

Attachment 1
Lynn Lake Gold Project
Information Requirements for Environmental Impact Statement Technical Review

On August 23, 2021 the Impact Assessment Agency of Canada commenced Round 2 technical review of the Environmental Impact Statement and responses to Round 1, Package 3 Information Requests for the Lynn Lake Gold Project. The table below is to assist in the preparation of Information Requests that support full understanding of the Project’s potential for significant adverse environmental effects and potential impacts to rights.

Reference IR#	Expert Dept. or group	EIS Guideline Reference	EIS Reference	Context and Rationale	The Proponent is Required to ...
Topic or Valued Component (e.g. Project Overview; Environmental Assessment Methodology; Fish Habitat; etc.)					
Nation or department name – IR number (Ro e.g. IAAC-01)	Nation or department Name e.g. IAAC	Reference the section(s) of the EIS Guidelines that relate to your comment, concern, or information request. e.g. Part 2, Section 7.1.5 Fish and Fish Habitat	Reference the section(s) of the EIS that speak to your comment, concern, or information request.	Identify what the EIS Guidelines require and/or the link to the <i>Canadian Environmental Assessment Act, 2012</i> (section 5 or section 19). Briefly identify what the EIS presents and the information gap, inconsistency, or challenge. Explain why filling that information gap is necessary to understanding potential significant adverse environmental effects to areas of federal jurisdiction or impacts to rights.	Describe the information required. Focus on the essential information, explanation, or justification required.
Water Quality					
IAAC-148	ECCC	8.0 Follow-up and Monitoring Programs	23.5 Environmental Monitoring and Management Plans	The Proponent’s response to Information Request IAAC-148 indicates that some of the wetlands (i.e., some swamps) within the Gordon and MacLellan Project Development Areas (PDAs) are fish-bearing, and that wetlands (swamps) outside of the PDAs have not been assessed in this respect. Characterization of baseline surface water conditions is important to support the detection of potential adverse effects on surface	ECCC-IR-R2-P3-01 Clarify whether and how the Surface Water Monitoring and Management Plan (SWMMP) will: (1) Include monitoring locations within fish-bearing wetlands; and (2) Be designed to detect any changes within fish-bearing wetlands.

				<p>water quality. It is unclear, however, whether the project includes water quality monitoring within wetlands. The Proponent’s response to IAAC-159 (a) (iii) describes monitoring of wetlands as follows: <i>“...the SWMMP [Surface Water Monitoring and Management Plan] will account for follow-up and monitoring specific to vegetation and wetlands by monitoring Project-related changes to surface water quality and quantity downstream of the tailings management facility at the MacLellan site and downstream of the MRSAs at the MacLellan and Gordon sites.”</i></p> <p>As the response does not mention any direct monitoring of wetlands, it is unclear whether the SWMMP will include monitoring locations within wetlands (swamps). Given the presence of fish-bearing wetlands (swamps), information regarding wetland water quality monitoring (baseline and effects) is required to gain a better understanding of whether the proposed monitoring approach would allow for detection of adverse effects on aquatic wetland biota/environments.</p>	<p>Clarify whether baseline water quality monitoring has been conducted within wetlands, including fish-bearing swamps. Describe the methods and results of any such baseline monitoring.</p> <p>With respect to water quality, identify any data gaps in the baseline monitoring dataset for fish-bearing wetlands (swamps), and describe how any such gaps will be addressed.</p>
Species at Risk					
IAAC-167	ECCC	<p>1.4 Regulatory framework and the role of government 2.4 Application of the precautionary approach 6.4 Mitigation measures</p>	<p>12.2.2.2 Species at Risk and Species of Conservation Concern 12.4.2.4 Project Residual Effect for Change in Habitat 12.5.2.2 Mitigation for Cumulative Effects</p>	<p>Section 6.4 of the EIS Guidelines outlines requirements for Mitigation measures:</p> <ul style="list-style-type: none"> • <i>“Every EA conducted under CEAA 2012 will consider measures that are technically and economically feasible and that would mitigate any significant adverse environmental effects of the project. Under CEAA 2012, mitigation measures includes measures to eliminate, reduce or control the adverse environmental effects of a designated project, as well as restitution for damage to the environment through replacement, restoration, compensation or other means.”</i> • <i>“The EIS will identify and describe mitigation measures to avoid, or lessen potential adverse effects on species and/or critical habitat listed under the Species at Risk Act.</i> 	<p>ECCC-IR-R2-P3-02</p> <p>Given that:</p> <ul style="list-style-type: none"> • Caribou habitat disturbance in the MB9 range is approaching the minimum 65% undisturbed habitat threshold; • Manitoba (2019) has identified the overlapping (KMU) caribou range as 56% undisturbed, which is below their 65% target; • Manitoba has committed to conserve and increase boreal caribou habitat and reduce or mitigate direct threats. • The mine will result in the destruction of 205 ha of caribou habitat for 60 or more years; • The proponent is not proposing caribou habitat compensation measures

				<p><i>These measures will be consistent with any applicable recovery strategy and action plans.”</i></p> <p>In IAAC-167 the proponent is asked to:</p> <p><i>a. Use the most geographically relevant data and best available information, in the context of caribou management ranges to:</i></p> <ul style="list-style-type: none"> <i>i. provide mitigation measures to lessen or avoid effects to Boreal Caribou in the RAA for any new disturbance (i.e., outside of the existing anthropogenic footprint); and</i> <i>ii. provide all proposed mitigation measures that will be implemented, considering all feasible compensative mitigation measures (i.e., offsetting and the proposed methods to restore, enhance, rehabilitate or create caribou habitat) to lessen the residual effects to Boreal Caribou habitat loss.</i> <p>In response to IAAC-167, the proponent states <i>“the proposed mitigation measures for woodland caribou do not include habitat compensation because there is no evidence to suggest the Project will affect critical habitat for the species.”</i></p> <p><u>Caribou Habitat Disturbance:</u></p> <p>Section 12.2.2.2 of the Proponent’s EIS indicates that the Project is located in the Province of Manitoba’s woodland caribou Kamauchawie Management Unit (KMU) and also overlaps with the Manitoba North Range (MB9), defined in the Federal Recovery Strategy for Woodland Caribou, Boreal Population. The EIS also states that <i>“the KMU (1,812,937 ha), is currently 56% undisturbed habitat for woodland caribou (pers. comm. 2019c), which is below the Province’s target minimum of 65% (MBWCMC 2015); most disturbance is a result of forest fires (pers. comm. 2019c).”</i></p>	<p>ECCC requests the Proponent be required to develop a plan to address project effects on boreal caribou habitat. The plan could include measures such as funding research and monitoring directed to the conservation of the MB9/KMU caribou and their range (e.g. Province of Manitoba telemetry studies, aerial surveys) and/or other related priorities consistent with the Province of Manitoba’s direction on caribou management needs.</p>
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