

Identifier	Topic	Reference to EIS/EA Report	Summary of Comment	Proponent's Response	Subsequent Comment
			<i>Date: March 2014</i>	<i>Date: June 2015</i>	
MNR-AA			<p>The alternative assessment has been carried out using a bounding scenario approach. As identified, this assessment does not fully evaluate each project component during each phase of the project, but instead selects the phase which reps the 'worst case' scenario in terms of the selected evaluation criteria.</p> <p>There are concerns with this approach as it adds another level of complexity to understanding the process which was used to determine the conclusion.</p> <p>It is not clear how the VECs were weighted against each other to determine the highest degree of risk, or how the ranking was determined to select each phase.</p> <p>By selecting only one phase to use to compare alternatives, the true differences between alternatives over the life of the project are not really assessed. By focusing on only on one phase, it increases the risk that the real effects are missed if a phase was incorrectly predicted of having less of an impact.</p> <p>As identified in earlier comments, and outlined in our cover letter, we continue to have concerns about the assessment, presentation and consultation of the alternatives for this project.</p> <p>There needs to be a section in the report that clearly identifies ALL the alternatives that have been considered, and are being considered and those that are being brought forward as preferred. This includes the alternatives that were presented in the ToR and in the Project Description, those that were not deemed feasible or deemed to have only one possible alternative. I.e. as it is presented for the tailings management facility in Section 4.3.1 in the TSD. Currently, there is an inconsistent or absent approach to presenting the screening of the alternatives. It would be expected, that for the Accommodation Camp, alternatives such as the location of the camp, and alternatives for the delivery of the camp i.e., on site, off site, part of the workforce accommodated in town, and part of the workforce at the camp (i.e., a smaller camp)</p> <p>There should be a summary that identifies ALL alternatives considered, and rationale of why they were or were not brought forward. Table 3.1 of the ARA do not do this. It misses all the activities that were identified in the comment, plus additional details of alternatives identified in other comments.</p> <p>The screening is not consistent with what was presented in the ToR. The EA fails to meet this requirement as set out in the Code of Practice: Pg 9 "The proponent must ensure that the EA represents accurately the planning and decision making process that was followed in a clear and understandable way and must communicate that clearly in the EA document". Table 3-1 of the ARA TSD, does not include the waste</p>	<p>Canadian Malartic understands that the Project schedule is a concern to the government and public. Although there has been fluctuation in gold prices and change in Project ownership, the intent remains to complete the permitting and approvals process and begin construction after receipt of required approvals.</p> <p>The Environmental Assessment Act already contains a provision that allows the Minister to reconsider decisions if there is a change in circumstances. Attaching a condition to the Hammond Reef EA is outside the established regulatory process and is not required. The bounding scenario approach to the assessment the potential effects of a multi-phase Project is a widely accepted environmental assessment approach that provides clarity and allows for a focused and conservative assessment.</p> <p>The Alternatives Assessment TSD outlines the alternatives that were considered for the Project. The Alternatives Assessment TSD was revised after the draft EIS/EA, additional work on accommodation camp alternatives and closure planning alternatives was undertaken in response to government feedback, and is provided in supplemental technical memorandums. The closure planning alternative assessment was provided in Part B of the Version 2 Conceptual Closure and Rehabilitation Plan TSD. The expanded accommodation camp alternatives assessment is provided <i>in Part 2 of the Version 3 Alternatives Assessment TSD as Attachment 1 of the Final EIS/EA Report Addendum.</i></p> <p>The Alternatives Assessment TSD includes two separate sections – an alternatives assessment of the Project components (not including the mine waste disposal alternatives), and a stand-alone mine waste disposal alternatives assessment. The mine waste disposal alternatives assessment was prepared and formatted in accordance with Environment Canada's <i>Guidelines for the Assessment of Alternatives for Mine Waste Disposal</i> which prescribes a detailed multiple accounts analysis for the evaluation of alternatives. It was the request of Environment Canada that this mine waste alternatives assessment report be provided as a stand-alone document.</p> <p>Some Project components were considered to have only one feasible alternative and are presented and described as such in Section 2.1 of the Alternatives Assessment Report TSD. It is neither practicable nor necessary to evaluate alternative means for every aspect of the Project.</p> <p>The fiber optic line and auxiliary transmission line were re-evaluated and are no longer required or considered part of the Project.</p> <p>The Alternatives Assessment completed and documented for the Project is considered to</p>	<p>MNR-17</p>

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			<p>rock storage, tailings management, tailings pipeline, tailings depositions, fibre optic/aux transmission line or closure/rehabilitation.</p> <p>Section 3.1 of the ARA TSD, (pg8-9) does not describe why there was only one feasible alternative for: explosive storage sitting, chemical and fuel storage sitting, hazardous waste storage, or water sourcing and recycling. As previously commented, screening is not consistent with what was identified in the ToR. As well, tailing dispositions or site layout are missing. As well as the tailing pipeline. These need to be included the section amended.</p> <p>The Figures in the ARA are not consistent. There are graphics for some of the alternatives, but not all of them (i.e., sewage treatment facility, TMA, closure etc.). And there are graphics for some of the single alternatives, (which are confusingly referred to as 'preferred'), but not all of them. Figure 4-3 is confusing and needs clarification. It needs to be identified what is included as 'disposal alternatives'</p>	<p>adequately present the alternatives considered and the rationale for selecting the preferred alternatives for the Project. We do not feel that further revision to the Alternatives Assessment TSD is required to comply with the EIS Guidelines.</p> <p>In order to address comments from both the Ministry of Natural Resources and Ministry of the Environment regarding the location of the worker accommodation camp and its proximity to Marmion Lake, further evaluation of additional on-site camp location alternatives has been undertaken since submittal of the Final EIS/EA. A total of five alternative locations were considered, including the original alternative, a new location west of the shoreline, two new locations east of the shoreline, and a new location on Reef Road. A memorandum summarizing this evaluation is found in <i>Part 2 of the Version 3 Alternatives Assessment TSD Attachment 1 of the Final EIS/EA Report Addendum</i>.</p> <p>Reference: Assessment of Alternative Camp Locations Technical Memorandum in Part 2 of the Version 3 Alternatives Assessment TSD</p>	