

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
			<i>Date: March 2014</i> MNR-EM 1	<i>Date: June 2015</i>	<i>Date: August 2015</i>	<i>Date: September 2016</i>	
MNRF-14	Environmental monitoring		The EMP needs to be redeveloped to include mitigation and monitoring objectives that actually address the potential effects and contingency/non-compliance strategies that provide some assurance that efforts are being taken to address the identified effects. (New Comment Table)	<p>Chapter 8 of the Final EIS/EA report outlines the proposed Environmental and Social Management Planning considerations for the Project. It is not to be considered as a final environmental management plan, but lays out the general environmental and social objectives, roles and responsibilities, and planned information sharing that the detailed environmental management plans will be developed from. Chapter 8 includes proposed Monitoring Program Considerations for the physical and biological environment which are directly tied to VECs and were developed by professional scientists familiar with the Hammond Reef Project. As outlined in the roles and responsibilities section of chapter 8, the monitoring plan is expected to be developed in consultation with the government and finalized based on government feedback and review.</p> <p>It is important to recognize that not all Project impacts can be fully mitigated. For instance, the goal of the closure plan and associated monitoring considerations, is not to fully restore the site the pre-existing condition as this cannot be practically or economically done (e.g., in the TMF, WRMF and pit areas. As detailed in the Conceptual Closure and Rehabilitation Plan TSD, the goal for the Closure Phase of the Project is to restore the site to an acceptable land use. This will include re-vegetation with native species and post-closure monitoring of re-vegetated areas as outlined in the CCRP and summarized below.</p> <p>Re-vegetated areas will be inspected twice annually during the growing season (late spring and late summer) during the active reclamation phase and annually thereafter for a period of up to 5 years following closure, to determine the success of the program (adequate cover and resistance to erosion) and the need for any remedial work. The species mix or mixes for</p>	<p>MNRF has no concerns with the commitment in the text of the EIS (pg 8-3, section 8.1.2.2) but has concerns with the monitoring objectives and strategies in the tables, since the VECs and study areas are key components of a sound monitoring plan.</p> <p>Also, monitoring to 5 years post closure will not create a sufficient picture of how the site has been rehabilitated and is recovering; it would only represent which early successional species, or potentially invasive species, have begun to colonize on the sites left behind.</p>	<p>We must re-iterate that the environmental management planning considerations presented in Chapter 8 of the EIS/EA are not considered to be the Final Environmental Management Plan. Chapter 8 is intended to provide a general framework including objectives, roles and responsibilities, and planned information sharing that the detailed environmental management plans will be developed from. The detailed environmental management plans, including specific monitoring requirements (parameters, locations, methods, frequency, duration) will be developed in consultation with the appropriate regulators during the permitting phase of the project.</p> <p>As stipulated under Ontario Regulation 240/00 Mine Development and Closure Under Part VII of the Ontario Mining Act (O.Reg 240/00), as part of the permitting process, a certified closure plan will be required which will be subject to review and approval by the Ministry of Northern Development and Mines (MNDM). The MNDM will review and determine the appropriate post-closure monitoring period and CMC will conform to the requirements of the MNDM approved Certified Closure Plan.</p> <p>It is the opinion of CMC that the environmental management planning framework presented in Chapter 8 includes mitigation and monitoring objectives that adequately address the potential effects and contingency/non compliance strategies that adequately address potential issues</p>	MNRF-14B

Version 3 Hammond Reef Gold Project EIS/EA – Addendum (Part B)
Responses to Provincial Information Requests

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				<p>site re-vegetation will be determined through onsite test work programs to be conducted during operations and progressive reclamation, to help ensure re-vegetation success at closure.</p> <p>Inspections will be carried out visually and will include photographic records. During monitoring, particular attention will be focused on potentially erosion prone areas such as slopes. Signs of gullyng, riling, and/or slumping will be identified for follow-up action. Photographic records will be standardized to the extent possible to allow year to year comparisons of vegetation success. Based on these surveys, areas of poor, or incomplete, vegetation cover will be identified.</p>			