020	To consult and engage stakeholders about the Project Status and Progress on the EA(s)	Stakeholders
Newsletters (Quarterly)	Summer, 2019; Winter, 2019/2020; Spring, 2020; Summer, 2020	To update and inform stakeholders about the Project Status and Progress on the EA(s). Newsletters will highlight information about upcoming public meetings, and to encourage feedback through the Project website, dedicated e-mail address, or through direct contact with FMG staff.	Mailed to Project mailing list. Available on Project website and at meetings/open houses.
Plain Language Fact Sheet: Baseline Studies Summaries	Summer, 2019; Winter, 2019; Summer, 2020	To provide plain language information about the Project's environmental baseline studies	Mailed to Project mailing list.
Notices	Prior to community consultation events and for notice of commencement or submissions as required by regulation	To provide notice of public consultation events or as required to inform other interested parties about the EA process (e.g., Notice of Commencement of an EA)	Posted in local newspapers. Mailed to Project mailing list.

**Table E.2.1.8 Consultation Tools and Activities Planned to Support Preparation and Review of the EA for the Public and Agency Consultation Plan**

Approximate Date	Consultation and Engagement Milestones
<p>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); approach to the development and evaluation of 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:</p>	
<p>Winter 2019 - Spring 2020</p>	<p><b>Round 1 – General Information:</b>  <i>Objective: to update the communities on the ToR and EA timeline and the Project as well as receive feedback on the Public Consultation Plan.</i></p> <ul style="list-style-type: none"> <li>➤ Notice of Commencement of an Environmental Assessment</li> <li>➤ Notice of upcoming Open House and meeting dates</li> <li>➤ Newsletters to be distributed:               <ul style="list-style-type: none"> <li>a. Project Update Newsletter (ToR submission, environmental baseline)</li> <li>b. Project Update Newsletter (summary of past open house and comments/responses)</li> <li>c. Consultation Plan</li> </ul> </li> </ul> <p><b>Round 2 – Baseline studies:</b>  <i>Objective: to identify, consider, and respond to feedback on the development, evaluation, and results of baseline or other studies.</i></p> <ul style="list-style-type: none"> <li>➤ Open Houses (at each Municipality):               <ul style="list-style-type: none"> <li>d. Topics to be discussed: Valued Components, species (e.g., plants, animals, etc.) of importance to communities, specific criteria/indicators for evaluating baseline studies</li> <li>e. Documents to present: Proposed Valued Components, fish baseline study, baseline data so far</li> </ul> </li> </ul> <p><b>Round 3 – Selection and Evaluation of Alternatives:</b>  <i>Objective: to identify, consider, and respond to feedback on the alternatives and evaluation methods of the alternatives, the results of the selection of the preferred alternative and final selection of criteria indicators.</i></p> <ul style="list-style-type: none"> <li>➤ Open Houses (at each Municipality):               <ul style="list-style-type: none"> <li>f. Topics to be discussed: Project Components, criteria/indicators, Alternatives to the Undertaking</li> <li>g. Documents to present: Effects and Mitigation, Project</li> </ul> </li> </ul>

Approximate Date	Consultation and Engagement Milestones
	<p style="text-align: center;">Components, Alternatives to the Undertaking</p> <p><b>Round 4 – Effects Assessment:</b>  <i>Objective: to identify, consider, and respond to feedback on the effects assessment and evaluation of the preferred Undertaking.</i></p> <ul style="list-style-type: none"> <li>➤ Open Houses (at each Municipality): <ul style="list-style-type: none"> <li>h. Topics to be discussed: Project Components, criteria/indicators and Preliminary Preferred Alternatives</li> <li>i. Documents to present: Effects and Mitigation, Project Components and their potential effects on the environment, Draft EA</li> </ul> </li> </ul> <p><b>Round 5 – Mitigation Measures and Monitoring</b>  <i>Objective: to identify, consider, and respond to feedback on potential impacts, mitigation and monitoring measures.</i></p> <ul style="list-style-type: none"> <li>➤ Open Houses (at each Municipality): <ul style="list-style-type: none"> <li>j. Topics to be discussed: Project Components, criteria/indicators and Preliminary Preferred Alternatives</li> <li>k. Documents to present: Effects and Mitigation, Project Components and their Potential effect to the environment, Alternatives to the Undertaking</li> </ul> </li> </ul>
Summer 2020	<ul style="list-style-type: none"> <li>• Notice of Draft EA Review Period</li> <li>• Newsletters to be distributed: <ul style="list-style-type: none"> <li>l. Project update, summary of meetings, and presentation (comments/responses)</li> </ul> </li> <li>• Ongoing public stakeholder meetings</li> <li>• Notice of Submission of EA to MECP.</li> </ul>
Following submission of EA	<ul style="list-style-type: none"> <li>➤ Confirmation of EA submission to interested stakeholders and description of anticipated decision timelines</li> <li>➤ Ongoing stakeholder meetings, if required</li> </ul>

## **E.2.2 PLAN NOTICES, ISSUE TRACKING AND EVALUATION**

### **E.2.2.1 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;
- 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.

***Circulation of Draft Documents:*** FMG will circulate draft documents to all interested stakeholders who have been identified by MECP for review and comment. This is collectively is termed as "Information Sharing Opportunities". Through the Information Sharing Opportunities, FMG will gather concerns and interests and potentially relevant impacts raised by any interested stakeholders to develop appropriate measures.

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 development of the Final Terms of Reference and the environmental assessment process.

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.

### E.2.2.2 Issues Tracking and Resolution

FMG is maintaining an electronic record (Praxis database) 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 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, 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 (written or verbal) 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 dispute. 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.

### E.2.2.3 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; and
- Recording verbal feedback provided from participants and through the Project website.

Evaluation criteria will be developed prior to consultation events and may be results-based and/or process-based and will be developed using best practices. Results-based criteria measure whether a defined objective or goal has been met or not. Process-based criteria measure how the consultation process was implemented. The types of evaluation criteria used will differ depending on the consultation activity. The evaluations will be undertaken in a phased approach prior to completing consultations related to baseline studies, effects assessment, and mitigation measures.

### **E.2.3 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

## Appendix E.3

### Proposed Government Consultation Plan

### **E.3.1 GOVERNMENT CONSULTATION PLAN FOR THE EA**

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 life of the Project. 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:

- Proposed consultation methods;
- How input will be obtained;
- Key decision-making milestones and feedback process; 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.

#### **E.3.1.1 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)
- 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 **E.3.1.1** and listed 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.

### E.3.1.2 Consultation Activities and Implementation

In the preparation and review of the Provincial and Federal EAs, government agencies will be asked to participate throughout the preparation of the EA.

FMG has been consulting government agencies on the Undertaking and in 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 and Praxis Data Management Program. The consultations focused on review of the Undertaking, EA Process, environmental and socio-economic baseline studies and development of the ToR. The objectives are 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 and review of the ToR and Draft EA. These FMG-led consultation activities are described below and include:

- Consultation purpose and objectives;
- Consultation tools and activities; and
- Notification requirements (for Provincial EA only, as Federal notices are the responsibility of the Agency).

The consultation on the EA will be organized based on the EA process including baseline, effects assessment, and mitigation and monitoring.

### E.3.1.3 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 Draft Documents (environmental baseline reports and EA/EIS)* – FMG will circulate copies of draft documents for review and comment. Where possible, these documents will be provided government departments and agencies prior to public release. FMG will work with government agencies to determine appropriate timelines. FMG will review and gather feedback on results of baseline studies, evaluation and election of alternatives, potential effects and mitigation measures and closure planning.

- *General Meetings/Presentation* – 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

FMG will use the methods mentioned above to notify and collect feedback from interested parties.

Throughout the consultation process, including the ToR stage, 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 all governments stakeholders how its issues, concerns and interests and identified relevant impacts are considered, addressed, or incorporated in the environmental assessment 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.

Input received through consultation and responses completed are given in **Table 9.6.3**. Inputs and comments given in **Table 9.6.3**, received through consultation at the ToR stage were used to refine the Consultation Plans for the EA process.

#### E.3.1.4 Consultation Tools and Techniques

The form of this consultation will include activities as detailed below in **Tables E.3.1.4** and **E.3.1.5**.

**Table E.3.1.4 Description of Consultation and Engagement Activities**

Approximate Date	Consultation Activity	Description	Milestones
August 2018-On-going	One-on-One Meetings	Meetings held between the Company and Government departments agencies to discuss aspects of the Project, permitting,	<ul style="list-style-type: none"> <li>• Commencement of the ToR               <ul style="list-style-type: none"> <li>○ Draft ToR</li> </ul> </li> </ul>

		baseline studies development and mining operations. All interactions will be recorded.	<ul style="list-style-type: none"> <li>○ ToR submission and acceptance</li> <li>• Commencement of the EA</li> <li>• Consultation for the EA Report/EIS <ul style="list-style-type: none"> <li>○ baseline, effects assessment, mitigation, and monitoring</li> </ul> </li> </ul>
August 2018- On-going	Site Tours	Site tours to provide an understanding of the size and layout of the Project.	
2018 - On-going	Project Website	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. FMG to develop a Springpole webpage with contact information for FMG and government resource and potentially interactive platform. All interactions will be recorded.	
On-going	Municipal Council Meeting	Formal presentation by FMG to interested municipal councils. All interactions recorded.	

**Table E.3.1.5 Summary of the Tools and Techniques Employed in Consultation and Engagement Activities**

Tools	Distributing Information	Seeking Information	Receiving Information	Incorporating Feedback
One-On-One Meetings	x	x	x	x
Site Tours	x	x	x	x
Project Websites	x			x
Municipal Council Meeting	x	x	x	x

### E.3.1.5 Government Consultation and Engagement Activity Timing

**Table E.3.1.6** outlines the consultation activity timing and **Table E.3.1.7** outlines the consultation tools and engagement milestones planned to support the preparation and review of the EA.

**Table E.3.1.6 Consultation and Engagement Activity Timing**

Activity	Timing	Purpose	Distribution/Participants
Government Agency Meetings	Summer, 2019 and on-going as needed	To plan and coordinate consultation activities related to Draft EA	Government Review Team (provincial)

Government Agency Meetings	Summer and Fall of 2019 and on-going as needed	To plan and coordinate consultation activities related to the Draft EA	Government Review Team (provincial and federal agencies)
Consultation and Engagement Meetings	Summer, 2019 to Fall, 2020	To consult and engage government agencies about the Project Status and Progress on the EA(s)	Government Agencies

**Table E.3.1.7 Consultation Tools and Activities Planned to Support Preparation and Review of the EA for the Government Consultation Plan**

Approximate Date	Consultation and Engagement Milestones
<p>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); approach to the development and evaluation of 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:</p>	
Winter 2019 - Spring 2020	<ul style="list-style-type: none"> <li>➤ <b>Government Review Team Working Group Meetings</b> (may include but not be limited to; atmospheric, terrestrial, water and fish/fish habitat). The following is a general outline only, it is expected that once working groups are established the priorities of each working group will need to be modified appropriately: <ul style="list-style-type: none"> <li>a. Meeting #1: Project introduction/update, current data collection and methods, potential for supplemental data collection, lessons learnt from past projects</li> <li>b. Meeting #2: Review of baseline reports and next steps</li> <li>c. Meeting #3 Confirm evaluation method, alternatives discussion, VC's/criteria/indicators</li> <li>d. Meeting #4: Alternatives evaluations, effects, mitigations</li> </ul> </li> </ul>
Summer 2020	<ul style="list-style-type: none"> <li>➤ Notice of Draft EA Review Period</li> <li>➤ Newsletters to be distributed: <ul style="list-style-type: none"> <li>e. Project update, summary of meetings, and presentation (comments/responses)</li> </ul> </li> <li>➤ Ongoing Government Review Team Working Group Meetings</li> <li>➤ Ongoing meetings with MECP and CEAA as required to coordinate federal and provincial EA decisions to the extent practical</li> <li>➤ Notice of Submission of EA to MECP</li> </ul>
Following submission of EA	<ul style="list-style-type: none"> <li>➤ Confirmation of EA submission to Indigenous communities and description of anticipated decision timelines</li> <li>➤ Ongoing Government Review Team Working Group Meetings, if required</li> </ul>

## **E.3.2 PLAN NOTICES, ISSUE TRACKING AND EVALUATION**

### E.3.2.1 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;
- Notices of Submission of the EA

Additional notifications include:

- Notice of Completion of Ministry review of EA; and
- Notice of Minister's Decision.
- Notice of Consultation Events

***Circulation of Draft Documents:*** FMG will circulate draft documents to the Agency and the MECP for review and comment. FMG distribute the draft documents to the GRT as appropriate.

### E.3.2.2 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.

**Appendix F**  
**Multi Stakeholder Matrix**

**Table F.1 Multi Stakeholder Matrix**

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Name	Title	Affiliation/Community	Email Address	Mailing Address	Phone Number
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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
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
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

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
Delford Mitchell	Lands	Slate Falls First 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			
INDIGENOUS OWNED BUSINESSES					
Name	Title	Affiliation/Community	Email Address	Mailing Address	Phone Number
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:bamajiir@hotmail.com">bamajiir@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>		

Laura Kakeeway	Group III Stakeholder Map/Slide 13		<a href="mailto:lkakeeway@gmail.com">lkakeeway@gmail.com</a>		
<b>GROUP II - MUNICIPAL GOVERNMENTS</b>					
<b>MUNICIPALITY OF EAR FALLS</b>					
NAME	TITLE	EMAIL	POSTAL	TEL. #	CELL #
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>					
NAME	TITLE	EMAIL	POSTAL	TEL. #	CELL #
Doug Lawrance	Mayor	For emails, see "contact" tab on website	25 Fifth Avenue PO Box 158	807-737-270-0	
All councilors		Idem See slide 16/Stakeholder Map	Sioux Lookout, ON P8T 1A4		
<b>MUNICIPALITY OF RED LAKE</b>					

NAME	TITLE	EMAIL	POSTAL	TEL. #	CELL #
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 Balmetown, 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>			
MUNICIPALITY OF DRYDEN					
NAME	TITLE	EMAIL	POSTAL	TEL. #	CELL #
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

MNRF					
NAME	TITLE	EMAIL	POSTAL	TEL. #	CELL # (F = FAX #)
Danielle Tarrant	Land Use Planning Supervisor (A)	<a href="mailto:Danielle.Tarrant@ontario.ca">Danielle.Tarrant@ontario.ca</a>	Suite 221A, 435 James Street South, Thunder Bay, ON P7E 6E3	807-475-1364	F: 807-473-3023
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		

MOECP					
NAME	TITLE	EMAIL	POSTAL	TEL. #	CELL # (F = FAX #)
Agni Papageorgiou	Special Project Officer	<a href="mailto:Agni.papageorgiou@ontario.ca">Agni.papageorgiou@ontario.ca</a>		416-314-8214	
Andrew Evers		<a href="mailto:Andrew.evers@ontario.ca">Andrew.evers@ontario.ca</a>			416-314-7213

MIN. TOURISM, CULTURE & SPORTS					
NAME	TITLE	EMAIL	POSTAL	TEL. #	CELL # (F = FAX #)
Karla Barboza	Team Lead (A) Heritage Program Unit, Programs & Services Branch	<a href="mailto:karla.barboza@ontario.ca">karla.barboza@ontario.ca</a>	401 Bay Street, Suite 1700, Toronto, ON M7A 0A7	416-314-7120	
Patrick Morash	Manager	<a href="mailto:Patrick.morash@ontario.ca">Patrick.morash@ontario.ca</a>	North Region, 433 James Street South, Suite 334, Thunder Bay, ON P7E 6S7	807-475-1635	F: 807-475-1297

James (Jim) Antler	Policy Advisor, Northern Policy and Research Branch and Ministry of Tourism, Culture and Sport	<a href="mailto:james.antler@ontario.ca">james.antler@ontario.ca</a>	447 McKeown Avenue, Suite 203, North Bay, ON P1B 9S9	705-494-4159	f: 705-494-4086
<b>CONSERVATION ONTARIO</b>					
<b>NAME</b>	<b>TITLE</b>	<b>EMAIL</b>	<b>POSTAL</b>	<b>TEL. #</b>	<b>CELL # (F = FAX #)</b>
Leslie Rich		<a href="mailto:lrich@conservationontario.ca">lrich@conservationontario.ca</a>		905-895-0716, 226	
<b>ONTARIO POWER GENERATION</b>					
<b>NAME</b>	<b>TITLE</b>	<b>EMAIL</b>	<b>POSTAL</b>	<b>TEL. #</b>	<b>CELL # (F = FAX #)</b>
Tammy Wong	Senior Environment Specialist, Corporate Programs	<a href="mailto:tammy.wong@opg.com">tammy.wong@opg.com</a>	700 University Avenue, Toronto, ON M5G 1X6	416-592-4548	
<b>MNDM</b>					
<b>NAME</b>	<b>TITLE</b>	<b>EMAIL</b>	<b>POSTAL</b>	<b>TEL. #</b>	<b>CELL # (F = FAX #)</b>
Tracey Dawson-Kinonen	Manager Strategic Support Unit	<a href="mailto:tracey.dawson-kinonen@ontario.ca">tracey.dawson-kinonen@ontario.ca</a>	Willet Green Miller Centre, 2nd Floor, 933 Ramsey Lake Rd., Sudbury, ON P3E 6B5	705-670-5806	F: 705-670-5803

Stephanie Rocca,	Regional Initiatives Coordinator, Strategic Support Unit	<a href="mailto:Stephanie.Rocca@ontario.ca">Stephanie.Rocca@ontario.ca</a>	Willet Green Miller Centre, 2nd floor, 933 Ramsey Lake Rd, Sudbury, ON P3E 6B5	705-670-5734	F: 705-670-5803
Jennifer Paetz,	Initiatives Coordinator, Strategic Support Unit	<a href="mailto:Jennifer.paetz@ontario.ca">Jennifer.paetz@ontario.ca</a>	Willet Green Miller Centre, 2nd floor, 933 Ramsey Lake Rd, Sudbury, ON P3E 6B5	705-670-5918	F: 705-670-5803
<b>ONTARIO ENERGENCY BOARD (OEB)</b>					
<b>NAME</b>	<b>TITLE</b>	<b>EMAIL</b>	<b>POSTAL</b>	<b>TEL. #</b>	<b>CELL # (F = FAX #)</b>
			200 Yonge Street, Toronto, ON M4P 1E4	416-314-2455	
<b>HYDRO ONE</b>					
<b>NAME</b>	<b>TITLE</b>	<b>EMAIL</b>	<b>POSTAL</b>	<b>TEL. #</b>	<b>CELL # (F = FAX #)</b>
		<a href="mailto:secondarylanduse@hydroone.com">secondarylanduse@hydroone.com</a>			
<b>MINISTRY TRANSPORTATION</b>					
<b>NAME</b>	<b>TITLE</b>	<b>EMAIL</b>	<b>POSTAL</b>	<b>TEL. #</b>	<b>CELL # (F = FAX #)</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
		-			

OFFICE OF THE FIRE MARSHALL					
NAME	TITLE	EMAIL	POSTAL	TEL. #	CELL # (F = FAX #)
		<a href="http://www.mah.gov.on.ca/page1591.aspx">www.mah.gov.on.ca/page1591.aspx</a>			
Walter Scarrow	Fire Chief	<a href="mailto:firechief@redlake.ca">firechief@redlake.ca</a>	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
MINISTRY OF ENERGY					
NAME	TITLE	EMAIL	POSTAL	TEL. #	CELL # (F = FAX #)
Mr. Andrea Pastori	Cabinet Liaison & Strategic Policy Branch Coordinator	<a href="mailto:andrea.pastori@ontario.ca">andrea.pastori@ontario.ca</a>	77 Grenville St., Toronto, ON M7A 1B3	416-327-7276	
		-			
Public Health Units					
NAME	TITLE	EMAIL	POSTAL	TEL. #	CELL # (F = FAX #)
			9TH Floor, 160 Bloor St. E., Toronto, ON M7A 2E6		
MINISTRY OF MUNICIPAL AFFAIRS					
NAME	TITLE	EMAIL	POSTAL	TEL. #	CELL # (F = FAX #)
Shawn Parry	Manager Planning Innovation Section	<a href="mailto:shawn.parry@ontario.ca">shawn.parry@ontario.ca</a>	777 Bay Street, 13th Floor, Toronto, ON M5G 2E5	416-585-6285	F: 416-585-6870
Victoria Kosny	Manager Community Planning &	<a href="mailto:victoria.kosny@ontario.ca">victoria.kosny@ontario.ca</a>	435 James Street, South, Suite 223, Thunder Bay, ON P7E 6S7	807-473-3025	F: 807-475-1196

	Development, Northern Municipal Services Office - Thunder Bay				
<b>INFRASTRUCTURE ONTARIO</b>					
<b>NAME</b>	<b>TITLE</b>	<b>EMAIL</b>	<b>POSTAL</b>	<b>TEL. #</b>	<b>CELL # (F = FAX #)</b>
Lisa Myslicki	Environmental Specialist, Realty Portfolio Planning, Environmental Services	<a href="mailto:lisa.myslicki@infrastructureontario.ca">lisa.myslicki@infrastructureontario.ca</a>	1 Dundas Street West, Suite 2000, Toronto, ON M5G 1Z3	416-557-3116	F: 416-327-3937
<b>MINISTER OF ECONOMIC DEVELOPMENT &amp; GROWTH</b>					
<b>NAME</b>	<b>TITLE</b>	<b>EMAIL</b>	<b>POSTAL</b>	<b>TEL. #</b>	<b>CELL # (F = FAX #)</b>
Micheal Falconi	Manager (A), Cabinet Office Liaison Unit Policy Coordination Branch	<a href="mailto:michael.falconi@ontario.ca">michael.falconi@ontario.ca</a>	900 Bay St., 7th Floor, Hearst Block, Toronto, ON M7A 2E1	416-325-8546	F: 416-325-6534
Michael Helfinger	Senior Policy Advisor, Cabinet Office Liaison Unit, Policy Coordination Branch	<a href="mailto:michael.helfinger@ontario.ca">michael.helfinger@ontario.ca</a>	901 Bay St., 7th Floor, Hearst Block, Toronto, ON M7A 2E1	416-325-6519	F: 416-325-6534

<b>MINISTER OF HEALTH &amp; LONG-TERM CARE</b>					
<b>NAME</b>	<b>TITLE</b>	<b>EMAIL</b>	<b>POSTAL</b>	<b>TEL. #</b>	<b>CELL # (F = FAX #)</b>
<b>NORHTWESTERN HEALTH UNIT</b>					
<b>NAME</b>	<b>TITLE</b>	<b>EMAIL</b>	<b>POSTAL</b>	<b>TEL. #</b>	<b>CELL # (F = FAX #)</b>
Dr. Kit Young-Hoon	Medical Officer of Health	<a href="http://www.nwhu.on.ca">www.nwhu.on.ca</a>	210 First Street North, Kenora, ON P9N 2K4	807-468-3147	F: 807-468-4970
Paul Ryan	Board of Health Chair	-			
<b>MINISTRY OF COMMUNITY SAFETY AND CORRECTIONAL SERVICES</b>					
<b>NAME</b>	<b>TITLE</b>	<b>EMAIL</b>	<b>POSTAL</b>	<b>TEL. #</b>	<b>CELL # (F = FAX #)</b>
Mr. Robert Greene	Director	<a href="mailto:robert.greene@ontario.ca">robert.greene@ontario.ca</a>	George Drew Building, 13th Floor, 25 Grosvenor Street, Toronto, ON M7A 1Y6	416-314-6683	F: 416-327-1470
		-			
<b>ONTARIO PROVINCIAL POLICE</b>					
<b>NAME</b>	<b>TITLE</b>	<b>EMAIL</b>	<b>POSTAL</b>	<b>TEL. #</b>	<b>CELL # (F = FAX #)</b>

Ms Meaghan Klassen	Administrator, Research and Program Evaluation Unit for Manager, Research and Program Evaluation Unit Business Management Bureau	<a href="mailto:meaghan.klassen@opp.ca">meaghan.klassen@opp.ca</a>	777 Memorial Avenue, 1st Floor, Orillia, ON L3V 7V3	705-329-6256	
Ms Joy Fishpool	Manager, OPP Facilities Section	<a href="mailto:joy.fishpool@opp.ca">joy.fishpool@opp.ca</a>	777 Memorial Avenue, 1st Floor, Orillia, ON L3V 7V3	705-329-6808	
<b>FEDERAL</b>					
NAME	TITLE	EMAIL	POSTAL	TEL. #	CELL # (F = FAX #)
<b>CEAA</b>					
NAME	TITLE	EMAIL	POSTAL	TEL. #	CELL # (F = FAX #)
Amy Sen	Project Manager	<a href="mailto:amy.sen@ceaa-acee.gc.ca">amy.sen@ceaa-acee.gc.ca</a>		416-505-1897	
Ramin Sadat		<a href="mailto:ramin.sadat@ceaa-acee.gc.ca">ramin.sadat@ceaa-acee.gc.ca</a>		647-632-2815	
Anjala Puvananathan	Director, Ontario Regional Office	<a href="mailto:anjala.puvananathan@ceaa-acee.gc.ca">anjala.puvananathan@ceaa-acee.gc.ca</a>	55 York Street, Suite 600 Toronto, ON M5J 1R7	416-952-1575	

<b>FISHERIES &amp; OCEANS CANADA</b>					
<b>NAME</b>	<b>TITLE</b>	<b>EMAIL</b>	<b>POSTAL</b>	<b>TEL. #</b>	<b>CELL # (F = FAX #)</b>
Fisheries Protection Program, Fisheries and Oceans Canada		<a href="mailto:fisheriesprotection@dfp-mpo-gc.ca">fisheriesprotection@dfp-mpo-gc.ca</a>	867 Lakeshore Road, Burlington, ON L7S 1A1	1-855-852-8320	
<b>TRANSPORT CANADA</b>					
<b>NAME</b>	<b>TITLE</b>	<b>EMAIL</b>	<b>POSTAL</b>	<b>TEL. #</b>	<b>CELL # (F = FAX #)</b>
		EnviroOnt@tc.gc.ca			
<i>Send the TOR to this email, and ask if they are interested</i>		<a href="mailto:enviroOnt@tc.gc.ca">enviroOnt@tc.gc.ca</a> – Contact to see if they have any interest in the EA.			
<b>INDIGENOUS &amp; NORTHERN AFFAIRS</b>					
<b>NAME</b>	<b>TITLE</b>	<b>EMAIL</b>	<b>POSTAL</b>	<b>TEL. #</b>	<b>CELL # (F = FAX #)</b>
	EA Coordinator	EACoordination_ON@aandc-aadnc.gc.ca			
Jane Philpott	Indigenous Services	jane.philpott@parl.gc.ca		613-992-3640	
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/indigeno">https://www.Canada.ca/en/indigeno</a>			

		us-services-Canada.html			
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.aad@canada.ca">aadnc.infopubs.aad@canada.ca</a>	10 rue Wellington, Gatineau, QC K1A 0H4	1-800-567-9604	F: 1-866-817-3977
		-			
<b>ENVIRONMENT &amp; CLIMATE CHANGE CANADA</b>					
NAME	TITLE	EMAIL	POSTAL	TEL. #	CELL # (F = FAX #)
Rob Dobos Manager	Manager Environmental Assessment Section	<a href="mailto:rob.dobos@canada.ca">rob.dobos@canada.ca</a>	87 Lakeshore Rd.  Burlington, ON L7S 1A1	905-336-4953	
<b>NATURAL RESOURCES CANADA</b>					
NAME	TITLE	EMAIL	POSTAL	TEL. #	CELL # (F = FAX #)
Amarjeet Sohi		<a href="mailto:amarjeet.sohi@parl.gc.ca">amarjeet.sohi@parl.gc.ca</a>		613-992-1013	
<b>GROUP VI - COMMUNITY, ASSOCIATIONS &amp; CIVIL SOCIETY</b>					
<b>BUSINESS OWNERS</b>					
<b>KaBeelo Lodge Inc &amp; KaBeelo Airways (they sent the letter to CEAA)</b>					
NAME	TITLE	EMAIL	POSTAL	TEL. #	CELL #
Ann/Allysson/Eric/Harald Lohn	Owner/Operators	<a href="mailto:infor@kabeelo.com">infor@kabeelo.com</a>	PO Box 670, Ear Falls, ON POV 1T0	807222-3246	
		-			

NORTH CARIBOO AIR***					
NAME	TITLE	EMAIL	POSTAL	TEL. #	CELL #
John Green	VP				
TRUE NORTH OUTPOSTS & CAMPS					
NAME	TITLE	EMAIL	POSTAL	TEL. #	CELL #
		<a href="mailto:fish@tno.on.ca">fish@tno.on.ca</a>		807-482-2362	
HIDDEN BAY LODGE***					
NAME	TITLE	EMAIL	POSTAL	TEL. #	CELL #
Sioux Lookout		<a href="mailto:hiddenbaylodge@gmail.com">hiddenbaylodge@gmail.com</a>			
		-			
WHITWING FLOATING LODGES					
NAME	TITLE	EMAIL	POSTAL	TEL. #	CELL #
Ear Falls		<a href="mailto:daveandbobbie@whitwingresort.com">daveandbobbie@whitwingresort.com</a>			
		-			
RED PINE LODGE & OUTPOSTS					
NAME	TITLE	EMAIL	POSTAL	TEL. #	CELL #
Sioux Lookout		<a href="mailto:john@fishredpine.com">john@fishredpine.com</a>		807-738-2594	
		-			
LATREILLE LAKE LODGE					
NAME	TITLE	EMAIL	POSTAL	TEL. #	CELL #
		<a href="mailto:info@latrellelakelodge.com">info@latrellelakelodge.com</a>	PO Box 874, Red Lake, ON POV 2M0	317-544-2250	

Millard Johnson***					
NAME	TITLE	EMAIL	POSTAL	TEL. #	CELL #
	Private land owner	-			
TROUT FOREST TOURIST OUTFITTER					
NAME	TITLE	EMAIL	POSTAL	TEL. #	CELL #
Bill & Laura Deschaps		<a href="mailto:info@troutriverlodge.ca">info@troutriverlodge.ca</a>		807-222-3265	
Birch Lake Lodge - Red Lake				807-727-2158	
FORT FRANCES NORTHERN WILDERNESS OUTFITTERS					
NAME	TITLE	EMAIL	POSTAL	TEL. #	CELL #
		<a href="mailto:fishcanada@nwonet.net">fishcanada@nwonet.net</a>		218-341-6309	
PICKEREL ARM CAMP					
NAME	TITLE	EMAIL	POSTAL	TEL. #	CELL #
		<a href="mailto:lee@pickerelam.com">lee@pickerelam.com</a>		807-737-4058	
GREEN AIRWAYS					
NAME	TITLE	EMAIL	POSTAL	TEL. #	CELL #
		<a href="mailto:info@jackgreenflyincamps.com">info@jackgreenflyincamps.com</a>			
KAY AIR SERVICE					
NAME	TITLE	EMAIL	POSTAL	TEL. #	CELL #
		<a href="mailto:kayair@toaytel.net">kayair@toaytel.net</a>		807-222-2434	

REMOTE TOURISM LAKES ***					
NAME	TITLE	EMAIL	POSTAL	TEL. #	CELL #
		<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					
BIRCH LAKE LODGE					
NAME	TITLE	EMAIL	POSTAL	TEL. #	CELL #
Edith & Barry Labine		<a href="mailto:info@birchlakelodge.com">info@birchlakelodge.com</a>		807-727-2384	
BEST BAIT (Ear Falls) ***					
NAME	TITLE	EMAIL	POSTAL	TEL. #	CELL #
D&E MINNOWS (Ear Falls) ***					
NAME	TITLE	EMAIL	POSTAL	TEL. #	CELL #
DOMTAR (Hold the Sustainable Forest License (SFI) for the Trout Lake Forest. Wenasaga Road is connected to the property. Harvesting standing timber ***		-			

<b>ASSOCIATIONS</b>					
<b>INDEPENDENT FIRST NATIONS ALLIANCE</b>					
<b>NAME</b>	<b>TITLE</b>	<b>EMAIL</b>	<b>POSTAL</b>	<b>TEL. #</b>	<b>CELL #</b>
		-	PO Box 5010, 98 King St, Sioux Lookout, ON P8T 1K6		
Matthew Hoppe	CEO	<a href="mailto:mhoppe@ifna.ca">mhoppe@ifna.ca</a>		807-737-1902	
Gail Binguis	Acting CEO	<a href="mailto:gbinguis@ifna.ca">gbinguis@ifna.ca</a>		807-737-1902, 100	
Donna Wesley	CFO	<a href="mailto:dwesley@ifna.ca">dwesley@ifna.ca</a>		807-737-1902, 102	
		-			
<b>EAR FALLS HUNTERS &amp; ANGLERS</b>					
<b>NAME</b>	<b>TITLE</b>	<b>EMAIL</b>	<b>POSTAL</b>	<b>TEL. #</b>	<b>CELL #</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>					
<b>NAME</b>	<b>TITLE</b>	<b>EMAIL</b>	<b>POSTAL</b>	<b>TEL. #</b>	<b>CELL #</b>
Chukuni Communities Devpt Corp.			137 Howey Street, PO Box 250, Red Lake, ON P0V 2M0	807-727-3275	
<b>EAR FALLS TRAPPERS COUNCIL/NORTHWESTER FUR TRAPPERS ASSOCIATION</b>					
<b>NAME</b>	<b>TITLE</b>	<b>EMAIL</b>	<b>POSTAL</b>	<b>TEL. #</b>	<b>CELL #</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>					

NAME	TITLE	EMAIL	POSTAL	TEL. #	CELL #
		-			
<b>ONTARIO PROSPECTORS ASSOCIATION</b>					
NAME	TITLE	EMAIL	POSTAL	TEL. #	CELL #
Garry Clark		<a href="mailto:gjclark@ontariopropectors.com">gjclark@ontariopropectors.com</a>	1000 Alloy Drive, Thunder Bay, ON P7B 6A5	807-622-3284	
		-			
<b>RED LAKE TRAPPERS ASSOCIATION</b>					
NAME	TITLE	EMAIL	POSTAL	TEL. #	CELL #
		-			
<b>BOREAL PROSPECTORS ASSOCIATION</b>					
NAME	TITLE	EMAIL	POSTAL	TEL. #	CELL #
		<a href="mailto:borealprospectors@hotmail.com">borealprospectors@hotmail.com</a>		866-259-3727	

## **Appendix G**

### **List of Previous Baseline Studies**

The list below contains the preliminary baseline studies which have been used to inform the description of the environment provided within this Draft ToR:

- Springpole Project Hydrogeology Baseline Reports:
  - Pinchin (2014). Factual Soil & Groundwater Testing Report, Pinchin, 10th Jan 2014
  - Zabev B. (2004). Technical Report on the Springpole Lake Property, Red Lake Mining Division, NW Ontario for Gold Canyon Resources Inc.
  - 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.
  - 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.
- Springpole Project Hydrology and Water Quality Baseline Reports:
  - 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.
  - Chem-Dynamics (2018). Report on Springpole Tailings Kinetic Humidity Cell Test Results, January 20, 2018.
  - North Rock Environmental (2017). Groundwater Monitoring Program, Springpole Project, January 2017.
  - North Rock Environmental (2018). Groundwater Monitoring Program, Springpole Project, 2018.
  - KBM (2017). Springpole Gold Project, Potential Aggregate Sources, October 31, 2019.
- 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. (2013A). 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.
  - DST Consulting Engineers Inc. (2013A). Biological Constraints Report for Springpole Gold Access Corridor Project Alternatives Assessment. Prepared for Gold Canyon Resources Inc.
- Springpole Project Aquatic Baseline Reports:
  - DST Consulting Engineers Inc. (2013). Aquatic Baseline Report for the Springpole Gold Project. March 2013
  - 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.
  - 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 SAR Baseline Reports:
  - DST Consulting Engineers Inc. (2013A). 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.
- Socio-Economic Baseline Reports:
  - Dennis A. Forbes & Associates and DST (2012). Socio-Economic Baseline Report by DST Consulting Engineers, May 2012
- Archaeology Baseline Reports:
  - Norris (P307-0019-2011) Stage 1 Report.
    - Report prepared but not entered MTCS Database. Work was transferred to another Archaeologist who failed to complete work.

- Slattery (No MTCS File Number) Stage 1 Report.
  - MTCS advise that Stage 1 Report had been issued but not accepted. Extensive modifications required to document; licensee did not renew license.
- Elder (P335-015-2012) Stage 2 Report.
  - Report submitted and accepted by the MTCS. The report has recommendations for additional work which are outstanding.
- Elder (P335-016-2012) Stage 2 Report.
  - Additional work to 10 sites identified within the Study Area. This work represents an ongoing and existing obligation.

**RECORD OF CONSULTATION – Submitted under separate cover**