

March 23, 2026 (*Delivered via Email*)

Theresa Stenlund  
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Region 1 Councillor for the Northwestern Ontario Métis Community  
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**RE: REVIEW OF PAST NORTHWESTERN ONTARIO MÉTIS COMMUNITY COMMENTS AND INCORPORATION WITHIN THE SPRINGPOLE GOLD PROJECT DRAFT ENVIRONMENTAL ASSESSMENT REPORT (DATE FEBRUARY 2026) AND POTENTIAL CONDITIONS UNDER THE CANADIAN ENVIRONMENTAL ASSESSMENT ACT, 2012**

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Dear Theresa Stenlund,

We have completed a comparison and review of past Northwestern Ontario Métis Community (“**NWOMC**”) issues/concerns<sup>1</sup> and contrasted them with how they were characterized within the Springpole Gold Project (the “**Project**”) draft Environmental Assessment Report prepared by the Impact Assessment Agency of Canada (“**IAAC**”).

We have also reviewed the draft Environmental Assessment Report (“**Draft EA Report**”) and the Potential Conditions under the *Canadian Environmental Assessment Act, 2012* (“**Conditions**”) for overall sufficiency.

Please find below in this letter:

- An overview of the process,
- Details of the findings, and
- Key items of note from the Draft EA Report and Conditions.

In addition, appended to this letter, there is a detailed table in Appendix A which compares previously raised issues/concerns and evaluates how the draft Environmental Assessment Report and Conditions have characterized them and, where applicable, notes how this can be improved.

We have structured this letter as advice to the NWOMC with respect to the adequacy of the Draft EA Report and Conditions to help the NWOMC to comment on the Draft EA Report and Draft Potential Conditions, within IAAC’s formal comment period. However, we authorize the NWOMC to forward this letter to IAAC as part of their comments to IAAC.

### Overview of Process

The Project is in ‘Phase 3’ (Environmental Assessment Report Phase) of the Impact Assessment led by the IAAC. This stage analyzes effects under federal jurisdiction and suggests approval conditions. Although regulated under the former *Canadian Environmental Assessment Act, 2012*, this Project and this Phase follows a similar approach to the current Impact Assessment Process led by the IAAC.

In the Draft EA Report, the IAAC considered potential effects on the Section 35 rights of the Métis Community. It is noted that the NWOMC and First Mining Gold (the “**Proponent**”) have signed a bilateral agreement (confidential) with respect to the Project, whereby the Parties agree that all previously raised issues have been resolved, and all identified impacts to the NWOMC as a result of the Project have been

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<sup>1</sup> Including draft and final EIS reviews

addressed by the Proponent through the terms of the agreement.<sup>2</sup>

## Findings

The Draft EA Report specifies that the Project will result in residual adverse effects to:

- Indigenous health conditions as a result of changes to air quality,
- Socio-economic conditions of Indigenous Peoples related to trapline use,
- Archaeological and heritage resources,
- Indigenous Peoples' current use of caribou for traditional purposes,
- Indigenous Peoples' wildlife harvesting,
- Indigenous Peoples plant and medicine gathering,
- Indigenous Peoples' fishing,
- Indigenous Peoples' ability to use portages and navigable waterbodies to access resources,
- Indigenous Peoples' experience of traditional practices involving water use and consumption,
- Indigenous Peoples' experience being on the land,
- Fish and fish habitat through loss and alteration of fish habitat and the dewatering of a portion of Springpole Lake,
- Migratory birds due to habitat loss,
- Migratory birds due to disturbance from noise and light,
- The terrestrial environment on federal land,
- Waterbodies and associated wetlands and riparian habitats and the wildlife that depend on them that may be directly linked or incidental to federal decisions,
- Public navigation in the north basin of Springpole Lake that may be directly linked or incidental to federal decisions, and
- Recreational fishing that may be directly linked or incidental to federal decisions,

The overall findings of the draft EA Report are that the IAAC finds that the Project will not result in any significant adverse environmental effects with the implementation of recommended mitigation measures.

In relation to Indigenous Peoples, the IAAC focused on changes to the environment on the health and socio-economic conditions of Indigenous Peoples, the physical and cultural heritage of Indigenous Peoples, and the current use of lands and resources for traditional purposes by Indigenous Peoples.

The IAAC is of the view that potential impacts of the project on the exercise of Section 35 rights for the NWOMC have been:

- 1) Adequately identified, and
- 2) Appropriately mitigated or accommodated.

Further, it is noted that the application of mitigation, accommodation measures, and follow-up programs should allow for the continued practice of Section 35 rights in a similar manner as before the project.

There is acknowledgement that consultation with the IAAC is ongoing, and the IAAC indicates that input of the Draft EA Report will be considered in the finalization of the Draft EA Report and will assist the IAAC in finalizing their conclusions regarding potential impacts from the Project on the exercise of Section 35 rights.

## Key Items of Note

### Clarity of Terminology

Within the Draft EA Report, various sections reference "Indigenous communities" generally. However, the Draft EA Report does not define which groups are included in this terminology explicitly apart from the following reference in Section 1.4:

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<sup>2</sup> Springpole Gold Project, Draft Environmental Assessment Report, February 2026, Page 107 (PDF Page 119)

*“IAAC consulted with the following Indigenous communities throughout the EA: Cat Lake First Nation; Lac Seul First Nation; Mishkeegogamang Ojibway Nation; the Northwestern Ontario Métis Community (formerly referred to as the Métis Nation of Ontario, Region 1); Slate Falls Nation; and Wabauskang First Nation.”*

It is recommended that “Indigenous Communities” be added to the glossary of terms to ensure understanding of NWOMC’s inclusion in this grouping. It appears that the Indigenous Communities have been listed in alphabetical order, which is positive, in that it avoids inadvertent hierarchical categorization. It would be helpful for IAAC to stipulate this if this is added to the glossary of terms.

Additionally, the Draft EA Report includes limited reference to NWOMC as a signatory to Treaty No. 3 in Section 11.3. It is recommended that the IAAC update this excerpt to include more specific detail, including:

*The existence of the NWOMC was recognized by the Crown in 1875 with the signing of an Adhesion to Treaty 3 with the ‘Halfbreeds of Rainy Lake and River’ (‘Halfbreed Adhesion’). The Métis descendants of this ‘Halfbreed’ collectivity form a part of the NWOMC today.*

This context is important and should be included throughout other sections where NWOMC rights are described in future iterations of the EA Report.

### **Consultation and Engagement with Indigenous Communities**

This Section includes general information on the IAAC’s overall consultation process with Indigenous communities. Specific to the NWOMC, there is one paragraph on IAAC-led consultation.

While the EIS comments are resolved as per the letters of support received from the NWOMC and the MNO<sup>3</sup>, it could be helpful if the IAAC summarizes the NWOMC’s previously raised concerns within this section and note that these concerns were resolved. The previously raised concerns are outlined in Appendix A of this letter and are listed by topic. Summarizing NWOMC’s previously raised concerns would improve the contextual framing.

### **Ongoing Engagement**

In previously raised concerns, the NWOMC required additional consultation and/ or engagement on numerous items (see Appendix A for full listing), for example, engagement on fish rescue and relocation, water quality monitoring, dewatering and monitoring wildlife populations, in particular caribou populations which NWOMC noted as a species of importance..

While many of these items for additional engagement are noted within the Draft EA Report, these items will require post-approval tracking by the NWOMC to ensure the additional requested engagement is completed.

### **Effects on the Health and Socio-Economic Conditions of Indigenous Peoples**

Specific concerns from First Nation participants<sup>4</sup> are described in the preambulatory parts of this Section, but no details related to the NWOMC are included. This preambulatory section should be updated to include an example from the NWOMC. For example, the NWOMC raised that perceptive effects from dust could impact Métis harvesters. This could be added to ensure the Métis viewpoint is included even though the bilateral agreement is the mechanism for addressing this potential impact

Also, within this Section, the IAAC notes that dust control measures such as dust suppressants would result in the particulate matter and fine particulate matter would be predicted to be below their

<sup>3</sup> Springpole Gold Project, Draft Environmental Assessment Report, February 2026, Page 107 (PDF Page 119).

<sup>4</sup> Slate Falls First Nation, Cat Lake First Nation, and Lac Seul First Nation

respective limits at the property boundary. The NWOMC raised various concerns about the use of dust suppressant as they can exacerbate impacts on Métis harvesters. This could be added to ensure the Métis viewpoint is included.

### **Effects on the Physical and Cultural Heritage and Sites of Significance of Indigenous Peoples**

This Section includes specific details related to archaeological resources, built heritage sites, and cultural heritage landscapes. There is no mention of the NWOMC.

Within the Section it notes that the Waabizheshi Agaasademon Onigam (the Marten Portage) “...has been used by Indigenous travelers since time immemorial, through the fur trade” which may include Métis voyageurs. This Section could be updated to specifically reference the Métis. Traditional Knowledge and Land use (TKLU) Reports shared with the Proponent highlight 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.

### **Effects to the Current Use of Lands and Resources for Traditional Purposes of Indigenous Peoples**

This Section includes consideration of the availability and quality of resources that could impact Indigenous Peoples’ wildlife harvesting, gathering of plants and medicines, and fishing. It also includes consideration of access to lands and resources including portages and navigable water, and the quality of experience and perception of lands and waters.

*Section 9.1.1 Changes to the Quality and Availability of Resources – Traditional Harvest of Boreal Caribou* is silent on the importance of caribou to the Métis. This should be updated in future iterations of the EA Report. The NWOMC should be listed as expressing previous concerns related to changes to boreal caribou as this was noted in previously submitted NWOMC Environmental Impact Statement comments. Section 11.3 of the Report, which focuses on the NWOMC states “caribou was noted as a species of importance, so any reduction of the species in the region could affect Métis citizens’ stewardship rights”. In addition, Appendix A of this letter notes that implementing additional mitigation measures related to caribou is a matter for on-going engagement for the NWOMC. This should be reflected in section 9.1.1 of the Report as the protection of caribou populations and habitat are of critical importance to the NWOMC.

*Section 9.1.1 Changes to the Quality and Availability of Resources – Harvesting of Other Wildlife* notes that the “...project is likely to result in residual effects to Indigenous Peoples’ wildlife harvesting” but that the IAAC understands that “...terrestrial habitats are available throughout the LSA and that a sufficient abundance of wildlife species is expected to remain to support Indigenous harvesting activities”. It is recommended that the IAAC discuss this further with the NWOMC to see if this can be added as a Condition of Approval whereby construction activities must be coordinated to avoid or minimize impacts to Indigenous Peoples wildlife harvesting.

*Section 9.1.1 Changes to the Quality and Availability of Resources – Fishing* describes species of importance and locations of importance for fishing for various First Nations. No details related to NWOMC fishing are included. This should be updated in future iterations of the EA Report as NWOMC citizens fish within the Regional and Local Study Areas for walleye, northern pike, and trout (among others).

*Section 9.1.1 Changes to the Quality and Availability of Resources – Resource Competition* notes that First Nation’s indicated concerns related to additional hunters and fishers entering areas previously only accessible by aircraft. This can be expanded to include the NWOMC as within the NWOMC Environmental Impact Statement comments, it was noted that there were concerns with harvesting competition between Métis and non-Indigenous land users.

Within *Section 9.1.2 Changes in Access to Lands and Resources – Portaging and Navigable Waters* it considers changes in access to lands and resources. Comments noted above related to *Effects on Physical and Cultural Heritage and Sites of Significance of Indigenous Peoples* could be applied within this Section as well. Currently, there is no mention of NWOMC or previously expressed interest in portages within Section 9.1.2.

*Section 9.1.3 Quality of Experience – Sensory and Visual Disturbance* currently includes no contextual details from the NWOMC. In the NWOMC's Environmental Impact Statement comments, the NWOMC expressed concern with noise impacting the quality of the experience on the land from helicopter or floatplane noise, as well as noise and vibration from blasting. Further, it was noted in comments on the draft Environmental Impact Statement that the location of harvest, in some cases, can be as important as the species, as locations can be taught, passed down generationally, or may be a place that contributes to the overall wellbeing of harvesters out on the land by providing aesthetic appeal. Future iterations of the EA Report can be updated to include these contextual details from the NWOMC alongside First Nation's concerns.

### Conditions of Approval

In conjunction with the issuance of the draft Environmental Assessment Report, the IAAC also issued *Potential Conditions under the Canadian Environmental Assessment Act, 2012*. The Conditions will become legally binding once the Minister decides that the designated project is unlikely to cause significant adverse effects under federal jurisdiction.

Within the Conditions, the definition for *Indigenous groups* includes the NWOMC.

This means the Proponent will be legally bound to future work with the NWOMC. Some key things to note include:

1. The Proponent will be required to mutually agree with the NWOMC on methods of notification, type of information to be provided, period of time to be provided for input, and period of time to advise the NWOMC of how their views were considered.
2. The Proponent is also required to determine with the NWOMC the resources required to support their participation in implementation of the follow-up program(s).

The Conditions require the Proponent to:

- Develop and implement a offsetting plan for fish and fish habitat in consultation with Indigenous groups;
- Identify opportunities for Indigenous groups to participate in fish salvage and relocation;
- Implement measures to restore fish habitat prior to decommissioning and after reconnection of the reflooded basin in consultation with Indigenous groups;
- Develop a follow-up program to verify the accuracy of the environmental assessment conclusions on fish and fish habitat from changes to surface water quality.
- Develop a follow-up program to verify the accuracy of the environmental assessment conclusions on Lake Trout in consultation with Indigenous groups;
- Develop a follow-up program prior to construction to verify the accuracy of the environmental assessment conclusions on migratory birds, including waterfowl, in consultation with Indigenous groups;
- Apply water or any other alternative dust suppressant in consultation with Indigenous groups;
- Develop a follow-up program prior to construction to verify the accuracy of the environmental assessment conclusions on the health of Indigenous Peoples due to changes in air quality, in consultation with Indigenous groups;
- Develop a follow-up program prior to construction to verify the accuracy of the environmental assessment conclusions on the health of Indigenous Peoples due to changes in drinking water

- quality, in consultation with Indigenous groups;
- Develop a follow-up program prior to construction to verify the accuracy of the environmental assessment conclusions on the health of Indigenous Peoples due to changes in country foods quality, in consultation with Indigenous groups;
  - Conduct progressive reclamation in consultation with Indigenous groups;
  - Invite Indigenous groups to participate in the planting or reclamation activities;
  - Develop habitat offsetting measure for woodland caribou in consultation with Indigenous groups;
  - Manage woody vegetation along the new transmission line right-of-way in consultation with Indigenous groups;
  - Develop a follow-up program prior to construction to verify the accuracy of the environmental assessment conclusions on the current use of lands and resources for traditional purposes related to woodland caribou, in consultation with Indigenous groups;
  - Monitor the quantity and quality of woodland caribou based on information provided from Indigenous groups;
  - Establish an Indigenous Environmental Committee with Indigenous groups;
  - Retain Indigenous monitors;
  - Develop and implement an accidents and malfunctions response plan for each project phase in consultation with Indigenous groups;
  - Notify Indigenous groups of an accident or malfunction within 24 hours of occurrence; and
  - Develop an accident and malfunction communication plan with Indigenous groups.

Overall, the Conditions are inclusive of areas of concern previously raised by the NWOMC and sufficiently require NWOMC involvement.

It should be noted that NWOMC is excluded from Section 7 of the Conditions which relate to the physical and cultural heritage of Indigenous Peoples. NWOMC is excluded implicitly by definition of three First Nations and specific reference that future actions refer only to those Nations listed. As previously noted, there are NWOMC physical and cultural heritage interests in the area (e.g., portages). This should be reflected in the Conditions through express inclusion of the NWOMC in Section 7.

### Closure

We hope that this letter assists the NWOMC in understanding how the draft Environmental Assessment Report characterized their involvement and described the potential Project effects; and how the Conditions chart the path forward for the NWOMC.

Sincerely,

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## Appendix A: Detailed Review Table

#	Previously Raised Concerns		Comment Reference	Details from Draft EA Report	Response
1.	Dust Suppressants		MNP Memorandum, Comment #51, #52, #54, #57, #58, #175 (Final EA Comparison)	<p>“Apply water, or any alternative dust suppressant determined in consultation with Health Canada and Indigenous communities, on project roads and other areas that may generate dust when dust generation is expected or occurring.”</p> <p>Condition 5, 5.1.2 – “apply water or any alternative dust suppressant determined in consultation with Indigenous groups and relevant federal authorities, on Designated Project roads or other areas that may generate dust;”</p>	<p>The Proponent will undertake dust suppressant application in consultation with Health Canada and Indigenous communities. While the Draft EA Report does not explicitly define Indigenous groups as including the NWOMC, the Conditions do include this specific definition.</p> <p>This is described in the Draft EA Report and Conditions of Approval.</p> <p>It is assumed ongoing consultation will be undertaken as part of the First Mining Gold / NWOMC bilateral agreement in relation to dust suppressant application.</p>
2.	Review of Plans, Permits, and Monitoring, including:	Environmental Permitting Documents (specifically related to flocculant and TSS discharge)	MNP Memorandum, Comment #16, #33, #32, #34, #53, #56, #59, #60, #65, #67, #68, #69, #74, #84, #85, #91, 95, #96, #99, #100, #102, #103, #105, #127,	Condition 3, 3.7 - “The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, and implement, during all phases of the Designated Project, a follow-up program to verify the accuracy of the environmental assessment and determine the effectiveness of mitigation measures with respect to adverse environmental	<p>Water Quality is primarily under provincial jurisdiction managed by the Ministry of the Environment Conservation and Parks.</p> <p>Therefore, within the Draft EA Report, Water Quality is mainly considered in relation to fish and fish habitat and in relation to drinking water for Indigenous land users. These aspects are conditioned for</p>

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			<p>#134, #147, #163, #165, #166, #170, #173, #177, #179 CL1, CL3, CL8 (Final EA Comparison)</p>	<p>effects from the Designated Project on fish and fish habitat resulting from changes to surface water quality. As part of the follow-up program, the Proponent shall:"</p> <p>Condition 5, 5.3 - "The Proponent shall develop, prior to construction and in consultation with Indigenous groups, and relevant authorities, and implement during all phases of the Designated Project, a follow-up program to verify the accuracy of the environmental assessment and determine the effectiveness of mitigation measures with respect to adverse environmental effects from the Designated Project on the health of Indigenous Peoples resulting from changes in drinking water quality."</p>	<p>follow-up programs in the Conditions.</p> <p>There is no discussion within the Draft EA Report of a specific, provincially required, permitting document(s) or specific reference to flocculant or total suspended solids.</p> <p>There is discussion of a comprehensive water monitoring program in the region with participation of Indigenous communities; however, only First Nations are listed as being provided opportunities for community-based monitoring.</p> <p>It is assumed ongoing consultation will be undertaken on this provincially led process as part of the First Mining Gold / NWOMC bilateral agreement.</p>
		Communication Plan		<p>"The proponent also noted that it would communicate with Indigenous communities at affected receptor locations prior to transmission line construction and would establish a mechanism for land users to file noise complaints. IAAC recommends</p>	<p>The Draft EA Report notes that the Proponent will develop various communication plans for noise, air quality, and water quality.</p> <p>The Conditions only specify a communications plan for</p>

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				<p>that this communication plan be developed in collaboration with the Environment Committee(s).”</p> <p>“...ensure that a communication plan is in place to notify Indigenous communities when there are likely to be exceedance in air quality to prevent exposure; and”</p> <p>“IAAC understands that these concerns could result in a change to current use, and, as noted in Section 7, has recommended that the proponent implement a comprehensive water quality monitoring program via the Environment Committee(s) and communication plan to maximize use of water and minimize alienation due to potential contamination.”</p>	<p>accidents and malfunctions is required.</p> <p>It is assumed ongoing consultation will be undertaken as part of the First Mining Gold / NWOMC bilateral agreement in relation to these communication plan(s).</p>
		Environmental Management Plan		<p>“The proponent has also committed to establish, prior to construction, one or more Environment Committee(s) with interested Indigenous communities. The aims of these committee(s), as articulated by the proponent, are to review project approvals and environmental management and monitoring plans, and to identify</p>	<p>The Draft EA Report indicates that review of the environmental management plans will be under the purview of Environment Committee(s).</p> <p>The establishment of the Indigenous Environment Committee(s) is recommended by the IAAC in the Draft EA Report and</p>

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				mitigation measures, if required. IAAC recommends that the proponent establish these committee(s).”	included in the Conditions. It is assumed ongoing consultation will be undertaken as part of the First Mining Gold / NWOMC bilateral agreement in relation to Environmental Committee(s).
		Dust Management Plan		“The proponent would implement a dust management plan that would include these dust mitigation measures, as well as adaptive management and visual inspection procedures to control the fugitive dust generated by the project. IAAC recommends that the proponent implement these measures, and conduct progressive reclamation of areas disturbed by the project, which would limit dust generated during operations and decommissioning phases.”	The Draft EA Report outlines the recommendations and Proponent commitments related to a Dust Management Plan. However, as Dust Management Plans are strictly regulated under Ontario provincial environmental laws, it is not included in the Conditions. It is assumed ongoing consultation will be undertaken as part of the First Mining Gold / NWOMC bilateral agreement in relation to the Dust Management Plan.
		Sediment Control Plan		N/A	The Draft EA Report and Conditions do not include reference to a Sediment Control Plan as this is primarily regulated through provincial legislation.

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					<p>It is assumed ongoing consultation will be undertaken as part of the First Mining Gold / NWOMC bilateral agreement in relation to the Sediment Control Plan.</p>
		Blasting Plan		<p>“To manage emissions related to blasting and exposure to these emissions, the proponent would implement a detailed Blasting Management Plan that would include a blasting schedule during operations and measures to avoid blasting during unfavourable meteorological conditions. The proponent noted that the weekly blast schedule would be posted on the proponent’s website so Indigenous land users would be aware of blasting activities in advance, reducing the risk of exposure. The proponent also indicated the preferred use of emulsion explosives, which typically generates reduced ammonia residuals compared with conventional ammonium nitrate fuel oil explosives. To manage tailpipe emissions, heavy equipment would be maintained to meet ECCC’s Tier 4 emission standards.”</p>	<p>Noise and vibration from blasting is briefly noted in relation to sensory or visual disturbances and the acoustic environment for Indigenous groups. Further it is noted that the Proponent will develop a blasting management plan.</p> <p>However, there is no recommendation, or Condition related to the Blasting Plan as this is typically regulated by Ontario.</p> <p>It is assumed ongoing consultation will be undertaken as part of the First Mining Gold / NWOMC bilateral agreement in relation to the Blasting Plan.</p>

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		Seepage Quality Monitoring Requirements		<p>“Develop and implement a seepage management follow-up program for the co-disposal facility.”</p> <p>“...recommended that the proponent implement a comprehensive water quality monitoring program via the Environment Committee(s) and communication plan to maximize use of water and minimize alienation due to potential contamination.”</p>	<p>The IAAC assessed how changes to surface water quality could impact Indigenous health conditions.</p> <p>The IAAC recommends a seepage management follow-up program to demonstrate that concentrations of the metals of concern would not, or do not, cause acute toxicity to fish.</p> <p>The Conditions further require monitoring of surface water quality for contaminants of potential concern at the seepage face in Birch Lake, Lake 16, and Springpole Lake.</p> <p>It is assumed ongoing consultation will be undertaken as part of the First Mining Gold / NWOMC bilateral agreement in relation to any seepage related / surface water quality monitoring.</p>
		Fish Habitat Offsetting and Compensation Plan		<p>“Preliminary offsetting concepts include a new fish habitat development area to the east of the reflooded basin. Because there are limited opportunities to restore or create Lake Trout</p>	<p>The Draft EA Report describes the requirement for fish habitat offsetting measures and development of a specific plan. This is carried through and specified</p>

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				<p>summer refuge habitat in the area, the proponent in consultation with Indigenous communities and DFO, is preparing supplemental offsetting options.”</p> <p>Condition 3, 3.1 - “The Proponent shall develop, to the satisfaction of Fisheries and Oceans Canada and in consultation with Indigenous groups, and implement any offsetting plan for activities that may result in the harmful alteration, disruption, or destruction of fish habitat, and death of fish associated with the Designated Project, taking into account Fisheries and Oceans Canada’s <i>Policy for Applying Measures to Offset Harmful Impacts to Fish and Fish Habitat</i>. The Proponent shall submit the approved offsetting plan(s) to the Agency prior to implementation.”</p>	<p>in the Conditions.</p> <p>Within the Conditions it is noted that any offsetting measures proposed in the plan, shall be developed in consultation with Indigenous groups.</p> <p>It is assumed ongoing consultation / engagement will be undertaken as part of the First Mining Gold / NWOMC bilateral agreement in relation to the Fish Habitat Offsetting and Compensation Plan.</p>
		Water Quality Monitoring		<p>“...recommended that the proponent implement a comprehensive water quality monitoring program via the Environment Committee(s) and communication plan to maximize use of water and minimize alienation due to potential</p>	<p>The IAAC assessed how changes to surface water quality could impact Indigenous health conditions.</p> <p>The IAAC recommends the proponent implement a comprehensive water quality</p>

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				contamination.”	<p>monitoring program via the Environmental Committee(s). The Conditions further require monitoring of surface water quality for contaminants of potential concern at the seepage face in Birch Lake, Lake 16, and Springpole Lake.</p> <p>It is assumed ongoing consultation/ engagement will be undertaken as part of the First Mining Gold / NWOMC bilateral agreement in relation to any water quality monitoring.</p>
		Revegetation and Reclamation Plans		<p>“As detailed in Table 7-1, conduct, in consultation with the Environment Committee(s), progressive reclamation of areas disturbed by the project. As part of this:</p> <ul style="list-style-type: none"> <li>• identify, in consultation with Indigenous communities, native plant species to use for revegetation; and</li> <li>• invite Indigenous communities to participate in the planting or reclamation activities.” <p>Condition 6, 6.1 – “The</p> </li></ul>	<p>The Draft EA Report described the Proponents approach of progressive revegetation.</p> <p>Further, it is indicated that this approach will be implemented through the Environmental Committee(s).</p> <p>It is further noted in the Conditions that the proponent shall conduct progressive reclamation of areas disturbed by the Project in consultation with Indigenous groups and invite those groups to participate in</p>

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#	Previously Raised Concerns		Comment Reference	Details from Draft EA Report	Response
				<p>Proponent shall conduct, in consultation with Indigenous groups, progressive reclamation of areas disturbed by the Designated Project, including along the mine access road and the transmission line, to progressively return physically disturbed areas to a state as close to baseline conditions as possible or better, as soon after the disturbance as feasible, and to mitigate fugitive dust emissions.”</p> <p>Condition 6, 6.1.2 – “invite Indigenous groups to participate in the planting or reclamation activities.”</p>	<p>planting or reclamation activities.</p> <p>It is assumed ongoing consultation will be undertaken as part of the First Mining Gold / NWOMC bilateral agreement in relation to revegetation and reclamation activities.</p>
		Overall Benefit Permit under section 17(2)(c) of the Endangered Species Act		N/A	<p>The Province of Ontario has legislative authority for the Overall Benefits Permit.</p> <p>It is assumed ongoing consultation will be undertaken as part of the First Mining Gold / NWOMC bilateral agreement in relation to the Overall Benefits Permit.</p>
		Post-Construction and Closure Monitoring		Various	<p>The Draft EA Report and Conditions specify there will be monitoring for effects under federal jurisdiction.</p>

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					<p>It is assumed ongoing consultation will be undertaken as part of the First Mining Gold / NWOMC bilateral agreement in relation to Permit the Overall any post-construction and closure monitoring.</p>
		Access Management Strategy		<p>“The proponent also committed to develop, prior to construction, an access management strategy in collaboration with Indigenous communities (through venues such as the Environment Committee(s)). The proponent committed to using a controlled access gate and/or gatehouse at a location towards the end of the Wenasaga forestry road, to be determined in consultation with Cat Lake First Nation, Lac Seul First Nation, Slate Falls Nation, MNR, and the forestry road owner to minimize unauthorized public access.”</p>	<p>It is noted in the Draft EA Report that the proponent will develop an access management strategy. This is specifically directed to First Nations.</p> <p>The Conditions further specify that the Proponent must establish procedures for safe access to the site for ceremonial purposes.</p> <p>It is assumed ongoing consultation will be undertaken as part of the First Mining Gold / NWOMC bilateral agreement in relation to an access management strategy.</p>
		Emergency Response Plan		<p>Condition 11, 11.3 – “The Proponent shall maintain the accidents and malfunctions response plan referred to in condition 11.2 up to date during the phase to which it pertains.</p>	<p>The Draft EA Report does not include specific details related to an emergency response plan, as this is typically regulated by Ontario; however, the Conditions do</p>

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#	Previously Raised Concerns	Comment Reference	Details from Draft EA Report	Response
			<p>The Proponent shall submit any updated accidents and malfunctions response plan to the Agency and to parties consulted for the development of the plan within 30 days of the plan being updated.”</p>	<p>require the development and maintenance of an accidents and malfunctions response plan which includes provisions for Indigenous group involvement.</p> <p>It is assumed ongoing consultation will be undertaken as part of the First Mining Gold / NWOMC bilateral agreement in relation to emergency response planning.</p>
3.	Minimization of Disruption to the exercise of Section 35 rights	Comment #2 (Final EA Comparison)	<p>“Comments were received about other potential impacts to the exercise of rights, such as changes to environmental conditions that support the exercise of rights, such as changes to plant and wildlife species of importance, changes to air and water quality, increased sensory disturbance, and increased public access potentially impacting Métis citizens’ harvesting rights. The likelihood of impacts to Métis land users due to changes to species of importance, air, and water quality, and sensory disturbance is low given the anticipated spatial extent of environmental effects (as described in Sections</p>	<p>The overall finding of the Draft EA Report is that, with the implementation of recommended mitigation measures, the project is not likely to cause significant adverse effect to effects under federal jurisdiction.</p> <p>It is assumed ongoing consultation will be undertaken as part of the First Mining Gold / NWOMC bilateral agreement to ensure continual consideration of NWOMC Section 35 rights.</p>

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#	Previously Raised Concerns	Comment Reference	Details from Draft EA Report	Response
			7 and 9) and IAAC understands that the proponent would work bilaterally with the Northwestern Ontario Métis Community to address any concerns.”	
4.	Use of NWOMC Valued Components	Comment #19 (Final EA Comparison)	<p>“Representatives of the Northwestern Ontario Métis Community expressed concerns about effects to fish and water quality in Birch Lake. Availability of fish and access to fishing areas are not expected to be impacted, but a lack of confidence in water quality could affect consumption patterns or land users’ behaviour. Additionally, caribou was noted as a species of importance, so any reduction of the species in the region could affect Métis citizens’ stewardship rights. The proponent would provide opportunities for water monitoring to manage a lack of confidence in water quality and IAAC understands that the proponent would work bilaterally with the Northwestern Ontario Métis Community to address additional concerns about species of importance.”</p>	<p>The overall finding of the Draft EA Report is that, with the implementation of recommended mitigation measures, the project is not likely to cause significant adverse effect to effects under federal jurisdiction.</p> <p>It is assumed ongoing consultation will be undertaken as part of the First Mining Gold / NWOMC bilateral agreement to ensure continual consideration of NWOMC Section 35 rights and matters of importance to the NWOMC as represented by VCs.</p>
5.	Finalization of Community Benefits	Comment #6,	“Additionally, the proponent and	The bilateral agreement has

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#	Previously Raised Concerns	Comment Reference	Details from Draft EA Report	Response
	Agreement	#21, #25, #38, #74, #145, #167 (Final EA Comparison)	the Northwestern Ontario Métis Community signed a bilateral agreement, and IAAC received a letter of support from the Northwestern Ontario Métis Community that noted that all issues have been resolved and any impacts have been addressed by the proponent.”	been signed, impacts have been addressed, and this is sufficiently referenced in the Draft EA Report.
6.	Importance of Acknowledging Species of Importance to the NWOMC, including: <ul style="list-style-type: none"> <li>• Plants (e.g., Plantain),</li> <li>• Wildlife (e.g., Sharptailed, Spruce, and Ruffed Grouse)</li> </ul>	Comment #28, #116, #118 (Final EA Comparison)	N/A	While these items were not amended in the Final Impact Statement document, a bilateral agreement has been signed, and all impacts were noted to have been addressed.
7.	Use of NWOMC rather than MNO Region 1; Recognition of NWOMC as Indigenous Community	Comment #14, #29 (Final EA Comparison)	“IAAC consulted with the following Indigenous communities throughout the EA: Cat Lake First Nation; Lac Seul First Nation; Mishkeegogamang Ojibway Nation; the Northwestern Ontario Métis Community (formerly referred to as the Métis Nation of Ontario, Region 1); Slate Falls Nation; and Wabauskang First Nation.”	In all instances in the Draft EA Report, the NWOMC is referred to; with the noted singular reference to Region 1 which was appropriate.
8.	Flight Schedule Notification	Comment #31 (Final EA Comparison)	“The proponent would implement an operation plan for helicopter use during construction that would require minimum flight altitudes, except when helicopters	The Draft EA Report notes that the proponent will implement an operation plan for helicopters.

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#	Previously Raised Concerns		Comment Reference	Details from Draft EA Report	Response
				are engaged in construction tasks, landing, or departure.”	It is assumed ongoing consultation will be undertaken as part of the First Mining Gold / NWOMC bilateral agreement to address forthcoming flight schedules.
9.	Ongoing Engagement, Related to:	Impacts to Métis Rights from NWOMC’s Perspective	Comment #10, #11, #12, #13, #15, #22, #23, #26, #33, #35, #36, #39, #40, #41, #42, #44, #47, #55, #64, #66, #74, #79, #92, #93, #94, #97, #98, #104, #109, #110, #112, #126, #129, #130, #132, #133, #135, #141, #142, #143, #144, #148, #149, #153, #154, #155, #156, #157, #168, #171, #172, #180, #181, #182, CL6 (Final EA Comparison)	N/A	It is assumed ongoing engagement will be undertaken as part of the First Mining Gold / NWOMC bilateral agreement to address all previously noted issues.
Baseline Reports					
Regular Meetings					
Ongoing Monitoring					
Access					
Self-Governance Rights					
Additional Mitigation (e.g., Caribou)					
Métis Perceptions					
GHG Emissions					
Vegetation Removal					
Fish Rescue					
Proposed Signage					
Dewatering					

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#	Previously Raised Concerns		Comment Reference	Details from Draft EA Report	Response
		Economic Opportunities/ Equitable Benefits			
10.	Involvement in Closure Plan Review		Comment #37, #80, #108, #112, #151 (Final EA Comparison)	“the proponent must file a closure plan with Ontario that conforms with standards in the Mine Rehabilitation Code of Ontario, and provide financial assurance for the costs of closure and rehabilitation.”	The Draft EA Report acknowledges the requirement for the Proponent to file a Closure Plan. It is assumed ongoing consultation will be undertaken as part of the First Mining Gold / NWOMC bilateral agreement to involve the NWOMC in Closure Plan review.
11.	Use of ‘Beyond the RSA’ for Residual Effects Criteria ‘Extent’		Comment #45, #61, #75, #81, #86, #113, #121, #124, #131 (Final EA Comparison)	N/A	As the Project has progressed beyond the Impact Statement phase, there is no opportunity for further amendment to the Impact Statement at this time.
12.	Lack of Integration of NWOMC details related to Air Quality concerns		Comment #46, #72, #77, #83, #88 (Final EA Comparison)	“To mitigate changes to air quality on the Slate Falls Nation Reserve, the proponent would ensure that equipment and vehicles are operated with pollution control equipment. In addition, the proponent has committed to implementing dust control measures. Following mitigation, concentrations of air	The Draft EA Report specifically references First Nations in relation to impacts on air quality. While the NWOMC is not referenced in the Draft EA Report, it is included as an Indigenous group in the Conditions which requires a directed follow-up program to

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#	Previously Raised Concerns	Comment Reference	Details from Draft EA Report	Response
			contaminants on the Slate Falls Nation Reserve were predicted to remain below their respective Ontario Ambient Air Quality Criteria and Canadian Ambient Air Quality Standards during all phases of the project, except benzo(a)pyrene, which was determined to already exceed the criteria in baseline conditions.”	determine effectiveness of the mitigation measures with respect to impacts on the health of Indigenous Peoples due to changes in air quality.  It is assumed ongoing consultation will be undertaken as part of the First Mining Gold / NWOMC bilateral agreement to involve the NWOMC follow-up programs related to air quality.
13.	Consideration of Behavioral Impacts including Métis Perceptions	Comment #48 (Final EA Comparison)	“IAAC’s assessment of effects to Indigenous Peoples’ current use of lands and resources considers ... Quality of experience includes environmental effects impacting Indigenous Peoples’ enjoyment of traditional activities and perception of lands and waters.”	The consideration of perception was noted in the preambulatory sections related to current use of lands and resources for traditional purposes. It was further described as a environmental effect rating criteria under “ecological and social context.”  The Quality of Experience was assessed; however, the only text is related to First Nations.  A mitigation measure is proposed generally for Indigenous community members for development of a communication plan.

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				It is recommended that the IAAC update this parameter to include information from the NWOMC either from the Final EA Comments Comparison Table or other sources, where applicable
14.	Update to Include Language Referencing Harvesting Rights	Comment #63, #140 (Final EA Comparison)	“Comments were received about other potential impacts to the exercise of rights, such as changes to environmental conditions that support the exercise of rights, such as changes to plant and wildlife species of importance, changes to air and water quality, increased sensory disturbance, and increased public access potentially impacting Métis citizens’ harvesting rights. The likelihood of impacts to Métis land users due to changes to species of importance, air, and water quality, and sensory disturbance is low given the anticipated spatial extent of environmental effects (as described in Sections 7 and 9) and IAAC understands that the proponent would work bilaterally with the Northwestern Ontario Métis Community to address any concerns.”	Language was included in the Draft EA Report with regards to Métis harvesting rights through acknowledgement of previously received comments.

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15.	Participation in Vegetation and Aquatic Resources Harvest Opportunities	Comment #146 (Final EA Comparison)	N/A	<p>In the NWOMC comments on the Draft EA it was requested that the NWOMC be part of the vegetation and aquatic resources harvest that was referenced in Section 6.21.3 as a potential mitigation measure.</p> <p>First Mining Gold responded that “The Métis will be invited to participate...”</p> <p>While this request is not described or referenced in the Draft EA Report, it is assumed that it can form future discussions as part of implementation of the First Mining Gold / NWOMC bilateral agreement.</p>
16.	Acknowledgement that the NWOMC is a Signatory to Treaty No. 3 through the Halfbreed Adhesion	Comment #169 (Final EA Comparison)	“Citizens of the Northwestern Ontario Métis Community also assert rights as descendants of signatories to the Halfbreed Adhesion of Treaty #3 (1875).”	<p>The Draft EA Report includes limited reference to NWOMC as a signatory to Treaty No. 3.</p> <p>It is recommended that the IAAC update this excerpt to include more specific detail, including:</p> <p><i>The existence of the NWOMC was recognized by the Crown in 1875 with the signing of an Adhesion to Treaty 3 with the ‘Halfbreeds of Rainy Lake and</i></p>

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#	Previously Raised Concerns	Comment Reference	Details from Draft EA Report	Response
				<i>River' ('Halfbreed Adhesion'). The Métis descendants of this 'Halfbreed' collectivity form a part of the NWOMC today.</i>