

Ministry of the Environment,
Conservation and Parks
435 James Street South
Suite 331
Thunder Bay, ON, P7E 6S7
Tel.: 807 707-6277
Fax: 807 475-1754

Ministère de l'Environnement, de la
Protection de la nature et des Parcs
435, rue James sud
Bureau 331
Thunder Bay, ON, P7E 6S7
Tél. : 807 707-6277
Télééc. : 807 475-1754



March 12, 2026

MEMORANDUM

To: Antonia Testa
Special Project Officer
Environmental Assessment Branch - Toronto Regional Office

From: Scott Parker
Surface Water Specialist
Technical Support Section – Northern Region

Re: Impact Assessment Agency of Canada (IAAC) Draft Environmental Assessment
Report - First Mining Gold, Springpole Gold Project - (ECHO SR# 1-1 586697796)

1.0 Introduction

As requested, I have reviewed the surface water related information provided regarding the Impact Assessment Agency of Canada (IAAC) Draft Environmental Assessment (EA) Report for the Springpole Gold Project proposed by First Mining Gold Corp (FMG). The IAAC Draft EA Report presents IAAC's preliminary conclusions and recommendations regarding whether the project is likely to cause significant adverse environmental effects and whether technically and economically feasible mitigation measures and follow-up programs would address those potential effects. The IAAC Draft EA Report sought input and considered measures that the Province of Ontario would undertake or ensure to address potential environmental effects of the project.

The purpose of this review was to evaluate whether the IAAC Draft EA Report has accurately and adequately characterized the potential adverse environmental effects and relevant provincial legislative frameworks, mitigation measures, monitoring, and closure plans that relate to ministry technical review comments and concerns regarding adverse effects to fish and fish habitat, or to the health of indigenous peoples. Only concerns related to surface water quality and/or quantity were considered as part of this review.

2.0 Discussion and Recommendations

The IAAC Draft EA Report identified several technical concerns that align with ministry concerns regarding assumptions of load generation from mine materials, the effectiveness of mitigation of contaminant loading, predicted timeframes for pit refilling,

habitat off-setting, the potential underestimation of seepage volume and contaminant pathways, and the potential impact to surface water quality in the receiving environment, in particular Springpole Lake and Birch Lake.

The IAAC Draft EA Report states that the IAAC has concluded that residual effects are not likely to be significant on fish and fish habitat (Table i-1) based on the implementation of recommended mitigation measures. However, the IAAC Draft EA Report also recognized that FMG previously indicated that substantial untreated fugitive seepage from the CDF (>10% by volume) would bypass proposed collection and site water management systems and enter the receiving environment; and that there are uncertainties related to seepage quality, preferential pathways, and nearshore discharge locations in Birch and Springpole Lakes that may impact fish and fish habitat at localized nearshore areas. The proponent also previously indicated that approximately 50% of the total tailings volume are PAG and water draining from the saturated tailings may contain sulphate concentrations greater than 1000 mg/L. FMG also previously indicated that at some flow assessment nodes, seepage accounted for a large volume of discharge from the identified waterbody or bay. Based on these uncertainties, I am of the opinion that the potential remains for impacts to fish and/or fish habitat from the project as proposed.

The design details for effluent treatment are not presented in the IAAC Draft EA Report and the report only states that effluent treatment will produce end-of-pipe concentrations necessary to prevent adverse effects to the receiving environment. However, it is important to note that the final effluent discharge must meet provincial and federal effluent concentration limits. These effluent limits and potential contaminant mixing zones downstream of the final effluent discharge point should be addressed more thoroughly during the EA process and must be finalized during permitting.

In general, the IAAC Draft EA Report accurately and adequately characterizes the potential environmental impacts and relevant provincial legislative requirements as they relate to previously identified MECP surface water concerns. However, several uncertainties raised in the IAAC Draft EA Report that align with ministry concerns related to the location and design of the CDF, potential underestimation of seepage volume and contaminant pathways, and uncertainty in the projected pit filling time frame, indicate that there may be residual impacts to fish and/or fish habitat from the project.

The technical concerns raised in the IAAC Draft EA Report related to potential surface water contamination from fugitive seepage sources, particularly from the Co-Disposal Facility (CDF), proposed deposition strategy, and contaminant pathways, align with previous/current ministry surface water related reviews and comments. Based on the current information available to the ministry, the concerns raised in the IAAC Draft EA Report continue to present uncertainty regarding treatment capability, contaminant generation, seepage management, contaminant loading to surface water, and potential residual impacts to fish and/or fish habitat. However, many of the surface water related

concerns that remain may be addressed through the EA process and/or EA conditions prior to permitting.

3.0 Closure

The purpose of the review is to provide advice regarding surface water conditions based on the information provided in the IAAC Draft EA Report. The ministry cannot guarantee that the information that has been provided by others is accurate or complete. The conclusions, opinions, and recommendations of the reviewer are based on information provided by others, except where otherwise specifically noted. A lack of specific comment by the reviewer is not to be construed as endorsing the content or views expressed in the reviewed material.

<Original signed by>

Scott Parker
Surface Water Specialist – Northern Region

Cc: Chris Mahon, Manager – Priority Sector Support Unit
Naomi Howard, Water Resources Supervisor, Northern Region
Carroll Leith, Technical Support Manager, Northern Region
Laura Maharaj, Regional Hydrogeologist, Priority Sector Support Unit