



Miawpukek First Nation
Comments on the Valentine Gold DRAFT Environmental
Assessment Report and Potential Conditions
June 2022



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1.0 Introduction

Marathon Gold Corporation (“Marathon”) is proposing to construct and operate the Valentine Gold Mine (“the Project”) in central Newfoundland (Figure 1). Construction is anticipated to take 16-20 months, with operations lasting for up to 13 years. The Project will consist of two open pit mines and associated infrastructure (Figure 2), including:

- Process plant
- Tailings management facility (TMF)
- High- and low-grade ore stockpiles
- Mine rock stockpiles
- Overburden stockpiles
- Water management infrastructure
- Transmission line
- Road access and upgrades
- Plant and project buildings
- Camp facilities
- Sanitary effluent

Mine rock and ore will be blasted and hauled from the open pits. Ore will be crushed and sent through the process plant where gold will be extracted via a cyanide carbon-in-leach circuit. Spent tailings will be sent through a cyanide destruction process which will use an air/SO₂ bubbler before being deposited in the TMF. Waste mine rock will be deposited in stockpiles adjacent to the open pits. Marathon intends to initially process ore at 6,850 tonnes per day, which will increase to 10,960 tonnes per day by the 4th year of operation. It should be noted that the above plans may change based on management decisions, process improvements, additional exploration results and/or other changes that may occur throughout the life of mine.

The Project is located within the traditional territory of Miawpukek First Nation (“MFN”).

MFN, with support from Tamarack Environmental Associates Inc. has prepared this report containing comments on the draft Environmental Assessment (“EA”) and potential conditions for submission to the Impact Assessment Agency of Canada (“IAAC” or “the Agency”). MFN’s comments are centred on the following three categories:

- Community, Cultural Heritage, Land Use and Rights
- Aquatic Resources
- Birds, Wildlife and Species at Risk

Based on MFN’s review of the Environmental Impact Statement, EA and involvement with the Project to date, MFN has concerns including but not limited to: information gaps, inadequate water quality monitoring and treatment, and insufficient safeguards for caribou and other important species. A detailed description of MFN’s concerns can be found in Sections 2.0 of this report.





Figure 1. Location of the Valentine Project, from EIS Figure 1-1 (Marathon, 2020)



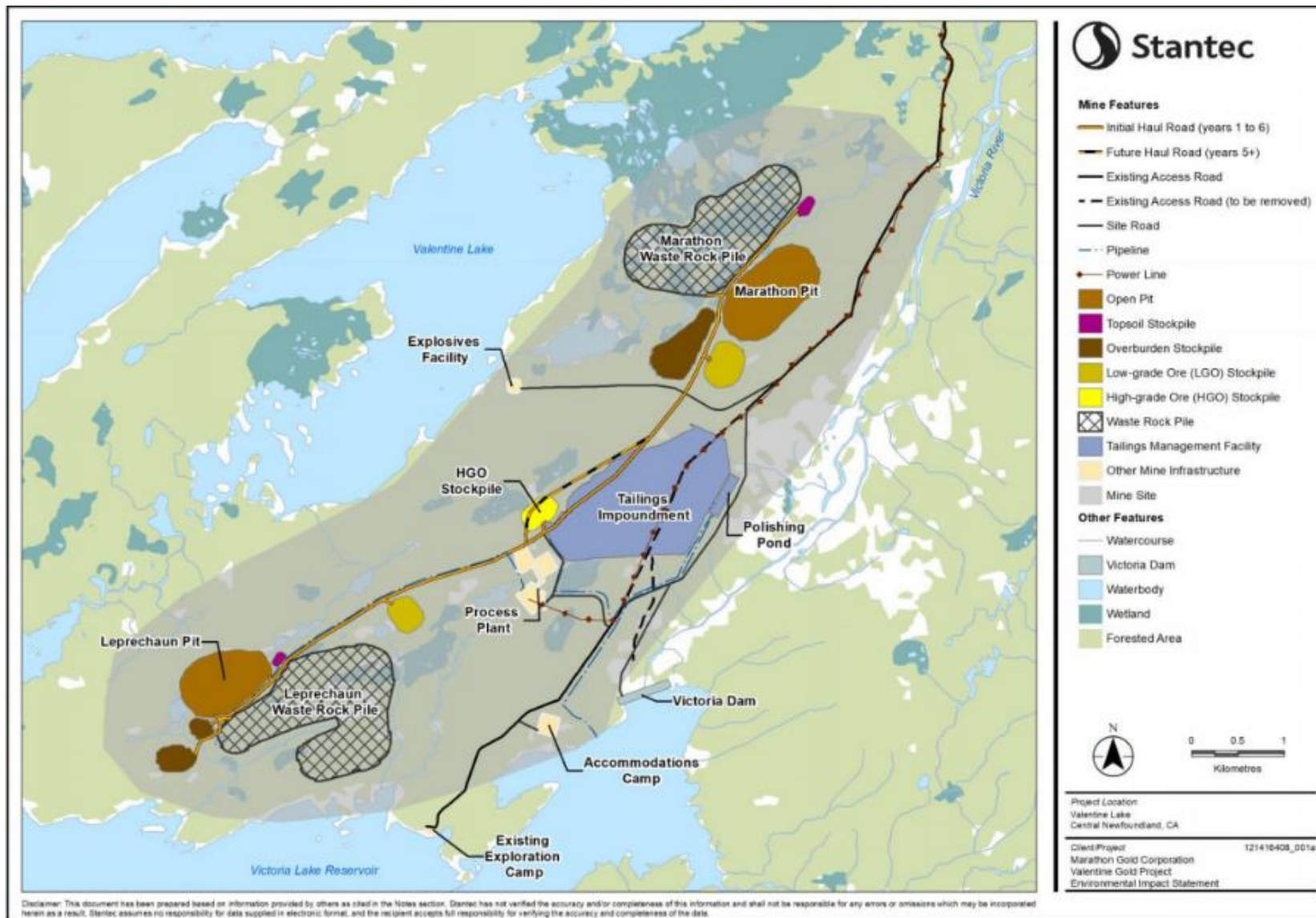


Figure 2. Mine site layout of the Valentine Project, EIS Figure 1-2 (Marathon, 2020)



2.0 Comments on the Valentine Gold Project Environmental Assessment Report and Potential Conditions

2.1 Community, Cultural Heritage, Land Use and Rights

Engagement with Indigenous Peoples

The Agency engaged with Miawpukek First Nation in an effort to reflect the Agency's support for the *United Nations Declaration on the Rights of Indigenous Peoples* and to advance the principles of reconciliation required of the Crown. The Agency provided participant funding to assist the communities' engagement on the file, and reviewed input provided by the Nations; this input was used to revise the Guidelines and inform additional requirements for the Proponent.

According to the Agency, the primary areas of concern raised by Miawpukek included:

- Potential loss of historic or cultural sites;
- Involvement of Indigenous peoples for environmental monitoring programs;
- Impact to water quality and changes to water flows;
- Potential for mercury contamination;
- Cumulative effect on Atlantic Salmon;
- Protection of fish, species at risk, migratory birds, caribou and culturally important species; and
- Alteration or loss of lands and resources for traditional use.

The Proponent also engaged with MFN, as per the requirements of the EIS Guidelines. The Proponent was required to obtain the communities' views on health and socio-economic conditions; physical and cultural heritage; and current use of lands and resources for traditional purposes. The Proponent started its engagement with both communities before the submission of the Project Description, and subsequently met with/sought input from both communities on several occasions. The Proponent provided funding for Traditional Knowledge studies for both communities. The Proponent noted that Qalipu First Nation's Traditional Knowledge study was used to inform the EIS; MFN's Traditional Knowledge Study, which was submitted later, will inform mitigation and monitoring measures.

The Agency has provided several conditions for ongoing consultation moving forward.

Indigenous Peoples – Land Use, Heritage and Socio-Economic and Health

The Agency considered the below potential effects of the Project on Indigenous peoples:

- *“change in current use of lands and resources for traditional purposes due to project activities impacting the quantity or quality of resources, access or restriction to lands and resources, and harvesting experience;*
- *change in physical and cultural heritage resources from construction activities resulting in the loss or disturbance of resources;*
- *change in socio-economic conditions through effects on availability or access to resources and harvesting activities; and*



- *change in Indigenous health conditions resulting from changes to air and surface water quality, and from ingestion of potentially contaminated country foods.” (IAAC, 2022a: 74)*

The Proponent engaged with MFN to assess the potential impact of the Project on the community. Subjects that were assessed included: consideration of current use of lands and resources for traditional purposes, physical and cultural heritage resources, and health and socio-economic conditions.

Following the Agency’s review of the Project documents, *“the Agency is of the view that the Project is not likely to result in significant adverse effects to Indigenous peoples after taking into account the implementation of proposed key mitigation and follow-up measures. The Agency based this conclusion on its analysis of the Proponent’s assessment, federal authority expert review, and comments provided by Indigenous groups and the public” (IAAC, 2022a: 74).*

While the Agency agrees that the Project may restrict access to harvesting and other traditional land use activities, they note that based on the information available, MFN’s use of the Project area is limited, something that MFN strongly disputes as evidenced by the Mi’kmaq Knowledge and Land Use Study (MFN 2022) which was shared in March 2022.

The Agency agrees that Project activities may result in habitat and species loss, which could further impact the communities, and notes that any additional information provided in MFN’s Mi’kmaq Knowledge Study should inform proposed monitoring and mitigation measures. The Proponent has committed to developing follow-up measures to consider new Indigenous Knowledge information to address potential impacts on lands and resources; this includes developing monitoring programs informed by this Knowledge, such as testing for contaminants in country foods.

The Agency notes that no cultural or spiritual sites were identified within the Project area at the time of the assessment, and there were no registered heritage sites. The Proponent has committed to developing a Heritage and Cultural Resources Protection Plan in consultation with Indigenous communities; consequently, the Agency is of the view that potential impact to heritage resources is negligible to low.

The Agency notes that while there are possible exceedances of Canadian Ambient Air Quality Standards at some locations outside of the Project area, the Proponent’s proposed monitoring programs and work with the First Nations combined with the low use within the area result in a negligible to low risk to human health.

The Agency developed the following key mitigation requirements following their consideration of the Project’s relationship with Indigenous peoples (IAAC, 2022a: 84-85):

“Current Use of Lands and Resources

- *Develop and implement, prior to construction and in consultation with Indigenous groups, a communication plan to share information related to the Project. The communication plan would include the following:*
 - *The location and timing of Project activities that may affect Indigenous groups’ use of lands and resources;*
 - *Procedures for Indigenous groups to provide feedback to the Proponent related to access to and use of lands for traditional purposes;*



- *Procedures for the Proponent to document and respond in a timely manner to the concerns received and demonstrate how issues have been addressed.*

Physical and Cultural Heritage

- *Develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a Heritage and Cultural Resources Protection Plan, to mitigate the potential adverse effects on historical resources resulting from accidental discovery.*

Indigenous Health Conditions

- *Implement the mitigation and follow-up measures identified in section 6.1 – Fish and Fish Habitat for water quality and fish and fish habitat to reduce the potential exposure to metals from contact with water and from the ingestion of contaminated fish.”*

The Agency further recommends follow-up monitoring programs to verify the predictions of effects to Indigenous peoples, including a program to monitor air quality, water and country foods on health of Indigenous peoples.

Table 1. MFN Comments on Valentine Gold Project related to community, cultural heritage, and land use.

Comment #	Description	Request
MFN Comment 1, EA Report Section 6.4.4 Agency Analysis and Conclusion; Condition 7.1	<p>The communication plan does not include the requirement for a process for receiving and considering ongoing Indigenous Knowledge information. Indigenous Knowledge is not static; Indigenous monitors and community members may have Indigenous Knowledge observations related to the Project throughout the lifecycle of the Project. A process should be developed to receive and consider that information.</p> <p>The proposed communication plan does not include a requirement for a cultural sensitivity and anti-discrimination training program. Cultural sensitivity is integral in any cross-cultural form of communication.</p>	<p>a) The communication plan should include the requirement to develop a process to receive, consider and collaboratively determine mitigation measures for Indigenous Knowledge throughout the lifecycle of the Project. This process should be developed in consultation with Indigenous communities.</p> <p>b) The communication plan should include the requirement for a cultural sensitivity and anti-discrimination training program for all Project personnel. This training program should be developed in consultation with Indigenous communities.</p>
MFN Comment 2, EA Report Section 6.4.4 Agency Analysis and Conclusion; Condition 6.1	<p>The Agency states that a follow-up program should be developed and implemented in consultation with Indigenous groups, Health Canada and other relevant authorities to monitor quality of air, water, and country foods on the health of Indigenous peoples and to determine the efficacy of mitigation measures. The recommendation within the follow-up program for</p>	<p>a) Under Condition 6.1, include a condition to have the Proponent work with Miawpukek to establish an Indigenous Environmental Monitoring Committee for the Project. This committee should include Indigenous monitors</p>



	<p>consultation with Indigenous groups does not go far enough.</p> <p>It is common practice across Canada for Indigenous Environmental Monitoring Committees to be created to help oversee major development projects and their follow-up programs. These committees include Indigenous representatives, Indigenous monitors hired to help oversee the project, and technical experts of Indigenous communities' choosing. These committees work alongside Proponent experts to ensure proper monitoring and oversight of the project.</p> <p>The follow-up programs should develop a process to receive, consider and develop mitigation measures for ongoing Indigenous Knowledge</p>	<p>hired to help oversee the Project.</p> <p>b) Under Condition 6.1, include a process to receive, consider and develop mitigation measures for ongoing Indigenous Knowledge. This process should be developed in consultation with Indigenous communities.</p>
MFN Comment 3, Condition 8.1	<p>The Agency requires the development, prior to construction and in consultation with Indigenous groups and relevant authorities, of a Heritage and Cultural Resources Protection Plan. Without adequate training, it is likely material culture will be overlooked by site staff, making this plan less effective. This plan should include the requirement for training of all Project personnel on archaeological resources and material culture.</p>	<p>Under Condition 8.1, include a requirement that the Heritage and Cultural Resources Protection Plan require Project personnel to receive training regarding archaeological resources and material culture in Newfoundland. Indigenous communities should be consulted on the development of this program.</p>
MFN Comment 4, Condition 8.1.5	<p>Condition 8.1.5 requires the Proponent to work with Indigenous groups and relevant authorities to comply with all applicable legislative or legal requirements and protocols related to previously unidentified structures, sites or things of historical, archaeological, paleontological or archaeological significance. This recommendation does not go far enough in allowing for Indigenous communities to specify their own requirements for handling materials of this nature.</p>	<p>Under Condition 8.1., include a requirement for the Proponent to work with each First Nation to develop community-specific procedures to ensure culturally respectful treatment of previously unidentified structures, sites or things of historical, archaeological, paleontological or archaeological significance</p>
MFN Comment 5, Condition 2.3.2	<p>This condition states that the Proponent may give consulted parties no less than 15 days to prepare their views and information on a particular topic that is being consulted upon. This timeframe does not provide allowances for weekends or holidays, and so may not provide adequate time for communities to properly respond.</p>	<p>Revise "15 days" to "15 business days, not inclusive of public holidays"</p>
MFN Comment 6, EA Report Section 6.4	<p>The Agency made its determination that the Project is not likely to result in significant adverse effects to Indigenous peoples without considering Miawpukek's Traditional Knowledge and Land Use Study. While the Agency acknowledges that this Study will inform mitigation and monitoring efforts, this speaks to a</p>	<p>The Agency should seek earlier engagement with Indigenous communities around Indigenous Knowledge such that its incorporation and consideration is</p>



	structural issue in the federal project assessment and approval process that is not fully in line with reconciliation. All efforts should be made to receive and consider Indigenous Knowledge prior to any regulatory determination on a project. When this does not occur, the information shared is not able to have as meaningful of an impact. It is unlikely the Agency would make a decision if the Project's EIS did not include fulsome scientific analyses of any of the valued components; how is Indigenous Knowledge any different? This speaks to remaining bias within the Agency.	more meaningful, in line with reconciliation.
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2.2 Aquatic Resources

The IAAC reviewed the potential impacts of the Project on the aquatic valued component “fish and fish habitat”. Based on the documents prepared, the Agency is of the view that the Project will not result in significant adverse environmental effects to fish and fish habitat.

Fish Habitat Quantity

The Project is anticipated to result in the alteration, disruption or destruction of 186,705 m² of fish habitat as a result of construction of mine infrastructure and dewatering. The Agency noted concerns raised by MFN on potential effects of water withdrawals on lake levels in Valentine Lake and Victoria Reservoir. In response, the Proponent has committed to implementing mitigation measures based on criteria which are to be developed. The Agency has also recommended monitoring of surface and groundwater levels/flows so that predictions can be confirmed. With the proposed mitigation measures and implementation of the offsetting plan, the Agency expects that effects to fish habitat quantity will be balanced.

Fish Habitat Quality

The Agency notes that seepage, runoff, and discharge from the project may all have a negative effect on water quality, which will occur throughout the life of the Project but expects that these effects will be localized. A key mitigation measure to avoid deposition of deleterious substances into fish habitat is the implementation of erosion and sedimentation controls. The Proponent will also manage waste rock, so that it is identified and segregated as required. Ultimately, the proponent will be required to managed effluent so that meets regulatory limits as prescribed in the Metal and Diamond Mining Effluent Regulations (MDMER) mean monthly concentration (MMC). Specific mitigation and monitoring during post-closure will be determined through development of the Rehabilitation and Closure Plan. To account for the potential impacts of sulphate discharges on lake water quality, the Proponent will be required to conduct monitoring in locations beyond what was stated in the EIS. Furthermore, the Agency has indicated that the Proponent will be required to monitor mercury, chromium, nitrogen, phosphorous, ammonia and cyanide during the follow-up program.

Fish Health and Survival



Mortality of fish is expected to be managed by maintaining fish passages, completing fish salvages prior to dewatering or in-water works, and the use of appropriate exclusionary screens on intake pipes. The Proponent and IAAC do not expect water quality to significantly impact fish health and survival.

To manage the potential impacts of the Project, the IAAC has described a list of key mitigation measures, monitoring requirements (including follow up programs). These are specified as part of the Potential Conditions for the Project.

Table 2. MFN Comments on Valentine Gold Project related to water resources.

Comment #	Description	Request
MFN Comment 7. EA Report Section 6.1.3	<p>The Proponent is not required to treat water discharge to any robust guidelines for the protection of aquatic life. Instead, water treatment is only required to meet MDMER which are problematic because they focus on relatively few contaminants and have a very high allowable concentrations for discharge. The Canadian Water Quality Guidelines for the Protection of Aquatic Life (Freshwater) (CWQG-FAL) have been prepared purposely to avoid adverse effects on fish and fish habitat, and should be relied upon in this instance.</p> <p>For example, the arsenic CWQG-FAL is 5µg/L, but the MDMER-MMC is two orders of magnitude larger, at 500 µg/L, and the max grab is twice the MDMER (at 1000 µg/L). Similarly, copper CWQG-FAL is 2-4 µg/L (based on hardness), while MDMER-MMC is 300 µg/L and max grab is again double at 600 µg/L.</p> <p>The chosen criteria are an aggregate mean of all the samples taken per month at each FDP and compared to the maximum authorized monthly mean concentration limit. This method can hide high exceedances of single grab samples, therefore is a less conservative measure of water quality effects on aquatic life.</p>	<p>a) MFN requests that all water quality samples are compared to both MDMER and CQWG-FAL guidelines and reported exceedances are noted.</p> <p>b) MFN requests that the most protective guideline be used for the protection of aquatic life for each parameter in comparing CWQG-FAL and MDMER. MFN does not believe the MDMER values alone are sufficient for the protection of aquatic life that MFN relies upon for sustenance and livelihood as it will degrade the water quality of their traditional territories.</p> <p>The IAAC should make it a requirement that all discharge from the Project meet or exceed CWQG-FAL prior to discharge to prevent any adverse effects on fish and fish habitat.</p>
MFN Comment 8. EA Report Section 6.1.3	<p>A mitigation measure listed under the Follow Up program states that the Proponent will “Monitor, and treat if necessary, during decommissioning and abandonment and in consultation with Indigenous communities, ECCC and other relevant authorities, the water quality of the pit lake during filling to ensure that the water quality of the impending open pit overflow does not cause adverse effects on fish and fish habitat. Where treatment is not effective, implement adaptive management measures, and monitor their effectiveness.”</p>	<p>The IAAC should make it a requirement that all discharge from the pit lakes meet or exceed CWQG-FAL prior to discharge to prevent any adverse effects on fish and fish habitat.</p>



	While monitoring and treatment of the pit lakes prior to discharge is clearly important, it is unclear why the Agency has not provided clearer guidance on specific thresholds which would trigger water treatment. The CWQG-FAL have been prepared purposely to avoid adverse effects on fish and fish habitat, and should be relied upon in this instance.	
MFN Comment 9. EA Report Section 6.1.1	Aluminum, arsenic, copper, lead, zinc, fluoride and phosphorous are predicted to exceed CWQG-FAL up to 300 meters in Valentine Lake, Victoria Lake Reservoir and Victoria River. This list may result in increasing concentrations of these contaminants in aquatic organisms, including brook trout and oananiche (land-locked salmon). This lake is used by MFN members for fishing (MFN, 2022) and any elevated concentrations of contaminants in these species would then become part of the diet for MFN members.	MFN requests that IAAC prepare a condition requiring these contaminants to be treated to meet CWQG-FAL prior to discharge to any receiving water body.
MFN Comment 10. EA Report, Section 6.1. Fish and Fish Habitat	Constructed wetlands are being considered for passive water treatment. However, constructed wetlands have major uncertainties around their effectiveness and long-term function. This can be due to a variety of reasons, including changes due to climate, invasion of unwanted plant species, saturation of substrates, clogging, and poor management (Huang, Chen, and Xu, 2013). Furthermore, it is unclear whether these types of systems have been successfully employed in Newfoundland's unique environment.	MFN requests additional information on how constructed wetlands would be monitored and maintained to ensure long-term effectiveness.
MFN Comment 11. EA Report, Section 6.1.3. Agency Analysis and Conclusion	MFN has previously requested monitoring for parameters including mercury, chromium, nitrogen, ammonia phosphorous, and cyanide species. IAAC has indicated that monitoring of these parameters would be required during follow up.	MFN requests additional details on the monitoring frequency, locations, and timeline for this monitoring. Furthermore, specific thresholds for adaptive management must be established.
MFN Comment 12. EA Report, Section 6.1	<p>Predictive water quality modeling suggests that exceedances of CWQG-FAL are expected for the following parameters: aluminum, arsenic, cadmium, chromium, copper, iron, lead, manganese, mercury, phosphorus, selenium, silver, uranium, zinc, nitrite, nitrogen ammonia, nitrogen unionized ammonia, fluoride and nitrate at some sediment ponds. The FDPs may affect a zone of influence up to 300m downstream into its ultimate receiver to assimilate the effects of these contaminants.</p> <p>The water management plan for contact water is to route them through sediment ponds to treat for suspended solids prior to release at the final discharge points into</p>	<p>MFN requests the following conditions be included:</p> <p>a) Consolidation of FDP must be completed to the extent feasible so that project effects are not diluted across a large assimilative area. Specifically MFN requests that the Proponent reduce the number of discharge points to a total of three. This includes one discharge for the Marathon complex, Leprechaun Complex, and the TMF.</p>



	<p>the environment. The plan includes up to 11 final discharge points (FDPs).</p> <p>With so many discharge points, the loadings and effects will be distributed, which would allow the Proponent to release even more contamination into all the watersheds surrounding the Project. The strategy being implemented by the Proponent appears to be to use dilution throughout the project area to hide significant consequences of contamination from the Project. This helps the Project meet water quality criteria (which are already less protective than they should be as noted in MFN Comment 9), thus avoiding the need for any meaningful water treatment. This issue is very concerning to MFN as water quality is one of their top concerns with the Project.</p>	<p>b) The Proponent must consult with MFN community members to evaluate the most appropriate location for the reduced number of FDP.</p> <p>c) Provide further rationale for the high number of FDPs in the Water Management Plan (WMP) and how the Proponent expects to address and reduce total loadings entering the environment. It is recommended to reduce the number of FDPs and loadings to each.</p> <p>d) Monitor and report on water quality at each FDP including exceedances based on MDMER and CWQG-FAL, at a minimum.</p> <p>e) Water treatment plant(s) must be in place to treat any exceedances of MDMER and CWQG-FAL (or other appropriate criteria) (or background) prior to the point of discharge.</p>
MFN Comment 13. Potential Conditions	<p>IAAC has drafted Condition 3.9 regarding seepage/runoff collection which states that effluent and seepage must be collected and treated prior to discharge. MFN is aware of other mining projects with similar conditions where these ditches have not been completed prior to operations, due to sequencing issues during construction.</p>	<p>MFN requests that the condition stipulate clearly that ditches must be in place prior to construction of mine infrastructure (e.g. open pits, mine rock stockpiles, tailings etc.) to avoid any lag between operations and collection of seepage/runoff.</p>

2.3 Birds, Wildlife and Species at Risk

MFN acknowledges the various mitigations that have been proposed in the Draft EA, to reduce the significant residual impacts of this project to caribou: especially the Buchans and Grey River herds. However, the wording in the draft EA to describe these mitigations allows for an unacceptable amount of leeway in their delivery, based on what is deemed practicable by the proponent. All mitigation thresholds should be developed and monitored with involvement, and oversight, from MFN. These thresholds must be clear, rigorous, and transparent, and be associated with meaningful management responses, for which the proponent has defined accountability.

Table 3. MFN Comments on Valentine Gold Project related to birds, wildlife, and species at risk.



Comment #	Description	Request
MFN Comment 14. EA Report Section 6.3	<p>Caribou Mitigation Thresholds</p> <p>The draft EA acknowledges a significant residual impact to caribou, especially to the Buchans and Grey River herds. One of the primary known impact pathways would be the disruption of migration routes - in particular the primary migration corridor of the Buchans herd. Furthermore, the proponent acknowledges complete uncertainty with respect to the behavioural response of migrating caribou to the novel physical and sensory barriers proposed. The draft EA's projected caribou response ranges from very limited disruption to complete herd migration failure. Also, the project proposes significant Grey River calving ground overlap, and there is substantial uncertainty about the level of disruption to this critical habitat.</p> <p>Despite these significant impacts and risks, there are not clear thresholds which would trigger mitigation measures and adaptive management.</p>	<p>It is essential that clear, rigorous and transparent mitigation thresholds are defined for all caribou that will be impacted by this project. These mitigation thresholds must:</p> <ul style="list-style-type: none"> i) Be developed and monitored with involvement and oversight from MFN, and in conjunction with other caribou experts; ii) Account for the percentage of herd disruption, disturbance and/or deflection from proposed novel physical and sensory barriers for both the Buchans herd (especially during migration) and the Grey River herd (especially during calving); iii) Consider up-to-date herd populations, demographics, body condition and calf recruitment metrics; iv) Adapt to intra-annual or multi-year trends or changes in caribou response; v) Be associated with meaningful management responses, for which the proponent has defined accountability.
MFN Comment 15. EA Report Section 6.3	Mitigation for Other Wildlife	<p>As with the preceding comment, mitigation for critical and Species at Risk wildlife such as (but not limited to), American marten, bats, and olive-sided flycatcher, should be developed and monitored with involvement and oversight from MFN. Clear, rigorous, and transparent mitigation thresholds must be associated with meaningful management responses, for which the proponent has defined accountability.</p>
MFN Comment 16. EA Report Section 6.3	<p>Site Plan Reconfiguration</p> <p>The reconfiguration of the site (i.e. removal of victory pit, improved placement of process plant and waste rock pile</p>	<p>Can the Agency comment on how the potential development of the Victory pit at a future time</p>



Comment #	Description	Request
	<p>alterations) in an attempt to accommodate the Buchans herd primary migration corridor is acknowledged as generally positive.</p> <p>However, it is not clear if this reconfiguration represents a commitment from Valentine Gold that the victory pit will not be developed.</p> <p>Developing the victory pit during a later project phase could effectively cut off the entire isthmus used as the primary migration corridor for the Buchans herd. Furthermore, developing it as a separate phase would largely undermine the draft EA's espoused value of this reconfigured site plan as a mitigation to the expected significant impacts to the Buchans herd.</p>	<p>would be permitted under the existing approval of the Project or under the Impact Assessment Act?</p>

3.0 Concluding Remarks

MFN has reviewed the Conditions of Approval and EA Report which provides a summary of the Crown's interpretation on the potential effects of the Project and consultation with Indigenous groups. The Project is located within the traditional territory of MFN, and the comments we have prepared on the EA/Conditions are for submission to IAAC. It is our hope that the perspectives we have provided will help create a project that is less impactful to the environment and will feature significant involvement of our community. To this end, *MFN requests that the Crown incorporate the recommendations within this report through the final conditions of approval.*



References

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