



June 23, 2022

To Whom It May Concern:

Please accept this letter regarding the Draft Environmental Assessment Report, May 2022, on behalf of the Canadian Parks and Wilderness Society Newfoundland and Labrador Chapter (CPAWS NL) with an emphasis on caribou.

According to the EA Report "The Proponent predicted that the Project would affect caribou through a change in habitat, movement and mortality risk. The Project is predicted to have an effect on both the Buchans and Grey River herds, and to a portion of the Grey River herd calving grounds." Under Cumulative Effects, "The Agency is of the view that the Project will cause adverse cumulative effects on caribou. The Agency based this conclusion on its consideration of the project effects, the effects of other past, present and reasonably foreseeable projects or activities, the Proponent's assessment, federal and provincial authority expert review, comments provided by Indigenous groups and the public, the proposed mitigation measures, and existing federal and provincial regulations..."

However, "The Agency notes that re-design to the Project has been undertaken in consultation with Newfoundland and Labrador Department of Fisheries, Forestry and Agriculture Wildlife Division to reduce overlap with the migration path. (As well) the Proponent has committed to continuing to update its Caribou Protection and Environmental Effects Monitoring Plan in consultation with regulators, scientific experts, Indigenous groups and stakeholders. The Agency is of the view that the key mitigations described in the other valued component sections would reduce adverse effects on caribou such as limiting vegetation clearing to the project area, implementing measures to reduce noise effects, and developing a Rehabilitation and Closure Plan"

Finally, "The Agency notes that the Government of Newfoundland and Labrador is the leading expert authority on caribou within the province and that caribou are located entirely on provincial lands in relation to the Project. Therefore, the Agency has primarily relied on the provincial expertise to assess the potential cumulative effects and any required mitigation measures for caribou. The Proponent will continue to engage with provincial experts as outlined in the Government of Newfoundland and Labrador conditions of release for the Project. "

ENGO's and concerned citizens recognizes that this will be the largest gold mine in Atlantic Canada and a significant contributor to the economy of Newfoundland and Labrador, however ensuring caribou and other species survival is equally important.

The provincial government has released this undertaking subject to terms and conditions: "The proponent shall implement, review, and update the Caribou Protection and Environmental Effects Monitoring Plan in collaboration with the Department of Fisheries, Forestry and Agriculture (FFA) - Wildlife Division. This review should occur twice per year, every year of project operation and prior to each caribou migration and should include sharing and reviewing of all data collected during the most recent migration, including the operational response of the mine site."

At this current time, without reviewing the Caribou Protection and Environmental Effects Monitoring Plan in its entirety but only high-level details, and not being able to provide additional advice/concerns to accompany the provincial government's expertise without prejudice, we do not have high confidence that caribou populations will not be adversely affected by the proponent. Furthermore, as indicated in this draft report, the hiring of a small number of monitoring personnel, purchasing a limited number of tracking collars and cameras, and then relying on those limited and fully functional electronic devices, to alert the proponent that caribou are in the vicinity, for the same proponent to decide to potentially have a "Reduction or suspension of operations, **may be implemented...**" is not satisfactory.

We ask the federal government to allow the public to provide input (with an appropriate timeline to assess) for the draft Caribou Protection and Environmental Effects Monitoring Plan, to ensure transparency and to provide best practices regarding mitigation, to accompany the provincial government's expertise. Furthermore, we encourage the federal government to work with the provincial government to ensure that we have real progress on an updated Protected Areas Plan and the WERAC process, including appropriate and significant conservation areas within central Newfoundland to safeguard caribou and other species.

Regards,

<Original signed by>

Tanya Edwards
Executive Director