



**Regional Councillor  
For the Northwestern Ontario Métis Community**

March 27, 2026

Amy Sen  
Acting Director, Ontario Region  
Impact Assessment Agency of Canada  
600-55 York Street  
Toronto ON M5J 1R7

*Sent via email:*

[springpolegoldmine-  
minedorspringpole@iaac-aeic.gc.ca](mailto:springpolegoldmine-minedorspringpole@iaac-aeic.gc.ca)

Dear Amy Sen:

**Re: REVIEW OF THE SPRINGPOLE GOLD PROJECT (THE “PROJECT”)  
DRAFT ENVIRONMENTAL ASSESSMENT REPORT (DATE FEBRUARY  
2026) AND POTENTIAL CONDITIONS UNDER THE CANADIAN  
ENVIRONMENTAL ASSESSMENT ACT, 2012**

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I am writing to you as the democratically-elected Regional Councillor for the Northwestern Ontario Métis Community (“NWOMC” also referred to as “**Region 1**”) and pursuant to the authority set out in the Métis Nation of Ontario’s (“MNO”) *Consultation Protocol for Treaty #3, Lake of the Woods/Lac Seul and Rainy Lake/Rainy River Traditional Territories*.

Thank you for the opportunity to comment on the Draft Environmental Assessment Report (the “**Draft EA Report**”) and the Potential Conditions.

### **Overview**

The Northwestern Ontario Métis Community (“NWOMC”) retained MNP to conduct a review and analysis of the Draft Impact Assessment Report prepared by the Impact Assessment Agency of Canada (“IAAC”). MNP proceeded to complete a comparison and review of past Northwestern Ontario Métis Community (“NWOMC”) issues/concerns, including the Draft and Final Environmental Impact Statement, and contrast them with how they were characterized within the Project.

The Draft EA Report accurately noted that the NWOMC and First Mining Gold (the “**Proponent**”) have signed a bilateral agreement (confidential) (the “**Agreement**”) with respect to the Project, whereby the Parties agreed that all previously raised issues have been resolved, and all identified impacts to the NWOMC as a result of the Project have been addressed by the Proponent through

the terms of the Agreement.<sup>1</sup> Both the NWOMC and the Métis Nation of Ontario (“MNO”) sent letters to IAAC informing them of this and indicating their support of the Project.

We attach MNP’s letter and request that IAAC give consideration to the points highlighted by MNP and to make the changes to the Draft EA Report noted in the MNP comments (see Enclosure 1).

I am also asking that you make changes to the following characterization of the NWOMC’s Section 35 Rights, Aboriginal and Treaty rights, found in section 11.3 of the Report. This section currently reads:

*“The project is located within the boundaries of the Métis Nation of Ontario’s Lake of the Woods/Lac Seul and Rainy Lake/Rainy River Consultation Protocol area, where Métis citizens assert Aboriginal rights. The Métis Nation of Ontario has established Aboriginal rights in the area through the Supreme Court in R. v. Powley (2003). Citizens of the Northwestern Ontario Métis Community also assert rights as descendants of signatories to the Halfbreed Adhesion of Treaty #3 (1875). In 2018, the Province of Ontario, as represented by the Ontario Ministry of Natural Resources, entered into a Framework Agreement on Métis Harvesting with the Métis Nation of Ontario, which acknowledges the Métis Nation of Ontario’s Harvesting Policy.”*

The above description includes some inaccuracies, which we have fixed and rectified in red, below. We ask that you replace the above paragraph with the corrected paragraph below:

*“The project is located within the boundaries of the Métis Nation of Ontario’s Lake of the Woods/Lac Seul and Rainy Lake/Rainy River Consultation Protocol area, where Métis citizens assert Aboriginal and Treaty rights. The Métis Nation of Ontario has established Aboriginal rights in the area through the Supreme Court in R. v. Powley (2003). Citizens of the Northwestern Ontario Métis Community also assert Treaty rights as descendants of signatories to the Halfbreed Adhesion of Treaty #3 (1875). In 2018, the Province of Ontario, as represented by the Ontario Ministry of Natural Resources, entered into a Framework Agreement on Métis Harvesting with the Métis Nation of Ontario, which acknowledges the Métis Nation of Ontario’s Harvesting Policy.”*

We further request that IAAC include the following additional information, to the paragraph above, to ensure that the NWOMC’s Aboriginal and Treaty rights are fully and accurately documented in the Report.

We request that IAAC add (or summarize) the following:

“In addition to the above, the NWOMC have entered into a number of agreements that recognize the NWOMC’s Section 35 rights, interests which include:

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<sup>1</sup> Springpole Gold Project, Draft Environmental Assessment Report, February 2026, Page 107 (PDF Page 119)

- In 2015, the MNO and Canada signed the [Consultation Agreement](#) (“**Consultation Agreement**”) to ensure the Métis communities represented by the MNO (including the NWOMC) are consulted and accommodated on projects impacting their Section 35 rights, interests, and claims;
- In 2017, the NWOMC (represented by the MNO) and Canada signed the [Agreement on Advancing Reconciliation with the Northwestern Ontario Métis Community](#) (“**Reconciliation Agreement**”) that established a specific sub-table negotiation process for advancing reconciliation and redress of the NWOMC’s outstanding claims against the federal Crown, including related to the Halfbreed Adhesion;
- In 2019, the MNO and Canada signed a self-government agreement—the [Métis Government Recognition and Self-Government Agreement](#) (“**MGRSA**”)—which recognizes the “Métis Communities Represented by the MNO” (which includes the NWOMC) as a Métis collectivity that holds the inherent right of self-government protected by Section 35 and that the MNO represents this Métis collectivity; and
- In 2023, the MNO and Canada signed a second self-government agreement—the [Métis Self-Government Recognition and Implementation Agreement](#) (“**MSGRIA**”)—that immediately recognizes the MNO as a “Métis Government” and “Indigenous Governing Body,” as well as commits Canada to continuing negotiations with the MNO to conclude a self-government Treaty, among other things.”

In addition to the above agreements the MNO has also entered into the following agreements:

- [MNO-Canada-Ontario Framework Agreement for Advancing Reconciliation](#)
- [MNO-Canada Agreement on Advancing Reconciliation with the Northwestern Ontario Métis Community](#)
- [MNO-Canada MOU on Advancing Reconciliation](#)
- [2014-2019 MNO-Ontario Framework Agreement](#)
- [2008 MNO-Ontario Framework Agreement](#)

### **Amendments Requested to the Draft EA Report**

#### ***Amendments re: NWOMC Aboriginal and Treaty Rights***

Amending section 11.3 of the Draft EA Report, as outlined above, is of critical importance to the NWOMC. It is imperative that the NWOMC’s Aboriginal and Treaty rights are accurately reflected in the Draft EA Report.

#### ***MNP Noted Amendments (see Enclosure 1)***

We request that IAAC make the following amendments:

- Clarify the terminology and description of Indigenous communities in section 1.4;
- Providing a summary of concerns raised by the NWOMC related to “Consultation and Engagement with Indigenous Communities” and noting the concerns related to perceptible effects from dust could impact Métis harvesters under the “Effects on the Health and Socio-Economic Conditions of Indigenous Peoples” would provide better contextual framing.
- Referencing the Métis within the discussion of the Waabizheshi Agaasademon Onigam (the Marten Portage) “...has been used by Indigenous travelers since time immemorial, through the fur trade” to reflect that the Métis played an integral role in the fur trade because of their skill on the land and waters and ability to traverse rivers and lakes and portage across the land.
- Referencing the Métis in sections 9.1.1, 9.1.2 and 9.1.3 with respect to caribou, the importance of fishing, hunting and fishing access as detailed in the MNP letter.

### **Closing**

Thank you for the opportunity to comment on the Draft EA Report. We request that you make the corrections and additions noted in this letter, and in particular the changes related to the NWOMC’s Aboriginal and Treaty rights.

Should you have any questions, please have your office contact Erin Reimer at [ErinR@metisnation.org](mailto:ErinR@metisnation.org) or (807) 355-5622. The NWOMC appreciates the Agency’s consideration of our comments and requests.

Sincerely,

<Original signed by>

Theresa Stenlund

Regional Councillor for the Northwestern Ontario Métis Community and Chair of the Treaty 3, Lake of the Woods/Lac Seul, Rainy Lake/Rainy River Consultation Committee

cc. Treaty 3/Lake of the Woods/Lac Seul/Rainy Lake/Rainy River Traditional Territory  
Consultation Committee officials:

Marlene Davidson, President of Atikokan Métis Council  
Liz Boucha, President of Kenora Métis Council  
Deanna Parker, President of Northwest Métis Council  
Brady Hupet, President of Sunset Country Métis Council  
Sandy Triskle, Captain of the Hunt, Region 1

Métis Nation of Ontario - Lands, Resources, and Consultations Branch:

Andrea Marcon, Manager  
Erin Reimer, Mineral Development Advisor

Enclosure (1): MNP Memo T. Stenlund Re Springpole Gold Project EA Report and Conditions  
Review.