

Slate Falls Nation

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February 26, 2025

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Steve Lines
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First Mining Gold Corp.
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Vancouver, BC Canada V6E 4A2

Ms. Bailey, Ms. Archibald and Mr. Lines

Re: The Proposed Springpole Mine Project on Slate Falls Nation Traditional Lands

Slate Falls Nation (SFN) has engaged with First Mining Gold (FMG) for years regarding its proposal to develop a mine on the peninsula and catchment divide between Springpole and Birch Lakes. This area is on SFN's Traditional Lands, which our ancestors entrusted us to steward for current and future generations. Should the Project be approved, SFN will bear the burden of any failures.

Over the years, SFN has worked with many mining and other resource industry companies and is not opposed to resource development. SFN supports responsible mining but insists that it must be done with integrity and accountability to protect SFN's constitutionally protected rights and follow meaningful consultation by the proponent and the Crown.

SFN requires that the principles, goals and objectives set out in the Community-Based Land Use Plan (CBLUP) be applied to the proposed Springpole Mine Project. The CBLUP "Niigaan

Bimaadziwin” (A Future Life) was created in 2011 between Ontario, SFN and its neighbour, Cat Lake First Nation (CLFN). Ontario must ensure that the CBLUP is applied to the Project.

SFN's review of the Environmental Impact Statement has identified major deficiencies

SFN has retained industry experts to evaluate the Environmental Impact Statement (EIS) and its findings to inform decision-making on the proposed Project. This review is enclosed. The review has revealed serious failures to comply with EIS guidelines and other requirements for the environmental assessment as well as major deficiencies in consultation, environmental risk mitigation, and project transparency. The volume and nature of these deficiencies, many of which pertain to matters that go to the heart of SFN's rights and way of life, underscore that this proponent and its information are unreliable. We outline these concerns below.

1. FMG's failure to conduct meaningful consultation

Despite FMG's repeated claims of engagement, the EIS demonstrates that FMG has failed to meaningfully consult with SFN or incorporate our input into decision-making. SFN has provided crucial data and recommendations, yet our review of the EIS confirms that FMG has disregarded them, manipulated our input for its benefit, and consistently failed to respond to requests for information. For example:

- The consideration of impacts to SFN in the EIS, including impacts to rights and the list of effects under s.5(1)(c) of *CEAA, 2012*, is wholly inadequate.
- As with many of our experiences with FMG, the EIS ignores, dismisses or mischaracterizes our Indigenous perspective consistently.
- As described below and in our technical review, FMG has failed to provide accurate, necessary and credible information relating to impacts to SFN and the environment and, in many cases, has provided no information at all regarding purported mitigation measures.
- FMG asserts that Indigenous input was used in selecting the site for the co-disposal facility, yet SFN was not involved in the process. Had SFN been meaningfully consulted, the criteria would have excluded the currently proposed site, which does not align with the CBLUP.
- The project design does not meet SFN's risk acceptance criteria, nor does it align with best practices for environmental protection.
- Contrary to environmental assessment requirements and the requirements from the duty to consult, FMG appears to have provided misleading or inadequate information to hinder the consideration of cumulative effects on our rights.
- The alternatives assessment process is driven by economics and underrepresents environmental and social issues, including issues relating to adverse impacts to SFN's rights.
- FMG must honour its agreements that SFN's consent of the Project is required and that the completion of SFN's Anishinaabe-Led Impact Assessment (ALIA) is an integral part of

SFN's consideration of the Project, all of which must occur prior to any decision on the Project.

This pattern of deficiencies and exclusion undermines the purpose and intent of consultation, has created a climate of mistrust, damaged relationships between Indigenous Nations, and calls into question FMG's credibility as a development partner.

2. Serious Environmental and Engineering Deficiencies threaten SFN's rights

The expert review has identified fundamental flaws in the EIS, including matters central to protecting SFN's rights and way of life, mine design and environmental mitigation measures. The EIS presents a Project design with unmitigated and unacceptable risks for SFN and the surrounding environment. Key concerns include:

- **The co-disposal facility is an extreme hazard:** The Canadian Dam Association rating of "Extreme," means a failure would have catastrophic consequences for SFN lands and waters.
- **Contaminant control is inadequate:** The design does not effectively contain contaminants from the low-grade ore stockpile or co-disposal facility.
- **Effluent treatment is unreliable:** The proposed biological treatment system has a history of failure in other Ontario mines.
- **Insufficient effluent water capacity:** If effluent water cannot be released, there is insufficient capacity to store the water on site.
- **Water protection measures are insufficient:** The co-disposal facility is within two kilometres of water bodies, violating CBLUP requirements. There is also inadequate space to implement remedial measures in the event of a co-disposal malfunction.
- **Insufficient NPAG material for closure:** Although no closure plan is provided, calculations reveal a significant shortage of NPAG material for closure.
- **Inadequate mitigation and accommodations for SFN's rights:** The proposed mitigation measures relating to SFN's rights are deficient, lack detail, and fail to protect SFN's rights.

Moreover, the closure plan is wholly inadequate. FMG has budgeted \$30 million for closure, while mines of similar scale and complexity require approximately \$150 million. FMG's closure plan lacks detail and disregards long-term environmental and community stability.

3. Ecological and Cultural Disruptions

The proposed mine site overlaps with areas of significant ecological and cultural importance. The EIS does not consider these matters adequately and fails to recognize that the Project has the potential to cause severe and potentially irreversible negative changes that will harm SFN's rights, health, current use and physical and cultural heritage. Examples of these concerns include:

- **Archaeological sites:** FMG's assessment failed to recognize ancient lakeshores or properly investigate unregistered sites significant to SFN's heritage.
- **Caribou habitat destruction:** The footprint of the mine encompasses a primary calving area for an endangered caribou population. The assessment does not meet net benefit requirements, and its simplistic area calculation fails to account for the cumulative impact on an already declining species.
- **Water and food security threats:** Fishing, drinking water, and aquatic ecosystems will be disrupted, directly affecting SFN's way of life.

4. Lack of Transparency and Hidden Expansion Plans

FMG failed to disclose its broader regional interests in the EIS, limiting discussion while describing the Project as having a small environmental footprint. FMG has assembled a land package of 74,000 ha surrounding the Springpole Project through Gold Canyon and other front companies and has spoken publicly about its foreseeable plans to expand the Project and life of mine. This confirms the foreseeability of FMG using this Project as a gateway for district-scale operations spanning decades. Accordingly, the EIS does not present a credible cumulative effects assessment and fails to consider those effects when assessing impacts to SFN's rights. Any decision on this mine must consider the cumulative long-term impact on SFN lands and rights.

5. SFN's Position and Required Actions

FMG has demonstrated through the EIS that it has failed to comply with the requirements of the environmental assessment process, has failed to responsibly design and assess the Project and has failed to uphold the requirements of meaningful consultation with SFN. The EIS also demonstrates a lack of protection for SFN's rights while also confirming that the Project will create major, unacceptable risks for components of the physical, biological, and cultural environment on which SFN's rights depend.

FMG's Project design is driven by economic considerations that are prioritized over environmental and community sustainability. In doing so, FMG has further undermined SFN's trust and has disregarded its obligations for consultation and responsible development.


Accordingly, SFN formally requests:

- **The immediate withdrawal of the current EIS** due to its failure to meet fundamental environmental and Indigenous consultation standards.
- **A re-evaluation of the mine design and impact assessment** to include SFN's risk acceptance criteria, CBLUP values and principles, SFN's ALIA and the technical review.
- **Full and meaningful consultation and project transparency**, including consideration of FMG's expansion strategy and long-term regional impacts.
- **That the free, prior and informed consent standard** be met.

We will not stand by while FMG disregards our rights and responsibilities as stewards of our Traditional Lands. Nor will SFN shy away from legal action to protect its lands, people, and future generations should that be necessary. We urge regulatory authorities to take note of the deficiencies we have identified in the EIS and, ultimately, to hold FMG accountable before irreversible damage occurs to our rights and the lands and resources upon which those rights depend.

Sincerely,

<Original signed by>

Chief Crane 

Slate Falls Nation

Please see attached Appendices:

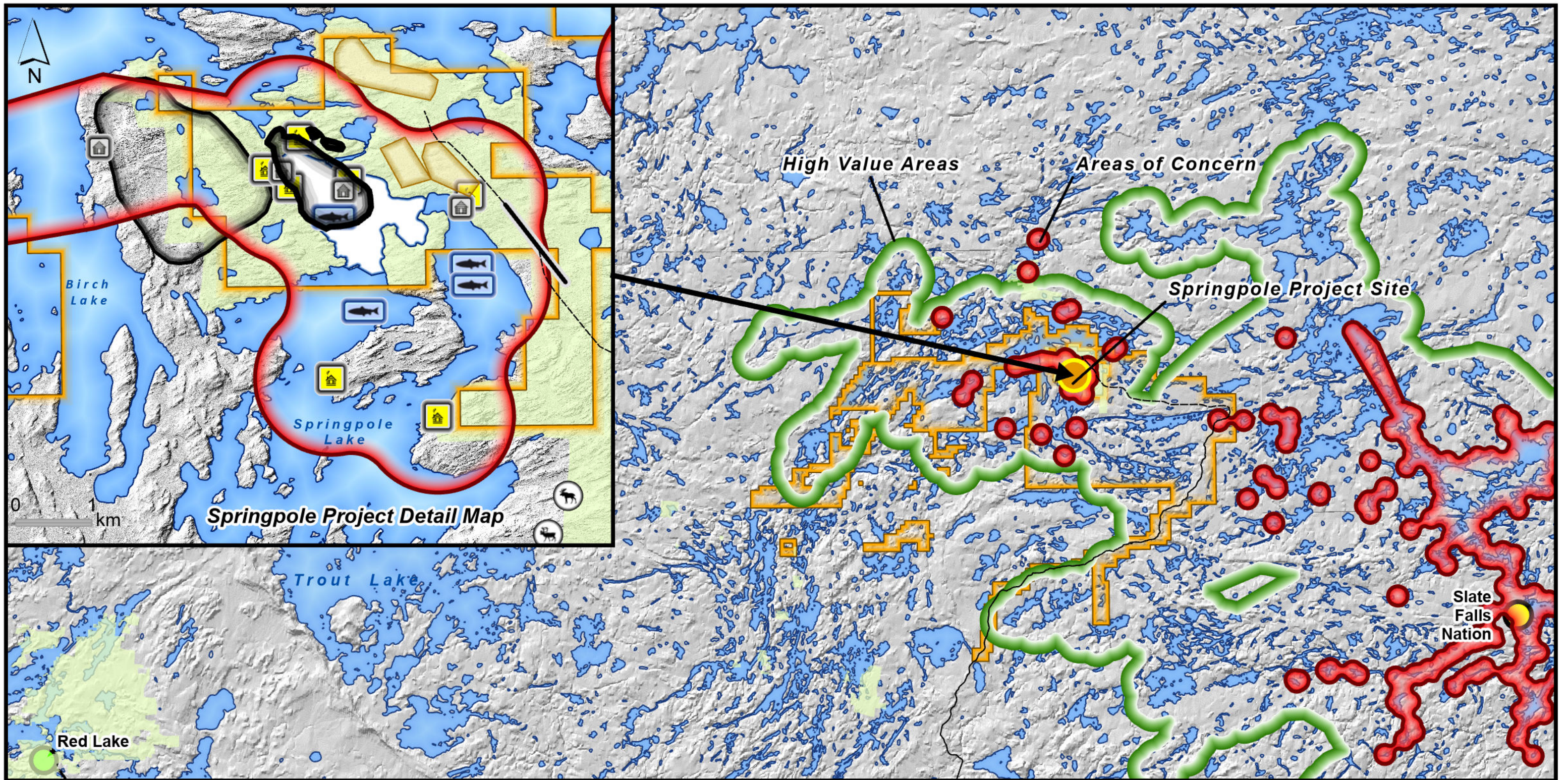
Appendix A: A map of the area

Appendix B: A summary of the CBLUP

Appendix B1: March 30, 2022 letter to FMG from the STPNs

Appendix C: A summary of key events

Appendix A
Maps of the Area



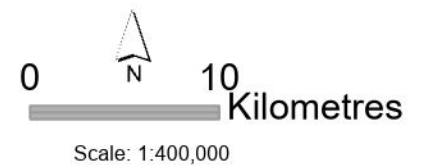
Slate Falls Nation High Value Lands and the Springpole Project

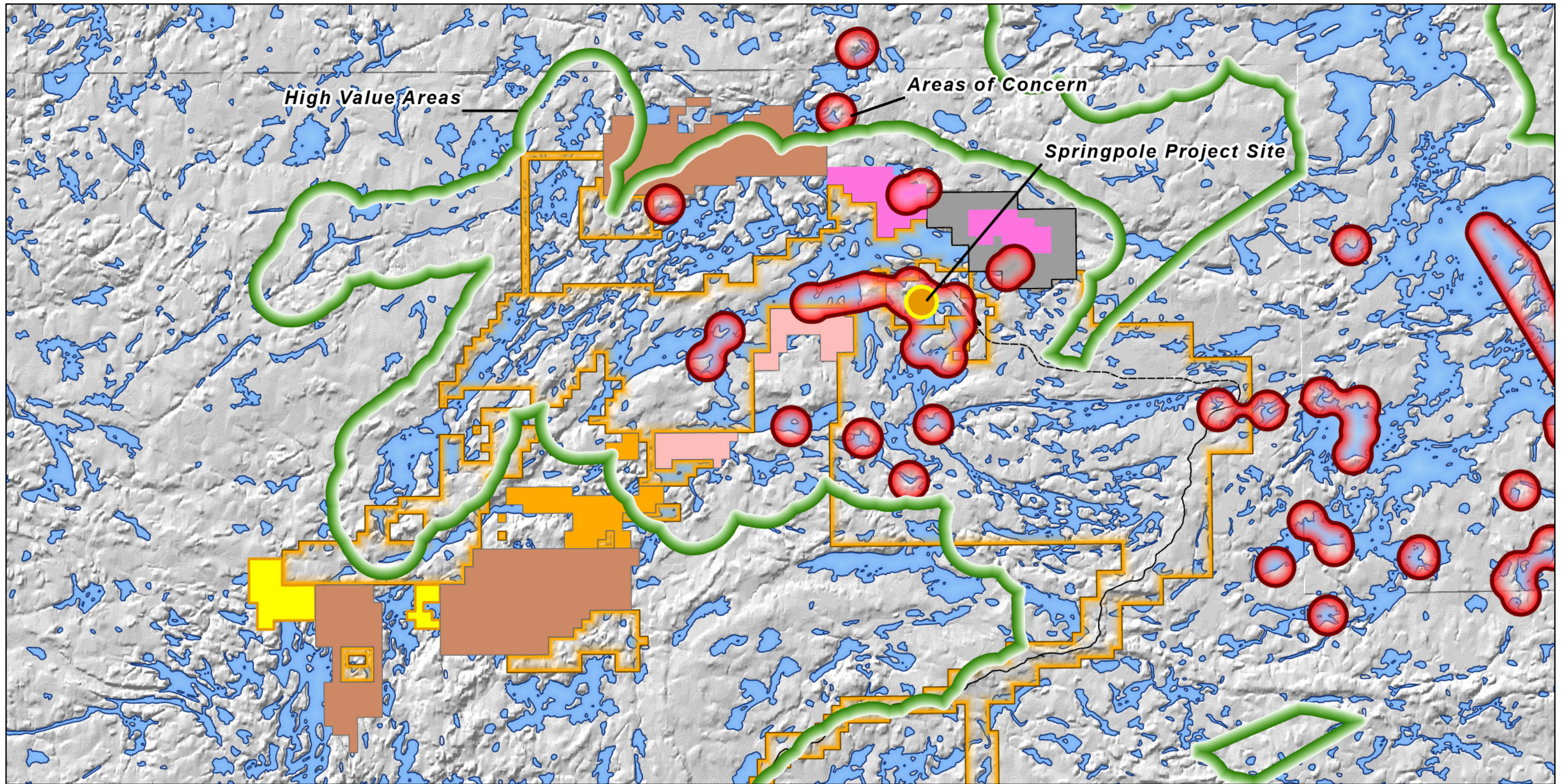
Map Key- Mine Site Details Inset

- | | | | | |
|---------------------|------------------|---------------------|--------------------|----------------------|
| Stockpiles | Outpost Camp | Caribou | Mining Land Tenure | Dewatered Lake Limit |
| SFN Area of Concern | Pickeral Fishing | Moose | Existing Road | Existing Road |
| Cabin Site | Trout Fishing | Open Pit | Proposed Mine Road | Proposed Mine Road |
| | | Waste Rock Facility | | |

Map Key- Overview Map

- | | |
|---------------------|--|
| Existing Road | SFN Areas of Concern |
| Proposed Mine Road | First Mining Gold/Gold Canyon Mineral Claims |
| Main Road | Mining Land Tenure |
| SFN High Value Area | |

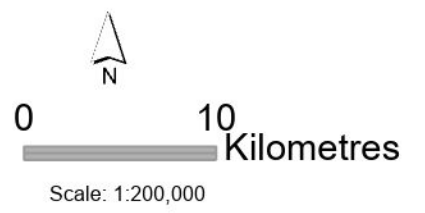




Slate Falls Nation High Value Lands and FMG Cumulative Land Package

Map Key- Overview Map

- | | | | | | |
|----------------------|------------------------|----------------------------|-----------------------|------------------------|-----------------------------|
| — Existing Road | 5007223 Ontario | Pelangio Exploration Inc. | Gold Canyon/Whitefish | Greenridge Exploration | SFN Areas of Concern |
| — Proposed Airstrip | Exiro Minerals | First Mining Gold/ | Whitefish Exploration | Thomas John Fingas | SFN High Value Area |
| — Proposed Mine Road | Greenridge Exploration | Gold Canyon Mineral Claims | | | |



Appendix B

Community-Based Land Use Plan “Niigaan Bimaadiziwin” – A Future Life

The Cat Lake-Slate Falls Community-Based Land Use Plan (CBLUP) was ratified in 2011 by Ontario (Ministry of Natural Resources) and the two First Nations (SFN and Cat Lake First Nation (CLFN)). It is Ontario's only land use plan with two First Nations.

The CBLUP contains the principles, goals and objectives that the three parties that created it (SFN, Ontario and CFLN) agreed upon. It is an expression of the SFN values, principles, and requirements for the conditions that are needed to maintain the exercise of SFN's rights. While the CBLUP has its own boundaries, the parties, including Ontario, agreed that the CBLUP extends beyond the administrative boundaries and applies to the entire Cat River catchment. In other words, the CBLUP provides essential context, information and guidance for understanding what is important to SFN, the principles and values that must be incorporated into all decision-making respecting SFN's lands and resources across SFN's territory and, most critically, what is needed to protect SFN's rights (and avoid harm to those rights), all of which Ontario agreed with.

Importance of the CBLUP to the EA process for the Springpole Project

SFN, CLFN and Lac Seul First Nation advised FMG of the requirements of the CBLUP and that the CBLUP needs to be used as the foundation of project planning and the EA process (Letter to FMG -March 30,2022-attached). Given its importance for understanding how the Project will interact with SFN's rights, SFN has repeatedly advised FMG that the principles of the CBLUP apply to area of the proposed Springpole Project. FMG has chosen to ignore this critical guidance, resulting in a wholly unacceptable, poorly planned mine design posing a catastrophic risk to the environment and the continued existence of the Slate Falls Nation itself. The discussion below provides additional detail.

Synopsis of Key Elements of the CBLUP

CBLUP Vision

"Cat Lake First Nation and Slate Falls Nation will maintain our ancestral stewardship responsibilities for the land that was given to us as a sacred gift from the Creator and pursue resource-based opportunities including forest management."

The CBLUP goes on to provide an explanation of the intention behind this vision statement:

"This vision expresses our intention to maintain the Anishnawbe relationship to the land and to maintain the Anishnawbe way of life in harmony with new land use activities. These new activities will be integrated with traditional land uses in a way that is guided by our traditional values and principles."

The vision set out in the CBLUP recognizes that resources of the Cat Lake-Slate Falls landscape can support many opportunities, including tourism, mineral exploration and mining and forest management. Importantly, the CBLUP sets out specific objectives, values and direction for identifying and managing opportunities that may arise from these resources in a way that is consistent with community needs and priorities.

Objectives

The land use plan and its implementation will contribute to the following objectives:

- Communicate the relationship of First Nations to the land;
- Describe and support the maintenance of the inherent cultural, social and economic benefits of the lands and resources to Cat Lake and Slate Falls First Nation people who traditionally use the area for subsistence and spiritual value;
- Provide a balance between protection and sustainable economic development;
- Sustain waterways that are a defining feature of the planning area and the foundation of the communities;
- Provide strategic direction that will contribute to the sustainability of lands and resources, including to:
 - Sustain free-flowing waterways; and
 - Sustain biological diversity and abundance, including support for the needs of species at risk (e.g., woodland caribou, lake sturgeon and wolverine);

Conditions that have sustained SFN's rights

The CBLUP notes that SFN traditional lands are a pristine, largely remote wilderness environment with clean, free-flowing rivers and healthy, productive fish and wildlife populations. These are the types of conditions that SFN needs to continue exercising its constitutionally protected rights and maintain its culture and identity.

CBLUP Direction Relating to Water

The Cat Lake-Slate Falls Dedicated Protected Area (CLSF-DPA) is defined by a minimum two-kilometre protection buffer on major rivers flowing through the planning area, plus several areas with notable landscape features. Major rivers include the Cat River system and the Throat River to the west. The Cat River system is a defining feature of the landscape, vital to the spiritual and cultural existence of the people of Cat Lake First Nations and Slate Falls Nation. The two-kilometre variable width protection buffer will include riparian areas directly contributing surface water and groundwater to the major waterways.

Applicability of the CBLUP to Consultation on the Springpole Mine

When the CBLUP was being created, all parties (including Ontario) recognized that creating planning area boundaries by drawing a line on the map was "arbitrary" at best as it would ignore the need to ensure that the applicable watershed(s) needed to be recognized. It was noted that the planning area is the primary watershed divide and the headwaters of five (5) tertiary watersheds (LUP-p.8).

The parties (Ontario, SFN and CLFN) recognized that ecosystems and sustainability are not limited to artificial boundaries drawn on a map or designated by legislation.

Consequently, all parties to the LUP agreed that the LUP's principles extended beyond the boundaries drawn on a map. For example, a watershed protection approach for the Cat Lake–Slate Falls waterway south of the planning area should be pursued to complement the waterway protection within the planning area. This is directly relevant to the areas of the proposed Springpole Project.

Under the CBLUP the Province and the Nations have the responsibility to advise proponents that the requirements of the CBLUP will apply to a proposed project. Given that the proposed Springpole Project

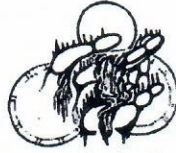
would be located in a watershed central to the vision, objectives and direction described in the CBLUP, SFN notified the proponent, IAAC and the province on 30 March 2022. The letter is attached.

To restate, the CBLUP is a critical guide for understanding how the proposed Springpole Project will interact with SFN's rights and interests and how the Project will adversely impact SFN's rights. Furthermore, given its expression of SFN values/interests, it is also an important indicator for evaluating whether or not the proponent and the Crown have meaningfully consulted.

Unfortunately, the flawed project design in the EIS – and its inconsistency with the values, objectives and direction in the CBLUP, particularly relating to the avoidance of activities within key water resources – clearly demonstrate that FMG has ignored SFN values, disregarded critical community information and is advancing a project that will undermine the conditions SFN has identified in the CBLUP as essential for the protection of its rights.

Appendix B1

March 30,2022 letter to FMG from the STPNs



March 30, 2022

via email no.: dan@firstmininggold.com

First Mining Gold Corp.
Suite 2070 - 11288 West Georgia Street
Vancouver, BC V6E 4A2

ATTENTION: Dan Wilton,
Chief Executive Officer

Dear Sir:

RE: FIRST MINING GOLD CORP. - SPRINGPOLE PROJECT

We are writing to respond to your February 15, 2022, letter.

The difficulty that each of us has, as Chief of our respective Nations, is that every time we read one of your letters, it greatly upsets us. It is bad enough to deal with a mining company that wants to drain a lake, damage our lands, and ignore our Community-based Land Use Plan but on top of all that, the company is aggressive, disrespectful of the First Nation whose lands they seek to damage and misrepresents that we support the Project and are "partners".

You continuously suggest that we should meet in person. We have explained to you, and you have not listened, that COVID-19 represents a serious health threat to First Nations, particularly remote First Nations. Each of our Nations is extremely protective of the safety of its Band Members. We have no intention of meeting in person with any First Mining individuals until the safety of our Band Members can be fully protected.

Each of us maintains that there must be a moratorium on all First Mining activities on our respective lands until we are able to establish a respectful relationship.

We have repeatedly told you that we would participate in an environmental review of the Project plans (of which we have had no input into) but under no circumstances do we wish to approve or consent to any further exploration work or development of the mine Project until after an environmental and impact assessment review is complete. We wish to learn the extent of the environmental damage before we begin the consultation process, and before we, in any way, approve your mining activities.

The activities of the STP Environmental Committee were about to commence when First Mining conducted a Webinar and announced to all its prospective investors that it had a partnership with our Nations. First Mining completely misrepresented each of our Nation's position. We were only prepared to conduct an environmental learning review of the proposed plans. We do not have a partnership. As a result of this serious misrepresentation, we lost all trust in First Mining. What could have been a collaborative review failed.

In response, First Mining aggressively writes letters, builds winter roads without our approval, continues drilling on the site without our approval, and disrespects us.

We want to have an opportunity to review the environmental damage and any impacts that your mine will cause.

We are prepared to cooperate with respect to all planning, development and construction activities with respect to the construction of the private roads to Cat Lake First Nation and to Slate Falls Nation, to be paid for by First Mining. However, it must be clearly understood that none of these activities is to be construed as the First Nations supporting the mining Project.

We have yet to hear from First Mining the exact terms of your offer of equity participation for the First Nations in the mining Project.

The negotiation protocol negotiated in 2018 was done in good faith by us, as the shared territory communities. However your disrespect, your aggressiveness, your failure to listen to the concerns of the First Nations has led to a complete breakdown of that protocol.

We have asked you to listen and we have asked you to slow down on your mining plans. First Nations are busy in the midst of a pandemic that is still active in our communities. The social needs of our citizens are a priority over your mining plans.

Your response is to pressure us into consulting with the company in ways that are disrespectful of our priorities and space at this time.

The chart in your letter is a tell-tale sign that you intend to litigate this matter sooner or later, and is an indication of your lack of trust, and demonstrates your disrespect. If you intend to litigate, we are sure we will see your chart and you will see our responses to it. We disagree with many of the comments in your chart. The following are a only a few:

Item 1: We have yet to see a concrete offer in equity partnership. Any equity partnership offer would have to be in writing. Partners should have a say in the mine

plans; particularly those “partners” that are stewards of the land. Please send us a copy of the partnership offer.

Item 2: The historic exploration drilling payment you offered to be shared by the three First Nations is simply inadequate in the circumstances.

Item 3: The exploration agreement contains extensive pre-mining and mining activities that are unacceptable. We have communicated this to you, and yet we still get the same agreement back without any significant changes. We will not agree to give you a “blank cheque”.

Item 4: You continue to build winter roads, conduct site activities, plan future mine activities, when we have not consented to those items or to the mine proceeding. Your activities demonstrate your disrespect. Your activities fail to involve our Nations in planning in any material way.

It was clear to the Springpole Environment Committee, its consultants and the regulatory authorities that the baseline information collected to-date by First Mining was very inadequate and that much more work is required.

Item 5: Our Elders have spoken to you and expressed their serious concerns over the environmental damage that the mine will cause. Yet, First Mining has ignored this. As part of the indigenous culture, you do not ignore what Elders say, you listen to what Elders say and try to learn from that. This lack of respect demonstrates that your attempts at meeting with community members is insincere. We fail to see the need to meet if you are not going to listen to us.

Item 5: It is premature to conduct Traditional Knowledge studies of the area. Our people know what activities they have done in the area of the mine. The recording of traditional ecological knowledge is solely for the purposes of the mine being in a position to obtain a Permit following an environmental assessment hearing.

Item 8: Our Nations believe that the current Environmental Assessment Process does not satisfy Ontario’s constitutional duty to consult with respect to this Project.

Item 9: We have repeatedly told you that we are not interested in developing a Consultation Protocol until we have done a review of the environmental damage and other impacts that will be caused by the mine. That was the purpose of the environmental committee. You misrepresented the role of that committee in your Webinar to the public and you failed to correct that error when it was brought to your attention.

Unfortunately, that is not the only misrepresentation.

Your continued insistence on developing a Consultation Protocol shows disrespect and demonstrates that you are not listening.

The Negotiation Protocol, signed in 2018, has failed as a result of First Mining's misrepresentations.

Item 12: If First Mining wants to explain its plans, then it should begin by accepting, in writing, that meaningful consultation cannot proceed until the environmental committee has reviewed the environmental plans of the project to understand the mine plan. There is no point in planning anything further until the environmental committee has completed its review. There is no need for a Development Agreement at this time.

Please provide us with the details of the "adjusting field plans to accommodate requests of the committee".

Item 14: We do not accept that the plans prepared by your company prevent an underground operation. We need the opportunity to verify this opinion with an independent peer review to be funded by First Mining. In addition, we need a concrete offer from First Mining to fund the planning, development and construction of the private roads from the mine to Cat Lake First Nation and to Slate Falls Nation, all to be built before any mine construction starts.

It has become clear to us that the difficulties in our relationship stem from fundamental differences between the way we understand our relationship with each other and the land. We understand your systems and laws, but you need to understand ours. We were gifted our territory by the Creator. Before we can approve any project, we must assess the impact of those activities in accordance with the laws and responsibilities which were given to us plus as is provided for by the various governments' adoption of UNDRIP principles.

Furthermore, Cat Lake and Slate Falls First Nations have adopted a Community-based Land Use Plan. Under the *Far North Act, 2010*, as of July 2011, land use activities in the planning area must be consistent with the land use direction specified in this plan, which includes emphasizing Cat Lake-Slate Falls Traditional Knowledge as a foundation for decision-making now and in future and to protect our water and water systems as vital to all life and inseparable from Cat Lake and Slate Falls peoples' spiritual and cultural existence. That the Project will be located at the headwaters of our water systems (and those in most of Northwestern Ontario) must be recognized and considered. Only through a process led by our nations and our elders and incorporating our principles can we be satisfied that any decision or project in our traditional territory is in line with the land use plan. Lac Seul First Nation shares the vision of maintaining our ancestral stewardship responsibilities for the land when considering projects.

For these reasons, we propose that an Anishinaabe Impact Assessment of the Springpole Project be conducted, similar to the approach between the Squamish Nation and Woodfibre in B.C., and the Stk'emlu'psemc te Secwempemc Nation and KGHM Ajax Mining Inc. This assessment will enable us to discharge our responsibilities as stewards for this territory and build the foundation for meaningful discussions about the Project. It would also allow you to understand our systems of laws and to engage in meaningful discussions about the Project.

We note that you have said that First Mining has earmarked \$1 million dollars to conduct an environmental assessment. These funds should be used to support an Anishinaabe-led Impact Assessment. However, we must develop a more comprehensive workplan and budget before we agree on a funding amount. We suggest meeting virtually at the end of April to discuss an agreement for conducting a comprehensive Anishinaabe Impact Assessment.

Sincerely,

<Original signed by>

<Original signed by>

<Original signed by>


Chief Russell Wesley
CAT LAKE FIRST NATION


Chief Clifford Bull
LAC SEUL FIRST NATION


Chief Lorraine Crane
SLATE FALLS NATION

cc. Keith Neumeyer, Chairman, First Mining Gold Board of Directors
via email no.: info@firstmininggold.com

Steve Lines, Vice President, Environmental & Community Relations - First Mining Gold Corp.
via email no.: steve@firstmininggold.com

Mark Deans, Community Relations Manager
via email no.: markdeans@firstmininggold.com

Hon. Greg Rickford, Minister of Indigenous Affairs, Minister of Northern Development, Mines, Natural Resources and Forestry
via email no.: greg.rickford@pc.ola.org

Hon. David Piccini, Minister of the Environment, Conservation and Parks
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Appendix C

Summary of Key Events 2011 to Present

In 2011, understanding that people would likely want to undertake projects in their unspoiled lands, Slate Falls Nation (SFN) worked with Cat Lake First Nation (CLFN) and the Ontario Ministry of Natural Resources to co-author and conclude a Community Based Land Use Plan (CBLUP). The first and only of its kind in the province involving two First Nations, the CBLUP affirms the Nations’ relationship and responsibilities to the land and the importance of ongoing traditional use. It further describes resource protection and responsible natural development principles the communities expect of proponents seeking to develop extractive projects. The plan confirms:

- The joint agreement to protect the essential waterways and adjacent riparian zones which SFN relies upon for their way of life, traditional use, and health of their Nation.
- Importance of the Nations’ traditional knowledge as a foundation for decision-making.
- Importance of enabling informed decision-making by the Nations
- The need for proponents to be guided by SFN's traditional values and principles.

Further, the CBLUP promotes the protection of the community and ecological values through the application of “Cat Lake-Slate Falls Guidelines for Mineral Sector Projects: Best Management Practices”.

First Mining Gold (FMG) proposes a commercial mining project in a critical watershed directly upstream of SFN on their Traditional Lands. The proposed FMG project will directly impact key watersheds and riparian areas upon which SFN depends for the exercise of rights, its way of life, and its existence as a people. Lac Seul First Nation (LSFN) and CLFN are also near the proposed Project but are less directly affected by the Project.

The Table below chronicles SFN's good-faith efforts to understand FMG's proposed development, which is guided by our Traditional Values and Principles expressed in the CBLUP. Despite SFN efforts, FMG has continually frustrated our meaningful participation. The Table below is not exhaustive, but it highlights key events and characterizes the relationship.

Year	Key Event
2011	Community-Based Land Use Plan (CBLUP) is ratified by SFN, Ontario (MNRF) and CLFN.
2014	Gold Canyon applies for a winter road extension to Springpole. The application was denied as there was no Net Overall Benefit for Caribou.
2015	FMG Acquires the Springpole Project and begins exploration.
2017	SFN, LSFN and CLFN developed the Shared Territory Protocol (STP) to collaborate on projects of shared interest.
2018	STP Nations reach Negotiation Protocol Agreement with FMG setting out a respectful engagement process that upholds the STP, establishing a cooperative working relationship, and acknowledging the CBLUP.
2018- to 2022	Lack of meaningful consultation between FMG and the STPN. IAAC grants FMG a three-year filing extension to December 2025 to allow the completion of STPNs ALIA.
2022 (Mar)	SFN provides written confirmation to IAAC, the province and FMG that the EIS project design must respect the principles and values expressed in the CBLUP.
2022	STPNs agree to complete an Anishinaabe-led Impact Assessment (ALIA) funded by FMG.
2023 (Nov)	SFN withdraws from the STPN and joint ALIA. SFN agrees to complete independent ALIA, funded by FMG. FMG promises full cooperation. SFN requests copies of all STPN ALIA, work in progress documents and related invoices. FMG refuses.

2023 (Aug)	FMG applies for a permit to construct a “temporary, winter only” mine access road outside of the EA process using the less onerous health and safety permit to avoid the requirement of Overall Benefit Plan Permit. This “temporary road”, coincidentally follows the same route as FMG’s preferred permanent mine access road. These efforts undermine the precautionary approach required in the EIS process and SFN views this as “Project Splitting”. Therefore, the EIS understates the cumulative risks and impacts to both SFN and the environment.
2024 (Feb)	FMG confirms financial support for an SFN-specific ALIA. FMG also acknowledges the need for SFN Project consent.
2024 (April)	CLFN and LSFN’s review of the draft EIS is presented to FMG. FMG erroneously claims participation by all three Nations.
2024 Spring	FMG asks SFN to submit a work plan and budget to complete the ALIA, technical reviews, and other matters to end of Dec 31, 2024, to inform the EIS before submission. SFN does so.
2024 Spring	FMG attempts to limit the scope and funding for the submitted workplan and budget. FMG delays funding. SFN continues without funding.
2024 (Jul)	FMG agrees to fund the SFN work plan and budget on July 15 th . On July 19 th FMG rescinds their agreement, presenting reduced work scope and budget. SFN objects and continues work. On Jul 29, FMG ignores defined SFN communication protocols, sending a letter to Chief Crane, copying regulators and attaching a new reduced scope offer and falsely implying that an agreement had been reached. The new offer continued to require an unacceptable limitation of scope and funding.
2024 (Aug - Oct)	1) FN writes FMG CEO Dan Wilton, requesting that he personally review contents of letter and attend meeting(s) to resolve outstanding issues. 2) Meetings were held Set 12, Oct 1, Oct17, where FMG made numerous apologies and commitments including an interim payment for outstanding invoices. 3) FMG proposes new conditions, limited scope workplan and shortened delivery time frames. SFN rejects proposed changes to agreement. 4) Draft minutes prepared by FMG did not reflect conversations. FMG dismissed need to create accurate minutes acceptable to both parties.
2024 (Nov)	FMG files the EIS with regulators without the benefit of the SFN ALIA or technical review. The EIS was submitted during community elections, limiting SFN's ability to respond.
2024 (Nov)	FMG files to convert 137 mining claims to seven leases adjacent to the Springpole Project site showing intent to increase the size of the Project beyond what was described in the EIS. Some of this is required for the Springpole project, but other areas are not.
2024 (Dec)	FMG submits, for review, two comprehensive exploration permit applications encompassing the Birch, Seagrave and Springpole Lake Caribou calving grounds, indicating its intent to increase size/scope of activities in the area.
2024 (Dec)	Note: The above-mentioned EIS submission, two exploration permit applications, and seven mining lease conversion applications were all submitted to coincide with review periods spanning the Christmas holidays, limiting visibility and ability to comment.
2025 (Jan)	FMG accuses SFN of “walking away from the table”. This is False. SFN continues to complete ALIA and technical review of EIS as agreed with FMG.
2025 (Feb)	SFN completes initial technical review of the EIS and submits to regulators for their consideration.