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VIA WEB PORTAL AND VIA EMAIL: springpolegoldmine-minedorspringpole@iaac-aeic.gc.ca

Tara Bailey, Project Manager

Impact Assessment Agency of Canada
600-55 York Street, Toronto, ON M5J 1R7

Dear Ms. Bailey:

Re: Springpole Gold Project – Comments on Draft Environmental Assessment Report

I am the Director of Operations of the International Union of Operating Engineers, Local 793 (“Local 793”). On behalf of Local 793, I write to express our strong support for the advancement of the Springpole Gold Project proposed by First Mining Gold Corp.

By way of summary, Local 793 submits that approval of the Springpole Gold Project (located in northwestern Ontario, approximately 110 kilometres northeast of the Municipality of Red Lake), would generate a substantial amount of work in a region of Ontario that has seen a recent economic decline to one of its principal industries (i.e. the paper and forestry sectors) as a result of tariffs and economic uncertainty. The socio-economic benefits associated with the approval of the project to workers, including Indigenous workers, and their communities would therefore be significant.

Consideration of these socio-economic benefits is consistent with the IAAC’s mandate and strongly weighs in favour of approval of the project.

I. The Mandate of the Impact Assessment Agency of Canada

Section 4(1) of the *Canadian Environmental Assessment Act, 2012* (the “CEAA”) is clear that an environmental assessment must be administered in a manner that promotes communication and cooperation with Indigenous peoples and promotes sustainable development in order to achieve or maintain a healthy environment and a healthy economy.

Moreover, section 19(1) of the CEAA outlines the factors that should be taken into account by the IAAC in conducting its assessment including, *inter alia*:

- (a) the environmental effects of the designated project, including the environmental effects of malfunctions or accidents that may occur in connection with the designated project and any cumulative environmental effects that are likely to

result from the designated project in combination with other physical activities that have been or will be carried out;

- (b) comments from the public — or, with respect to a designated project that requires that a certificate be issued in accordance with an order made under [section 54](#) of the [National Energy Board Act](#), any interested party — that are received in accordance with this Act;

The term “environmental effects” is defined as, with respect to Indigenous persons, “an effect occurring in Canada of any change that may be caused to the environment”, including health and socio-economic conditions (s. 5(1)(c)).

While we acknowledge that the instant assessment is being conducted pursuant to the *CEAA*, we would also highlight the broadened scope of the IAAC’s mandate pursuant to the *Impact Assessment Act, 2019* (“IAA”), which further emphasizes consideration of the social and economic well-being of the people of Canada.

In preparing this submission, we have aimed to ensure that our comments are relevant to the IAAC’s mandate and, in particular, the factors outlined above. What is abundantly clear from a plain reading of both the *CEAA* and the *IAA*, is that the socio-economic impact of a project is an important consideration in the assessment. As a trade union representing workers in diverse communities, Local 793 offers its perspective specifically on the socio-economic impact of the Springpole Gold Project.

II. Background on Local 793 and the Operating Engineers Training Institute of Ontario

Local 793 is a trade union representing more than 21,000 crane and heavy equipment operators and other skilled workers employed in all sectors of the construction industry, industrial and mining sectors across the Province of Ontario and the Territory of Nunavut.

Many of the large construction contractors that operate in Northwestern Ontario are signatories to collective agreements with Local 793. These contractors include large general contractors such as Aecon Group Inc., EllisDon, Kiewit Corporation, and Bird Construction. It also includes local area contractors such as Tom Jones Corp., LH North Contracting, LTL Contracting, Tera North Construction, Wildon Wiring, Staal Utility, Gridlink Corp, North Shore Forest Productions, among many more. The collective agreements that we have negotiated offer fair wages, benefits, pensions, training opportunities and other important employment terms.

We have hundreds of members that live in Northern Ontario with the necessary training and skills to perform the work that would be generated by the construction of the Springpole Gold Project.

Additionally, in coordination with Local 793's training division, the Operating Engineers Training Institute of Ontario ("OETIO"), we are well-equipped to provide the necessary skills training for the next generation of operating engineers, including for Indigenous workers.

The OETIO is a progressive organization affiliated with Local 793 that is dedicated to the provision of quality skills training consistent with evolving needs and government standards and is an established training delivery agent with the Ontario Ministry of Labour, Immigration, Training and Skills Development for crane and heavy equipment apprenticeships. Importantly, the OETIO is also registered as a vocational program under the *Ontario Career Colleges Act, 2005*.

The relevance of these training capabilities to the IAAC's mandate is discussed in more detail below.

III. The Importance of Economic Reconciliation to the IAAC's mandate

An important goal of Local 793 is to be a positive participant in economic reconciliation. We take equitable access to jobs, training, and career opportunities very seriously. Part of Local 793's strategy involves partnering with Indigenous communities to ensure the economic and cultural interests of members of those local communities are meaningfully represented in the collective agreements we negotiate. These goals are consistent with IAAC's mandate to consider the health, social, and economic consequences of a project, including for affected Indigenous communities.

In our experience, the benefit of these mining projects to the socio-economic realities of local Indigenous communities cannot be overstated. Often, these projects represent significant long-term employment opportunities and careers in well-paid, skilled positions.

For example, since 2019 Local 793 has represented approximately 900 production employees working at Baffinland Iron Mine Corporation's Mary River Mine on Baffin Island, Nunavut. A significant portion of these employees are Inuit and reside in the Qikiqtani Region of Nunavut. The benefit of this project on the local communities has been impactful, as Baffinland is one of the largest private sector employers in Nunavut. Our Inuit members have consistently voiced their support for the project and the employment and training opportunities that the project has afforded them.

Local 793 does not simply speak about economic reconciliation in the abstract. We act on that philosophy. Local 793 has already been engaged in dialogue with certain Indigenous communities and organizations that will be affected by the Springpole Gold Project, in order to maximize the benefits to these communities.

Notably, Local 793 has had discussions with representatives of the Ojibway Nation of Saugeen as well as with the Nokiiwin Tribal Council. Nokiiwin Tribal Council has Member Nations in the following Northwestern communities, including: Animbiigoo Zaagi'igan

Anishinaabek, Biinjitiwaabik Zaaging Anishinaabek, Bingwi Neyaashi Anishinaabek, Fort William First Nation, Netmizaaggamig Nishnaabeg, and the Ojibway Nation of Saugeen.

Representatives of the Ojibway Nation of Saugeen have expressed the need for training in order to ensure that workers in their communities have the required skills to effectively take advantage of the economic opportunities that the Springpole Gold Project and other similar development projects will create.

These issues are intricately connected to the IAAC's mandate, as skills and training are necessary in order to translate economic opportunities into meaningful long-term careers for workers in these affected communities.

IV. Labour Shortages and Training Opportunities

Demand for skilled workers in the mining sector is a growing problem. The Mining Industry Human Resources Council (MIHRC) has forecasted that mining employment could grow up to 25 percent in the next 10 years, but the shortage of skilled labour has slowed that growth.¹ The MIHRC has further found that the industry underutilized key talent pools, and in particular, indigenous workers.²

The Government of Ontario has also recognized this reality. In a press release, Greg Rickford, Minister of Indigenous Affairs and Minister of Northern Development stated as follows:

“By supporting innovative skills training projects across Northern Ontario, we are opening the door for Indigenous workers and job seekers to embark on meaningful, lifelong careers within in-demand sectors across a number of industries,” [...]. Our government continues to reduce barriers for workplace entry, creating an intuitive process that will yield beneficial opportunities for communities, business owners and workers in the North.”³

In our view, trade unions, employers, and governments all have vital roles to play in ensuring that Indigenous communities and others in Northwestern Ontario can meaningfully access the employment opportunities and careers created by projects such as the Springpole Gold Project.

The OETIO has been in operation since 1982 and is approved by the Ministry of Labour, Immigration, Training and Skills Development to deliver Heavy Equipment, Mobile Crane, Tower Crane, Concrete Pump and apprenticeship programs. It further offers specialized training courses such as WHMIS, confined space, and environmental protection. The latter focuses on providing participants with knowledge of environmental protection legislation as

¹ ['Chronic labour shortages' putting growth of mining sector at risk: council - Northern Ontario Business](#)

² [Labour gaps risk slowing mining sector's rise, industry council says - Canadian Mining Journal](#)

³ [Ontario Training Indigenous People for In-Demand Jobs | Ontario Newsroom](#)

well as the cause and effects of environmental hazards related to the mining and construction industries. The OETIO is also launching a new course on Surface Mining in June that will teach important skills intended specifically for the mining sector.

Of particular relevance to the IAAC's mandate is the OETIO's Indigenous pre-apprenticeship program, which is a program consisting of three weeks of classroom training, four weeks field training, and an eight-week work placement with a Local 793 signatory contractor. The program teaches Indigenous trainees fundamental skills for employment in the construction and mining sectors, including equipment operation and health and safety.

Approval of the Springpole Gold project, in conjunction with a plan to ensure that training opportunities are available and accessible, will help maximize the benefits of the project for affected communities.

V. The Springpole Gold Project: Socio-Economic Benefits

Historically, the paper and forestry sectors have been one of the primary economic engines of Northern Ontario. Communities in Northern Ontario have therefore been unduly affected by the impact of recent tariffs, trade disputes, and economic uncertainty. Many Indigenous and rural communities in Northern Ontario have depended on the jobs created by this sector. The Government of Ontario has published a report regarding the forestry sector detailing these concerns.⁴

With the decline of the paper and forestry sector, it is even more important that projects such as the Springpole Gold Project proceed in an expeditious manner to ensure economic and social prosperity for the future of these communities.

The Springpole Gold Project represents a major opportunity for long-term economic development in Northwestern Ontario. Communities across the region—including many First Nations—continue to seek stable, well-paid employment and clear pathways to apprenticeship and certification in the skilled trades. Springpole can play an essential role in meeting these needs by creating positions in many of the skilled trades that will be required for the construction and operation phases of the project, as well as supporting local and Indigenous contractors.

We also recognize the broader regional benefits connected to this project. Planned infrastructure improvements—such as enhanced road access and upgrades to electrical transmission—will strengthen connectivity for remote communities and support more reliable access to essential services. These investments will leave lasting benefits well beyond the life of the mine.

⁴ [Success at a glance: Ontario's Forest Sector Strategy 2025 progress report | ontario.ca](#)

The Project's anticipated construction and development phases will generate substantial opportunities in the skilled trades and specifically for operating engineers that may be employed by many of our signatory contractors in areas such as heavy equipment operation, crane operations, earthworks, site preparation, and ongoing maintenance. With its strong emphasis on safety, training, and partnership with local and Indigenous communities, Springpole represents a significant career-building opportunity for our members while contributing to sustainable economic growth across Northwestern Ontario.

VI. Conclusion

In light of the above, **Local 793 strongly encourages the Government of Canada to approve the environmental assessment and allow the Springpole Gold Project proposed by First Mining Gold Corp to proceed.** This Project is a vital opportunity to strengthen northern communities, expand skilled-trade careers, and support a more inclusive and prosperous regional economy.

Sincerely,



Ken Lew

Director of Operations, IUOE Local 793

Cc: Honourable Julie Dabrusin Minister of Environment, Climate Change and Nature
(ministre-minister@ec.gc.ca)