

RE: **Missanabie Cree First Nation COMMENTS to the Impact Assessment Agency of Canada**  
**Supplemental Impact Assessment Report - Magino Gold Project**

### **COMMENT #1**

MCFN Cumulative Effects Concerns for ECA Air/Noise sent to MECP – Shareen Han \_ Senior Program Support Coordinator, Permissions and Program Services Unit, October 19, 2022.

Shareen Han – MECP response received November 8, 2022.

MECP response – Each mine is reviewed individually, and states that neither proponent meets the requirements under the cumulative effects policy for air emissions on an individual basis. Each operation may be able to comply with Ontario’s air emissions standards (O.Reg. 419/05) on an individual application, but the policy that regulates cumulative effects cannot be pre-determined in an individual application framework. Cumulative effect considerations should require the Ministry to evaluate the assembled information from both proponents prior determining whether the proponent meets the governing requirements.

The MECP response concludes that an assessment for potential cumulative impacts will be considered once Alamos application review has commenced. Alamos originally used EDSM models to demonstrate emission concentrations during Environmental Community Meetings, to which MCFN recognized that the concentrations were likely to increase with the addition of Argonaut Gold’s operations included. Since incorporating both mines’ data, provided by WSP, the concentration density within the model has increased substantially. First Nations are granted access to information before the Ministry that allows the First Nations to foreshadow the potential impacts before the Ministries receive the applications. Note: These EDSM models do not yet include the emissions that are to be expected with Alamos Gold’s proposed LNG/CNG Power Plant. MCFN does not understand why the Ministry can pre-determine whether the proponent meets the requirements under the cumulative effects policy for air emissions prior to the application review process.

Transboundary Effects for Air and Noise were considered to not impact anyone, as the Project is considered remote without any nearby residence. MCFN would like to recognize that we have members that live permanently nearby, and their consideration has not been made apparent throughout the assessment process. These MCFN members are 2<sup>nd</sup> generation trapline operators that live off the land east of the Magino Mine Property, making them potentially susceptible to air quality impacts according to prevailing westward winds in the area.

Transboundary Effects described within the assessment are said to have no permanent receptors. There exists the home of MCFN members, as well as the site of extreme cultural significance – Manitou Mountain, both of which can potentially receive Air/Noise disturbances from prevailing westward wind patterns.

## **COMMENT #2**

The Assessment Agency of Canada recommends that the proponent develop and implement a GHG Management Plan and re-evaluate low-carbon alternatives to the LNG power plant every three years from the commencement of operations. MCFN would like to not only have access to the GHG Management Plan but requires evidence that Argonaut Gold- Magino Mine is making progress to find an alternative power source.

At the time of Magino Mine Consultation for the LNG Power Plant, the Electrical Grid Options were still in the planning stages but have since commenced and are nearing completion. With electrical options becoming more available, MCFN believes that Prodigy Gold Inc. can further pursue Electrical Grid Options. Although current power availability remains inadequate for the required demand, recent discussions with Algoma Power, Regional Electrical Distribution Provider have revealed that the authority to manage increased power availability to both Mines rest with the Independent Electrical System Operator of Ontario (IESO).

MCFN is currently performing a Hollingsworth Study with support from the IESO authority to determine the necessary steps in achieving greater electrical supply that can meet the demand of our communities on-going community development, which will serve to supply an Evacuation Center (MW), and industrial park (proposed MW), and additional homes. The MCFN community is seeking greater than 5 Mega Watts of power supply for community developments which should prompt the Assessment Agency of Canada to suggest that increased investment and effort on behalf of Prodigy Gold Inc. is required.

The Ontario Critical Minerals Strategy is supported by “Bill 71 – The Building More Mines Act”, which consists of changes to both regulations and legislation to expedite necessary resources required for Environmental Protection Efforts. The Province of Ontario has positioned itself to become the Critical Mineral Capital of Canada but requires the support from Federal Sectors to develop enhanced power corridors and supporting infrastructure.

A mine cannot solely rely on LNG power plants due to potential difficulties in connecting with electrical grid systems. While LNG power plants can provide a source of electricity for mining operations, their feasibility depends on various factors, including proximity to gas pipelines, infrastructure limitations, and environmental considerations. In many cases, connecting a mine to the electrical grid may pose challenges that make relying on LNG power plants a less optimal solution.

In summary, while connecting to electrical grid systems may present challenges, mines have a responsibility to continuously seek substitutes for LNG power plants in their operations. The province of Ontario should support these efforts through financial incentives, regulatory frameworks, and provisions in the Ontario Critical Mineral Strategy. The federal government also plays a significant role in providing support and enforcing initiatives by offering funding, research and development assistance, and implementing policies that promote sustainable mining practices and the use of alternative energy sources.

### **COMMENT #3**

#### **Decision Statement – Issued under Section 54 of the Canadian Environmental Assessment Act, 2012 to Prodigy Gold Incorporated**

**The Honourable Catherine McKenna** (Minister of the Environment - Date : January 24, 2019) states that she is satisfied that the consultation process undertaken is consistent with the honour of the Crown and, with the conditions I have established, that the concerns and interests of Indigenous groups are appropriately accommodated for the purpose of issuing this Decision Statement.

Respectfully, after a careful review of the consultation log provided in the Supplemental Impact Assessment Report for the Magino Gold Project, it is noticeable that satisfactory consultation has occurred. When reviewing how the Proponent chose to answer First Nation Comments, regarding the timeline for what is proposed to be a temporary Energy Source, deflection was used by the proponent when discussing LNG Power Plant consultation. All the answers to First Nations are equipped with similar language such as; expectations, potentials, non-feasibilities, and furthermore, the information about Algoma Powers ability is not up to date and currently positioned for new considerations. There is no sense of Prodigy Gold's commitment to find alternative power sources.

To summarize, the efforts to consult with Indigenous Communities can be described as tokenism at best. The consultation responses to all First Nation inquiry do not provide confidence to MCFN that Prodigy Gold intends to remedy the temporary status of its LNG Power Plant and instead rely on the supplemental assessment as leverage to continue its operations as is.

MCFN is requesting that Prodigy Gold Inc. demonstrate to all Indigenous Communities how Electrical Grid Options remain unfeasible. This demonstration must include the review of from ministry regulatory agencies and should include federal oversight.

MCFN would like to request an explanation to all Indigenous Communities how Prodigy gold Inc. can continue to claim that the LNG Power Source is a Temporary item, when all the language within the Supplemental Impact Assessment indicates otherwise. MCFN has noted that using the word temporary is misleading and its use, unethical in the original proposition for consultative purposes.