

### **3.0 CONSULTATION SUMMARY**

#### **3.1 Overview**

Stakeholder and Aboriginal consultation is recognized by Rainy River Resources (RRR), stakeholders (including government agencies) and Aboriginal people as a central component of the Environmental Assessment (EA) process. Effective engagement of participants in the process is not only a regulated requirement, but has provided valuable information for RRR decision making and helped to build positive, mutually beneficial relationships between the company, and regional stakeholders and Aboriginal people. Involving stakeholders and Aboriginal people helps RRR to operate in the region through building respectful relationships, listening and responding to concerns about project effects and management practices and being otherwise informed about and involved in the Rainy River Project (RRP).

RRR has engaged local and regional stakeholders and Aboriginal people in the EA process so that:

- Local and traditional, knowledge and land use is better understood about the project area and region and improves baseline reporting, effects assessment and management decisions;
- Concerns and interests are considered in the selection of natural environment valued ecosystem components (VECs) and human environment valued ecosystem components (VSECs) addressed in the EA;
- Mitigation or enhancement measures used to manage effects are relevant, achievable and appropriate in the local / regional context;
- Local environmental and social values are better understood and incorporated into the determination of significance of effects; and
- An Aboriginal consultation record is established and will assist the Provincial and Federal Crown in determining the significance of and appropriate accommodation for any effects on Aboriginal people.

The stakeholder and Aboriginal groups involved in the EA and an overview of how they were identified are provided in Section 2.3.

This section provides a summary of consultation activities, including:

- A description of the consultation activities that took place prior to and during the preparation of the EA;

- A summary of the comments and concerns raised, and RRR response to these comments and concerns;
- A description of any outstanding stakeholder and Aboriginal concerns; and
- Plans for ongoing consultation during the life of the RRP.

Further information and documentation of consultation is provided in Appendix D.

### **3.2 Consultation Activities - Prior to Preparation of the EA Reports (prior to November 9, 2012)**

#### **3.2.1 Overview of Consultation Activities**

Since acquiring the RRP property in 2005, RRR has engaged the local communities as well as First Nations and Métis community members about exploration and mine development plans. RRR believes that in order to be successful it needs to effectively engage the local communities throughout all phases of the project, including exploration, construction, operation and decommissioning / closure. The primary focus of initial consultations, meetings and discussions was to introduce RRR, to inform citizens of the status of the exploration and future mining-related activities, and to provide information regarding future consultation opportunities.

To demonstrate commitment to local communities, RRR opened a community office in Emo, Ontario in August 2010 and maintains an open door policy whereby community members may drop by during office hours to learn more about the RRP and share their views. RRR also maintains offices in Thunder Bay and Toronto, Ontario. As appropriate, RRR tabulates enquiries to their offices from the interested public and documents any issues raised.

During the early stage of the RRP, consultation activities consisted of:

- Hosting informal meetings, exploration site tours and presentations for stakeholders including local citizens, government departments and members of the Aboriginal communities;
- Publishing and distribution of community newsletters;
- Initiating meetings with the Aboriginal leaderships to establish a path forward through negotiated agreements;
- Establishing a local Aboriginal liaison position to enhance Aboriginal community participation in the project;

- Raising awareness about mining and supporting training by sponsoring a Mining Matters workshop (Prospectors and Developers Association of Canada) in Fort Frances in the summer of 2011 and 2012, and by supporting Confederation College's Diamond Driller's Helper's training program; and
- Discussions about approaches to Aboriginal Traditional Knowledge / Traditional Land Use (TK / TLU) studies with Aboriginal groups to work toward building a relationship to proceed with studies.

RRR initiated the EA process in 2012, and voluntarily developed and submitted a draft Terms of Reference (ToR) to proactively seek feedback from interested stakeholders and Aboriginal communities on the RRP. The draft ToR and Record of Consultation, Discussions and Meetings was available for a 30-day review period at six public locations, as well as from the RRR website starting on May 17, 2012. Hard copies of the draft ToR and Record of Consultation, Discussions and Meetings were available for public viewing / review at:

- Rainy River Resources Ltd., 5967 Highway 11/71, Emo, Ontario;
- Fort Frances Public Library, 601 Reid Avenue, Fort Frances, Ontario;
- Rainy River Library, 334 4th Street, Rainy River, Ontario;
- Brodie Resource Library, 216 South Brodie Street, Thunder Bay, Ontario;
- Ministry of the Environment, 2 St. Clair Avenue West, Floor 12A Toronto, Ontario; and
- Rainy River Resources Ltd., 701-1 Richmond Street West, Toronto, Ontario.

Hard copies of the Draft ToR were also provided directly to 12 Aboriginal communities and organizations.

- Anishinaabeg of Naongashiing First Nation;
- Couchiching First Nation;
- Lac La Croix First Nation;
- Big Grassy River First Nation;
- Mitaanjigamiing First Nation;
- Naicatchewenin First Nation;
- Nigigoonsiminikaaning First Nation;
- Rainy River First Nations;
- Seine River First Nation;
- Fort Frances Chiefs Secretariat;
- Pwi-Di-Goo-Zing Ne-Yaa-Zhing Advisory Services; and
- Métis Nation of Ontario (MNO).

RRR hosted two open houses during the public review period on the draft ToR to assist with information gathering. The open house held in Rainy River on May 30, 2012 was attended by

28 individuals; and 75 individuals participated in the Barwick open house, held on May 31, 2012. A total of 28 comment forms were received from participants of the two open houses.

An overview of the nature of the comments received through the May 2012 open houses is presented in Table 3-1. Further details regarding the comments shared during the open house events can be found in the Amended Proposed ToR Record of Consultation, Discussions and Meetings provided in its entirety in Appendix D-11.

The draft ToR was revised based on comments received and was then submitted as the Proposed ToR for a 30-day public review period starting October 26, 2012. The Proposed ToR included an updated Record of Consultation, Discussions and Meetings. Digital versions of these documents were posted to the RRR website and hard copies were available for public viewing at the following locations:

- Rainy River Resources Ltd., 5967 Highway 11/71, Emo, Ontario;
- Fort Frances Public Library, 601 Reid Avenue, Fort Frances, Ontario;
- Rainy River Library, 334 4th Street, Rainy River, Ontario;
- Brodie Resource Library, 216 South Brodie Street, Thunder Bay, Ontario;
- Ministry of the Environment, 2 St. Clair Avenue West, Floor 12A Toronto, Ontario; and
- Rainy River Resources Ltd., 701-1 Richmond Street West, Toronto, Ontario.

Hard copies of the Proposed ToR and Record of Consultation, Discussions and Meetings were also provided to following Aboriginal communities and organizations:

- Anishinaabeg of Naongashiing First Nation;
- Buffalo Point First Nation<sup>1</sup>;
- Couchiching First Nation;
- Lac La Croix First Nation;
- Big Grassy River First Nation;
- Mitaanjigamiing First Nation;
- Naicatchewenin First Nation;
- Naothamegwanning First Nation<sup>1</sup>;
- Ojibways of Onigaming First Nation<sup>1</sup>;
- Rainy River First Nations;
- Seine River First Nation;
- Fort Frances Chiefs Secretariat;
- Pwi-Di-Goo-Zing Ne-Yaa-Zhing Advisory Services;
- Sunset Country Métis; and

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<sup>1</sup>Identified by the Crown after release of the Draft ToR, these communities received copies of the Proposed ToR.

- Métis Rainy River Lake of the Woods Regional Consultation Committee (RCC) Region #1.

The following communities were notified of the availability of the Proposed ToR for review:

- Anishinabe of Wauzhushk Onigum;
- Northwest Angle #33 First Nation;
- Northwest Angle #37 First Nation; and
- Nigigoonsiminikaaning First Nation.

RRR hosted two additional open houses during the public review period on the Proposed ToR to assist with information gathering. The open house held in Nestor Falls on November 7, 2012 was attended by 29 individuals while 155 individuals participated in the Emo open house, held on November 8, 2012. A total of 23 comment forms were received from participants of the two open houses. Additional information about open houses held prior to November 10, 2012 is provided in the Amended Proposed ToR Record of Consultation, Discussions and Meetings (Appendix D-11).

An overview of the nature of the comments received through the November 2012 open houses is presented in Table 3-2. Further details regarding the comments shared during the open house events can be found in the Amended Proposed ToR Record of Consultation, Discussions and Meetings located in Appendix D-11.

The draft ToR and the Proposed ToR included copies of the RRP Stakeholder Consultation and Engagement Plan, and Aboriginal Consultation and Engagement Plan, that outlined the consultation and engagement objectives, and activities for the preparation of the EA. Comments received on the draft Plans were considered and where appropriate incorporated into the final Consultation and Engagement Plans.

The Proposed ToR was amended per direction of the MOE to reflect comments received and issued as an Amended Proposed ToR for MOE review. The Amended Proposed ToR was approved on May 15, 2013. A copy of the Provincially-approved Amended Proposed ToR and final Consultation and Engagement Plans (Appendices E and F therein) are provided in Appendix C-1.

The purpose of consultation during this period was to gather feedback from stakeholders and Aboriginal groups on the ToR for the Provincial EA and coordinate this, as practical, with Federally-led consultation on the Project Description and Environmental Impact Statement (EIS) Guidelines. Consultation activities were focused on determining what environmental factors or concerns should be examined in the Provincial and Federal EA process because they are important to stakeholders and/or Aboriginal groups and could be influenced (positively or negatively) by the proposed RRP. General feedback was also requested regarding the RRP.

Consultation objectives met during this period were:

- Consult with a wide range of stakeholders and Aboriginal groups by voluntarily issuing a draft ToR for the EA and incorporate feedback into the preparation of the Proposed ToR;
- Consult with a wide range of stakeholders and Aboriginal groups about the Proposed ToR;
- Continue to engage regional stakeholders and Aboriginal communities in the collection and review of environmental baseline information including local knowledge and Aboriginal traditional knowledge about the environment in the region that the RRP may influence such as: Aboriginal TLU, archaeology and socio-economic conditions; and
- Meet all regulatory requirements for stakeholder and Aboriginal consultation.

Objectives specific to Aboriginal groups were to:

- Ensure Aboriginal groups have had an adequate opportunity to understand the RRP and identify potential impacts to Aboriginal or Treaty rights and interests;
- Demonstrate how the RRP (or components of the RRP) has been modified to reduce or avoid those potential impacts;
- Provide an explanation of why the RRP (or components of the project) cannot be modified to reduce or further avoid the potential impacts; and
- Provide an explanation of how the communities have been either accommodated or compensated for remaining impacts that cannot be avoided.

For further information regarding the consultation activities that occurred prior to the preparation of the draft EA Report, readers are referred to the comprehensive description contained in the Amended Proposed ToR Record of Consultation, Discussions and Meetings (Appendix D-11). This appendix includes further details regarding activities undertaken prior to November 9, 2012.

### **3.3 Comments and Concerns - Prior to Preparation of the EA Reports (Prior to November 9, 2012)**

#### **3.3.1 Comments and Concerns - Stakeholders**

Key comments received by RRR have consistently been related to employment and training opportunities prior to the release of the draft ToR. There were also comments about: the need to manage the RRP to avoid negative effects to surface and groundwater resources; adjacent

landowners; and to keep the size of the RRP site as compact as possible to avoid loss of land for other uses. Table 11-1 summarizes the changes to the project since original proposed, reflecting in part these and other stakeholder comments, as well as the progression of engineering design.

The region has and continues to experience ongoing significant declines in both employment and population in large part related to the downturn in the forestry industry, and therefore the RRP has received positive comments from many local citizens at open houses; stakeholders such as the Ministry of Economic Development, Trade and Employment as well as Aboriginal groups. The RRP has become a significant economic driver for the Township of Chapple, Township of Emo and Naicatchewenin First Nation.

Once further information became available regarding the proposed RRP development to stakeholders and Aboriginal groups through the release of the draft Proposed ToR and subsequent consultation opportunities, key comments received by RRR continued to include employment and training opportunities. Comments regarding potential effects to water resources, on adjacent landowners and uses continued to be expressed in a constructive manner.

Numerous comments and questions were received on the Proposed ToR from the public and other stakeholders. Appendix D-3b contains the comments and questions received from the public on the Proposed ToR, as well as the responses provided by RRR. A broad range of comments and questions were received related to the Proposed ToR, with key or frequent comments / questions relating to: the management of surface and groundwater impacts, the treatment of tailings, and potential environmental effects related to the mineral waste stockpiles. These comments were largely related to the proximity of individuals' properties or property use near the RRP site. Additional comments and questions related to the location of RRP infrastructure, the use of cyanide in ore processing, concern for Species at Risk (SAR), and environmental concerns associated with a potential temporary suspension of mining activities. Comments on the Proposed ToR also noted that the RRP has the potential to positively impact the local and regional economy, and individual expressions of support were noted.

The comments from government agencies during the Proposed ToR review period and thereafter, focused primarily on methodology and process, and the natural environment. Key topics of discussion related to the adequacy of: environmental baseline studies, the Proposed ToR and alternatives descriptions, Aboriginal engagement and consultation; and EA methodologies. Comments received from government agencies on the Proposed ToR focused primarily on the natural environment, Aboriginal engagement and consultation, social and economic effects, as well as risks and mitigation. Study methodology, surface and groundwater quality, RRP power requirements, alternatives, monitoring, waste management, land use and SAR were commonly raised. Appendix D-2c contains the comments and questions received from government agencies on the Proposed ToR as well as responses to the comments by RRR.

Further details regarding the comments shared by stakeholders to November 9, 2012 and the response from RRR, are provided in the Amended Proposed ToR Record of Consultation, Discussions and Meetings (Appendix D-11).

### **3.3.2 Comments and Concerns - Aboriginal Groups**

Through early consultation and discussions and prior to the release of the draft ToR for the Provincial EA process, key comments and discussions about the RRP were related to employment and training opportunities, fish and wildlife effects, environmental management, water resources and traditional culture and land use. These continued to be the focus during the Proposed ToR review and approval process (and remained important as the EA process progressed).

Appendix D-1a contains copies of the comments and questions received from Aboriginal groups on the Proposed ToR as well as responses to the comments by RRR.

### **3.4 Consultation Activities - During Preparation of the EA Reports (November 10, 2012 to October 7, 2013)**

#### **3.4.1 Overview of Consultation Activities**

The purpose of consultation during preparation of the EA Reports was to engage a wide range of stakeholders and Aboriginal groups through various methods to gather feedback on the proposed undertaking (the RRP) and the preliminary EA findings. Submission of a draft EA Report for Aboriginal group review (Version 1) and subsequently stakeholder review (Version 2), facilitated this feedback and helped determine if there were any remaining issues or concerns that needed to be addressed and should be resolved before the submission of this final EA Report to the government agencies for review.

Consultation objectives for stakeholders:

- Review the EA findings with identified stakeholders to show how issues and concerns were addressed;
- Document and respond to comments, issues or concerns;
- Identify appropriate strategies to manage, avoid or eliminate environmental effects; and
- Meet all regulatory requirements for stakeholder consultation and revise the consultation approach as appropriate based on feedback to date.



Consultation objectives for Aboriginal groups:

- Support an independent technical review of the draft EA Report;
- Review the EA findings with identified Aboriginal groups to show how issues and concerns were addressed;
- Document and respond to comments, issues or concerns;
- Identify and solicit from Aboriginal groups appropriate strategies to manage, avoid or eliminate environmental effects;
- Meet all regulatory requirements for Aboriginal consultation;
- Ensure Aboriginal groups had an adequate opportunity to understand the RRP and identify potential impacts to Aboriginal or Treaty rights and interests;
- Demonstrate how the RRP has been modified to reduce or avoid those potential impacts;
- Provide an explanation of why the RRP (or components of the project) cannot be modified to reduce or avoid the potential impacts; and
- Provide an explanation of how the Aboriginal communities have been either accommodated or compensated for remaining impacts that cannot be avoided.

The following consultation activities occurred during the preparation of the EA Reports from November 10, 2012 to October 7, 2013, including:

- Distribution of environmental baseline studies for government review;
- Distribution of draft EA Report (Version 1) for Aboriginal review;
- Distribution of draft EA Report (Version 2) for stakeholder and Aboriginal review;
- Distribution of notices;
- Stakeholder interviews and meetings;
- Aboriginal group meetings and discussions;
- Community open houses;
- Site tours;
- Newsletters and updates;
- Updates to the RRP website;
- Ceremonies; and
- Workshops.

Each of these activities is described below with supporting information provided in Appendix D.

### **3.4.2 Distribution of Environmental Baseline Studies for Government Review**

In order to assist with the technical review of the RRP, copies of all of the environmental baseline studies completed for the RRP were provided to the Federal and Provincial agencies well in advance of submission of the final EA Report. Environmental baseline studies submitted to the Federal and Provincial agencies in advance of the final EA Report are listed below:

- B1 KCB Baseline Report, 2008 - 2010 (Appendix N);
- B2 Ross Stage 1 Archaeology Report 2010;
- B3 KCB Species at Risk (SAR) Report 2008 - 2010;
- B3P KCB SAR Report 2008 - 2010 (Appendix K-1);
- B4 AMEC Low Flow Report 2011;
- B5 AMEC Noise Monitoring Report 2011;
- B6 AMEC SAR Report 2011;
- P6P AMEC SAR Report 2011 (Appendix K-2);
- B7 AMEC Aquatics Baseline 2011 (Appendix I-2);
- B8 AMEC Winter Low Flow Report 2012;
- B9 WHS Stage 2 Archaeological Report 2011 (Appendix M-2);
- B10 AMEC Wildlife Report 2011 (Appendix J-2);
- B11 AMEC Interim Geochemistry Report 2012;
- B12 AMEC Terrestrial Baseline Report 2012 (Appendix J-3);
- B13 AMEC SAR Baseline Report 2012;
- B13P AMEC SAR Baseline Report 2012 (Appendix K-3);
- B14 AMEC Aerial Survey Report 2012 (Appendix J-4);
- B15 AMEC Climate, Air Quality and Sound Baseline (Appendix F);
- B16 AMEC 2012 Aquatics Baseline (Appendix I-3);
- B17 AMEC Hydrogeology Baseline (Appendix H);
- B18 AMEC Hydrogeology Modelling Report (Appendix S-1);
- B19 AMEC Socio-economic Baseline (Appendix L);
- B20 AMEC Metal Leaching / Acid Rock Drainage Tailings and Mine Rock (Appendix G);
- B21 AMEC Aerial Survey Report 2013 (Appendix J-5); and
- B22 Unterman McPhail Cultural Landscapes and Built Heritage Resources (Appendix M-3).
- B23 AMEC 2013 Aquatics Baseline (Appendix I-4);
- B24 AMEC 2013 Aquatics Baseline: Pinewood River / Highway 600 Crossing (Appendix I-5);
- B25P AMEC 2013 Species at Risk Baseline (Appendix K-4); and
- B26P AMEC 2013 Species at Risk Baseline: Bats (Appendix K-5).

At the request of the Ministry of Natural Resources (MNR), the SAR reports were modified so that individual observations were not shown in the reports issued to all government agencies, and only Environment Canada was afforded the opportunity to view the detailed versions after signing an agreement with MNR. The modified versions (denoted with a P after the reference number in the report name) are also appended to this final EA Report.

Appendix D-2b includes a copy of the detailed comments received on the baseline reports and RRR responses. Where appropriate, the final baseline reports were re-issued or errata were provided based on the comments received. These revised versions are appended to this final EA Report.

Multiple meetings and workshops were held with government representatives to advance discussions regarding: SAR, fisheries compensation and closure approach. Copies of correspondence documents (letters and meeting notes) are provided in Appendix D-2f (Government) with the exception of those related to SAR or as otherwise deemed confidential.

### **3.4.3 Distribution of Draft EA Reports for Aboriginal Review**

#### **3.4.3.1 Draft EA Report (Version 1)**

RRR was informed by Aboriginal communities at various community and leadership meetings, that they did not have the time, financial and human resource capacity to adequately review the RRP EA Report. In response to those concerns, RRR committed financial resources to the Aboriginal groups for an independent technical review of the draft RRP EA Report. The draft EA Report (Version 1) was released to thirteen Aboriginal groups eight weeks in advance of the general public and government agencies, in order to allow additional time for the Aboriginal technical review. Version 1 contained a record of consultation activities to February 15, 2013.

The following groups were provided access to a digital version of the draft EA Report (Version 1) on May 17, 2013:

- Anishinaabeg of Naongashiing First Nation;
- Big Grassy River First Nation;
- Buffalo Point First Nation;
- Couchiching First Nation;
- Lac La Croix First Nation;
- Mitaanjigamiing First Nation;
- Naotkamegwanning First Nation;
- Naicatchewenin First Nation;
- Nigigoonsiminikaaning First Nation;
- Ojibways of Onigaming First Nation;
- Rainy River First Nations;

- RCC Region #1 / MNO;
- Seine River First Nation; and
- Fort Frances Chiefs Secretariat.

### **First Nation Independent Review**

Utilizing the financial resources provided by RRR, the Aboriginal groups who chose to participate selected Dillon Consulting Limited (Dillon), consultants in planning, engineering, environmental sciences and management, to assist them in conducting a high-level technical review of the draft EA Report (Version 1). The consulting firm held a workshop with Elders, youth, hunters, consultation coordinators and other community knowledge holders of the Big Grassy River First Nation, Couchiching First Nation, Lac La Croix First Nation, Mitaanjigamiing First Nation, Naicatchewenin First Nation, Rainy River First Nations and Seine River First Nation on April 30, 2013 to gather information regarding the knowledge, values and priorities held by these First Nations; as well as issues, concerns and opportunities surrounding the RRP. Dillon prepared an assessment tool based on the information collected from this workshop which was used by Dillon's technical specialists to review the draft EA Report (Version 1). On completion of their technical review, a subsequent workshop was held with representatives of the same communities to review the key findings of the technical review, prior to finalizing the comments and recommendations.

RRR received approximately 125 comments from the independent technical review on August 14, 2013. On September 18, 2013, RRR provided responses to all of the comments received (Appendix D-1e) and copied the Canadian Environmental Assessment Agency (CEA Agency), Ministry of the Environment (MOE) and Ministry of Northern Development and Mines (MNDM). Comments from the technical review completed on behalf of the Aboriginal groups were fully considered and incorporated into this final EA Report as appropriate. A summary of the comments and responses is provided in Table 3-3.

RRR made 13 significant commitments (Table 3-4) arising from the independent technical review of the draft EA Report (Version 1) on behalf of Aboriginal groups, in addition to revising the EA Report as appropriate. RRR shared their commitments with the Aboriginal groups and appropriate regulatory authorities on September 18, 2013.

### **Métis Nation of Ontario Review**

The Métis Nation of Ontario is in the process of completing a TK / TLU study and technical review of the RRP EA Report. RRR anticipates that as part of the consultation process with the MNO an addendum outlining any follow-up programs or agreements may need to be submitted in parallel with the final EA Report review.

### 3.4.3.2 Draft EA Report (Version 2)

Aboriginal groups were also provided access to a hardcopy or digital copy of the draft EA Report (Version 2), which was released for stakeholder review for a 30-day public review period starting on July 19, 2013. The following groups were provided with a Notice of Consultation Opportunity for the RRP and either: a complete hardcopy of the draft EA Report (Version 2; C) or complete hard copy of Volumes 1 and 2 of the draft EA Report (Version 2) and digital version of the appendices, and were invited to provide written comments by August 19, 2013:

- Anishinaabeg of Naongashiing First Nation (C);
- Big Grassy River First Nation (C);
- Buffalo Point First Nation (C);
- Couchiching First Nation;
- Lac La Croix First Nation;
- Mitaanjigamiing First Nation;
- MNO RCC Region #1 through the Sunset Country Métis (C);
- Naotkamegwanning First Nation (C);
- Naicatchewenin First Nation (C);
- Nigigoonsiminikaaning First Nation;
- Ojibways of Onigaming First Nation (C);
- Rainy River First Nations (C); and
- Seine River First Nation.

The Fort Frances Chiefs Secretariat and MNO also received a copy.

The following communities / groups were provided with a Notice of Consultation Opportunity for the RRP, which included information about how to access the draft EA Report (Version 2) and were invited to provide written comments by August 19, 2013:

- Anishinabe of Wauzhushk Onigum (Rat Portage) First Nation;
- Northwest Angle No. 33; and
- Northwest Angle No. 37.

Per guidance provided by the Federal government on September 10 2012, these communities were considered to have a low depth of consultation. Guidance provided by the MNM on May 17, 2012, was that these communities were classified as requiring notification. RRR elected to have the Provincial Crown coordinate notification in August of 2012. There were no requests from these communities for copies of the draft EA Report.

Big Grassy River First Nation undertook a second independent review of the draft EA Report that was provided to the RRR on October 18, 2013. The review concluded that additional work

with the community was required and RRR has committed to continuing the close engagement with the community in support of the RRP development.

#### **3.4.4 Distribution of Draft EA Report for Stakeholder Review**

RRR voluntarily issued the draft EA Report (Version 2) for stakeholder review for a 30-day public review period starting on July 19, 2013. At their request, the government reviewers were provided an additional 15 days for their review and their comments were received thereafter.

This version of the draft EA Report was very similar to Version 1, although additional information was added which not available previously, including:

- Summary of residual affects;
- Benefits to Canadians;
- Monitoring and environmental management plans;
- Summary of commitments; and
- Various detailed appendices:
  - Concordance tables to EIS Guidelines and Approved ToR (previously available);
  - Approved ToR commitments list (previously available);
  - Various baseline reports (climate, air quality and sound baseline; compiled fish species list; compiled plant and wildlife species list; aerial survey reports; archaeology reports); and
  - Select modelling reports (air quality, sound and vibration modelling reports; prediction of post-closure water quality; and tailings management area failure assessment).

Complete hard copies of the draft EA Report (Version 2) including all volumes were provided for public viewing and hosted during the entire review period (July 19, 2013 to August 19, 2013) at:

- Township of Chapple, 54 Barwick Road, Barwick, Ontario;
- Rainy River Resources Ltd., 5967 Highway 11/71, Emo, Ontario;
- Fort Frances Public Library, 601 Reid Avenue, Fort Frances, Ontario;

- Rainy River Library, 334 4th Street, Rainy River, Ontario;
- Brodie Resource Library, 216 South Brodie Street, Thunder Bay, Ontario; and
- Rainy River Resources Ltd., 701-1 Richmond Street West, Toronto, Ontario.

A digital version of the draft EA Report was posted to the RRR website at:

<http://www.rainyriverresources.com/Community-and-Environment/environmental-assessment-process/default.aspx>

The digital version was available for download on July 19, 2013. On August 13, 2013, RRR was informed by the CEA Agency that three appendices of the draft EA Report (Version 2) were missing from the RRR website. Action was immediately taken and the missing files were posted within two days.

Government agencies and Aboriginal groups were provided either: complete hard copies; hard copies of Volumes 1 and 2 with digital copies of the appendices (Volumes 3+); digital copies of the entire document; and/or notification of the availability to access the draft EA Report (Version 2). A listing of the direct recipients of the draft EA Report (Version 2) is provided in Appendix D-5.

### **3.4.5 Notices**

A Notice of Commencement of Environmental Assessment and a Notice of Consultation Opportunity (draft EA Report Version 2) were distributed by RRR during the preparation of the EA. The Provincially-required Notice of Commencement of Environmental Assessment was distributed as follows:

- Published in local newspapers on May 29, 2013 (Fort Frances Times, Westend Weekly and Thunder Bay Chronicle Journal) and May 30, 2013 (Fort Frances Daily Bulletin);
- Posted on the RRR website ([www.rainyriverresources.com](http://www.rainyriverresources.com)); and
- Included with the RRR Spring 2013 newsletter (June 24, 2013) which was mailed to all residents of Rainy River, Fort Frances, Devlin, Emo, Barwick, Stratton, Pinewood, Sleeman, Nestor Falls, Mine Centre and Pawitik, Ontario.

The Notice of Consultation Opportunity on the draft EA Report (Version 2) for the RRP, which contained information on how to access the draft EA Report online and included a list of locations where hard copies were available to the public for viewing, was distributed as follows:

- Published in local newspapers on July 17, 2013 (Thunder Bay Chronicle Journal, Fort Frances Times and Westend Weekly) and July 18, 2013 (Fort Frances Daily Bulletin); and

- Posted on the RRR website ([www.rainyriverresources.com](http://www.rainyriverresources.com)).

In addition to published notices, invitations encouraging people to get involved in the EA process through the public open houses were published on June 24 (Fort Frances Times), August 7, 2013 (Fort Frances Times and Westend Weekly) and July 25 (Westend Weekly). The invitations were also included in a general mailing by RRR on July 24, 2013 to residents throughout the region.

Copies of all Notices are provided in Appendix D-4.

### **3.4.6 Stakeholder Interviews and Meetings**

In preparing the draft EA Report, interviews and meetings occurred and socio-economic questionnaires were distributed for the purposes of communicating information about the RRP, and gathering information to inform the baseline reporting, effects assessment and management planning. Seven socio-economic interviews were conducted with Municipal and public agencies, and Aboriginal organizations. Meetings were also held with various Provincial and Municipal government agencies during which topics such as environmental management planning, the Proposed ToR, and potential impacts of the RRP on municipalities and municipal planning were discussed.

Detailed information about stakeholder interviews and meetings can be found in the following Appendices:

- Appendix D-1c: Aboriginal Records of Consultation;
- Appendix D-1d: Aboriginal Correspondence Documents;
- Appendix D-2e: Government Records of Consultation;
- Appendix D-2f: Government Correspondence Documents;
- Appendix D-3d: Public and Stakeholder Records of Consultation; and
- Appendix D-3e: Public and Stakeholder Correspondence Documents.

### **3.4.7 Aboriginal Group Meetings and Discussions**

A total of 31 meetings were held with Aboriginal groups during the preparation of the draft EA Report. Meeting discussions focused primarily on TK / TLU studies, the Participation Agreement and the independent technical review of the draft EA Report. In addition, RRR held a meeting on February 22, 2013 with representatives of the Rainy River First Nations, Naicatchewenin First Nation, and Provincial and Federal government representatives to discuss the RRP, the proposed highway re-alignment, the Amended Proposed ToR and the EA process.

Following the issuance of the draft EA Report (Version 1) for review by the Aboriginal groups, three meetings were held with Aboriginal groups. Two meetings were held with Big Grassy River First Nation, one of which focused on the independent technical review of the draft EA



Report (Version 1), and the other on the RRP and interaction between RRR and the community to date. The third meeting was a TK / TLU session which was held with Mitaanjigamiing First Nation.

RRR and the MNO have been working together to ensure that Métis interests and rights are being taken into account with the RRP. Métis engagement in the RRP has been progressing, most notably with the signing of a Memorandum of Understanding between RRR and the MNO in June 2013, along with the development and implementation of a work plan. RRR was pleased to provide a site tour in September 2013 to the local MNO Consultation Committee, as represented by members of the Sunset Country, Kenora, Atikokan and Northwest Métis Councils. The site tour provided an opportunity for the Consultation Committee to gain a greater understanding of the RRP from exploration through to the proposed development. Following the site tour a Consultation Committee Memorandum of Understanding meeting was held. On October 18, 2013 RRR was invited by the MNO RCC Region #1 and gave a presentation on the RRP to members of the MNO at the Sunset Country Métis Hall.

Additional information about meetings and discussions with Aboriginal groups is provided as follows:

- Appendix D-1b: Aboriginal Comments and Responses;
- Appendix D-1c: Aboriginal Records of Consultation; and
- Appendix D-1d: Aboriginal Correspondence Documents.

Meetings and discussions with Aboriginal groups will continue throughout the life of the RRP as outlined in Section 3.7.

### **3.4.8 Community Open Houses**

RRR hosted four open houses between November 10, 2012 and October 7, 2013. Two of the open houses were held during the preparation of the draft EA Report (November 10, 2012 to June 15, 2013), and were in addition to those held previously and documented in the Amended ToR and described in Section 3.2. The first was held at the Seine River First Nation on November 13, 2012 and the second at Mitaanjigamiing First Nation on November 20, 2012. Ten individuals attended each of the sessions. Four comment forms were received from attendees, copies of which are provided in Appendix D-8.

An overview of the nature of the comments received through the November 13 and 20, 2012 open houses is presented in Table 3-5. Further details regarding the comments shared during the open house events are located in Appendix D-1b.

Following the issuance of the draft EA Report (Version 2) for comment in July 2013, two additional community open houses / public information sessions were held to provide opportunities for Aboriginal groups, the public and other stakeholders to receive an update on

the RRP, become informed about EA findings, and provide feedback about appropriate management of environmental effects. The first of these sessions was held in Barwick on July 30, 2013 and was attended by 51 people. A second community open house was held on August 8, 2013 in Fort Frances and was attended by 27 people. Ten comment forms were received from attendees at these open house sessions.

An overview of the nature of the comments received through the July 30, 2013 and August 8, 2013 open houses is presented in Table 3-6. Further details regarding the comments shared during the open house events are located in Appendix D-2d and Appendix D-3c.

The following appendices contain additional information about the community open houses:

- Appendix D-1: Aboriginal Records;
- Appendix D-2: Government Records;
- Appendix D-3: Public and Stakeholder Records;
- Appendix D-7: Poster Boards;
- Appendix D-8: Comment Forms; and
- Appendix D-10: EA Handouts.

#### **3.4.9 Site Tours**

RRR hosted five site tours between November 10, 2012 and October 7, 2013 which allowed participants to view the RRP site and share comments related to the RRP. The following groups participated in site tours during preparation of the EA Report:

- Environment Canada (November 15, 2012), 4 employees;
- Baibombeh Anishinabe School (June 6, 2013), 10 Naothkamegwaning First Nation high school student and 2 adults;
- Mitaanjigamiing First Nation (July 11, 2013), 15 community members;
- Mining Matters (August 1, 2013), 35 adults and children; and
- MNO Region 1 Consultation Committee (September 24, 2013), 5 members.

Complete listings of tour participants are located in the following appendices:

- Appendix D-1c: Aboriginal Records of Consultation;
- Appendix D-2e: Government Records of Consultation; and
- Appendix D-3d: Public and Stakeholder Records of Consultation.

### 3.4.10 Newsletters and Updates

RRR has consistently used newsletters and updates as a primary means of communication for all consultation activities and to distribute information about the RRP and the EA process to residents throughout the region. The distribution for the newsletters and updates includes approximately 7,500 recipients throughout the following Ontario communities:

- Rainy River;
- Fort Frances (including Couchiching First Nation, Nigigoonsiminikaaning First Nation, Mitaanjigamiing First Nation, Lac La Croix First Nation and Sunset Country Métis);
- Devlin (including Naicatchewenin First Nation);
- Emo (including Rainy River First Nations);
- Barwick;
- Stratton;
- Pinewood;
- Sleeman (including Big Grassy River First Nation, Anishinaabeg of Naongashiing First Nation);
- Nestor Falls (including Ojibways of Onigaming First Nation);
- Mine Centre (including Seine River First Nation); and
- Pawitik (including Naotkamegwanning First Nation).

Newsletters and updates were distributed as follows:

- RRP Update, February 11, 2013;
- Winter 2013 Community Newsletter, March 22, 2013;
- Spring 2013 Community Newsletter, June 24, 2013;
- Invitation to Get Involved in EA and Mining Matters Workshops, July 24, 2013; and
- Summer / Fall 2013 Community Newsletter, September 25, 2013.

The newsletter distributed on September 25, 2013 provided an overview of the public open houses that were held as part of the consultation on the draft EA Report, the Mining Matters workshops and the acquisition of RRR by New Gold Inc.

Copies of all newsletters and updates are provided in Appendix D-9.

### 3.4.11 RRP Website

The RRP website has been an essential tool in communicating information about the RRP and has acted as a repository for RRP news and documents related to the EA process including the:

- Approved Amended Proposed ToR;
- RRP community newsletters;

- Notices;
- Draft EA Report (Version 2); and
- An animated video showing the site during operations and after reclamation and closure.

A copy of the final EA Report has been uploaded to the RRP website.

### **3.4.12 Ceremonies**

RRR hosted a Spring Ceremony and Feast at the RRP site on June 4, 2013. Invitations were extended to area First Nations and Métis and the ceremony was conducted by an Elder from Naicatchewenin First Nation. The event was attended by approximately 50 people.

A Fall Ceremony was held on October 18, 2013 at the RRP site which was attended by 27 community members and 12 New Gold employees. As with other ceremonies, invitations were extended to area First Nations and Métis.

### **3.4.13 Status of Aboriginal Agreements**

Discussions and meetings with the local First Nations have been ongoing since early exploration. A Participation Agreement was signed in March, 2012 with respect to the development of the RRP by RRR, the Fort Frances Chiefs Secretariat and communities of:

- Couchiching First Nation;
- Lac La Croix First Nation;
- Mitaanjigamiing First Nation;
- Naicatchewenin First Nation;
- Rainy River First Nations; and
- Seine River First Nation.

A Participation Agreement Advisory Committee (PAAC) was subsequently formed and meets on a regular basis to share information and ensure successful implementation of the Agreement. The PAAC is comprised of one representative from each of the six First Nations, as well as two representatives from RRR.

RRR also signed a Memorandum of Understanding with Big Grassy River First Nation in March 2012. A Memorandum of Understanding between the MNO and RRR was signed in July 2013 to guide their working relationship with respect to the development of the RRP.

### **3.4.14 Workshops**

RRR sponsored Mining Matters workshops offered through the Prospectors and Developers Association of Canada aimed at providing an opportunity to build understanding about rocks, minerals, metals and mining, and potentially to create interest in careers in mining. The workshops held in Barwick, were offered free of charge to adults and children (ages 9 to 15). Invitations were distributed using the same distribution method as the newsletters, which included all Aboriginal groups involved in the RRP as well as residents within the area. A site visit was also conducted as part of the program.

## **3.5 Summary of Comments and Concerns - During EA Report Preparation**

### **3.5.1 Comments and Concerns – Stakeholders**

In preparing the draft EA Report, numerous stakeholder interviews were conducted to discuss current service capacities, regional issues and challenges, and involvement in mitigation and enhancement planning. The information gathered through these interviews has been used to inform baseline reporting, effects assessment and management planning. Through interviews, other meetings and discussions, RRR received numerous comments related to the economic benefits that will accrue within the region as a result of the RRP, particularly those benefits that may result from anticipated employment and business opportunities. Other comments and questions received from stakeholders during this time period related to the biophysical environment, particularly the management of tailings and the potential for RRP to impact air and water quality. A potential was also noted for RRP to impact local infrastructure through increased demand. The importance of information sharing between RRR and the municipalities to inform municipal decision making was highlighted.

Consultation, meetings and discussions with Municipal agencies largely focussed on social and economic effects of the RRP, including impacts on municipal planning, the proposed re-alignment of a section of Highway 600, housing options and economic development in the Rainy River District (employment, business and procurement opportunities).

Provincial and Federal government agency interactions during this period centred primarily on the natural environment baseline studies, ToR review and approval, and the EA process. Appendix D-2d contains the comments and questions received from the government agencies as well as responses and comments by RRR. Where appropriate, the final baseline reports were re-issued or errata were provided based on the comments received. These revised versions are appended to this final EA Report.

Discussions and meetings occurred with the MNR and Fisheries and Oceans Canada during this time in order to provide an update on progress made to SAR permitting and development of a No Net Loss Plan related to aquatic resources. The SAR Working Group which includes MNR and RRR representatives, held meetings on November 15, 2012, February 13, 2013 and

June 7, 2013. The Fisheries Working Group, comprised of Federal and Provincial government representatives and RRR representatives, held workshops on November 29, 2012, January 31, 2013, and May 8, 2013, which focused on the overall fisheries offset strategy and No Net Loss Plan provided in Appendix X. A closure planning meeting was held with the various government agencies on January 9, 2013 which supported the preparation of the conceptual closure plan provided in Appendix E.

Public and stakeholder comments and concerns between November 10, 2012 and October 7, 2013, and the responses from RRR are tabulated in Appendix D-2d (government) and Appendix D-3d (public and stakeholders). Summaries of consultation, meetings and discussions that occurred between November 10, 2012 and October 7, 2013 are provided in Appendix D-2e (government) and D-3d (public and stakeholders). Copies of correspondence documents (letters, meeting notes) are provided in Appendix D-2f (government) and Appendix D-3e (public and stakeholders) with the exception of those related to SAR or deemed confidential.

RRR has received considerable support for the RRP from stakeholders during this period, as demonstrated in part, by the letters of support provided in Appendix D-3e. Support from stakeholders is detailed in Section 3.6.

The public comment period for the draft EA Report (Version 2) commenced July 19, 2013 and remained open until August 19, 2013 for stakeholders and Aboriginal groups. Government agencies were provided an additional 15 days for review at their request (ending September 3, 2013). All written submissions containing comments on the draft EA Report (Version 2) and corresponding comment and response tables are located within Appendix D (D-1 Aboriginal; D-2 Government; D-3 Public and Stakeholder). The comment and response tables include the RRR response to individual comments and provide information about where the comment is addressed in the final EA Report as applicable. The tables also indicate whether the response / actions are considered complete, or if ongoing actions will be undertaken to further address the comment. Over 500 comments were received on the draft EA Report (Version 2).

Consultation, meetings and discussions with government agencies were focused on the coordinated Federal / Provincial EA process and SAR. RRR met with the CEA Agency and MOE on August 12, 2013 to discuss the EA process, review of the draft EA Report (Version 2) and the timeline for the RRP. Discussions and meetings continued with the MNR regarding SAR, relating to field surveys, survey methodology, the management and protection of potentially affected SAR, and related permitting requirements. The SAR Working Group which includes both MNR and RRR representatives, held meetings on June 25, 2013 and August 8, 2013.

The CEA Agency and MOE coordinated Federal and Provincial agency comments on the draft EA Report (Version 2) and provided these to RRR in early to late September 2013. RRR provided the CEA Agency and MOE detailed written responses to comments and concerns during the period of September 18, 2013 and October 11, 2013. Comments received were

extensive and detailed as shown in Appendix D-2a. The tabular listings of comments and responses include where appropriate the location where the comment is addressed in the final EA Report.

Comments from each government agency were generally focussed on each agencies' regulatory authority, but can be grouped as follows:

- Air quality effects: technical comments regarding air quality assessment and model, dust quality effects and approach to climate change assessment;
- Aquatics: revisions to include Lake Sturgeon capture during 2013 in the lower Pinewood River and clarification on baitfish industry;
- Consultation: confirmation regarding activities, clarification on future requirements and final EA report organization;
- Minor editorial aspects: inclusion of all appendices, corrections to Ministry names and correction to table reference;
- Groundwater modelling and effects: technical comments regarding model, potential for effects on offsite wells, seepage quantities and post-closure effects;
- Lands: land tenure requirements and descriptions of significant wildlife habitat;
- Project design: dam / diversion design details, pipeline details, Highway 600 re-alignment, requirements for Hydro One involvement and contingency measures;
- Reclamation: post-closure water management, reclamation approaches, requests for further detail and ability to reclaim to swamp habitat;
- Regulatory aspects: requirement for a comprehensive summary, alternative methodology, description of VECs, environmental approvals listing, future approval requirements and clarification regarding agency directives and terminology;
- Sound: technical comments regarding model and reporting;
- Traditional knowledge and land use: clarification regarding information available and collected, use of information in EA preparation, and local harvesting and use;
- Waste management: clarifications regarding operations and demolition landfills and alternatives assessment;

- Water management, flows and quality effects: additional technical information needs regarding water balance and approach to water management, clarification regarding use of Burditt Lake and Off Lake, and evaporation data source;
- Wildlife and SAR: technical clarifications / corrections to text, information regarding deer hunting, clarification regarding Moose decline, proposed mitigation measures and presence of elk; and
- Vegetation: classification of habitat in the RRP vicinity and constructed wetland use.

Further detail is provided in Table 3-7 and complete comments and responses are provided in Appendix D-2a.

Copies of correspondence containing comments from government agencies on the draft EA Report (Version 2), as well as the subsequent comment and response tables, including references to where the comments were addressed in the final EA Report where applicable, are provided as follows:

- Appendix D-2f: Correspondence Documents; and
- Appendix D-2a: Comments and Responses on draft EA Report (Version 2).

The Township of Chapple also provided comments on the draft EA Report (Version 2). The Township's comments focused on the limited amount of time available to conduct a review of the draft EA Report (Version 2) and references to concerns previously expressed at a meeting held between RRR and the Township of Chapple on December 5, 2012. The Township of Chapple requested a meeting to follow-up with RRR on these issues which RRR is following up.

Written comments were also received from the Ontario Federation of Anglers and Hunters (OFAH), the Ontario Federation of Anglers and Hunters Zone A (OFAH Zone A) branch and the Rainy River Future Development Corporation (RRFDC). Concerns expressed by the OFAH largely related to fish and fish habitat. Comments from the OFAH Zone A related to wildlife and wildlife habitat, fish and fish habitat, land use and acid generating rock. The OFAH Zone A also commended RRR for the creation of the Fisheries Working Group. The RRFDC provided comments related to potential economic growth as a result of the RRP, noting that should the RRP proceed as planned, the local labour market could be able to supply workers. The RRFDC also expressed interest in working together to prepare the labour force for opportunities, and to maximize local hiring and purchasing.

An overview of the public stakeholder comments as they relate to the VECs studied by RRR and other topics is provided in Table 3-7.

Copies of correspondence containing comments from the public stakeholders on the draft EA Report (Version 2) as well as the subsequent comment and response tables, including



references to where the comments were addressed in the final EA, where applicable, are provided as follows:

- Appendix D-3e: Correspondence Documents; and
- Appendix D-3a: Comments and Responses on draft EA Report (Version 2).

### **3.5.2 Comments and Concerns - Aboriginal Groups**

During the preparation of the draft EA Report, RRR met with Aboriginal groups to further advance TK / TLU studies, strengthen relationships and share information about the RRP. Environmental management, in particular the potential effects of the RRP on surface and groundwater, as well as the potential for the RRP to impact the land for future generations have continued to be key areas of discussion. Discussion topics have also included the management of chemicals at the RRP site, noise, and the management of onsite domestic sewage and solid waste, with RRR committing that all regulatory requirements will be met. Discussions and correspondence with Aboriginal groups also focused on the RRR support for an independent technical review of the draft EA Report (Version 1) which was issued for Aboriginal review on May 17, 2013 (Section 3.4.3).

Positive socio-economic RRP effects such as employment, training and business opportunities have also continued to be a key theme in discussions held during the preparation of the draft EA Report. In particular, communities have expressed interest in understanding the types of opportunities that may become available and how best to prepare to participate in these opportunities. In response, RRR has shared information with the communities about the types of positions that will be available at the RRP. Other related areas noted include transportation of workers to and from the RRP site and accommodation planning, with a preference stated for using local accommodations for workers in lieu of a camp setting. RRR has maintained their position to not have a work camp at the RRP site, choosing instead to support local hoteliers and outfitters through maintaining a local temporary accommodations list that will be provided to construction workers and contractors.

Rainy River First Nations and Naicatchewenin First Nation provided letters to RRR expressing support for the fish habitat compensation plan proposed by RRR, which they were provided a copy to review. In addition, Mitaanjigamiing First Nation and Naicatchewenin First Nation provided letters of support for the RRP to the MNM.

Comments were received through the independent technical review of the RRP draft EA Report (Version 1) conducted on behalf of various Aboriginal groups related to Aboriginal consultation, TK / TLU, socio-economics, fish, wildlife, vegetation, surface water, groundwater, air quality, noise and vibration, and human and ecological health. Commitments resulting from the review were provided by RRR to the MOE and CEA Agency on August 14, 2013 (Table 3-4). RRR provided detailed responses to the comments to the Aboriginal groups, the MOE and CEA Agency on September 18, 2013 (Appendix D-1e). A summary is provided in Table 3-3.

The MNO, through their Lands, Resources and Consultation Branch provided an initial review of the RRP Draft EA Report (Version 1) on August 19, 2013. The review identified several issues to be addressed which RRR has been cognizant and respectful of, to ensure the Métis Way of Life is considered throughout the RRP. A copy of the MNO comments are provided in Appendix D-1e. RRR will work with the MNO to address these comments during the final EA Report review period.

Big Grassy River First Nation undertook a second independent review of the draft EA Report a copy of which was provided to RRR on October 18, 2013. The review concluded that additional work with the community was required and RRR has committed to continuing the close engagement with the community in support of the RRP development.

### **3.6 Documented Support for the RRP**

#### **3.6.1 Documented Support for the RRP - Stakeholders**

RRR has received considerable support for the RRP from various stakeholders and Aboriginal groups. This section outlines support received by government, public and stakeholders and Aboriginal groups.

Various Municipal governments have provided letters of support for the RRP to CEA Agency and MOE. The letters of support largely expressed concern for the current state of the collective local economy in the Rainy River District and requested that government agencies demonstrate their commitment to the economy through an efficient and effectively managed EA process for the RRP.

Letters of support have been received from:

- Township of Alberton;
- Township of Chapple;
- Township of Dawson;
- Township of Lake of the Woods;
- Township of La Vallee;
- Township of Morley;
- Town of Fort Frances; and
- Town of Rainy River

Copies of letters of support are provided in Appendix D-2f.

In addition to the letters of support from Municipal governments, support from public and stakeholders was largely expressed through meetings and discussions, as well as during socio-economic interviews and public open houses. Positive comments received from members of the

public and stakeholders focussed on the potential positive RRP impacts associated with employment, business and procurement opportunities that would support local economic development.

Additional information about public and stakeholder support for the RRP is provided as follows:

- Appendix D-3c: Comments and Responses;
- Appendix D-3d: Records of Consultation;
- Appendix D-3e: Correspondence Documents; and
- Appendix D-8: Open House Comment Forms.

### **3.6.2 Documented Support for the RRP - Aboriginal Groups**

Letters of support for the RRP were provided to MOE and CEA Agency from the following Aboriginal groups:

- Big Grassy River First Nation;
- Mitaanjigamiing First Nation;
- Naicatchewenin First Nation; and
- Rainy River First Nations.

These letters cited support for the RRP and included the following types of information: an overview of the relationship between RRR and the Aboriginal groups in the area; ways in which the communities have already benefited from RRP; and support for the RRP ToR.

Additional letters of support from groups were received from Naicatchewenin First Nation and Rainy River First Nations with respect to the proposed fish habitat compensation plan that is expected to complement and work with existing local programs and initiatives, such as the Rainy River First Nations Watershed Program and MNR District Partnership Program.

In addition to formal letters of support, Aboriginal groups have also noted support for the RRP during the course of discussions and meetings held with RRR.

Letters of support from Aboriginal groups are provided in Appendix D-1d.

### **3.7 Ongoing Consultation**

Consultation efforts will continue to focus mainly on the EA process as RRR moves toward environmental approvals for construction, operation and closure of the RRP. RRR will continue to maintain a record of its consultation activities for the RRP.

As outlined in the RRP EA Consultation and Engagement Plan, and Aboriginal Consultation and Engagement Plan, the following RRR-led activities will occur as part of the ongoing consultation for the RRP:

- Continue Aboriginal engagement sessions to address outstanding concerns and to show how comments were considered in the preparation of the final EA;
- Regularly prepare and widely distribute RRR Community Newsletters to inform newsletter recipients about project activities, upcoming public meetings and encourage feedback through the RRP webpage or through direct contact with RRR staff at the Emo office;
- Distribute copies of the final EA Report for a conformity review by the Federal government agencies with a coincidental Provincial informal review;
- On completion of the conformity review and revision (if any), the final EA Report will be available for a 30-day public review period, including through making hard copies available at strategic public locations such as public libraries in local communities, and the RRR and government offices. The EA Report will also be available for downloading from the RRP webpage;
- Update the RRP webpage to include the final EA Report and provide an e-mail link for direct feedback; and
- Post in local newspapers and widely distribute (such as by mail drops, e-mail and RRP webpage) the Notice of Submission of EA required by the Province.

Ongoing and future RRR-led consultation activities will also inform the closure planning aspects of the RRP as per the legal requirements for stakeholder consultation outlined in the *Mining Act*.

**Table 3-1: Open House Comments and Responses; May 30, 2012 (Rainy River) and May 31, 2012 (Barwick)**

Topic		Overview of Comments and Questions	Overview of Responses
Natural Environment	Wildlife	<ul style="list-style-type: none"> <li>• Potential impacts on SAR in the project area</li> <li>• Potential impacts on big game animals</li> <li>• Interest in studies undertaken for the RRP</li> </ul>	<ul style="list-style-type: none"> <li>• Extensive baseline studies completed working with MNR and Trent University</li> <li>• Reports will be provided with EA Report</li> </ul>
	Fisheries and aquatic resources	<ul style="list-style-type: none"> <li>• Potential impacts on fish habitat</li> </ul>	<ul style="list-style-type: none"> <li>• Extensive baseline studies completed</li> <li>• Compensation will be provide per regulatory requirements</li> </ul>
	Water resources	<ul style="list-style-type: none"> <li>• Potential for contamination</li> <li>• Potential water quality issues associated with the tailings management area</li> <li>• Water levels and water quality on Clearwater Lake</li> <li>• Water quality in the tailings management area</li> <li>• Quality of water returned to the Pinewood River</li> </ul>	<ul style="list-style-type: none"> <li>• Extensive water quality studies completed</li> <li>• All discharges will meet regulatory requirements</li> <li>• Study will be completed to assess potential impacts which will be provided in the EA Report</li> <li>• No effect to local lakes</li> </ul>
	Biodiversity	<ul style="list-style-type: none"> <li>• Interest in studies undertaken for the RRP</li> </ul>	<ul style="list-style-type: none"> <li>• Extensive baseline studies completed</li> <li>• Reports will be provided with EA Report</li> </ul>
	Noise and vibration  Air quality / climate	<ul style="list-style-type: none"> <li>• Noise impacts</li> <li>• Potential impacts to air quality</li> </ul>	<ul style="list-style-type: none"> <li>• All emissions will meet regulatory requirements</li> <li>• Study will be completed to assess potential impacts which will be provided in the EA Report</li> </ul>
Human Environment	Land and resource use	<ul style="list-style-type: none"> <li>• Popularity of area with resident and non-resident hunters</li> <li>• Fishing occurs mainly on the Rainy River Rainy Lake and Lake of the Woods</li> </ul>	<ul style="list-style-type: none"> <li>• Information noted with appreciation and will be considered in assessment of potential impacts</li> </ul>
	Socio-economic	<ul style="list-style-type: none"> <li>• Realignment of Highway 600</li> <li>• Traffic levels on Highway 600</li> <li>• Mine access road</li> <li>• Housing requirements and plans</li> <li>• Economic benefits to the region</li> <li>• Employment opportunities</li> </ul>	<ul style="list-style-type: none"> <li>• Information noted with appreciation and will be considered in assessment of potential impacts</li> <li>• Road alignments will be assessed</li> <li>• RRR prefer to hire locally and will work with communities to ensure employment is accessible</li> </ul>
	Human health	<ul style="list-style-type: none"> <li>• Potential impact of the tailings management area on meat acquired through hunting</li> </ul>	<ul style="list-style-type: none"> <li>• All regulatory requirements will be met</li> </ul>
	Consultation	<ul style="list-style-type: none"> <li>• Level of engagement with the Township of Chapple</li> <li>• Level of engagement with First Nations</li> <li>• Access to information that is not too technical</li> </ul>	<ul style="list-style-type: none"> <li>• Township of Chapple is involved</li> <li>• RRR will continue to inform local community and Aboriginal groups about the project going forward and will try to make accessible</li> </ul>
Mining	Mine rock, process plant	<ul style="list-style-type: none"> <li>• Proposed location of mine rock stockpiles</li> <li>• Location of ore processing</li> </ul>	<ul style="list-style-type: none"> <li>• Discussion regarding proposed design with further information to be provided in the EA Report</li> </ul>

Note: Appendix D-3c provides a record of comments and specific responses made during the open house

**Table 3-2: Open House Comments and Responses; November 7, 2012 (Nestor Falls) and November 8, 2012 (Emo)**

Topic		Overview of Comments and Questions	Overview of Responses
Natural Environment	Wildlife	<ul style="list-style-type: none"> <li>• Potential impact on SAR</li> <li>• Potential impact on deer</li> <li>• Concerns about impact of wildlife fencing</li> </ul>	<ul style="list-style-type: none"> <li>• Extensive baseline studies completed</li> <li>• Reports will be provided with EA Report</li> <li>• Additional discussions provided subsequently</li> </ul>
	Water resources	<ul style="list-style-type: none"> <li>• Groundwater and surface water quality</li> <li>• Potential impacts on agricultural operations</li> </ul>	<ul style="list-style-type: none"> <li>• Extensive water quality studies completed</li> <li>• All discharges will meet regulatory requirements</li> <li>• Study will be completed to assess potential impacts which will be provided in the EA Report</li> </ul>
	Noise and vibration	<ul style="list-style-type: none"> <li>• Potential impacts on nearby residents</li> </ul>	<ul style="list-style-type: none"> <li>• All emissions will meet regulatory requirements</li> <li>• Study will be complete to assess potential impacts which will be provided in the EA Report</li> </ul>
	Air quality / climate	<ul style="list-style-type: none"> <li>• Carbon discharge and sequestration protocols</li> <li>• Potential impacts on agricultural operations</li> </ul>	<ul style="list-style-type: none"> <li>• All emissions will meet regulatory requirements</li> <li>• Study will be complete to assess potential impacts including greenhouse gasses which will be provided in the EA Report</li> </ul>
Human Environment	Land and resource use	<ul style="list-style-type: none"> <li>• Mine footprint</li> </ul>	<ul style="list-style-type: none"> <li>• Compact footprint proposed</li> </ul>
	Socio-economic	<ul style="list-style-type: none"> <li>• Employment opportunities</li> <li>• Business opportunities</li> <li>• Potential impacts on property values</li> <li>• Housing options for workers</li> </ul>	<ul style="list-style-type: none"> <li>• RRR will continue to inform and involve the local communities about the project going forward</li> <li>• RRR anticipates the RRR will have a positive socio-economic effect on the region</li> </ul>
	Aboriginal engagement	<ul style="list-style-type: none"> <li>• Involvement of Aboriginal communities</li> <li>• Importance of conducting traditional ceremonies at the site</li> </ul>	<ul style="list-style-type: none"> <li>• RRR will continue to inform and involve local Aboriginal groups about the project going forward</li> <li>• RRR agrees and supports the importance of conducting traditional ceremonies at the site</li> </ul>
	Consultation	<ul style="list-style-type: none"> <li>• Viewing locations for EA documents</li> </ul>	<ul style="list-style-type: none"> <li>• A number of local locations will be available</li> </ul>
Mining	Process	<ul style="list-style-type: none"> <li>• Potential use of cyanide</li> </ul>	<ul style="list-style-type: none"> <li>• Cyanide is a necessary component of gold processing</li> <li>• Modern management procedures are in place to ensure safe transport and use</li> </ul>
Project Phase	Closure	<ul style="list-style-type: none"> <li>• Interest in closure planning</li> </ul>	<ul style="list-style-type: none"> <li>• RRR will continue to inform and involve the local communities about the project going forward</li> <li>• The EA Report will include a conceptual closure discussion for comment</li> </ul>

Note: Appendix D-11 provides a record of comments and specific responses made during the open house

**Table 3-3: Summary of Comments and Responses on the Draft EA Report (Version 1) - Independent First Nation Review**

Overview of Comments and Questions	Responses
<b>First Nations</b>	
<p><b>TK / TLU:</b> Concern was expressed regarding the role of TK / TLU in the EA and future project planning, the availability of studies lead by each First Nations community and information sharing.</p>	<p>Traditional Knowledge/Traditional Land Use (TK/TLU) data has been widely collected for the RRGP, including from the closest communities of Big Grassy River First Nation, Rainy River First Nations and Naicatchewenin First Nation. All TK/TLU sessions were community driven, meaning that the method of data collection was community specific. No TK/TLU data has been identified for the Project area specifically. The majority of the data has been broad and overreaching, which Rainy River Resources (RRR) will continue to respect as it serves as the basis for First Nations' unique relationship to the land. TK/TLU collection will continue; information collected will be appropriately considered for construction, operation and closure phases. For example, RRR will further investigate the historical travel corridor and incorporate appropriately any new information that may become available.</p> <p>RRR will share results of the TK/TLU data sessions in a non-public First Nations forum(s).</p>
<p><b>Aquatic Resources:</b> Comments were provided regarding the potential for impacts to local water quality and fisheries.</p>	<p>RRR will commit to a joint water quality monitoring and reporting program with the area First Nations as part of the existing monthly water quality monitoring program which is currently carried out by RRR. The program will be funded by RRR and form an integral part of the overall environmental management program as it relates to First Nations traditional knowledge and assurances of maintaining water quality and by extension, aquatic biota protection. The program will be developed jointly with the First Nations in lead-up to the initiation of mine construction.</p>
<p><b>Communication of Information:</b> The First Nations wish to be kept up to date on the Project, including any potential changes.</p>	<p>RRR will continue to communicate closely with First Nations regarding the Project.</p>
<p><b>Environmental Monitoring:</b> Ensure that First Nations have an active role in monitoring plans and programs.</p>	<p>RRR has an open invitation for First Nations to participate in all baseline and environmental monitoring programs, including Whip-poor-will, where appropriate and to share monitoring results. RRR will continue to advise of the opportunity at public forums in order to encourage participation by anyone who is interested.</p>
<p><b>Cultural Awareness Training:</b> Provide cultural awareness training for those working at the mine.</p>	<p>All RRR staff will undergo cultural awareness training. Temporary contractors will undergo an awareness program as part of the regular induction program when working at the mine.</p>

Overview of Comments and Questions	Responses
<p><b>Lake Sturgeon:</b> Consider obtaining new information on Sturgeon.</p>	<p>Additional information related to Lake Sturgeon and the Rainy River First Nations management program will be added to the Final EA Report. RRR has committed to a program of close coordination with Rainy River First Nations in support of the pre-existing First Nation Watershed Program and water quality protection. Company funding will be provided as part of the fisheries compensation program to further water quality enhancement programs for the Pinewood and similar agriculturally-impacted waterways.</p>
<p><b>Baseline Health Information:</b> The Proponent may wish to contact the Seven Generations School and/or MNR to obtain additional information.</p>	<p>RRR will reach out to the Seven Generations Education Institute and/or the MNR to obtain any additional information on baseline health of animals and fish.</p>
<p><b>Closure Planning:</b> Describe what the mechanisms are to deliver a successful closure plan over time, including incorporation of TK and community engagement activities.</p>	<p>First Nations will play an active role in the development of the mine Closure Plan, including development of the monitoring and mitigation programs. While the Closure Plan will be completed prior to construction, RRR will consult on significant revisions periodically during operations to ensure incorporation of TK and best management practices.</p>
<p><b>Wildlife Studies:</b> Investigate whether there will be changes to ungulates.</p>	<p>Monitoring programs targeted at ungulates (moose, deer) will be coordinated with First Nations.</p>
<p><b>First Nation Water Supply:</b> Concern expressed regarding the potential for effects to water supply from the RRP.</p>	<p>RRR would be pleased to assemble a map showing the locations of the closest First Nation community water supply intakes on receipt of the locations/coordinates.</p>
<p><b>First Nation Member Health:</b> The First Nations wish to be kept up to date on the Project, including any potential changes. It is suggested that the Proponent and the First Nations work together through a committee to mitigate any potential social problems with workers staying in nearby villages and camps. The largest issue is the potential for more drugs and alcohol to be brought in and consumed in the area.</p>	<p>While the Draft EA has shown no impacts to First Nations or non-Aboriginal people's health, any new information that has a potential to impact health will be provided to First Nations.</p> <p>RRR will work with First Nations to ensure employee overall well-being. Programs to highlight the dangers of drug use combined with drug testing will be implemented.</p>

Note: Appendix D-1e provides a complete record of comments from the independent technical review of the draft EA Report (Version 1) and specific responses. Comments were either: responded to directly or through revision to the EA Report; or a commitment was made to completion in the future (such as through the environmental approvals process or additional consultation).



**Table 3-4: Commitments Resulting from the Independent First Nations Review of the Draft EA Report (Version 1)**

<b>Commitment</b>
TK / TLU data has been widely collected for the RRP, including from the closest communities of Big Grassy River First Nation, Rainy River First Nations and Naicatchewenin First Nation. All TK / TLU sessions were community driven, meaning that the method of data collection was community specific. No TK / TLU data has been identified for the Project area specifically. The majority of the data has been broad and overreaching, which RRR will continue to respect as it serves as the basis for First Nations' unique relationship to the land.
TK/TLU collection will continue; information collected will be appropriately considered for construction, operation and closure phases. For example, RRR will further investigate the historical travel corridor and incorporate appropriately any new information that may become available.
RRR will share results of the TK/TLU data sessions in a non-public First Nations forum(s).
RRR will commit to a joint water quality monitoring and reporting program with the area First Nations as part of the existing monthly water quality monitoring program which is currently carried out by RRR. The program will be funded by RRR and form an integral part of the overall environmental management program as it relates to First Nations traditional knowledge and assurances of maintaining water quality and by extension, aquatic biota protection. The program will be developed jointly with the First Nations in lead-up to the initiation of mine construction.
RRR will continue to communicate closely with First Nations regarding the Project.
RRR has an open invitation for First Nations to participate in all baseline and environmental monitoring programs, including Whip-poor-will, where appropriate and to share monitoring results. RRR will continue to advise of the opportunity at public forums in order to encourage anyone who's interested to participate.
All RRR staff will undergo cultural awareness training. Temporary contractors will undergo an awareness program as part of the regular induction program when working at the mine.
Additional information related to Lake Sturgeon and the Rainy River First Nations management program will be added to the Final EA Report.
RRR has committed to a program of close coordination with Rainy River First Nations in support of the pre-existing First Nation Watershed Program and water quality protection. Company funding will be provided as part of the fisheries compensation program to further water quality enhancement programs for the Pinewood River and similar agriculturally-impacted waterways.
RRR will reach out to the Seven Generations Education Institute and/or the MNR to obtain any additional information on baseline health of animals and fish.
First Nations will play an active role in the development of the mine Closure Plan, including development of the monitoring and mitigation programs. While the Closure Plan will be completed prior to construction, RRR will consult on significant revisions periodically during operations to ensure incorporation of TK and best management practices.
Monitoring programs targeted at ungulates (moose, deer) will be coordinated with First Nations.
RRR would be pleased to assemble a map showing the locations of the closest First Nation community water supply intakes on receipt of the locations/coordinates.
While the Draft EA has shown no impacts to First Nations or non-Aboriginal people's health, any new information that has a potential to impact health will be provided to First Nations.
RRR will work with First Nations to ensure employee overall well-being. Programs to highlight the dangers of drug use combined with drug testing will be implemented.

**Table 3-5: Open House Comments and Responses; November 13, 2012 (Seine River First Nation) and November 20, 2012 (Mitaanjigamiing First Nation)**

Topic		Overview of Comments and Questions	Overview of Responses
Natural Environment	Wildlife	<ul style="list-style-type: none"> <li>• Potential impact on the land</li> <li>• Concern for future generations</li> </ul>	<ul style="list-style-type: none"> <li>• Extensive baseline studies completed</li> <li>• Reports will be provided with EA Report</li> </ul>
	Water resources	<ul style="list-style-type: none"> <li>• Potential contamination of water supply</li> <li>• Concern for future generations</li> </ul>	<ul style="list-style-type: none"> <li>• Extensive water quality studies completed</li> <li>• All discharges will meet regulatory requirements</li> <li>• Study will be completed to assess potential impacts which will be provided in the EA Report</li> </ul>
Human Environment	Socio-economic	<ul style="list-style-type: none"> <li>• Training for employment</li> <li>• Employee transportation</li> </ul>	<ul style="list-style-type: none"> <li>• RRR will continue to inform and involve the local communities about the project going forward</li> <li>• Examples of types of jobs provided</li> <li>• RRR anticipates the RRR will have a positive socio-economic effect on the region</li> </ul>
	TK / TLU	<ul style="list-style-type: none"> <li>• Incorporation of TK / TLU</li> <li>• Respect for traditional protocols prior to disturbing land and animals</li> </ul>	<ul style="list-style-type: none"> <li>• RRR will continue to inform and involve local Aboriginal groups about the project going forward including with the collection and incorporation of TK / TLU</li> <li>• RRR agrees and supports the importance of conducting traditional ceremonies at the site</li> </ul>

Note: Appendix D-1b provides a record of all comments and responses made during the open house

**Table 3-6: Open House Comments and Responses; July 30, 2013 (Barwick) and August 8, 2013 (Fort Frances)**

Topic		Topics of Discussion	Overview of Responses
Natural Environment	Wildlife	<ul style="list-style-type: none"> <li>Wildlife studies (Elk population in the RRP area)</li> <li>Potential impacts on SAR</li> </ul>	<ul style="list-style-type: none"> <li>Extensive baseline studies completed</li> <li>Reports will be provided with EA Report</li> <li>Information provided will be incorporated as appropriate in the EA Report</li> </ul>
	Water resources	<ul style="list-style-type: none"> <li>Quantity of water used by the RRP from the Pinewood River</li> <li>Water management strategies</li> <li>Water levels and quality of the Pinewood River for safety of nearby farmland</li> <li>RRP impacts on Pinewood River</li> </ul>	<ul style="list-style-type: none"> <li>Extensive water quality studies completed</li> <li>All discharges will meet regulatory requirements</li> <li>Study will be completed to assess potential impacts which will be provided in the EA Report</li> </ul>
Document Reviews	Draft EA Report	<ul style="list-style-type: none"> <li>Allotted 30-day review time period</li> </ul>	<ul style="list-style-type: none"> <li>Time constraint is understood but there will be additional review opportunities</li> </ul>
Human Environment	Land and resource use	<ul style="list-style-type: none"> <li>Water levels and quality of the Pinewood River for safety of nearby farmland</li> </ul>	<ul style="list-style-type: none"> <li>All discharges will meet regulatory requirements</li> <li>Study will be completed to assess potential impacts which will be provided in the EA Report</li> </ul>
	Socio-economic	<ul style="list-style-type: none"> <li>Private sector support to meet housing requirements during construction</li> <li>Local aggregate holdings offered by local business to RRP</li> </ul>	<ul style="list-style-type: none"> <li>Comment noted with appreciation</li> </ul>
Methodology and Process	Baseline studies	<ul style="list-style-type: none"> <li>Accuracy of data (suggested to commence studies earlier)</li> </ul>	<ul style="list-style-type: none"> <li>Extensive baseline studies completed; initiated years ago</li> <li>Reports will be provided with EA Report</li> </ul>
Mining	Open pit	<ul style="list-style-type: none"> <li>Open pit depth</li> </ul>	<ul style="list-style-type: none"> <li>Depth / area provided</li> </ul>
	Transportation	<ul style="list-style-type: none"> <li>Accessing land claims near RRP site</li> <li>RRP maintenance of local road access</li> </ul>	<ul style="list-style-type: none"> <li>Detailed explanation of proposed; accessed to be provided</li> </ul>
	Project site	<ul style="list-style-type: none"> <li>RRP use of fencing</li> </ul>	<ul style="list-style-type: none"> <li>Fencing will be provided around TMA; there will be a security gate at site</li> </ul>
	Tailings management area	<ul style="list-style-type: none"> <li>Potential for expansion</li> <li>Closure management strategies</li> <li>Dust exposure</li> <li>Tailings management area footprint</li> <li>Runoff and seepage management</li> </ul>	<ul style="list-style-type: none"> <li>Detailed explanation provided of proposed management for tailings storage and control of discharges / emissions to ensure regulatory requirements are met</li> </ul>
	Transmission line	<ul style="list-style-type: none"> <li>Proposed route and alternatives</li> </ul>	<ul style="list-style-type: none"> <li>Detailed explanation of plan; alternatives to be described in the EA Report</li> </ul>
Project Phase	Closure	<ul style="list-style-type: none"> <li>Backfilling the open pit with mine wastes</li> <li>Site re-purposing</li> </ul>	<ul style="list-style-type: none"> <li>Explanation provided of proposed approach to be described in the EA Report further</li> </ul>
	Construction	<ul style="list-style-type: none"> <li>Blasting impacts on local residents (vibration)</li> <li>Inquiry about the use of stripping</li> </ul>	<ul style="list-style-type: none"> <li>All emissions will meet regulatory requirements</li> <li>Stripping will occur</li> </ul>

Note: Appendix D-3c provides a record of all comments and responses made during the open house

**Table 3-7: Summary of Comments and Responses on the Draft EA Report (Version 2) - Government**

Topic	Overview of Comments	RRR Response
<b>Natural Environment</b>		
Air quality / climate	<ul style="list-style-type: none"> <li>• Air concentrations of particulate matter</li> <li>• Mitigation measures to reduce particulate matter emissions</li> <li>• Air monitoring programs</li> <li>• Potential impacts on climate change</li> <li>• Climate change scenarios potential impacts on RRP</li> <li>• Potential air quality impacts from construction</li> </ul>	<ul style="list-style-type: none"> <li>• Additional technical information provided directly regarding air quality model inputs and results</li> <li>• Completion of additional climate change modelling (Appendix W-2)</li> <li>• Incorporation of information into the EA Report including Appendix Q-2</li> </ul>
Water resources / quality	<ul style="list-style-type: none"> <li>• Potential impacts on water quality</li> <li>• Water management strategies</li> <li>• Potential impacts on groundwater quality</li> <li>• Drinking water monitoring and mitigation measures</li> <li>• Potential tailing and waste mine rock impacts to Pinewood River</li> <li>• Lack of assimilative capacity in the Pinewood River</li> <li>• Desired assessment of alternative discharge locations</li> <li>• Total and methyl mercury trace analysis</li> <li>• Hydrogeology modelling</li> <li>• Possible climate change impacts on hydrology post-closure</li> </ul>	<ul style="list-style-type: none"> <li>• Additional technical information provided directly regarding the potential effects on water quality, and proposed mitigation measures and monitoring plans</li> <li>• Development of a comprehensive water management plan that fully responds to technical requests (Appendix W-1)</li> <li>• Commitment to additional field investigations</li> <li>• Completion of additional climate change modelling (Appendix W-2)</li> <li>• Incorporation of information into the EA Report</li> </ul>
Wildlife	<ul style="list-style-type: none"> <li>• Potential country food exposure to contaminants of concern</li> <li>• Potential impacts on SAR</li> <li>• Baseline wildlife descriptions and methodologies</li> <li>• Wildlife exclusion measures over tailing management area</li> <li>• List of Avian SAR and Provincially rare species incomplete</li> </ul>	<ul style="list-style-type: none"> <li>• Additional technical information provided directly regarding Species-at-Risk and other wildlife, including information from investigations to date</li> <li>• Revision of EA Report to address errors</li> <li>• Incorporation of information into the EA Report</li> </ul>
Noise and vibration	<ul style="list-style-type: none"> <li>• Noise source assessments and control measures</li> <li>• Points of noise reception</li> <li>• Land Use Zoning Designation Plan of the surrounding area</li> </ul>	<ul style="list-style-type: none"> <li>• Additional technical information provided directly the approach to modelling noise effects and presentation of information</li> <li>• Incorporation of information into the EA Report as appropriate including Appendix R-1</li> </ul>
Fisheries and aquatic resources	<ul style="list-style-type: none"> <li>• Potential impacts on fish habitat</li> <li>• Effects of blasting on the aquatic environment</li> <li>• Habitat restoration initiatives</li> <li>• Watershed restoration program</li> <li>• Aquatic SAR (Lake Sturgeon)</li> </ul>	<ul style="list-style-type: none"> <li>• Additional technical information provided directly related to potential effects on fisheries and aquatic species as well as proposed mitigation measures and compensation plans</li> <li>• Incorporation of information into the EA Report</li> <li>• Revision of EA Report to address progression in development of compensation plans (Appendices X-1, X-2, X-3)</li> </ul>

<b>Topic</b>	<b>Overview of Comments</b>	<b>RRR Response</b>
Biodiversity	<ul style="list-style-type: none"> <li>Swamp habitat management</li> <li>Use of the wetland for water treatment</li> <li>Aerial survey methodology</li> <li>Rare plant survey methodology</li> <li>Revegetation plan for closure</li> </ul>	<ul style="list-style-type: none"> <li>Additional technical information provided directly regarding the constructed wetland design and surveys to date</li> <li>Development of a comprehensive water management plan that fully responds to technical requests (Appendix W-1)</li> <li>Commitment to develop a revegetation plan for closure</li> <li>Incorporation of information into the EA Report</li> </ul>
<b>Human Environment</b>		
Land and resource use	<ul style="list-style-type: none"> <li>The need for a study of baseline domestic well water quality to establish pre-development conditions</li> <li>Land tenure designations</li> <li>Domestic groundwater use</li> </ul>	<ul style="list-style-type: none"> <li>Additional technical information provided directly regarding land tenure and current groundwater use / potable water sources</li> <li>Commitment to additional field investigations</li> <li>Incorporation of information into the EA Report</li> </ul>
Socio-economic	<ul style="list-style-type: none"> <li>Potential impacts on housing markets</li> <li>Public engagement discussions and RRR responses</li> <li>Valued socio-economic components (VSECs)</li> </ul>	<ul style="list-style-type: none"> <li>Additional information provided directly regarding results of public consultation efforts</li> <li>Incorporation of information into the EA Report</li> </ul>
TK / TLU	<ul style="list-style-type: none"> <li>The need to address independent technical reviewer comments with potential impact to the natural environment</li> <li>Integration of TK / TLU information regarding cultural heritage resources</li> </ul>	<ul style="list-style-type: none"> <li>Independent technical reviewer comments responded to directly (copies provided to MOE, CEA Agency and MNDM)</li> <li>Incorporation of information into the EA Report. A copy is provided in Appendix D.</li> </ul>
Aboriginal engagement	<ul style="list-style-type: none"> <li>Consultation practices and notifications</li> <li>Aboriginal Consultation Record</li> </ul>	<ul style="list-style-type: none"> <li>Incorporation of information into the EA Report</li> <li>Revision of EA Report and consultation appendix (Appendix D) and consultation summary (Volume 2 Section 3)</li> </ul>
Human health	<ul style="list-style-type: none"> <li>Consumption guidelines for cadmium and lead</li> <li>Potential impacts of RRP on human exposure to contaminated country foods related to project activities</li> </ul>	<ul style="list-style-type: none"> <li>Additional technical information provided directly regarding potential impacts from metal releases</li> <li>Revision of EA Report as appropriate</li> </ul>
Archaeology heritage	<ul style="list-style-type: none"> <li>Integration of TK / TLU information regarding cultural heritage resources</li> <li>Potential impacts on cultural heritage resources</li> </ul>	<ul style="list-style-type: none"> <li>Clarification regarding TK / TLU studies and information provided directly</li> <li>Incorporation of results of cultural heritage landscapes and built heritage resources study into the EA Report</li> <li>Clarifications provided in the EA Report</li> </ul>
<b>Other Topics</b>		
Tailings management area	<ul style="list-style-type: none"> <li>Potential impacts on water quality</li> <li>Long term management strategies</li> <li>Emissions (hydrogen cyanide and ammonia)</li> <li>Effluent discharge, quality, mitigation and treatment measures to manage waste water</li> <li>Soil permeability</li> </ul>	<ul style="list-style-type: none"> <li>Additional technical information provided directly regarding design measures, potential impacts and mitigation measures</li> <li>Development of a comprehensive water management plan that fully responds to technical requests (Appendix W-1)</li> <li>Incorporation of information into the EA Report</li> </ul>

Topic	Overview of Comments	RRR Response
Mine rock	<ul style="list-style-type: none"> <li>• Potential impacts on water quality</li> <li>• Long term management strategies</li> <li>• Potentially acid generating material management, auditing and monitoring</li> </ul>	<ul style="list-style-type: none"> <li>• Additional technical information provided directly regarding acid rock drainage management approach and potential effects on water quality</li> <li>• Development of a comprehensive water management plan that fully responds to technical requests (Appendix W-1)</li> <li>• Revision to Conceptual Closure Plan (Appendix E)</li> <li>• Incorporation of information into the EA Report</li> </ul>
Transmission line	<ul style="list-style-type: none"> <li>• Electromagnetic fields exposure</li> <li>• Fragmentation effects on wildlife</li> </ul>	<ul style="list-style-type: none"> <li>• Additional technical information provided directly regarding potential for effects on wildlife from habitat fragmentation</li> <li>• Incorporation of information into the EA Report</li> </ul>
Roads	<ul style="list-style-type: none"> <li>• Controls management measures for emissions</li> </ul>	<ul style="list-style-type: none"> <li>• Additional technical information provided directly regarding means to control dust from roads</li> </ul>
Process plant	<ul style="list-style-type: none"> <li>• Sulphur dioxide and contingency / response measures</li> </ul>	<ul style="list-style-type: none"> <li>• Revision to discussion of malfunctions and accidents in the EA Report (Volume 2 Section 9.3.9)</li> </ul>
Open pit	<ul style="list-style-type: none"> <li>• Pit lake concentrations of contaminants of concern and impacts on Pinewood River</li> </ul>	<ul style="list-style-type: none"> <li>• Additional technical information provided directly regarding contaminants of concern and potential effect on Pinewood River</li> <li>• Incorporation of information into the EA Report</li> </ul>
Transportation	<ul style="list-style-type: none"> <li>• Highway 600 realignment</li> </ul>	<ul style="list-style-type: none"> <li>• Additional technical information provided directly regarding the proposed realignment design</li> <li>• Incorporation of information into the EA Report (Appendices Y-1 and Y-2)</li> </ul>
Waste management	<ul style="list-style-type: none"> <li>• Development of an onsite landfill and regulatory requirements</li> </ul>	<ul style="list-style-type: none"> <li>• Additional technical information provided directly regarding sufficient capacity in local landfills and RRR's understanding of the regulatory regime</li> <li>• Incorporation of information into the EA Report</li> </ul>
Operations	<ul style="list-style-type: none"> <li>• Potential impacts on Pinewood River Watershed during start-up</li> <li>• Water supply for process plant operations</li> </ul>	<ul style="list-style-type: none"> <li>• Additional technical information provided directly regarding potential effects on the Pinewood River related to start-up and proposed water supply options</li> <li>• Development of a comprehensive water management plan that fully responds to technical requests (Appendix W-1)</li> <li>• Incorporation of information into the EA Report</li> </ul>
Construction	<ul style="list-style-type: none"> <li>• Recommendations to provide an assessment of metal leaching potential for construction materials</li> <li>• Contingency measures should acid rock drainage issues arise in construction</li> <li>• RRP potential impacts to Hydro One transmission facilities</li> </ul>	<ul style="list-style-type: none"> <li>• Additional technical information provided directly regarding proposed investigation and management of construction materials</li> <li>• Revision to the EA Report as appropriate</li> </ul>
Closure	<ul style="list-style-type: none"> <li>• Waste management</li> <li>• Workforce transition plans</li> <li>• Detail regarding demolition landfill</li> </ul>	<ul style="list-style-type: none"> <li>• Additional technical information provided directly regarding the demolition landfill</li> <li>• Incorporation of information into the EA Report</li> </ul>

<b>Topic</b>	<b>Overview of Comments</b>	<b>RRR Response</b>
Post-closure	<ul style="list-style-type: none"> <li>• Partial saturation of mine rock stockpiles</li> </ul>	<ul style="list-style-type: none"> <li>• Additional technical information provided directly regarding the mine rock stockpile post-closure</li> </ul>
Alternatives	<ul style="list-style-type: none"> <li>• Descriptions of locations, advantages and disadvantages of alternatives</li> </ul>	<ul style="list-style-type: none"> <li>• Additional technical information provided directly regarding various alternatives for which comments were provided</li> <li>• Revision as needed in the EA Report</li> </ul>
Effects assessment	<ul style="list-style-type: none"> <li>• Effects assessment and mitigation methodology deemed conservative</li> <li>• Cumulative effects analysis methodology</li> <li>• Restrictions of existing environmental baseline</li> </ul>	<ul style="list-style-type: none"> <li>• Additional technical information provided directly regarding methodology utilized and as defined in the Provincially-approved Terms of Reference</li> <li>• Revision of the EA Report as appropriate</li> </ul>
Regulatory	<ul style="list-style-type: none"> <li>• Accuracy of the record of consultation</li> </ul>	<ul style="list-style-type: none"> <li>• Additional technical information provided directly regarding consultation activities to date</li> <li>• Revision to the EA Report for clarity</li> </ul>

Note: Appendix D-2a provides a complete record of government comments and specific responses on the draft EA Report (Version 2). Comments were either: responded to directly or through revision to the EA Report; or a commitment was made to completion in the future (such as through the environmental approvals process or additional consultation).

**Table 3-8: Summary of Comments and Responses on the Draft EA Report (Version 2) - Other Stakeholders**

Valued Component or Other Topic	Overview of Comments	RRR Response
<b>Natural Environment</b>		
Wildlife	<ul style="list-style-type: none"> <li>• Methods used to survey elk (aerial survey)</li> <li>• Moose densities in the RRP area</li> </ul>	<ul style="list-style-type: none"> <li>• Additional technical information provided directly regarding elk and moose for the local area</li> <li>• Revision to the EA Report as appropriate</li> </ul>
Fisheries and aquatic resources	<ul style="list-style-type: none"> <li>• Presence of Lake Sturgeon in the Pinewood River</li> <li>• RRP impacts on fish and fish habitat</li> </ul>	<ul style="list-style-type: none"> <li>• Additional technical information provided directly regarding the three Lake Sturgeon captured during 2013 and potential effects on fish and fish habitat from the RRP</li> <li>• Revision to the EA Report as appropriate</li> </ul>
<b>Human Environment</b>		
Land and resource use	<ul style="list-style-type: none"> <li>• Number of hunters who use the area and that will be displaced</li> </ul>	<ul style="list-style-type: none"> <li>• Revision to the EA Report as appropriate</li> </ul>
Socio-economic	<ul style="list-style-type: none"> <li>• Employment opportunities related to RRP</li> <li>• Local workforce and economic capacity</li> </ul>	<ul style="list-style-type: none"> <li>• Comments responded to with appreciation</li> <li>• Revision to the EA Report as appropriate</li> </ul>
Human health	<ul style="list-style-type: none"> <li>• Rationale for human health risks related to metal exposure related to project activities</li> </ul>	<ul style="list-style-type: none"> <li>• Additional technical information provided directly regarding the potential for human health risks</li> </ul>
<b>Other Topics</b>		
Mine rock	<ul style="list-style-type: none"> <li>• Acid generation treatment methods</li> </ul>	<ul style="list-style-type: none"> <li>• Clarification provided</li> </ul>

Note: Appendix D-3a provides a complete record of public and other stakeholder comments and specific responses on the draft EA Report (Version 2). Comments were either: responded to directly or through revision to the EA Report; or a commitment was made to completion in the future (such as through the environmental approvals process or additional consultation).