

Spanish Mountain Gold Project

The following comments have been provided by Indigenous Services Canada (ISC) regarding the Initial Project Description (IPD) for the Spanish Mountain Gold Project proposed by Spanish Mountain Gold Ltd. (SMG).

Manager:	
<i>Name:</i>	<i>Email:</i>
Anik Guertin	anik.guertin@sac-isc.gc.ca
Project Officer(s):	
<i>Name:</i>	<i>Email:</i>
Danielle Jeddore	danielle.jeddore2@sac-isc.gc.ca
Joseph Whiteside	joseph.whiteside2@sac-isc.gc.ca

Comment #:	Page #:	Section:	Original:	Suggested Amendment:
ISC-01	XIX	Table S3 Preliminary Identification of Potential Project Interactions	Economic: support Indigenous communities' agencies with training and skills development.	Recommend including employment and procurement opportunities as additional examples of potential mitigation. The text could potentially read: Example of potential mitigation Economic: support Indigenous communities' agencies with training and skills development, and employment and procurement opportunities.
ISC-02	8	3.3 Project Location	Figure 3.2	It is difficult to ascertain what mine facilities are being depicted in the map. The legend indicates a line as symbolizing facilities, however, reviewers cannot distinguish the project components that are represented by each line. Recommend adding labels to identify each mine facility

				that is symbolized by lines to ensure all project components are included in the project footprint (e.g., temporary construction camp).
ISC-03	18	7.2 Project Components	Project components are expected to include the following:	<p>Recommend indicating what is included in the overall site water management.</p> <p>The text could potentially read:</p> <ul style="list-style-type: none"> • Overall site water management including temporary and permanent structures
ISC-04	18	7.2 Project Components	<p>Project components are expected to include the following:</p> <ul style="list-style-type: none"> • Temporary construction camp 	<p>Recommend including the existing exploration camp amongst the list of project components as it will become a permanent facility.</p> <p>The text could potentially read:</p> <p>Project components are expected to include the following:</p> <ul style="list-style-type: none"> • Temporary construction camp and existing exploration camp
ISC-05	21	7.3 Project Activities	Project Activities	Recommend including a new subsection under “Project Activities” to account for any pre-construction activities/assessment that may be undertaken, such as surveying or delineation of avoidance areas.
ISC-06	42	8.4 Indigenous Nation Engagement	SMG’s objectives specific to Indigenous nation engagement are to:	Recommend including considerations with regard to the identification of impediments to engagement (e.g., capacity limitations,

			<ul style="list-style-type: none"> Identify Indigenous nations who may be affected by the Project and, through ongoing engagement, determine how they wish to be engaged 	<p>public health crises, hunting/trapping seasons, etc.).</p> <p>The text could potentially read:</p> <ul style="list-style-type: none"> Identify Indigenous nations who may be affected by the Project and, through ongoing engagement, determine how they wish to be engaged including the identification of impediments to conducting engagement.
ISC-07	81	10.2 Local and Regional Economy	10.2 Local and Regional Economy	Recommend including a reference to the Indigenous Business Directory (https://www.sac-isc.gc.ca/eng/1100100033057/1610797769658) to obtain information on Indigenous owned and/or sourced businesses within the project area.
ISC-08	82	10.4 Non-traditional Land Use	Land uses surrounding the Project include outdoor recreation, fishing, and hunting.	There is no indication of any consideration that has been given for Indigenous cultural practices within the sections on land use. This aspect may not necessarily be suited for the section titled “Non-traditional Land Use”, however, it should be included within an existing section or as a new sub-section.
ISC-09	83	10.5 Health Conditions	Overall health conditions are summarized by the Provincial Health Services Authority (http://communityhealth.phsa.ca/HealthProfiles/PdfGene	Recommend including references to data/information and guidance specific to Indigenous populations, such as that produced by the British Columbia First

			rator/Williams%20Lake), and are generally characterized as good	Nations Health Authority (https://www.fnha.ca/contact-us), the First Nations Health Council Social Determinants of Health Discussion Guide (https://fnhc.ca/our-approach/), and the Community Well-being Index (https://www.sac-isc.gc.ca/eng/1100100016579/1557319653695).
ISC-10	83	10.6 Public and Environmental Safety	An Emergency Response Plan (ERP) will be developed to outline the response procedures and preventive measures for potential malfunctions and accidents.	Recommend indicating whether any consideration will be given to the potential need to translate emergency documents into local Indigenous languages.
ISC-11	115	14.2 Parks and Protected Areas	There are no federal or regional parks, wilderness or conservancy areas, ecological reserves, or protected areas immediately adjacent to the Project.	There is no indication as to whether any consideration has been given to the existence of any Indigenous Protected and Conserved Areas (IPCAs) within the project area. Recommend including a reference to IPCAs (https://www.canada.ca/en/environment-climate-change/services/nature-legacy/canada-target-one-challenge.html), specifically whether there are any overlapping with the project area.