

Memorandum #4: Slate Falls' Submission on Proposed Federal Project Conditions

June 8, 2026

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I. Executive Summary

This submission is made on behalf of Slate Falls Nation. **Slate Falls Nation seeks incorporation of the measures set out in this submission as federal regulatory conditions, should the Project be approved. This is essential to address the major gaps in and non-responsiveness of the current proposed federal conditions.**

It had been our intention to provide our views on Project conditions after receiving the information we have been requesting from IAAC for months and after receiving comments from IAAC on our comments on the draft EA Report so that we could incorporate that information into this submission. For reasons IAAC has refused to articulate, IAAC has declined to respond to our submission on the draft EA Report or our requests for information. As it appears to us that IAAC has decided to arbitrarily end engagement with us on June 11, we are sending this to you without the benefit of the information we have requested and without the benefit of two-way dialogue with the federal Crown.

We have organized these comments within groups of core measure areas that reflect gaps and outstanding issues that must be addressed. While some of the measures will involve the Project looking different than proposed, all of these proposals are confined within the general project area and reduce (rather than increase) identified effects. All requested measures have been developed and scoped so they can be adopted in the federal Decision Statement as part of the current EA process without resulting in delay or amendment to the process.

While these measures are necessary, they are not sufficient to address the Crown's obligations to Slate Falls Nation given (i) the level of risk and residual effects that are expected following the implementation of all mitigations and (ii) the Crown has yet to engage on matters relating to rights (as opposed to cultural heritage and current use). We note with duress that IAAC only shared its (flawed) views on Project impacts to Slate Falls' Rights on the evening of Friday, June 5, 2026 (which is more than 150 days after IAAC received the Slate Falls' ALIA, >210 days after we verbally shared the conclusions of the then draft ALIA and ~550 days since IAAC received the Environmental Impact Statement from FMG). In short, even if fully implemented as project conditions, additional Crown accommodation will still be required.

II. Overview of Core Measures that Must be Incorporated into Federal Project Conditions

The core measures that must be translated into Project conditions are:

- **Baseline Information and Data Transparency:** conditions must require updated baseline information including regarding water quality, caribou population health, a comprehensive methylmercury assessment, hydrogeological connectivity, country foods assessments, and archaeological assessment. This is critical to understanding baseline effects and ensuring mitigation measures in fact reduce effects to the environment and SFN.
- **Geographic Restrictions:** conditions must include geographic restrictions to reduce effects on Slate Falls' current use of lands and resources, physical and cultural heritage, health and socio-economic conditions. These include:
 - increased setback from Birch Lake;
 - prohibition on high-sulphur tailings or any facilities involving high-sulphur tailings on the Peninsula;
 - if any portions of the CDF are located on the Peninsula, there must be strict height limitations and all catchments must be designed to passively drain into the open pit;
 - the (new) geographic location for the high-sulphur tailings storage should require SFN-approval and involve geographic setbacks from water;
 - no infeed ore stockpiles of any grade outside the open-pit catchment area;
 - lakebed sediments and surficial soils must be segregated at all times;
 - lake sediment can only be stored in the open pit catchment;
 - cofferdams must be in place at all times during operations and closure;
 - no water from the open pit area can co-mingle with waters of Springpole or Birch Lake unless water quality meets SFN's standards;
 - effluent discharge location and design must have SFN approval.
- **Further Project Mitigations:** the following key mitigation measures are also required to reduce effects on Slate Falls' current use of lands and resources, physical and cultural heritage, health and socio-economic conditions, and sites of historical/archaeological significance:
 - all catchment areas must be sloped or designed to drain toward the open pit;
 - liners must be used in high-grade ore area;
 - no lake sediments can be used for terrestrial cover;

- no water transfer between water basins;
 - the topsoil storage facility must be located at least 500m from the water's edge;
 - no ore stockpiles in areas with hydrologic connectivity to the Cat River watershed.
- **Co-Disposal Risk Reduction:** given the extreme hazard and effects associated with the CDF, conditions must be put in place to require the evaluation of pre-defined alternative locations for the CDF that have a risk assessment and meet the above-outlined design and geographic criteria. The selected alternative must reduce cumulative watershed risks and reflect the highest standards of co-approval with SFN.
 - **Cofferdam Risk Reduction and Safety:** conditions should require that at least three cofferdam alternatives be identified for independent review. The selected design must demonstrate safety with reduced failure probability under various scenarios and reflect the highest standards of co-approval with SFN. The cofferdam must be connected to bedrock and designed/built to withstand 1 in 200+ year events. It must remain in place at all times during both operations and closure and only removed after pit water quality meets the highest environmental protection standards. A cofferdam plan should be required that includes or confirms comprehensive modelling, a failure modes and effects analysis, confirmation of reduced structural failure and hydraulic uncertainties, and mitigation measures for seepage and catastrophic failures developed in collaboration with SFN and an independent review panel.
 - **Closure Planning:** a key outstanding issue is the lack of a closure plan. Before the project is constructed, a closure plan must be developed through a robust co-approval process that includes:
 - a closure vision reflecting SFN values, IK and culture;
 - confirmation of reduction in closure-related risks;
 - adequate material covering all facilities;
 - design criteria including, at a minimum: (1) no reconnection of mine area to the lakes, (2) CDF sloped to drain back to pit, (3) lakebed sediment to be deposited back into the pit, and (4) PAG tailings must be deposited into the pit.
 - **Independent Oversight Mechanisms:** Additional independent review boards need to be established to review design criteria and ensure condition compliance. These must cover Tailings, Water Quality and Geochemistry, Closure and Cofferdam Engineering.

- **Caribou Protections:** another key document that has not yet been co-developed is an overall benefits plan for caribou. The plan needs to confirm the following minimum requirements:
 - Project does not increase functional habitat loss above federal disturbance thresholds for boreal caribou ranges;
 - Project does not impair caribou movement between seasonal habitats;
 - Project does not increase predation risk associated with linear features or noise light disturbance;
 - Seasonal restrictions on blasting, road building and high-noise activities
 - Caribou crossing structures or avoidance zones where needed;
 - Deactivation, revegetation, and physical removal of linear corridors at closure;
 - Long-term monitoring of movement occupancy and health; and
 - Identify protect and integrate SFN routes and cultural areas related to caribou use into access management plans, reclamation design, and other wildlife mitigation strategies.
- **Recognition of Slate Falls Authority:** SFN involvement in decision-making respecting the acceptance of mitigation measures, follow-up plans and oversight/compliance is essential. Accordingly, Slate Falls seeks conditions requiring the Proponent to provide technical reports/plans before submission to the regulators, requiring written responses to SFN technical feedback, and requiring explanatory statements from the Proponent addressing compliance related issues.

III. Slate Falls’ Requirements for Federal Project Conditions

Slate Falls’ review of IAAC’s proposed conditions indicates the proposed conditions are generally structured around monitoring, follow-up, and procedural requirements. While these are necessary, they are not protective of the environment, are non-responsive to SFN’s submissions to date, and do they establish clear, enforceable performance outcomes or thresholds that must be achieved to ensure protection of the environment Slate Falls.

The below table is organized into sections, with each section further delineated into “topic areas”. Issues that must be addressed through conditions are described in the “description of issue” column. The “Slate Falls Condition Requirement” column shows examples of conditions that Slate Falls requires that provide a clear and enforceable pathway to achieving acceptable environmental and rights-based outcomes, incorporating:

- Defined performance standards rather than reliance on monitoring alone.
- Measurable thresholds and limits, including mass loading and habitat productivity targets.
- Requirements to demonstrate performance under conservative and failure scenarios.
- Clear triggers for corrective action, including where necessary the suspension or modification of activities.
- Indigenous knowledge, participation, and verification in decision-making.

The absence of any condition language should not be taken as an indication that Slate Falls does not require action in respect of the identified issue; nor should the proposed condition language be taken to mean that these are the only conditions Slate Falls requires in respect of the Project.

The column on the far right “Slate Falls Proposed Adjustment to IAAC Conditions” addresses the situations where there is some degree of ‘overlap’ between Slate Falls’ required conditions and the conditions IAAC has proposed (the IAAC conditions that correspond are identified in the “IAAC Conditions Overlap” column). That column indicating overlap with IAAC conditions is partial at most and should not be taken to mean that IAAC’s proposed condition is satisfactory to address all issues. Furthermore, many gaps exist in the conditions proposed by IAAC and as such, these outstanding gaps require additional conditions to ensure Slate Falls’ requirements are met.

ID	Topic Area	Description of Issue	Slate Falls Condition Requirement	IAAC Conditions Overlap	Slate Falls Proposed Adjustment to IAAC Conditions (where any overlap exists)
Section 1: ROBUST ROLE OF SFN					
Intent: to confirm SFN involvement in oversight of conditions implementation					
1.1	Written Confirmation	The Proponent must provide written confirmation from SFN that the conditions have been met before entering the permitting process	The Proponent shall not submit any federal or provincial permit applications until SFN has provided written confirmation of its satisfaction that EA conditions have been satisfied.	2.1	1. The Proponent shall provide Slate Falls Nation with complete access to all technical studies, models, input datasets, assumptions, and calibration data in fully executable and reviewable formats. All models shall be reproducible by independent reviewers without reliance on proprietary constraints. 2. All predictive models, including water quality, geochemical, and hydrological models, shall include quantified uncertainty analysis, sensitivity testing, and identification of key assumptions. Model outputs shall present upper-bound and lower-bound scenarios, and decision-making shall be based on conservative (protective) scenarios.
		No subsequent regulatory approvals may proceed until SFN provides written confirmation of satisfaction	The Proponent must provide all technical reports, models, and supporting documentation to SFN at least 90 days prior to regulator submission, respond in writing to all SFN comments, and obtain written confirmation of satisfaction before proceeding. This reduces information asymmetry and technical uncertainty classifications.		
		The Proponent must provide written responses to addressing all SFN technical comments			
		SFN’s written confirmation of satisfaction is required for the EA conditions to be considered fulfilled			
		The Proponent must provide SFN with all technical reports, models, and plans minimum 90 days before submission to federal regulators	All predictive models relied upon for EA approval, including water quality, pit lake, geochemical, groundwater, seepage, and closure performance models, must include quantified uncertainty ranges, sensitivity		

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			analyses, and probability-of-exceedance reporting. Model outputs must be presented in a form sufficient to classify risk under the SFN Risk Matrix and demonstrate reduction of uncertainty category by at least one level prior to advancement beyond EA. Absence of quantified uncertainty maintains the element in an elevated risk category.		
1.3	Fulfillment of Conditions	The Proponent must prepare a Satisfaction Demonstration Statement identifying: - how requirements were met - evidence supporting compliance - SFN review comments and responses - any remaining uncertainties and how they are managed	The Proponent shall prepare a Satisfaction Demonstration Statement documenting how each condition was met, evidence supporting compliance, responses to SFN comments, and identification of remaining uncertainties with mitigation measures. Residual risks must be reduced to Moderate or lower prior to advancement.		
1.4	Outcomes	No subsequent regulatory approvals may proceed until SFN provides	No subsequent regulatory approvals or project phase transitions may proceed without written confirmation from SFN that applicable	2.2, 2.4, 2.15, 2.16	1. The Proponent shall not advance the Project beyond any defined project stage unless Slate Falls Nation has provided written confirmation that all applicable conditions for that stage have been satisfied. Such

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		written confirmation of satisfaction	conditions are satisfied. This prevents advancement of project phases while High or Extreme risks remain unresolved.		confirmation shall be based on review of complete technical documentation and verification of compliance with all performance requirements. 2. The Proponent shall develop and implement a Construction Environmental Management Plan prior to the commencement of any construction, site clearing, or ground disturbance activities. The Plan shall define measures to prevent uncontrolled disturbance, sediment release, and contamination of land and water, and shall address all construction-related activities including clearing, grubbing, earthworks, laydown areas, temporary works, and infrastructure installation. The Plan shall include defined control measures, monitoring requirements, and response actions for exceedances, and shall demonstrate how environmental protection objectives will be achieved during all construction phases. The Plan shall be provided to Slate Falls Nation for review prior to implementation and shall be updated as required based on monitoring results and observed site conditions. 3. Project schedules shall be contingent on demonstration that all applicable conditions have been satisfied prior to advancement.
1.5	SFN Review	Provide SFN with all plans models and reports at least 90 days before	All plans, models, and reports must be provided 90 days prior to submission. SFN comments must be addressed in writing, including		Plans shall demonstrate achievement of defined environmental performance objectives and SFN criteria prior to approval.

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		regulatory submission	justification where recommendations are not adopted.		
1.6	SFN Satisfaction	If SFN objects to proponent reports works or activities resolve the difference before continuing	If SFN objects to reports or activities, differences must be resolved prior to continuation.		
Section 2: CDF MEASURES Intent: Ensure the Co-Disposal Facility is located further away from water to protect downstream waters, aquatic life, fish, drinking water, and cultural values and identify an alternative location					
2.1	CDF design and selection of alternative CDF location	The Proponent must protect Birch and Springpole Lakes and all connected watercourses from CDF-related risks.	The CDF must be designed such that there is passive drainage to the open pit, and setbacks from Birch and Springpole Lakes acceptable to SFN. The design must demonstrably reduce groundwater connectivity risk, catastrophic release consequence classification, and long-term contamination probability from Extreme to Moderate or lower.	11.1	The Proponent shall design the co-disposal facility such that it is demonstrably outside of direct or indirect hydrogeological connectivity pathways to Birch Lake and Springpole Lake. The design shall be supported by site-specific hydrogeological modelling, tracer studies where required, and independent review demonstrating that contaminant transport to receiving water bodies is prevented under both operational and closure conditions.
2.2		An evaluation of alternative sites, which includes participation by SFN, must be undertaken	A defensible assessment, co-developed with SFN, must evaluate other viable CDF locations using hydrological isolation, geotechnical stability, long-term treatment avoidance, and cumulative watershed risk criteria. The selected alternative must demonstrate measurable reduction of cumulative watershed risk.	2.15, 2.1	1. The Proponent shall conduct an evaluation of alternative locations for the CDF, taking into account mine waste storage locations and configurations, incorporating Indigenous knowledge and technical input. 2. The Proponent shall demonstrate that selected designs represent best available technology economically achievable for minimizing environmental impacts.

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2.3		Site-specific investigations are completed before a CDF design is finalized in collaboration with SFN	Comprehensive geotechnical, hydrogeological, and geochemical investigations must be completed with scopes co-developed with SFN prior to final design. Investigation results must reduce uncertainty classification from High to Low or Moderate confidence bands.		
2.4		There must be confirmation that any interaction between the CDF and surface or groundwater sources will have not have adverse impacts or effects will be negligible	A complete assessment, reviewed and accepted by SFN, must demonstrate that any interaction between the CDF and surface or groundwater systems will not result in adverse impacts.		
2.5	Risk Assessment	The Proponent must complete, in collaboration with SFN, a defensible, peer-reviewed documented Risk Assessment	The Proponent must complete a peer-reviewed Risk Assessment including FMEA and quantitative probability analysis addressing ice loading, climate change, liner degradation, geotechnical variability, and long-term treatment dependency. All High or Extreme failure modes must be engineered down to Moderate or lower prior to approval.	11.2	The Proponent shall complete a comprehensive Failure Modes and Effects Analysis for all mine waste storage facilities, including the co-disposal facility, identifying all credible failure scenarios, likelihoods, and consequences. The analysis shall include extreme events, long-term degradation mechanisms, and climate change scenarios, and shall be reviewed by an independent engineering panel.
2.5a		Quantitative probability analysis considering ice loading, climate change, liner performance, geotechnical uncertainty, and long-term water			

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		treatment requirements			
2.5b		Failure Modes and Effects Analysis for all potential release pathways	The Proponent must complete an integrated probabilistic Failure Modes and Effects Analysis covering all high-consequence infrastructure and systems, including CDF, low grade ore stockpiles, pit lake, water treatment plant, diversion systems, and closure-era containment structures. The analysis must address construction, operation, closure, and post-closure phases and include consequence severity, likelihood, detectability, and residual risk. Infrastructure remains in High or Extreme risk category until failure modes are demonstrated to be reduced to Moderate or lower through design modification.		
2.6	Meeting Standards	The CDF design must meet modern risk standards consistent with INAP GARD Guide, CDA Dam Safety, and MAC TSM	The CDF design must meet or exceed modern risk standards consistent with INAP GARD Guide, CDA Dam Safety Guidelines, and MAC TSM, verified by independent experts and accepted by SFN. Compliance must demonstrably reduce structural and release probability classification.	11.2, 11.4	1. The Proponent shall develop and implement a Malfunction and Accident Prevention and Response Plan covering all credible scenarios including dam breach, pipeline failure, explosives incidents, and chemical spills. 2. Emergency response plans shall include defined response times, equipment, trained personnel, and coordination with Slate Falls Nation, with regular drills and reporting. 3. All fuel, reagents, and hazardous materials shall be stored with secondary containment

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2.7		All predicted water quality outcomes in normal, upset, and failure states meet SFN water objectives	All predicted water quality outcomes under normal, upset, and credible failure conditions must meet Ontario Drinking Water Standards, Canadian Aquatic Life Guidelines, and SFN-specific objectives where more stringent. Any predicted exceedance requires redesign before advancement.		systems and monitored for leakage, with inspection records maintained.
Section 3: INDEPENDENT TECHNICAL REVIEW PANELS					
Intent: To ensure independent oversight of all major technical risks					
3.1	Establish Panels	Independent Tailings Review Board required	An Independent Tailings Review Board jointly selected with SFN must be established prior to detailed design approval. The Board must review all tailings and CDF-related design assumptions, models, and risk analyses. Any identified High or Extreme risks must be engineered down to Moderate or lower before advancement.		
3.2		Independent Water Quality / Geochemistry Review Panel required	An Independent Water Quality and Geochemistry Panel must review all water models, source term assumptions, pit lake modelling, and long-term loading projections. Model uncertainty classifications must be reduced to Moderate or lower prior to permitting.		
3.3		Independent Closure Technical Advisory Panel	An Independent Closure Technical Advisory Panel must review closure vision, long-		

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			term water treatment dependency, landform design, and liability estimates. Closure-related risks classified as High or Extreme must be reduced before regulatory submission.		
3.4	Expert Selection	Each panel must include experts selected by or jointly with SFN, and SFN may reject panel members who do not meet competence or impartiality standards	All panel members must be jointly selected with SFN, and SFN retains the right to reject nominees who do not meet competence or impartiality standards. This reduces Governance Failure risk associated with conflicted or insufficient expertise.		
3.5	Reporting	Panel reports must be provided to SFN, regulators, and the public simultaneously	Panel reports must be provided simultaneously to SFN, regulators, and the public to eliminate information asymmetry and ensure accountability.	2.7, 2.9	1. All environmental monitoring data shall be independently verified and subject to audit by Slate Falls Nation. 2. Monitoring results shall be reported annually in a format accessible to Slate Falls Nation members.
3.6	Outcomes	No construction or permitting shall proceed until panel recommendations have been implemented to SFN's satisfaction	No construction or permitting may proceed until panel recommendations addressing High or Extreme risks have been implemented and verified.	10.1	Independent Technical Review Panels shall be established, including experts selected by Slate Falls Nation. The Panels shall review and provide written opinions on all major engineering designs, water quality models, geochemical models, closure plans, and risk assessments. Project advancement shall not proceed until the Panels confirm that designs meet accepted engineering standards and the environmental protection objectives of Slate Falls Nation.

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Section 4: LOW-GRADE ORE STOCKPILE LOCATION AND SEEPAGE PREVENTION					
Intent: Prevent long-term acid/metal leaching and contamination of SFN waters					
4.1	Viable Alternatives	The Proponent must either eliminate the Low-Grade Ore Stockpiles entirely or relocate it to remove or reduce long-term acid and metal leaching sources. Relocation must reduce cumulative watershed contamination risk to Moderate or lower. The Proponent must alternatively install full-containment engineered lining systems if no other alternative exists.	The Proponent will locate the facility for low-grade ore stockpile in the Springpole North Basin east of the open pit, inside coffer dams or within the catchment draining naturally to the open pit.		
4.2	Modelling Update	A revised seepage model correcting prior errors and incorporating conservative assumptions must be completed. Parameter uncertainty must be reduced and sensitivity testing completed such that predicted	In collaboration with SFN, the Proponent must complete a seepage prediction update correcting previous modelling errors under conservative assumptions.	3.6, 3.7	1. The Proponent shall demonstrate, through predictive modelling and validation, that total contaminant loads generated from PAG materials, including waste rock, tailings, and ore stockpiles, will not exceed defined site-specific loading thresholds over a minimum 200-year period. These thresholds shall be established in consultation with Slate Falls Nation and shall be protective of aquatic ecosystems and country foods. 2. The Proponent shall implement a statistically robust material classification

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		exceedances are not plausible under credible scenarios.			program to differentiate potentially acid generating (PAG) and non-acid generating (NAG) materials prior to placement. Classification shall achieve a minimum confidence level of 95 percent, supported by kinetic and static testing, and shall be verified through ongoing operational sampling and reconciliation. 3. The Proponent shall not rely solely on saturation-based controls for PAG management. The design shall incorporate multiple independent barriers, including geochemical controls, physical isolation, and hydraulic management, such that failure of any single control does not result in unacceptable contaminant release. 4. Predictive modelling shall demonstrate compliance under worst-case and failure scenarios.
4.3	Containment Requirement	The Proponent must demonstrate to the satisfaction of SFN that no untreated drainage from the stockpile area enters any waterbody used by SFN.	The Proponent must demonstrate to the satisfaction of SFN that no untreated drainage enters waterbodies used for drinking, fishing, travel, or cultural purposes.	3.5	The Proponent shall develop and implement a management plan for all water treatment residuals, including sludge, that defines storage, stability, containment, and long-term disposition. Residuals shall not be stored in a manner that creates additional long-term contamination risk.
Section 5: COFFERDAM SAFETY, DESIGN, AND RISK MANAGEMENT Intent: Ensure cofferdams are designed, engineered, and independently verified to eliminate risks of catastrophic flooding and protect water, fish, travel routes, and cultural sites					
5.1	Geotechnical / Hydrotechnical Investigations	High-resolution bathymetric surveys	Comprehensive bathymetry, sediment coring, geotechnical testing, ice-load assessment, wave modelling, and groundwater interaction		
5.2		Sediment coring and geotechnical testing for			

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		stratigraphy, strength, liquefaction potential, and permeability	modelling must be completed prior to final cofferdam design. Investigation results must reduce structural failure and hydraulic uncertainty classifications from Extreme to Moderate or lower.		
5.3		Ice-load and ice-heave assessment			
5.4		Wave and storm modelling under extreme event scenarios			
5.5		Groundwater–surface water interaction and seepage modelling			
5.6		Results must be provided to SFN before any design work is done	At least three cofferdam alternatives must be evaluated, independently reviewed, and approved by SFN prior to construction. Selected design must demonstrate safety under normal, storm, seismic, and ice-load scenarios with failure probability reduced to Moderate or lower.		
5.7	Cofferdam Design and Selection	Evaluate at least three engineering alternatives and provide an alternatives analysis demonstrating the rationale for the selected design			
5.8		Avoid reliance on weak lakebed sediments unless fully remediated or stabilized			
5.9		Demonstrate safety under all normal, storm, seismic, and ice-load conditions			

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5.10		Be reviewed by independent experts			
5.11		Be approved by SFN prior to construction			
5.12	Independent Cofferdam Engineering Review Panel	Establish an Independent Cofferdam Engineering Review Panel composed of qualified specialists	An Independent Cofferdam Engineering Review Panel must review all design documents, QA/QC, and modelling. Construction cannot begin until High or Extreme failure modes are engineered down to Moderate or lower.		
5.12. a		SFN must approve all panel members			
5.12. b		The panel must review design reports, drawings, models, material specifications, and construction QA/QC			
5.12. c		The Proponent must not begin cofferdam construction until the panel and SFN confirm the design is acceptable			
5.13	Cofferdam Failure Modes and Effects Analysis (FMEA)	Prepare a cofferdam-specific FMEA addressing: overtopping; Internal erosion/piping; Foundation failure, uplift, or bearing capacity issues; Liquefaction of lakebed sediments;			

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		Blasting-induced vibration failure; Rapid drawdown instability; Ice load failure; Wave scour and erosion			
5.13. h		If any failure mode indicates an unacceptable risk, the cofferdam design must be re-engineered			
5.14	Blasting and Vibration management	Establish vibration thresholds approved by SFN and the Independent Panel that prevent damage to cofferdam structures	A detailed cofferdam-specific FMEA must address overtopping, piping, liquefaction, vibration, drawdown, and ice load failure. Real-time monitoring and emergency response systems must be implemented to ensure no credible failure mode remains High or Extreme prior to operation.	6.6	Blasting activities shall be designed and monitored to ensure vibration, air overpressure, and acoustic impacts do not exceed thresholds protective of fish habitat, wildlife, and cultural use areas.
5.14. a		Real-time vibration monitoring devices must be installed on the cofferdams			
5.14. b		Any exceedance must result in immediate suspension of blasting activities			
5.15	Redundant Protection and Fail-Safe Water Diversion Systems	Construct redundant cofferdam systems including primary and secondary cofferdam lines			

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5.15. a		Emergency spillways and diversion channels			
5.15. b		Backup pumping and water-level management systems			
5.15. c		Redundancy must ensure that no single failure results in water entering the open pit			
5.16	Seepage Control and Monitoring	Implement active seepage control measures including upstream and downstream piezometers			
5.16. a		Relief wells or horizontal drains			
5.16. b		Monitoring of pore pressures, turbidity, flow, and settlement			
5.16. c		A real-time telemetry system accessible to SFN			
5.16. d		Any indication of increased pore pressure, movement, or turbidity triggers immediate mitigation			
5.17	Cofferdam Construction QA/QC	Material testing and acceptance criteria			
5.17. a		Verification of lakebed preparation			

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		and key trench installation			
5.17. b		Daily as-built documentation reviewed by a professional engineer			
5.17. c		On-site SFN monitoring participation throughout construction			
5.18	Cofferdam Operation, Inspection, and Maintenance	Daily inspections during construction			
5.18. a		Weekly inspections during operation			
5.18. b		Monthly formal inspections by a qualified professional engineer			
5.18. c		Immediate reporting to SFN of any anomalies or conditions requiring mitigation			
5.19	Emergency Preparedness and Catastrophic Failure Response	SFN-approved Cofferdam Emergency Action Plan including inundation modelling		11.2	The Proponent shall develop and maintain detailed response plans for all credible failure scenarios, including dam failure, water treatment failure, and contaminant release. Plans shall include response actions, timelines, and responsibilities, and shall be tested through regular exercises.
5.19. a		Real-time notification to SFN within 15 minutes of emergency detection			

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5.19. b		On-site containment materials and pumps staged and ready for deployment			
5.19. c		Evacuation procedures for workers, boaters, and SFN land users			
5.19. d		Annual joint emergency exercises with SFN participation			
5.19. e		Any indication of instability triggers immediate implementation of the plan			
5.20	Cofferdam Removal and Lake Restoration	Confirm pit water quality is suitable for reconnecting water bodies by cofferdam removal	Cofferdam removal must occur only after pit water quality is confirmed acceptable.		
5.20. a		Ensure no mining materials and waste remain on the former lakebed before reflooding			
5.20. b		Remove cofferdams in a controlled and safe manner			
5.20. c		Restore natural lake contours, hydrology, and habitat			
5.20. d		Implement a SFN-approved aquatic			

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5.20.e		ecosystem restoration plan Monitor restored lake conditions for a minimum of 10 years including shoreline stability, habitat quality, sedimentation, and water quality recovery			
Section 6: WATER QUALITY PROTECTION AND EFFLUENT STANDARDS					
Intent: Ensure scientifically valid predictions and enforce stringent treatment outcomes					
6.1	New Water Quality Model	In collaboration with SFN, submit a new corrected Water Quality Model	A corrected Water Quality Model must be developed incorporating validated source terms, kinetic extrapolation, seepage pathways, and prior technical critiques. Model confidence must reduce uncertainty classification to Moderate or lower.	3.7, 2.4	1. The Proponent shall develop a revised water quality model incorporating updated geochemical data, site-specific hydrological inputs, and conservative assumptions. The model shall be calibrated against baseline conditions and validated using sensitivity analysis and independent peer review. 2. The Proponent shall develop a dynamic, site-wide water balance model that accounts for all inflows, outflows, storage components, and operational scenarios, including extreme precipitation events and climate change projections. The model shall be used to design water management infrastructure and prevent uncontrolled releases. 3. All water quality and water balance modelling shall include worst-case scenarios, including treatment system failure, increased seepage rates, and extreme hydrological conditions. Project design shall demonstrate that environmental protection objectives are met under these scenarios.
6.1.a		Verified source term geochemistry			
6.1.b		Conservative kinetic test extrapolation			
6.1.c		Field-validated seepage pathways			
6.1.d		Incorporation of technical critiques from independent experts			
6.2	Peer Review	The model must be peer-reviewed by	The revised model must be peer-reviewed by Qualified		

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		Qualified Professionals selected jointly by SFN and regulators	Professionals jointly selected with SFN. All identified High-risk modelling deficiencies must be corrected prior to permitting.		
6.3	Guidelines	Effluent released from the site must meet Ontario Drinking Water Quality Standards for all parameters affecting human health	Effluent must meet Ontario Drinking Water Standards, Canadian Aquatic Life Guidelines, and SFN-specific objectives where more stringent. Any predicted exceedance requires redesign before advancement.	3.5, 3.6, 3.7	1. All effluent discharged from the Project shall meet or exceed applicable federal and provincial water quality guidelines, including site-specific thresholds established in consultation with Slate Falls Nation. Compliance shall be demonstrated at the point of discharge and verified through continuous monitoring. 2. The Proponent shall meet water quality objectives at discharge and seepage points and shall comply with defined mass loading limits. 3. Material classification shall achieve ≥95% confidence and PAG management shall meet defined long-term performance criteria. 4. The Proponent shall establish and comply with maximum allowable annual and cumulative contaminant mass loading limits to receiving waters. These limits shall be defined for key parameters including, but not limited to, arsenic, sulphate, selenium, and mercury, and shall be based on protection of aquatic life and country foods. 5. The Proponent shall not rely on dilution within receiving water bodies as the primary mechanism for achieving water quality compliance. Water quality objectives must be achieved at the point of discharge and at seepage release points.
6.4		Effluent released from the site must meet Canadian Water Quality Guidelines for the Protection of Aquatic Life			
6.5		Effluent released from the site must meet SFN-specific water objectives where more stringent			
6.6	Actions on Exceedances	Immediate notification to SFN within 24 hours	Exceedances must trigger 24-hour SFN notification,	2.4	Exceedance of defined thresholds shall trigger immediate corrective action, including

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6.7		Implementation of mitigation within 30 days	corrective action within 30 days, and public reporting.		modification or suspension of project activities until compliance is achieved.
6.8		A public update to SFN members describing cause, consequence, and corrective measures			
Section 7: PIT LAKE WATER QUALITY AND LIMNOLOGY RE-EVALUATION					
Intent: Correct previous modelling defects and ensure pit lake does not become a long-term pollution source					
7.1	Redo Pit Lake Modelling	Redox-driven metal mobility	Pit lake modelling must incorporate redox-driven mobility, methylation potential, ice dynamics, thermal stratification, and groundwater exchange. Long-term predictions must demonstrate no exceedance of health or aquatic thresholds.	2.4	The Proponent shall establish predefined quantitative trigger thresholds for key environmental indicators, including water quality, groundwater levels, and ecological metrics. Exceedance of these thresholds shall require immediate implementation of predefined corrective actions.
7.2		Methylation potential			
7.3		Ice cover dynamics			
7.4		Thermal stratification risk			
7.5		Evaporation/precipitation balance			
7.6		Groundwater inflows/outflows			
7.7	Peer Review	The model must be peer-reviewed by independent experts selected with input from SFN	Model must undergo independent expert review with SFN input. Identified High-risk deficiencies must be corrected before advancement.		
7.8	Outcomes	If predicted outcomes exceed guidelines or impact SFN waters, redesign the mine plan, mitigation measures or closure configuration	If modelling predicts exceedances, the mine plan, mitigation, or closure configuration must be redesigned to eliminate the source of exceedance prior to permitting.		

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Section 8: GROUNDWATER FLOW AND SEEPAGE CONNECTIVITY					
Intent: Ensure no unmitigated seepage reaches Birch/Springpole Lake or SFN travel/harvest areas					
8.1	Connectivity Assessment	Conduct a baseline hydrogeological connectivity assessment including preferential flow pathways	A baseline hydrogeological connectivity assessment must identify preferential flow paths, hydraulic conductivity, contaminant transport, and groundwater-surface water interaction zones. Uncertainty classification must be reduced to Moderate or lower.	3.7	1. The Proponent shall develop a fully integrated conceptual and numerical hydrogeological model that defines groundwater flow paths, hydraulic connectivity, and contaminant transport mechanisms. The model shall be calibrated using field data and independently reviewed. 2. The Proponent shall demonstrate, through modelling and field verification, the degree of hydraulic connectivity between mine waste facilities and adjacent water bodies, including Birch Lake and Springpole Lake. Demonstration shall include travel time analysis and, where required, tracer testing.
8.1.a		Hydraulic conductivity of tills and bedrock			
8.1.b		Transport models for metals, metalloids, ammonia, nitrate			
8.1.c		Groundwater-surface water interaction zones			
8.2	Outcomes	If connectivity is confirmed or predicted under future conditions implement mitigations such as cutoff walls	If connectivity is confirmed, mitigation such as cutoff walls, interception trenches, lined systems, or redesign must be implemented. Mitigation must reduce predicted contaminant transport to Moderate risk classification or lower.	3.7	The Proponent shall design and implement seepage interception and collection systems capable of capturing a defined minimum percentage of contaminated seepage prior to discharge to the environment. Capture efficiency targets shall be established in consultation with Slate Falls Nation and verified through monitoring.
8.2.a		Interception trenches			
8.2.b		Lined collection systems			
8.2.c		Redesign of stockpiles or CDF location			
8.3	Monitoring Wells	A network of monitoring wells must be constructed with	A monitoring well network must be installed and maintained for life-of-mine plus 50 years to ensure early		

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		SFN participation and maintained for the life of the mine plus 50 years	detection of contaminant migration. Monitoring must be accessible to SFN and trigger corrective action.		
			If modelling demonstrates that long-term active water treatment may be required beyond closure, the Proponent must provide either: (a) a technically demonstrated pathway to eliminate active treatment within a defined post-closure timeframe supported by performance modelling; or (b) a perpetual, legally secured funding mechanism sufficient to finance treatment, renewal, and oversight independent of corporate solvency. Absence of an exit strategy or secured perpetual funding maintains closure risk in High or Extreme category.		
Section 9: COMPREHENSIVE CLOSURE PLAN REQUIREMENT					
Intent: Require long-term stewardship					
9.1	Closure Plan	Develop a comprehensive conceptual fully detailed Closure Plan and Closure Costing before permitting; Closure vision and objectives in collaboration with SFN; Landform	The Proponent and SFN must collaborate on and develop a fully detailed Closure Plan prior to construction, including closure vision, landform design, progressive reclamation sequencing, material balance, long-term geochemical modelling to minimum 200 years, treatment lifecycle costs,	2.4, 6.2	1. The Proponent shall develop a detailed closure plan that defines final landforms, water management systems, ecosystem recovery objectives, and long-term monitoring requirements. The plan shall be developed in collaboration with Slate Falls Nation. 2. The closure design shall demonstrate, through modelling and supporting analysis, that environmental performance objectives will be met for a minimum period of 200 years

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		design including contours; Plan for progressive reclamation; Material balance outlining volume and timing of NAG construction and cover material availability analysis; CDF long-term stability analysis; Geochemical closure modelling to 200 plus years; Treatment plant lifecycle and renewal costs if any; Passive treatment alternatives assessment; Site access management; Long-term monitoring for fish wildlife sediment groundwater air quality stability	passive treatment assessment, access management, and long-term monitoring design. Closure-related risks classified as High or Extreme must be reduced to Moderate or lower before advancement.		without degradation of water quality, land stability, or ecosystem function. 3. The Proponent shall provide detailed engineering designs for all final landforms, including slopes, drainage systems, and material placement, demonstrating long-term geotechnical stability and resistance to erosion. 4. The Proponent shall develop and implement an Access Management Plan controlling public and industrial access during operations and after closure, including physical barriers and enforcement mechanisms.
9.2	QP and SFN Collaboration	Prepared by a Qualified Professional in collaboration with SFN and must meet satisfaction of SFN and regulators	Closure Plan must be prepared by a Qualified Professional in collaboration with SFN and meet SFN satisfaction.		
9.3	Closure Liability Estimate	Closure liability estimates must	Closure liability estimates must incorporate perpetual	2.9	Financial assurance calculations for closure and post-closure liabilities shall not apply discounting

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		incorporate and be agreed upon by SFN including perpetual management if required; 200-year cost curves with and without discounting; Risk-adjusted contingency multipliers; Capital renewal cycles for water treatment if needed	management where required, 200-year cost curves with and without discounting, risk-adjusted contingency multipliers, and capital renewal cycles for treatment systems. Financial assurance must reduce residual long-term liability classification to Moderate or lower.		to long-term or perpetual cost components. Full undiscounted costs shall be secured. The Proponent shall prepare a closure cost estimate that includes all capital, operating, and long-term care costs associated with closure and post-closure management, including water treatment where required. The estimate shall be independently reviewed.
9.4	SFN Acceptance	No construction may occur until SFN confirms closure design meets closure vision and objectives and aligns with long-term sustainability requirements	No construction may proceed until SFN confirms the closure design aligns with the closure vision and long-term sustainability objectives.		
Section 10: PORTAGE PROTECTION AND CULTURAL USE Intent: Prevent cultural and travel disruptions central to SFN identity					
10.1	Portage Protection	Ensure all existing portages remain open and unaffected unless SFN agrees otherwise	All existing portages must remain open and functional unless expressly agreed otherwise by SFN.		
10.2	Portage Relocation	If relocation is unavoidable undertake a full archaeological Stage 2 survey of existing and	If relocation is unavoidable, Stage 2 archaeological surveys and SFN-led cultural assessment must be completed, and relocated portages must provide equal		

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		proposed new sites executed by a qualified contractor selected in active consultation with SFN	or improved usability before any existing route is disturbed. Conduct full Cultural Impact Assessment before interference.		
10.2. a		Work with SFN to determine alignment slope width and seasonal access requirements; ensure equal or better usability; reconstruct portages before interference with existing travel routes; Any impact to water routes narrows or travel corridors must undergo an SFN Cultural Impact Assessment before work begins.			
Section 11: CARIBOU PROTECTION AND HABITAT INTEGRITY					
Intent: Prevent adverse impacts to caribou and align with recovery strategies					
11.1	Operational Management	Mandatory reduced speed zones near travel routes, wildlife collision mitigation, dust and noise controls, controlled public access gates where appropriate	Mandatory speed zones, wildlife collision mitigation, dust and noise control, and controlled access gates must be implemented to reduce safety and wildlife disturbance risk to Moderate or lower.	5.1	1. Traffic volumes, vehicle interactions, and accident risks shall be monitored and mitigated through speed controls, scheduling, and safety infrastructure. 2. Access control measures shall include physical barriers and enforcement mechanisms.

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11.2	Management Plan	A Road Safety Management Plan must be developed with SFN before road construction starts and implemented before any major hauling occurs	A Road Safety Management Plan must be co-developed with SFN and implemented before major hauling occurs.		
11.3	Baseline and Updated Caribou Assessment	Prepare comprehensive caribou habitat and population assessment including identification of ranges used by SFN members	A comprehensive caribou habitat and population assessment must identify seasonal ranges, movement corridors, calving areas, and cumulative disturbance within 30 km. Assessment must demonstrate no increase in functional habitat loss above federal thresholds.		
11.4	Disturbance Thresholds	Demonstrate project does not increase functional habitat loss above federal disturbance thresholds for boreal caribou ranges	The project must not increase habitat disturbance above federal boreal caribou thresholds, impair seasonal movement, or increase predation risk associated with linear features.		
11.4. a		Does not impair caribou movement between seasonal habitats			
11.4. b		Does not increase predation risk associated with linear features or noise light disturbance			

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11.5	Caribou Mitigation and Monitoring	Seasonal restrictions on blasting road building high-noise activities if and where possible	Seasonal activity restrictions, corridor deactivation, revegetation, and long-term monitoring must be implemented to ensure habitat recovery and maintain harvest continuity.	6.2, 6.3, 6.6	1. The Proponent shall develop and implement a Caribou Habitat Protection and Recovery Plan that demonstrates no net loss of functional caribou habitat within the affected range. The Plan shall include avoidance of high-value habitat, minimization of disturbance, restoration of disturbed areas, and measurable habitat recovery targets. The Plan shall be aligned with federal and provincial caribou recovery objectives and shall be developed in collaboration with Slate Falls Nation. 2. The Proponent shall implement an Access Control Plan to manage all project-related access routes, including roads, transmission corridors, and trails, during operations and after closure. The Plan shall include physical barriers, monitoring, enforcement mechanisms, and decommissioning measures to prevent unauthorized access and minimize increased hunting pressure and predator movement associated with linear disturbances.
11.6	Outcomes		1. Reclamation shall achieve defined habitat productivity targets. 2. Caribou habitat shall achieve no net loss of functional habitat.		
Section 12: SFN CURRENT USE Intent: Protect integrity of SFN lands waters harvesting and culture					
12.1	Current Use of Lands and Resources	Project activities must not impair SFN ability to exercise fishing, hunting,	Project activities must not impair SFN ability to exercise fishing, hunting, travel, cultural practices, or water	2.1, 5.3, 2.4, 7.1, 6.6, 3.1	1. The Proponent shall identify, map, and design all laydown and temporary construction areas prior to permitting. Laydown areas shall be located to avoid sensitive environmental and

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		travel, cultural practices, water based activities, harvesting, etc.	harvesting. Avoidance-first design must be demonstrated before mitigation is considered.		cultural features, including water bodies, wetlands, and identified harvesting areas. Design shall include surface stabilization, drainage control, erosion protection, and containment of fuels and materials to prevent runoff contamination. Total footprint of laydown areas shall be quantified and included in the cumulative disturbance assessment. 2. The Proponent shall design all accommodation camps and associated service infrastructure, including water supply, wastewater treatment, solid waste management, fuel storage, and wildlife attractant controls, to meet applicable environmental standards and minimize ecological disturbance. Wastewater treatment systems shall meet discharge criteria equivalent to or more stringent than provincial requirements, and all waste streams shall be managed to prevent contamination of land and water. 3. The Proponent shall provide a complete and integrated site layout identifying all project components, including but not limited to laydown areas, accommodation camps, maintenance facilities, explosives storage, roads, and utility corridors. The total disturbed area shall be quantified and updated throughout project development. 4. The Proponent shall define and adhere to a maximum allowable disturbed footprint for the Project. Any expansion beyond this footprint shall require additional assessment and approval. 5. The Proponent shall assess and mitigate visual impacts of major structures, including

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					the co-disposal facility, on culturally important landscapes and travel routes. 6. The Proponent shall establish and maintain exclusion zones around identified cultural, spiritual, and harvesting areas where industrial activity is prohibited. 7. A Nation-led program shall continuously document land use patterns and verify project impacts on access, navigation, and harvesting. 8. All wetland losses shall be quantified and offset through restoration or creation of equivalent or higher-function wetlands.
12.2	Avoidance and Mitigation	Where impacts are predicted design and implement avoidance-first and mitigation not offsets	Avoidance-first hierarchy must be applied. Offsets alone are not acceptable where avoidance is feasible.	6.1, 3.1, 3.2, 3.3, 3.4, 3.9	1. The Proponent shall establish and achieve measurable wildlife habitat productivity targets for moose and other key species, including habitat availability, forage quality, and usage rates. Habitat design and reclamation shall incorporate features that support sustainable populations, and performance shall be evaluated through long-term monitoring programs developed in collaboration with Slate Falls Nation. 2. Offset measures shall achieve no net loss or net gain of functionally equivalent habitat within areas identified by Slate Falls Nation. 3. Offset performance shall be demonstrated through monitoring confirming functional equivalency. 4. Fish salvage programs shall be designed to minimize mortality and support long-term population stability. 5. Habitat restoration shall achieve defined ecological productivity targets. 6. Restoration success shall be demonstrated through measurable ecological indicators.

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Section 13: FISH AQUATIC HEALTH AND CONTAMINANT BIOACCUMULATION					
Intent: Protect fish prevent harm from methylmercury cobalt arsenic and safeguard SFN reliance on fish					
13.1	Methylmercury Assessment and Mitigation	Complete comprehensive methylmercury generation and bioaccumulation assessment incorporating flooding biomass decomposition dissolved organic carbon release	A comprehensive methylmercury generation and bioaccumulation assessment must incorporate biomass flooding decomposition, dissolved organic carbon release, cold-climate methylation rates, downstream transport, and 100-year post-closure fish tissue projections. Predicted concentrations must not exceed Health Canada consumption thresholds or baseline conditions.	3.7	Mercury modelling shall be conducted separately for Birch Lake and Springpole Lake and shall not combine datasets across water bodies.
13.1. a		Cold climate methylation rates supported by empirical studies			
13.1. b		Downstream methylmercury transport modelling			
13.1. c		Fish tissue methylmercury projections for at least 100 years post-closure			
13.2	Protection of SFN Food Systems	Demonstrate project activities do not cause increases in methylmercury concentrations in harvested species above baseline conditions	The Proponent must demonstrate that project activities do not cause increases in methylmercury or other contaminants in harvested species above baseline levels or health-based thresholds. Any predicted increase requires redesign to eliminate the source.	5.4	The Proponent shall ensure that contaminant concentrations in fish tissue do not contribute to exceedances of thresholds established for safe human consumption, based on Health Canada guidelines and site-specific baseline conditions.
13.2. a		Do not exceed Health Canada fish consumption thresholds for			

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		sensitive populations			
13.2. b		If predicted increases occur redesign the project to eliminate the cause			
13.3	Cobalt and Metal Bioaccumulation	Conduct full metals bioaccumulation assessment for cobalt selenium arsenic nickel and other relevant parameters including benthic uptake	A full metals bioaccumulation assessment must be conducted for cobalt, selenium, arsenic, nickel, and other relevant parameters including benthic uptake, food chain transfer factors, and tissue concentration projections for multiple trophic levels. Independent review required.		
13.3. a		Water column uptake			
13.3. b		Food chain transfer factors			
13.3. c		Tissue concentration predictions for multiple trophic levels			
13.3. d		Assessment must be independently reviewed by experts selected jointly by SFN the Proponent and regulators			
13.4	Fish Health Monitoring Program	Design a long-term monitoring program in collaboration with SFN including fish tissue testing mercury	A long-term fish health monitoring program co-designed with SFN must include tissue testing, growth and reproductive indicators, and Indigenous-led sampling.	3.7, 3.8	1. The Proponent shall establish and implement a long-term fish and aquatic monitoring program that includes assessment of fish populations, fish health, fish tissue contaminants, aquatic habitat condition, and water quality. The program shall include

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		methylmercury cobalt arsenic selenium	Exceedances trigger 24-hour notification, investigation, corrective action, and public reporting.		multiple species and life stages and shall be designed to detect both short-term and long-term changes attributable to the Project. Slate Falls Nation shall participate directly in program design, fieldwork, and data interpretation. 2. The Proponent shall identify and implement protection measures for all aquatic species at risk, including sturgeon and other sensitive species. 3. The Proponent shall implement a monitoring program for mercury and methylmercury in water, sediment, and fish tissue using detection limits sufficient to assess bioaccumulation pathways.
13.4. a		Growth reproductive and condition-factor monitoring			
13.4. b		Indigenous-led sampling using SFN methodologies			
13.4. c		Annual reporting to SFN members in plain language			
13.5	Prohibition on Effluent Exceedances	No effluent may be discharged that causes downstream concentrations to exceed Canadian Water Quality Guidelines for Protection of Aquatic Life	Effluent must meet Ontario Drinking Water Standards, Canadian Aquatic Life Guidelines, and SFN-specific objectives where more stringent. Any predicted exceedance requires redesign before advancement. Exceedances must trigger 24-hour SFN notification, corrective action within 30 days, and public reporting.	5.3	Project activities shall not result in exceedance of water quality standards.
13.6	Response to Contaminant Exceedance	Any exceedance requires immediate SFN notification within 24 hours			
13.6. a		A full investigation			
13.6. b		Corrective action			
13.6. c		A public report to SFN membership			

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13.7	Fish stocking Spawning Ground Protections		Spawning grounds and fish habitat must be protected from disturbance, and any stocking or habitat alteration must be approved by SFN and demonstrate no long-term ecological degradation.		
Section 14: COUNTRY FOODS AND HUMAN HEALTH					
Intent: Protect SFN land-based food systems and prevent health impacts					
14.1	Long-term Monitoring and Outcomes	Implement long-term program with annual sampling including SFN-led harvesting and data interpretation. Any increase above baseline or guideline levels triggers immediate mitigation SFN notification and redesign of contributing project components	A long-term monitoring program including SFN-led harvesting and data interpretation must be implemented. Any increase above baseline or guideline levels triggers mitigation and redesign of contributing components.	5.1, 5.2, 5.3, 5.4, 3.1, 2.4, 2.7, 5.2, 6.6	1. A comprehensive monitoring program shall be implemented for fish, wildlife, and plant species used as country foods, including contaminant testing and consumption advisories where required. 2. Long-term mercury and methylmercury monitoring shall include multiple fish species and life stages to assess trends in bioaccumulation and human exposure risk. 3. The Proponent shall demonstrate that lake trout populations in Springpole Lake are maintained or restored to baseline population levels within defined timeframes following closure. 4. The Proponent shall develop and implement a Fish Habitat Offset and Compensation Plan that achieves no net loss, and where feasible a net gain, of productive fish habitat within areas identified by Slate Falls Nation as priorities. The Plan shall include creation or enhancement of spawning, rearing, and foraging habitats, and shall not rely on fish stocking as a primary compensation measure. All offset measures shall be demonstrated to be functionally equivalent to or better than the habitats lost. 5. The Proponent shall design, install, and maintain a comprehensive, site-wide

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					environmental monitoring system that provides continuous or high-frequency measurement of key parameters including, but not limited to, water quality, groundwater levels, seepage flows, dam performance, and meteorological conditions. Monitoring systems shall include automated instrumentation where feasible, real-time data logging, and remote access capability for Slate Falls Nation. All monitoring data shall be transmitted, stored, and made available in near real-time to Slate Falls Nation and regulators. 6. The Proponent shall develop and implement an Air Quality Management Plan that includes dispersion modelling, dust suppression measures, and continuous monitoring of PM2.5, PM10, and metals deposition. The Plan shall demonstrate compliance with health-based thresholds at all sensitive receptors. 7. Continuous real-time air quality monitoring shall be implemented, with automatic notification to Slate Falls Nation when thresholds are exceeded and immediate mitigation measures triggered. 8. The Proponent shall assess and monitor deposition of airborne contaminants onto vegetation, water, and wildlife used for country foods, including cumulative exposure pathways. 9. A Noise Management Plan shall be developed to limit operational noise at culturally significant areas and harvesting zones, including timing restrictions and equipment controls.

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					10. The Proponent shall fund and implement a long-term community health monitoring program addressing physical, mental, and socio-economic indicators. 11. The Proponent shall develop a plan to manage workforce-related impacts including housing, substance use, and community safety. 12. Measures shall be implemented to prevent workplace discrimination, ensure safe working conditions, and support retention of Indigenous employees.
Section 15: ARCHAEOLOGICAL AND CULTURAL HERITAGE PROTECTION Intent: Identify assess and protect archaeological sites cultural landscapes and heritage resources					
15.1	Comprehensive Archaeological Review	Conduct full archaeological assessment including Stage 1–4 investigations or Ontario equivalents Systematic surveys of all previously disturbed areas Full assessment of all new proposed facilities and infrastructure Remote sensing and LiDAR-based predictive modelling Integration of SFN traditional knowledge and cultural mapping	A full Stage 1–4 archaeological assessment including remote sensing and SFN traditional knowledge integration must be completed for all disturbed and proposed areas. Cultural heritage loss risk must be reduced to Moderate or lower.	7.1	1. The Proponent shall complete a comprehensive archaeological assessment of the Mine Site Development Area and all associated infrastructure areas using field-based methods that achieve full spatial and seasonal coverage. The assessment shall be sufficient to identify archaeological resources across all terrain types and shall not rely on limited-duration or partial surveys. 2. The Proponent shall conduct archaeological assessment at a landscape scale, incorporating waterways, travel corridors, portage routes, and associated cultural heritage features. The assessment shall not treat the Project area in isolation and shall demonstrate consideration of regional cultural use and movement patterns. 3. The Proponent shall apply archaeological survey methods capable of identifying both surface and subsurface archaeological resources across all terrain types, including previously disturbed areas, shoreline zones,

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					and submerged environments. The Proponent shall demonstrate that survey methods achieve reliable detection of archaeological resources.
15.2	SFN Participation and Leadership	Archaeological work must be jointly designed with SFN and under SFN leadership	Archaeological work must be jointly designed with SFN, conducted with SFN monitors, and guided by SFN cultural protocols.	7.1	The Proponent shall establish and implement an archaeological program that is developed and conducted with the direct participation and leadership of Slate Falls Nation. This shall include involvement in study design, field investigations, interpretation of findings, and decision-making regarding archaeological resources.
		Conducted with SFN archaeological monitors			
		Guided by SFN cultural protocols for sacred sites burials artifacts and cultural landscapes			
15.3	Protection of Identified Sites	No construction clearing drilling or blasting within 500 m of any identified archaeological or cultural site unless SFN expressly consents	No construction may occur within 500 m of identified archaeological or cultural sites unless expressly consented by SFN.	7.1, 7.2	1. The Proponent shall avoid or protect archaeological sites in situ wherever feasible. Where disturbance cannot be avoided, the Proponent shall implement mitigation measures that ensure full documentation and recovery of archaeological information. Protection and mitigation measures shall be implemented prior to any site disturbance. 2. Cultural access routes shall be preserved across the broader project area.
		Culturally appropriate mitigation and preservation plan developed and implemented			
15.4	Reporting and Data Ownership	All archaeological data maps findings and analysis shared with SFN	All archaeological data must respect SFN data sovereignty.	7.1	The Proponent shall develop and implement a formal archaeological research plan and a chance find protocol prior to any construction or ground disturbance activities. The chance find protocol shall ensure immediate protection of discovered materials, cessation of work in affected areas, and
		Held under an information-sharing	A SFN-led Chance Find Protocol must require immediate work stoppage and		

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		agreement that respects SFN data sovereignty	culturally appropriate response.		appropriate assessment and management of finds.
15.5	Chance Find Protocol	SFN-led Chance Find Protocol implemented requiring immediate work stoppage			
		On-site involvement of SFN designated representatives			
		Culturally appropriate treatment and documentation			
Section 16: CULTURAL ACCESS AND TRAVEL ROUTE PROTECTION Intent: Protect culturally essential land-use areas beyond portages alone					
16.1	Cultural Access Plan	No disturbance may occur until a SFN-approved Cultural Access Plan is completed	No disturbance may occur until a Cultural Access Plan approved by SFN is completed.		