

Identifier	Topic	Reference to EIS/EA Report	Summary of Previous Comment	Proponent's Response to Previous Comment	Follow-up comment/ Request for Information	New Proponent Response	Subsequent Comment
			Date: April 2017 <a href="#">MNRF 7B</a>	Date: June 2017	Date: July 2017	Date: August 2017	
MNRF 7C	Tailings (wildlife)		<p>MNRF requests that the water quality of the TMF be added to the Environmental Monitoring program during all phases, not just closure, of the Mine Development in order to verify that the actual concentrations in the water meet the requirements that the predicted concentrations were measured against. MNRF requests that results of the monitoring program be submitted to MNRF.</p> <p>Furthermore, the MNRF requests a commitment that CMC will develop a contingency mitigation plan(s) to prevent wildlife use in the event PWQOs and/or Canadian Livestock Water Quality Guidelines are not met (e.g. TMF dilution, water cannons for waterfowl, fencing, etc.).</p>	<p>Monitoring of TMF water quality will be added to the Environmental Monitoring Program during construction (when a pond is present), operations and closure (in accordance with the Certified Closure Plan).</p> <p>CMC will include the following commitments in the Commitments Registry for the Project (1) submit the TMF Pond water quality monitoring results to the MNRF, and (2) develop a contingency plan to mitigate adverse impact to wildlife, if monitored concentrations are found to consistently exceed toxicological benchmarks considered to be protective of wildlife health.</p>	<ol style="list-style-type: none"> <li>1. MNRF requests that CMC specify which guidelines will be used to define the toxicological benchmarks considered to be protective of wildlife health.</li> <li>2. MNRF objects to the use of the term "consistently." Previous comments from CMC simply stated that benchmarks would not be exceeded. MNRF requests that a contingency plan be enacted to mitigate adverse impacts to wildlife if toxicological benchmarks are exceeded.</li> <li>3. MNRF requests clarification on when the contingency plan will be developed. Will it be after the monitored concentrations are found to consistently exceed the benchmarks? MNRF requests that the contingency plan be developed during the construction phase, before the pond is present and that it provides for the potential that the estimates by Canadian Malartic will exceed the benchmarks and therefore require the activation of the plan.</li> </ol>	<ol style="list-style-type: none"> <li>1. The HHERA applied PWQOs, CCME livestock watering guidelines, BCMOE guidelines for the protection of wildlife, and water benchmarks from Sample et al. 1996 to the predicted concentrations at the TMF (HHERA TSD, Appendix 4.I, Table 5). These sources will be considered in the selection of toxicological benchmarks for the protection of wildlife in the Environmental Monitoring Program. The Environmental Monitoring Program will be developed in consultation with the MNRF prior to or during construction of the Reclaim Pond. A commitment to this effect will be included in the commitments registry.</li> <li>2. Exceedances of toxicological benchmarks are not predicted or anticipated. CMC proposes a confirmatory approach to the implementation of the TMF Reclaim Pond water quality contingency plan. Should the TMF pond water quality be found to exceed the toxicological benchmarks, the water will be re-sampled and re-tested after 7 days. This will allow time to take immediate corrective action if the cause of the exceedance is known. If this second, confirmatory sample is found to exceed the benchmarks, the established contingency plan will be implemented. A commitment to this effect will be included in the commitments registry.</li> <li>3. The contingency plan will be developed prior filling the pond with water (during or prior to the construction phase). The plan will define the toxicological benchmarks and mitigation measures to be implemented to protect wildlife should pond water quality be found and confirmed to exceed the benchmarks. The contingency plan will be provided to the MNRF for review and comment prior to finalization. A commitment to this effect will be included in the commitments registry.</li> </ol> <p>Reference: <i>Sample, B.E., D.M. Opresko, and G.W. Suter II. 1996. Toxicological benchmarks for wildlife: 1996 Revision. The Risk Assessment Program Health Sciences Research Division (ed.). Prepared for the US Department of Energy. Office of Environmental Management. ES/ER/TM. Oak Ridge, TN.</i></p>	