

Identifier	Topic	Reference to EIS/EA Report	Summary of Comment	Proponent's Response	Subsequent Comment
MNR-14	Assessment method – significance of impact	EIS/EA 2.2.2, 2.6.2, 2.6.4, 2.6.5, 6.2.1.4	<i>Date: March 2014</i>	<i>Date: June 2015</i>	N/A
			<p>The methods used to determine significance of the impacts does not reflect the reality of the project and can have impacts to monitoring and rehabilitation. MNR has stated for the record that we are not in agreement with the established LSA and RSA boundaries that were selected for the EA.</p> <p>The methods used to determine significance of the impacts with this project are such that with regard to geographical extent of the project, any impact that affects only the mine study area or, in the case of Human Health and Ecological Risk and Socio-Economic Environment the mine study and the local study area, will be assessed as low significance. Given that activity of mining is essentially a very high impact on a localized area, this approach pre-disposes the outcome of the EA to a conclusion of no significant impacts to the environment, regardless of the level of activity to the mine site and whether rehabilitation is effective or not. The result of this approach to assessing significance, even with the acknowledgement there will be a permanent and negative alteration to the existing environment over most of the mine site, an area of well over 10 km², was a concluded to be non-significant. MNR has concerns that the message delivered to the public with this conclusion of the EA document (i.e., that there is “no significant residual impact to the biophysical environment”) is not truly reflective of the real impact of the project. MNR also has concerns with the long term implications as this conclusion affects monitoring and rehabilitation efforts. If the conclusion of the EA is that the impacts are not significant, it becomes more difficult to ensure that impacted areas will be rehabilitated and the proper monitoring will occur to ensure effectiveness of the rehabilitation efforts.</p>	<p>The methods used in the environmental assessment are consistent with those used elsewhere in Ontario and Canada and were discussed at length throughout the EA Process. The study areas selected were established within the <i>Establishing Spatial Boundaries</i> guidelines set by CEAA. The guidelines state to establish a LSA in which the obvious, easily understood and often mitigable effects will occur, and establish a RSA that includes the areas where there could be possible interactions with other actions. These methods are widely accepted and have been deemed as reasonable and appropriate by environmental professionals, Project stakeholders and regulatory agencies.</p> <p>Table 6-55 (Environmental Assessment Matrix for Construction Phase), Table 6-56 (Environmental Assessment Matrix for Operations Phase), and Table 6-57 (Environmental Assessment Matrix for Closure and Post-Closure Phase) of the Final EIS/EA identify residual effects based upon Project activity, the prediction of impact after mitigation, as well as the significance of the residual effect, each within separate columns of these tables.</p>	
			<p>Many of the predicted degree of impacts do not align with the significance of predicted impact statements. For example, the waste rock stockpile is predicted not to return to pre-development levels of vegetation and habitat yet the significance of residual effect was determine to be positive. This requires a rationale to be provided. Similarly, the TMF is predicted to have only “some habitat” and return of only “some wildlife” post closure due to the closure strategy of just attempting to re-vegetate rather than restoring the site to a forest condition, yet again, the significance of residual effect was determine to be positive. Similar concerns exist with the assessment of the aquatic biota where the significance is rated low: no impacts on aquatic life when in reality, the plan is for a loss of streams and a lake. Other impacts identified on Table’s ES-6 are also questionable and confusing to understand how conclusions were reached. For example, it is not understood how or why reversibility is not desirable for terrestrial biota and vegetation.</p>	<p>The term “significance” has been used in a manner consistent with established environmental assessment methods and definitions used for other recent mining projects in Canada. Significance of the impacts were determined foil all components of the biophysical environment (including soils), following standard practices which considered: duration; frequency; magnitude; reversibility; and geographic extent. Therefore, the conclusions of the Final EIS/EA, in terms of significance, cannot be altered.</p>	
			<p>Based on the review of the information provided in the document including but not limited to 1) 800+ ha tailings management facility which has no plan to restore to its previous forested condition or ensure water quality from the remaining 65ha water body will support aquatic life; 2) 200+ ha pit lake in which Osisko [Canadian Malartic Corporation] states it does not intend to restore an aquatic community; 3) ~150 ha waste rock pile which will not be re-vegetated resulting in permanent alteration to the landscape; 4) permanent changes to water flow patterns, wetlands, wildlife habitat, etc.; I find no evidence to support the stated conclusion that the project will have "no significant residual impact to the biophysical environment". Although the closing statement in the EIS/EA has been changed from previous versions to identify these as permanent changes to the landscape, the overall conclusion remains unchanged even in the face of this contradiction.</p>	<p>The Executive Summary of the Final EIS/EA Report has been revised to include a description of the Project impacts.</p>	
			<p>We question how it can be stated that the magnitude of the loss of a potential hibernacula for two endangered species is concluded to be low-negligible.</p>		
			<p>For <i>MNR-1</i> and <i>MNR-8</i>, there needs to be a better description of how these effects were assessed and evaluated. The points presented to justify the comments made regarding effects to soil, noise, water quality, and reversibility continue to lack credibility. It is difficult to accept that there will not be some impact to soils in the LSA Fig 3-7, as the disturbance of the road, the mine works, and the TMA is a large portion of this area. It is anticipated that more</p>	<p>With respect to the removal of hibernacula habitat, due to the provisions of Ontario's Endangered Species Act, a permit would be required for the destruction of habitat for a listed species such that an "overall benefit" to the</p>	

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			<p>information be presented in the EA on roads and their impacts, particularly with the number of water crossings there are here. As previously expressed in written comments and verbally at meetings, it is easy to argue all aspects of the project will be low in a regional context. But this is not a fair portrayal. As well, the study areas greatly vary from component to component.</p> <p>As stated in the original comment, you have either failed to describe the future changes to the proposed mine site in the EA document or have failed to describe the impact of these changes on the aquatic and terrestrial ecosystems in the EA.</p> <p>The EA needs to provide a better portrayal of the change in the site, landscape and baseline as a result of an open pit mine. Section 6 needs a better description of how the effects were assessed and evaluated. That is, how the measures of effect such as Extent, Duration, Frequency, Reversibility and Magnitude were ranked to determine the assessment conclusion. For example, Table 6: for Terrestrial Habitat, it is identified there will be impacts from all activities for construction (site preparation, TMF construction, infrastructure construction, site access roads, main access road, and drainage of Mitta Lake). The measures of effect describe how there will be effect in Extent, Duration, Frequency, and Reversibility, but there is no evaluation i.e., high, moderate or low. Magnitude was the only measure of effect that was ranked. It was ranked as a Moderate effect for all activities for this component, and yet the significance of effect was concluded to be Low. The mitigation stated for these activities (buffers and clearing at non sensitive times where possible) does not support the overall significance of effect being ranked to Low.</p> <p>The presentation of residual effects is not clear. It needs to be included and rationalized in the table of environmental effects.</p> <p>The EA needs to amend this approach as per discussions at the face to face meeting in August. Also, as previously mentioned, cross referencing to other documents such as the EEM report, for important information related to this topic is not efficient. There should be a summary provided in the EA report.</p>	<p>species be provided which contributes to the protection and/or recovery of Ontario's populations of the species. The EA conclusion assumes that the overall benefit activities include the creation of habitat to replace that being lost and that the listed bats will use the habitat created. This is the intent of an overall benefit permit and, if successfully negotiated with the MNR, the magnitude of impact on the population of a listed bat species will be low-negligible.</p> <p>Canadian Malartic has consulted with the MNR with regard to the potential for the presence of endangered species on the site and is prepared to mitigate the effects through habitat compensation. Further field studies to understand and define the bat population within the mine study are planned.</p>	