



WABAUSKANG FIRST NATION

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To: Impact Assessment Agency of Canada

March 26, 2026

Subject: Comments on Springpole Mine Project Draft Environmental Assessment Report – Improper Project Scoping and Failure to Assess Road-Related Impacts on Wabauskang First Nation

On behalf of Wabauskang First Nation (WFN), this letter provides comments on the Draft Environmental Assessment Report (EAR) for the Springpole Gold Project, released by the Impact Assessment Agency of Canada (IAAC) on February 27, 2026, during the current public comment period.

WFN submits that the Draft EAR is incomplete and based on an improperly and overly narrow project scope, particularly with respect to road construction, road upgrading, and substantially increased industrial road use associated with the Project. As a result of this incorrect scoping, the Environmental Impact Statement (EIS) and the Draft EAR fail to assess a set of significant adverse effects on WFN's territory, Aboriginal and Treaty rights, traditional land use, archaeology, and environmental values.

Throughout the EA process, the Project has been described primarily as consisting of:

- the mine site,
- the transmission line, and
- an approximately 18-kilometre mine access road.

This description is materially incomplete. In practice, the Project will require the extension, upgrading, long-term maintenance, and intensive use of existing forestry roads to the east and west of the proposed access road to accommodate heavy, frequent, and year-round mining traffic. These road segments are functionally necessary to the Project and operate as an integrated access system. Treating them as baseline conditions rather than Project-enabled infrastructure improperly excludes their effects from the assessment.

In addition, the Project description improperly assumes that existing and planned forestry access represents a stable or continuous baseline. Current regional forestry conditions include mill curtailments and idling, limited near-term harvest scheduling in the vicinity of the mine, and broader recessionary pressures within the forest sector. Forestry operations are inherently periodic and temporary, advancing and retreating as harvest areas change, whereas mining operations require continuous, long-term, and high-intensity access over



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the life of the Project. Treating forestry access as an enduring baseline against which mining-related road use is assessed fails to account for the fundamentally different scale, duration, and intensity of mine-enabled access and results in a material understatement of Project effects.

The mine associated road networks are located within the heart of WFN's traditional territory. The forestry roads traverse areas of high cultural, ecological, and practical importance to WFN, including areas of active traditional land use and areas with archaeological and heritage values.

The extension, upgrading, and intensified use of these roads will:

- create new and expanded access into areas that are currently relatively intact,
- permanently increase third-party access and use,
- increase disturbance, safety risks, and displacement of traditional activities, and
- result in lasting environmental and cultural effects.

Once established and upgraded to support mining traffic, these access effects are likely permanent and cannot be meaningfully reversed. Importantly, road extension and upgrading to support mining traffic creates path-dependent effects that cannot be undone through future mitigation or monitoring. Once access is established and normalized, associated environmental, cultural, and land-use impacts persist regardless of future operational changes or closure commitments.

WFN did not raise these concerns at earlier stages of the EA because the Project was consistently presented and understood to be narrowly scoped to the mine site, the transmission line, and a defined 18-kilometre access road. Based on the information provided at that time, WFN did not understand that the Project would require the extension, upgrading, and substantially increased use of additional road networks across WFN territory, nor that these road systems would function as integral components of the mine.

As a result, WFN did not anticipate that the Project would give rise to widespread access-related effects affecting large portions of its territory, traditional land use, archaeology, and environmental values. It is only through review of the Draft EAR, which relies heavily on access, linear disturbance, and cumulative effects assumptions carried forward from the EIS, that the full implications of this incorrect scoping have become apparent.



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WFN is therefore raising these concerns now, during the Draft EAR public comment period, to ensure that IAAC has the opportunity to address these deficiencies before the EA Report is finalized and submitted to the Minister.

Because the Project was improperly scoped:

- significant effects associated with road upgrading, extension, and intensified use were excluded from assessment;
- impacts to WFN traditional land use, archaeology, and heritage values were under-assessed or not assessed at all; and
- cumulative effects on WFN territory were materially understated.

This exclusion also misled WFN's understanding that the Project would not significantly affect its territory, thereby limiting WFN's engagement earlier in the process.

Pursuant to section 23(2) of CEAA 2012, where the responsible authority is of the opinion that there is insufficient information to conduct the environmental assessment or prepare the EA report, it may require the collection of additional information or the undertaking of studies, including requiring the proponent to carry out such work. These deficiencies are particularly acute given CEAA 2012's express purpose of encouraging the study of cumulative effects of physical activities in a region and the consideration of those effects in environmental assessments.

Given the deficiencies outlined above, WFN submits that:

- the Draft EAR does not contain sufficient information regarding the impacts of road extension, upgrading, and increased industrial use on WFN;
- additional studies are required to assess impacts on traditional land use, archaeology, heritage values, and the environment; and
- these matters must be addressed before the EA Report is finalized.

Proceeding to finalize the EA Report without addressing these deficiencies would risk a decision being made on an incomplete and inaccurate understanding of the Project's effects on WFN and its territory.

WFN respectfully requests that IAAC:

1. Determine that the Draft EAR is incomplete due to improper scoping of road-related Project components and effects; and



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2. Require the Proponent to provide additional information and studies addressing the impacts of road extension, upgrading, and increased use on WFN territory, traditional land use, archaeology, heritage values, and cumulative effects.

WFN raises these concerns in good faith and in accordance with the EA process. Addressing these deficiencies at this stage is necessary to ensure that the final EA Report is complete, precautionary, and capable of supporting informed decision-making.

Sincerely,

<Original signed by>

Chief Bill Petiquan

CC: Wabauskang First Nation: Councillor Jason Petiquan; Councillor Terri Meekis; Councillor Rhonda Audit; Triin Hart, Resource Office Manager, Ashlee Perrault, Consultation Coordinator; Kate Kempton, Senior Counsel, Woodward & Company LLP