LYNN LAKE GOLD PROJECT: ECCC input into the Draft EA Report

Chapter	Original text from the	ECCC's input/comments	Rationale
Section #, Page	Agency		
2.2.2 MacLellan Site Tailings Management Facility p.28	"The use of a full liner beneath the Tailings Management Facility was not proposed as the current design was considered more economically feasible and would allow tailings consolidation over time."	ECCC recommends that the Agency consider expanding the Agency's text to reflect the following additional rationale provided by the Proponent, in their response to Information Request IAAC-R2-75: In response to IAAC-R2-75 the Proponent noted: With a fully lined TMF, the lack of foundation drainage would prolong the tailings consolidation process, reducing long-term stability and increasing the risk of embankment failure.	To include additional relevant information and rationale provided by the Proponent.
3.2.1 Proponent's Alternatives Assessment Mine Waste Disposal	"Use of a full liner beneath the Tailings Management Facility was not selected as this option was not considered economically feasible."	As in the previous recommendation (for 2.2.2), ECCC recommends that the Agency consider expanding the Agency's text to reflect additional rationale provided by the Proponent.	To include additional relevant information and rationale provided by the proponent
p.39			
Groundwater Decommissionin g/Closure p.62	systems around the mine rock storage areas, and ore and overburden stockpiles at the Gordon and MacLellan sites, and around the Tailings	Agency consider revising text as follows: "Seepage collection systems until surface water quality meets applicable regulatory discharge requirements for a sufficient	of seepage collection systems will not adversely affect fish and fish habitat.
	Management Facility at the MacLellan site would remain in place during decommissioning/ closure until surface water quality meets applicable	duration to demonstrate that removal of seepage collection systems would not cause adverse effects on fish and fish habitat."	

	regulatory discharge reguirements."		
6.2.1 Proponent's Assessment of Environmental Effects Operation p.64	"The Proponent predicted that concentrations of contaminants in groundwater would not exceed thresholds for the discharge of groundwater to surface water at the point of discharge, despite the predicted exceedances of federal and provincial water quality guidelines, due to dilution along the groundwater flow nath "	ECCC recommends that the Agency consider reordering this text for clarity: "Despite the predicted exceedances of federal and provincial water quality guidelines, due to dilution along the groundwater flow path, the Proponent predicted that concentrations of contaminants in groundwater would not exceed thresholds for the discharge of groundwater to surface water at the point of discharge."	Rephrasing is recommended for clarity, as it is currently not clear in the paragraph who predicted what.
6.2.3 Agency Analysis and Conclusions p.67	"The Agency also acknowledges that uncertainty remains as to the effectiveness of the interceptor well system at mitigating project-related changes to lake levels in Gordon and Farley Lakes as a result of groundwater drawdown."	ECCC notes the following for the Agency's information: Uncertainty also remains for dilution along the flow path and that monitoring at all stages of the Project will be essential in verifying the Proponent's predictions.	To highlight for the Agency that there are other sources of uncertainty. ECCC notes that the effectiveness of the interceptor well system is not the only source of uncertainty brought forward by the Proponent. Many assumptions are made by the Proponent in stating that there will be dilution of contaminants along the flow path, as stated in the Operation (p.64) and Decommissioning/Closu re (p.65) sections. However, the mitigation measures and Follow up monitoring sections generally address concerns for these assumptions (p 68-69) by requiring monitoring at sites of concern.

6.2.3 Agency Analysis and Conclusions Mitigation Measures p.68	"Contact water will be treated to meet the GCDWQ and the MWQSOG requirements prior to discharge, as necessary."	ECCC recommends the Agency consider adding the following guideline to the sentence: "Contact water will be treated to meet the GCDWQ, CWQG-FAL and the MWQSOG requirements prior to discharge, as necessary." CWQG-FAL: Canadian Water Quality Guidelines – Freshwater Aquatic Life	To include additional relevant standards ECCC recommends also including the CWQG- FAL in the Agency's text, for any discharges to surface waters.
6.2.3 Agency Analysis and Conclusions Follow-up and Monitoring p.69	"o monitoring of groundwater quality near the open pits, Gordon Lake, Farley Lake, Susan Lake, Minton Lake, the unnamed lakes northeast of Minton Lake (i.e. Lake 2 and Lake 3), Payne Lake, the Keewatin River, and the unnamed tributary of the Keewatin River, and up- and down-gradient from the Tailings Management Facility, mine rock storage areas, ore and overburden stockpiles, "	ECCC recommends that the Agency consider adding Pump Lake as a monitoring location: "monitoring of groundwater quality near the open pits, Gordon Lake, Farley Lake, Susan Lake, Pump Lake, Minton Lake, the unnamed lakes northeast of Minton Lake (i.e. Lake 2 and Lake 3), Payne Lake, the Keewatin River, and the unnamed tributary of the Keewatin River, and up- and down-gradient from the Tailings Management Facility, mine rock storage areas, ore and overburden stockpiles,"	Pump Lake is downgradient from Project operations and closer than Susan Lake.
6.3 Surface Water Gordon Site Changes to Surface Water Quality p.73	"The Project may affect the pH and turbidity of lakes and streams within the Gordon site LAA through increased erosion and sedimentation in all project phases; the release of contact and non-contact water with high concentrations of suspended solids during construction and operation; and the release of effluents	ECCC recommends that the Agency consider revising text as follows: "The Project may affect the pH and turbidity of lakes and streams seepage with high amounts of suspended solids. or The pH may be affected by seepage or runoff that has come into contact with mine rock or tailings during operation or later."	This sentence implies that project-related discharges will contain high concentrations of suspended solids. ECCC notes that discharges are required to meet the Metal and Diamond Mining Effluent Regulations (MDMER) discharge limits, including suspended sediment limits, and recommends including a

	and groundwater		clarification to that
	seepage with high		effect.
	amounts of suspended		
	solids or that has come		Since pH is not affected
	into contact with mine		by suspended
	rock or tailings during		sediments it would be
	operation "		more accurate to
			discuss nH senarately
6 2 2 Agency	"• During all project	ECCC recommends that the	To address additional
Analysis and	• During an project	Agonov consider revising text as	contaminants of
Conclusions	will implement	follows:	concorn If monitoring
Conclusions	mitigation moasures	Tonows.	domonstratos
Koy Mitigation	including collection	"• During all Project phases and	differences from what
Monsures and	and treatment of	• During an Project phases, and	was prodicted in the EIS
Monitoring to	and treatment of	total and dissolved cadmium, and	additional parameters
Nonicoring to		any additional contaminants of	
Avoid Significant	seepage before	concern.	may require monitoring.
Effects and	discharge to the		
Program	to provert project		
Program	to prevent project-		
Requirements	related exceedances of		
	the CWQG-FAL in all		
Mitigation	surface waterbodies		
Measures	within the Gordon and		
	MacLellan site PDAs,		
p.81	LAAs, and RAA,		
	including for fluoride,		
	iron, hexavalent		
	chromium,		
	phosphorus,		
	aluminum, arsenic,		
	copper, cyanide,		
	antimony, and total		
	and dissolved		
	cadmium."		
6.3.3 Agency	" •Prior to release to	ECCC recommends that the	Additional text is
Analysis and	the receiving	Agency consider revising text as	recommended to
Conclusions	environment, water in	follows:	describe treatment
	the pit lakes will be		goals.
Key Mitigation	treated in accordance	Prior to release If pit lake	
Measures and	with the CWQG-FAL. If	water quality is not suitable for	
Monitoring to	pit lake water quality is	release to the surrounding	
Avoid Significant	not suitable for release	environment, additional	
Effects and	to the surrounding	treatment options will be	
Follow-Up	environment,	implemented to improve water	
Program	additional treatment	quality to prevent project-related	
Requirements	options will be	exceedances of the CWQG-FAL in	
	implemented to	the aquatic receiving environment	
	improve water quality	and to comply with federal	

Mitigation	to comply with	discharge requirements (i.e.,	
Measures	MDMER limits."	MDMER and subsection 36(3) of	
		the Fisheries Act, as applicable)."	
p.82	"Drier to construction	FCCC recommends that the	To address additional
6.3.3 Agency	•Prior to construction,	Agency consider revising text as	contaminants of
Conclusions	This follow-up program	follows:	concern If monitoring
conclusions	will be used to monitor		demonstrates
Key Mitigation	the following	" Prior to construction, a follow-	differences from what
Measures and	parameters, at a	up program calcium, and	was predicted in the EIS
Monitoring to	minimum:	magnesium; and	additional parameters
Avoid Significant	instantaneous flows;	any additional parameters	may require monitoring.
Effects and	total suspended solids	determined in consultation with	
Follow-Up	and turbidity; lake	relevant authorities."	
Program	levels; pH levels; and		
Requirements	concentrations of		
	contaminants		
Follow-up and	identified in the		
Monitoring	NIDIVIER, Including		
n 97	hovevelent chromium		
p.oz	nexavalent chronnum,		
	aluminum arsenic		
	copper, cyanide.		
	antimony, and total		
	and dissolved		
	cadmium, calcium, and		
	magnesium."		
6.3.3 Agency	" •Prior to construction,	ECCC recommends that the	To include more near-
Analysis and	a follow-up program	Agency consider revising text as	field and on-site
Conclusions	The follow-up program	follows:	locations, and
	will include a	<i>"</i> – , , , , , , , , , , , , , , , , , ,	potentially additional
Key Mitigation	description of:	" Prior to construction, a follow-	monitoring locations. If
Measures and	o monitoring locations	up program The follow-up	monitoring
Avoid Significant	for Gordon Lake, Farley	of	difforences from what
Fffects and	Lake, Minton Lake,	01.	was predicted in the FIS
Follow-Up	Cockeram Lake, Swede	 monitoring locations for Gordon 	additional locations may
Program	Lake, Ellystan Lake,	Lake	require monitoring.
Requirements	Arbor Lake, Burger	the Hughes River, Payne Lake,	
	Lake, the Keewatin	Susan Lake, fish-bearing wetlands,	
Follow-up and	River, the unnamed	the pit lakes, and the Tallings	
Monitoring	Koowatin Pivor the	Storage Areas, collection pends	
	Hughes River the nit	all discharges and seenage, and	
p.82	lakes, and the Tailings	any additional locations	
	Management Facility:"	determined in consultation with	

		relevant authorities during review of final monitoring plans;"	
6.3.3 Agency Analysis and Conclusions Key Mitigation Measures and Monitoring to Avoid Significant Effects and Follow-Up Program Requirements	 Prior to construction, a follow-up program will be developed monitoring locations analytical parameters to be monitored and monitoring frequency; and 	ECCC recommends the Agency consider adding the following bullet into this section between the bullets on analytical parameters and contingency measures: "o triggers and corresponding response actions; and"	Monitoring should be accompanied by triggers and response measures to enable proactive detection and response for protection of the aquatic environment.
Follow-up and Monitoring p.82	o contingency measures that will be implemented to address potential project effects to surface water quality and quantity."		
 6.3.3 Agency Analysis and Conclusions Key Mitigation Measures and Monitoring to Avoid Significant Effects and Follow-Up Program Requirements Follow-up and Monitoring p.82 	" Prior to construction, a follow- up program will be developed If monitoring indicates that project-related discharges are resulting in exceedances of the CWQG-FAL limits for fluoride, iron, hexavalent chromium, phosphorus, aluminum, arsenic, copper, cyanide, antimony, or total and dissolved cadmium at or downstream of the edge of mixing zones, additional mitigation measures will be developed and	ECCC recommends that the Agency consider revising text as follows: "• Prior to construction, a follow- up program will be developed If monitoring indicates that project-related discharges are resulting in exceedances of the CWQG-FAL limits for fluoride, iron, hexavalent chromium, phosphorus, aluminum, arsenic, copper, cyanide, antimony, or total and dissolved cadmium, or any additional contaminants of concern at or downstream of the edge of mixing zones, additional mitigation measures will be developed and implemented"	To address any additional contaminants of concern. If monitoring demonstrates differences from what was predicted in the EIS additional parameters may require monitoring.

 6.3.3 Agency Analysis and Conclusions Key Mitigation Measures and Monitoring to Avoid Significant Effects and Follow-Up Program Requirements Follow-up and Monitoring p.83 	"•Monitoring of pit lake water quality will continue throughout the decommissioning /closure and post- closure phases of the Project until water quality in the pit lakes meets CWQG-FAL limits, to allow unabated discharge to the surrounding environment. After that time, monitoring and maintenance will cease."	ECCC recommends that the Agency consider revising text as follows: "•Monitoring of pit lake water quality will continue throughout the decommissioning /closure and post-closure phases of the Project until it has been demonstrated that water quality in the pit lakes has stabilized and consistently meets CWQG-FAL limits"	To provide clarity and add important detail to ensure protection of fish.
 7.1.3 Agency Analysis and Conclusions Key Mitigation Measures and Monitoring to Avoid Significant Effects and Follow-Up Program Requirements Mitigation Measures p.105 	 Prior to construction, the Proponent will develop, in consultation with Indigenous nations and relevant federal and provincial authorities, mitigation measures to reduce the potential for project-related erosion and sedimentation, including the following: intake and effluent discharge pipes will be screened; and effluent discharge pipes will be equipped with diffusers" 	 ECCC recommends that the Agency consider revising text as follows: "• Prior to construction, the Proponent will develop including the following: • intake and effluent discharge pipes • effluent discharge pipes • all other mitigation measures described in the final erosion and sedimentation control plan which should be developed and implemented prior to construction." 	In order to incorporate all relevant mitigation measures, the condition should also include the erosion and sedimentation control (ESC) plan/measures, which is an essential element in ESC. A comprehensive erosion and sediment control plan will include a number of essential mitigations not related to the two bullets identified in the current condition.
7.1.3 Agency Analysis and Conclusions, Key Mitigation Measures and	"•Prior to discharge of water from the Wendy and East pit lakes to Farley Lake during construction,	ECCC recommends that the Agency consider including the following additional text: "•Prior to discharge of water from the Wendy and East pit lakes to	To include discharge requirements. For clarity, it is important to include language to ensure that that water will be tested, and

Monitoring to	contact water	limit effects to egg incubation and	treated as needed, prior
Avoid Significant	collection ditches to	iuvenile recruitment. Contact	to discharge. The
Effects and	Farley Lake during	water will be tested prior to	current text does not
Follow-Up	construction,	release or discharge. If water	mention testing,
Program	operation, and	quality is not suitable for release	preventing
Requirements	decommissioning/	to the surrounding environment.	exceedances. or
	closure. and	mitigations (e.g., treatment) will	compliance with federal
Mitigation	groundwater	be implemented to improve water	discharge requirements.
Measures	interceptor wells to	quality to prevent project-related	5 1
	Farley Lake and	exceedances of the CWQG-FAL in	
p.105	Gordon Lake during	the aquatic receiving environment	
	operation, water will	and to comply with federal	
	be heated or cooled,	discharge requirements."	
	when required, to	5 1	
	maintain the		
	temperature regime in		
	both lakes (i.e. water		
	will only be discharged		
	when it is within 2°C of		
	background water		
	temperatures). To the		
	extent possible,		
	collected water will be		
	discharged outside of		
	burbot winter		
	spawning periods, as		
	determined by		
	Fisheries and Oceans		
	Canada, to limit effects		
	to egg incubation and		
	juvenile recruitment."		
7.1.3 Agency	"•Groundwater	ECCC recommends that the	To include discharge
Analysis and	collected by	Agency consider revising text	requirements. For
Conclusions	interceptor wells and	similar to ECCC's recommendation	clarity, it is important to
	water from the existing	regarding contact water (provided	include language to
Key Mitigation	Wendy and East pit	in 7.1.3 above).	ensure that that water
Measures and	lakes,		will be tested, and
Monitoring to	prior to dewatering,		treated as needed, prior
Avoid Significant	will be aerated to		to discharge. The
Effects and	encourage		current text does not
Follow-Up	precipitation of oxide-		mention testing,
Program	forming elements,		preventing
Requirements	break down thermal		exceedances, or
	and chemical		compliance with federal
Mitigation	stratification, and		discharge requirements.
Measures	increase dissolved		
	oxygen concentrations		
p.105	prior to release of		

	this water to Gordon		
	and Farley Lakes."		
7.2.2 Views	"Environment and	ECCC recommends that the	ECCC rather stated that
Expressed	Climate Change	Agency consider revising text as	there is low cumulative
	Canada agreed with	follows:	effects in the region.
Federal	the Proponent that the		
Authorities	Project would cause	"Environment and Climate Change	However, there will be
	temporary residual	Canada agreed with the	water table drawdown
p.111	effects on migratory	Proponent that the Project would	of 1 meter or more that
	bird and bird species at	cause temporary residual effects	will extend 800m and
	risk habitat and that	on migratory bird and bird species	1200m respectively
	these effects would	at risk habitat and that these	around the Gordon and
	likely be reversible	effects would likely be reversible	MacLellan Sites during
	following reclamation	following reclamation and re-	the various Project
	and re-vegetation of	vegetation of the project sites.	phases (see Volume 1
	the project sites.	Environment and Climate Change	and 2 excerpts below).
	Environment and	Canada was of the view that	This will affect adjacent
	Climate Change	residual adverse effects of the	habitat for many years.
	Canada was of the	Project to migratory birds and bird	
	view that residual	species at risk would be	ECCC anticipates that
	adverse effects of the	adequately addressed,	the residual effects of
	Project to migratory	consideration of the low predicted	water table drawdowns
	birds and bird species	effects to nabitat adjacent to the	will be restored over
	at risk would be	PDAS, In consideration of, the	time after closure (e.g.
	adequately addressed,	recovery of groundwater levels to	10 years). This is more
	In consideration of the	near baseline conditions, the	likely to affect fens
	to hobitat adjacent to	Corden and Mast allon sites	rather than bogs.
		following operation including the	ECCC recognizes that
	nronocod roclamation	logacy mine feetprints, and the	wotlands are not
	of the Cordon and	mitigation measures identified "	limiting in the region
	Machellan sites	initigation measures identified.	initial in the region.
	following operation		FIS Volume 2
	including the legacy		Vegetation Wildlife
	mine footprints and		11.4.4.3 Project
	the mitigation		Residual Effect
	measures identified."		Gordon Site:
			Dewatering is needed to
			empty the open pit
			during construction for
			mine operation and is
			expected to lower water
			levels by 1 m within 800
			m of the open pit
			(Chapter 8, Section
			8.4.2.3). Shrubby willow
			was observed in a fen
			community and requires

	subgygric to subhydric
	soil moisture conditions
	for seed production and
	germination (Flora of
	North America 2020).
	Drier conditions during
	construction/operation
	and post-closure due to
	ground water
	drawdown will likely
	lead to the loss of this
	occurrence. Indirect
	effects of dewatering
	may last approximately
	10 years post-
	reclamation due to
	natural refilling of the
	open pit (Chapter 8,
	Section 8.1.4.2).
	MacLellan Site:
	Dewatering is needed to
	empty the open pit
	during construction for
	mine operation and is
	expected to lower water
	levels by 1 m within
	1,200 m of the open pit
	(Chapter 8, Section
	8.4.2.3) Therefore, both
	of these occurrences
	may be indirectly
	affected by drawdown
	from dewatering of the
	open pit, and will likely
	last through post-
	closure until the open
	pit fills (Chapter 8,
	Section 8.1.4.2).
	11.4.6 Project Residual
	Effects. Gordon Site.
	Swamps and marshes
	have fluctuating water
	tables and may be
	connected to ground
	water tables (Halsey et
	al. 1997). However, bog

		•	
			wetlands are not
			anticipated to be
			indirectly affected by
			groundwater
			drawdown because
			bogs typically receive
			water only from
			precipitation and have
			low water flow (Halsey
			et al. 1997).
			EIS Volume 1.
			Map 8-17 to Map 8-23.
			Maps of drawdown at
			MacLellan and Gordon
			Sites
7 2 3 Agency	"However the Agency	FCCC recommends that the	Ongoing monitoring of
Analysis and	is of the view that	Agency consider revising text:	bird deterrents is
Conclusions	these measures should	signify consider revising text	necessary to measure
conclusions	be implemented at all	"However the Agency is of the	their efficacy and to
n 112	times and throughout	view that these measures should	prevent/reduce
p.112	all project phases to	he implemented and monitored at	mortality and
	mitigate effects to	all times and throughout all	contraventions of the
	migratory hirds and	nroject phases to mitigate effects	MBCA
	hird species at risk	to migratory birds and bird species	WIDEA.
	until surface water	at rick until surface water quality	Monitoring is an
	quality at the project	at the project sites meets	important component
	sites meets applicable	annlicable federal and provincial	of implementing hird
	federal and provincial	regulatory requirements "	deterrents
	regulatory		deterrents.
	requirements "		
7 2 3 Agency	"If vegetation clearing	FCCC recommends that the	Surveys should be
Analysis and	and/or construction	Agency consider revising text as	conducted by a
Conclusions	activities cannot occur	presented below:	qualified professional to
conclusions	outside of migratory		ensure appropriate
Key Mitigation	bird breeding	" If vegetation clearing and/or	methods are used, and
Measures and	periods, as described in	construction activities cannot	birds and nests are not
Monitoring to	Environment and	occur outside of migratory bird	disturbed or damaged.
Avoid Significant	Climate Change	breeding periods, as described in	This addition is
Effects and	Canada's General	Environment and Climate Change	consistent with the
Follow-Up	Nesting Periods for	Canada's General Nesting Periods	language used in the
Program	Migratory Birds.	for Migratory Birds, additional	next bullet on page 113.
Requirements	additional mitigation	mitigation measures will be	
	measures will be	implemented to protect migratory	
Mitigation	implemented to	birds, their eggs, and their nests.	
Measures	protect migratory	including non-intrusive bird	
	birds, their	surveys, by a gualified	
p.113	, -	professional, which will be	

eggs, and their nests,	conducted within the Gordon and	
including non-intrusive	MacLellan site PDAs prior to	
bird surveys, which will	construction to identify nests of	
be conducted within	migratory bird and bird species at	
the Gordon	risk, including common nighthawk,	
and MacLellan site	olive-side flycatcher, barn	
PDAs prior to	swallow, bank swallow, short-	
construction to identify	eared owl, horned grebe, yellow	
nests of migratory bird	rail, evening grosbeak, and rusty	
and bird species at	blackbird. Based on the results of	
risk, including common	surveys, buffer zones and setback	
nighthawk, olive-side	distances around nests will be	
flycatcher, barn	established prior to construction	
swallow, bank swallow,	and in consultation with	
short-eared owl,	Indigenous nations and other	
horned grebe, yellow	relevant federal and provincial	
rail, evening grosbeak,	authorities, taking into account	
and rusty blackbird.	the Manitoba Conservation Data	
Based on the results of	Centre's Recommended	
surveys,	Development Setback Distances	
buffer zones and	and Restricted Activity Periods for	
setback distances	Birds by Wildlife Feature Type	
around nests will be	(2021), to protect nests and	
established prior to	prevent mortality. Buffer zones	
construction and in	and setbacks will be maintained	
consultation with	during vegetation clearing and site	
Indigenous nations and	preparation activities."	
other relevant federal		
and provincial		
authorities, taking into		
account the Manitoba		
Conservation Data		
Centre's		
Recommended		
Development Setback		
Distances		
and Restricted Activity		
Periods for Birds by		
Wildlife Feature Type		
(2021), to protect nests		
and prevent		
mortality. Buffer zones		
and setbacks will be		
maintained during		
vegetation clearing and		
site preparation		
activities."		

7.2.3 Agency Analysis and Conclusions. Key Mitigation Measures and Monitoring to Avoid Significant Effects and Follow-Up Program Requirements Mitigation Measures p.114	"• Lights used at nighttime will be aimed downwards (i.e. down- lighting) to limit effects on migratory bird and bird species at risk habitat adjacent to the Gordon and MacLellan site PDAs."	ECCC recommends that the Agency consider adding the following text: "•Lights used at nighttime will be aimed downwards Navigation lighting should be of minimum intensity and duration, that meets navigation regulations, to minimize attraction to migratory birds. Lighting that does not attract insects will also be considered."	In addition to the stated mitigation, tall structures that require navigation lighting also need to employ measures to avoid harm to birds. These structures have been known to cause large migratory bird mortality events during migration. Consider using lighting throughout the Project that does not attract insects that migratory birds and bats feed on.
7.2.3 Agency Analysis and Conclusions Key Mitigation Measures and Monitoring to Avoid Significant Effects and Follow-Up Program Requirements Follow-up and Monitoring p.114	" Prior to construction, a follow-up program will be developed, in consultation with Environment and Climate Change Canada , other relevant federal and provincial authorities, and Indigenous nations, to verify the accuracy of the environmental assessment and to determine the effectiveness of mitigation measures related to avoiding harm to migratory birds, including migratory birds that are listed species at risk, their eggs and nests. The follow-up program will be implemented during all phases of the Project."	ECCC recommends that the Agency consider removing the specific reference to ECCC. "•Prior to construction, a follow- up program will be developed, in consultation with Environment and Climate Change Canada, other relevant federal and provincial authorities, and Indigenous nations, to verify the accuracy of the environmental assessment and to determine the effectiveness of mitigation measures related to avoiding harm to migratory birds, including migratory birds that are listed species at risk, their eggs and nests. The follow-up program will be implemented during all phases of the Project."	Follow up measures are readily available in the public domain from other Projects. ECCC is available to review the plan developed by the Proponent.
7.3.3 Agency Analysis and Conclusions	"The Agency recommends that the Proponent work with Environment and	ECCC recommends that the Agency consider revising the text as follows:	ECCC is available to review the follow-up program developed by the Proponent but

p.123	Climate Change	"The Agency recommends that the	would not participate in
	Canada and Indigenous	Proponent work with	the development of the
	nations to develop a	Environment and Climate Change	program.
	follow-up program to	Canada and Indigenous nations to	
	monitor for any unique	develop a follow-up program, in	
	species-specific effects,	consultation with federal	
	including potential	authorities and Indigenous	
	effects to habitat	Nations to monitor for any unique	
	within the PDAs and	species-specific effects, including	
	LAAs, mortality risk,	potential effects to habitat within	
	and species at risk	the PDAs and LAAs, mortality risk,	
	health, and develop	and species at risk health, and	
	species-specific	develop species-specific mitigation	
	mitigation measures to	measures to limit or prevent these	
	limit or prevent these	project effects."	
	project effects."		
7.3.3 Agency	During all project	ECCC recommends that the	ECCC is available to
Analysis and	phases and in	Agency consider revising text as	review the Proponent's
Conclusions	consultation with	follows:	plan to mitigate adverse
	Environment and		Project effects on
Key Mitigation	Climate Change	During all project phases and in	boreal caribou and their
Measures and	Canada, Indigenous	consultation with Environment	habitat through all
Monitoring to	nations, and other	and Climate Change Canada,	phases of the Project.
Avoid Significant	relevant federal and	Indigenous nations, and other	
Effects and	provincial authorities,	relevant federal and provincial	
Follow-Up	the Proponent will	authorities, The Proponent will	
Program	mitigate adverse	develop a mitigation plan to	
Requirements	project effects on	address, through all Project	
	boreal caribou and its	phases, adverse Project effects on	
Mitigation	habitat in a manner	boreal caribou and its habitat,	
Measures	consistent with the	will mitigate adverse project	
	federal Recovery	effects on boreal caribou and its	
p.124	Strategy for Woodland	habitat in a manner consistent	
	Caribou (Rangifer	with the federal Recovery Strategy	
	tarandus caribou),	for Woodland Caribou (Rangifer	
	Boreal Population	tarandus caribou), Boreal	
	(2020)."	Population (2020). The Proponent	
		will consult with relevant federal	
		and provincial authorities and	
		Indigenous nations on the	
		mitigation plan."	