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June 8, 2026

*Delivered Electronically*

Springpole Gold Project  
Impact Assessment Agency of Canada  
Email: [springpolegoldmine-minedorspringpole@iaac-aeic.gc.ca](mailto:springpolegoldmine-minedorspringpole@iaac-aeic.gc.ca)

**RE: Review of Ojibway Nation of Saugeen Concerns and Incorporation within the Springpole Gold Project Draft Environmental Assessment Report (Dated February 2026) and Potential Conditions under the *Canadian Environmental Assessment Act, 2012***

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To whom this may concern,

This letter is submitted to the Impact Assessment Agency of Canada ("IAAC") by the Ojibway Nation of Saugeen ("ONS").

We have completed a review of ONS issues and concerns and compared them with the contents of the Springpole Gold Project's (the "Project") draft Environmental Assessment Report ("draft EA report") and the Potential Conditions under the *Canadian Environmental Assessment Act, 2012* (the "Conditions") to understand whether the issues and concerns were sufficiently considered.

Please see below for details on our issues and concerns and our view on how these were characterized within the draft EA report and Conditions.

**Conditions of Approval**

One of the main issues noted within the draft EA report and Conditions is the lack of inclusion of ONS in the Conditions document.

Within the Conditions, "Indigenous groups" are defined to include Cat Lake First Nation, Lac Seul First Nation, Mishkeegogamang Ojibway Nation, the Northwestern Ontario Métis Community, Slate Falls Nation, and Wabauskang First Nation.

This means that all post-approval conditions that require involvement of Indigenous groups will not include the involvement of ONS.

This is important as it means that ongoing engagement with ONS is not required and First Mining Gold is not legally bound to include ONS in any future follow-up or monitoring programs undertaken for the Project.

ONS would like to request that the Conditions be amended to either:

1. Include ONS in the definition of "Indigenous groups", or
2. Specifically reference ONS in the Conditions document where involvement in future follow-up or monitoring activities is linked to our issues and concerns (e.g., water and water quality, species used in the exercise of rights).

Some specific Conditions where ONS involvement should be contemplated include:

- Development of a follow-up program to verify the accuracy of the environmental assessment conclusions on fish and fish habitat from changes to surface water quality;

- Development of a follow-up program to verify the accuracy of the environmental assessment conclusions on the health of Indigenous Peoples due to changes in drinking water quality;
- Development of a follow-up program to verify the accuracy of the environmental assessment conclusions on the health of Indigenous Peoples due to changes in country foods quality;
- The conduct of progressive reclamation;
- Invitation for ONS to participate in the planting or reclamation activities;
- Management of woody vegetation along the new transmission line right-of-way;
- Development of a follow-up program to verify the accuracy of the environmental assessment conclusions on the current use of lands and resources for traditional purposes;
- Monitoring the quantity and quality of woodland caribou;
- Selection and retention of Indigenous monitors;
- Notification of an accident or malfunction within 24 hours of occurrence; and
- Development of an accident and malfunction communication plan.

The IAAC should amend the draft Conditions to include ONS as per above.

#### **Water and Water Quality**

While it is understood by ONS that water quality is primarily under provincial jurisdiction, the draft EA report does discuss water quality in relation to fish and fish habitat as well as in relation to drinking water. Further, there are conditions of approval proposed which require development of a follow-up program to verify the accuracy of conclusions on fish and fish habitat from changes to surface water quality and changes to the health of Indigenous Peoples due to changes in drinking water quality.

In the Fall of 2025, ONS undertook direct community engagement in the form of an Open House and targeted interviews to engage Nation members specifically on the Springpole Gold Project. In these engagements, Nation members described water as a powerful force that 'pulls other things with it when it travels'. Further, the proximity of the Project to Springpole Lake and nearby waterbodies was raised as a concern by Nation members because of this interconnectivity.

Additionally, waste and waste management was noted as an issue; and potential spills and accidents during waste management processes into Springpole Lake and subsequent waterbodies was also of concern. Additionally, there was concern with tailings proximity to the water and safety protocols that First Mining Gold would put in place.

At these engagements, water and water quality were discussed at length with specific concerns raised for the future generations of ONS. Nation members indicated that dams have previously been built in the Nation's vicinity. In some cases, these dams have altered the flow and direction of water. There was concern that this project could also alter flow of water from Springpole Lake. Further, there were concerns regarding potential future projects and their impacts on water and how this will impact future generations.

To address these ONS outstanding concerns, it is recommended that the IAAC evaluate the above noted options for the Conditions and continue consultation with ONS to ensure our ongoing involvement post approval in follow-up programs related to water quality (i.e., fish and fish habitat and drinking water quality).

#### **Traditional Use**

The draft EA report found that the Project will result in adverse effects to Indigenous Peoples' current use of caribou for traditional purposes, wildlife harvesting, plant and medicine gathering, fishing, the ability to use portages and navigable waterbodies to access resources, traditional practices involving water use and consumption, and overall experience of being on the land.

The Conditions propose a number of legally binding follow-up programs to verify the accuracy of the environmental assessment conclusions and include Indigenous groups (as defined in the Conditions) in these programs' development and execution.

In the Fall 2025 engagement, ONS Nation members identified species that could be impacted by the Project, including moose, duck, and beaver. Caribou were identified as being present in the area, but it was noted that ONS does not currently hunt caribou due to stewardship and protection measures. Fishing was described for walleye and whitefish; and berry gathering was noted for blueberry, raspberry, and pin cherry. Nation members described using waterways for travel. Additionally, springs were identified in the ONS territory where drinking water was collected; and Nation members noted using water from lakes as drinking water as well.

As noted above, to address ONS' outstanding concerns, it is recommended that the IAAC include ONS in the Conditions and continue consultation with ONS to ensure the residual effects on Indigenous Peoples are effectively mitigated, managed, and monitored.

### **Safety and Security**

During the Fall 2025 engagement, Nation members described an increase in sightings and interactions with non-locals.

This includes people travelling through the region and field workers completing work for this and other prospective mines in the area. Nation members described increases in break-ins at their trapping cabins; including instances where items were stolen and garbage was left behind.<sup>1</sup> Nation members noted that it is important for ONS to be notified of who is out on the land for safety purposes.

Increased road traffic because of workers present in the area was also noted as a concern by Nation members; particularly large trucks. Increased road traffic, including that of large vehicles poses a potential safety risk to Nation members who are travelling within the territory. Additionally, increased traffic poses a risk of vehicular strikes to wildlife. This was described in the draft EA report in relation to increases in vehicular collisions with migratory birds.

The draft EA report recommends that First Mining Gold provide cultural awareness training to mine employees to ensure that workers are respectful of Indigenous cultural values and sites of importance to Indigenous communities. In addition, the Conditions require development and implementation of an accidents and malfunction response plan and an accident and malfunction communication plan. The Conditions also require establishment and enforcement of speed limits on all designated Project roads.

It is recommended that the IAAC explore inclusion of ONS in the conditions of approval specifically related to accidents and malfunctions. In addition, ONS will continue engagement with First Mining Gold to ensure adequate ONS-specific cultural awareness of workers.

### **Economic Interests**

During the Fall 2025 engagement sessions, Nation members expressed a desire to realize economic benefit from the Project. Specifically, considering the Project's residual effects, which may span generations, Nation members indicated that the involvement of youth in economic decision-making regarding this Project, and other projects, is critical. Nation members want to involve youth in all steps of the assessment process and want to ensure that decisions are made with their input, not solely on their behalf.

Nation members saw value in gaining employment from the Project. This could result in learning new skills, gaining certifications, and having employment close to the Nation. It was noted that ONS has a construction company that can be employed for this type of work. However, there was skepticism that this would occur as in the past, companies promise to hire First Nations people, but do not follow through.

The opportunity for community monitoring for the Project was also raised as an opportunity for ONS to participate and find value in the Project. It was also noted that First Mining Gold should have restoration plans in place prior to project approval.

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<sup>1</sup> Trapping and hunting cabins are often left unlocked in case of emergency. Locals and community members respect each other's cabins and do not take things without indicating, nor leave items behind.

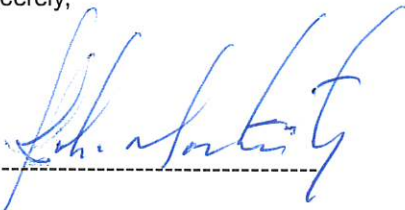
While First Mining Gold has committed to continued engagement with ONS in future project phases and has committed to funding future socio-economic work, there are no specific conditions related to the economics of the Project.

It is recommended that the IAAC expand the information in the draft EA report to include information on the economic and social benefits of the Project. This could include written confirmation from First Mining Gold on their next steps with ONS to ensure documentation and future compliance.

**Next Steps and Concluding Remarks**

We hope that this letter assists the IAAC in understanding ONS issues and concerns related to the Project and how the Conditions can be amended to chart the path forward for ONS. We look forward to future adjustments and discussions with the IAAC, where required.

Sincerely,

A handwritten signature in blue ink, appearing to read "John Machimity", is written over a horizontal dashed line.

Chief John Machimity  
Ojibway Nation of Saugeen

C.c. ONS Council  
ONS Lands Office  
ONS Band Manager