



Qalipu
FIRST NATION

December 16, 2020

Valentine Gold Project
Impact Assessment Agency of Canada
301-10 Barters Hill
St. John's, Newfoundland and Labrador A1C 6M1

SUBJECT: Qalipu First Nation Comments on the Environmental Impact Statement for the proposed Valentine Gold Project

To whom it may concern:

The purpose of this letter is to provide comments on the potential environmental effects the Proposed Valentine Gold Project as described by Marathon Gold Corporation in its EIS.

Qalipu First Nation (QFN) represents approximately 24,000 registered members in Newfoundland and abroad and is made up of 67 traditional Mi'kmaq communities across Newfoundland. As a band, we provide core programs and service to our members, including Natural Resources Management.

Given there are several identified species at risk and culturally important species expected to be impacted by the project, additional protection measures should be implemented. Specific wildlife concerns are as follows:

- Newfoundland Marten have critical habitat in the project area. Habitat fragmentation caused by project development needs to be addressed.
- Northern long-eared bats and little brown bats may exist in the project area. Given existing threats including white-nose syndrome, additional surveys should be completed to ensure species protection.
- Significant impacts are expected on woodland caribou distribution and migration. Permanent habitat alteration will cause long lasting changes in woodland caribou behavior/habitat utilization in the area.
- Project activities could negatively affect various avifauna in the area. The impact on ptarmigan, a traditional important species is not fully understood.

Considering the nature of the open-pit mine development large amounts of habitat will be permanently altered. Specific concerns include the effects this will have on flora and fauna in the area possibly including medicinal plants. While significant traditional use has not been well documented within the project area, the general area has been known to be of importance to Mi'kmaq people. Permanent

habitat alteration will remove the ability for future traditional land use. Project development will increase risk of surface water contamination and/or large-scale spills. Given the importance of water and fish species to Mi'kmaq people additional protection measures is recommended in this area.

Project operations must be conducted according the highest environmental standards as outlined in the legislation of the Government of Canada, and the Government of Newfoundland and Labrador. Mining operations should also have the flexibility to adjust to upgrades in environmental standards during the life of the project. All aspects of the proposed mine operations must be conducted with the primary objective of having the least possible negative impact on its surroundings. The potential environmental effects as described in the EIS provided by Marathon Gold may have adverse effects on resources of cultural, historical, and traditional importance. All potentially affected species listed within the EIS are of concern. Mi'kmaq people have no assumptions of superiority over other life forms. All of creation is sacred and should be treated with respect and honor.

Sincerely,

<original signed by>

Chief Brendan Mitchell