

TMI\_861-AC(2)-01

Unique Identifier	Agency IR #	Annex	Agency / Group / Stakeholder	Cross Reference / Comment / Information Request / Response	
TMI_861-AC(2)-01	AC(2)-01	1	CEA Agency	Reference to EIS Guidelines:	Part 2 Section 11.1
				Reference to EIS / Appendix	Section 6.21.5; Table 6.23-20
				Cross-reference to Round 1 IRs	TMI_357-AC(1)-31, TMI_603-AC(1)-276, TMI_661-AC(1)-334
				<p><b><u>Context and Rationale:</u></b></p> <p>J Section 6.21.5 and table 6.23-20 outline mitigation measures for effects of changes to the environment on Aboriginal peoples' health and socio-economic conditions, physical and cultural heritage, current use of lands and resources for traditional purposes and any structure site or thing that is of historical, archaeological or paleontological significance. However, the listed mitigation measures are relevant to the change to the biophysical environment rather than the effect or impact on Indigenous people.</p> <p>J One of the few mitigation measures specific to Aboriginal peoples is the following: "Treasury Metals will undertake a land and resources use baseline to establish a preconstruction baseline of the land and resource users. This will serve as the basis for future monitoring and management of land and resources uses effects throughout the life of the Project. [Mit_094]." However, it is not clear how this would counteract an effect to current use of lands and resources for traditional purposes.</p>	
<p><b><u>Specific Question / Request for Information:</u></b></p> <p>A. Provide specific, relevant mitigation measures for the following effects to Aboriginal peoples':</p> <ul style="list-style-type: none"> <li>o restricted access to sites for current use of lands and resources (e.g. hunting, fishing, trapping and gathering) and physical and cultural heritage (e.g. campsites, teaching sites); and</li> <li>o decreased quality "on the land experience", specifically air, noise and visual disturbances.</li> </ul> <p>B. Describe how these mitigation measures will counteract the possible effects and impacts to Aboriginal peoples.</p> <p>C. Characterize residual effects, if any, after the mitigation measures have been implemented.</p>					

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				<p>D. Update the follow-up program for potential effects of changes to the environmental on Aboriginal peoples, including objectives and any monitoring measures that will be implemented to verify the predictions of effects and evaluate the effectiveness of the proposed mitigation measures. If follow-up is not required, provide a rationale.</p> <p><b><u>Draft Response:</u></b></p> <p>Part A. In the revised EIS (April 2018), all mitigation measures were identified with a unique identifier (e.g., Mit_094). The mitigation measures presented in the revised EIS (April 2018) were worded in a way so as to avoid repetition in those situations where mitigation measures could be applied to a number of disciplines, and would help to reduce the predicted effects of the Project for multiple VCs. An example of this is Mit_024, which states:</p> <p style="padding-left: 40px;">The pit lake will be monitored as it is filling to determine whether batch treatment will be required to ensure the water meets PWQO, or background if background levels exceed the PWQO, prior to the discharge from the pit lake to a tributary of Blackwater Creek.</p> <p>This mitigation measure applies to a number of different disciplines, including: surface water quality, fish and fish habitat, wildlife and wildlife habitat, wetlands and vegetation, human health, land use, as well mitigating the effects of the Project to multiple Aboriginal peoples VCs. Although the mitigation measure only discusses the biophysical effect, the intent of the wording is to allow for applicability to more disciplines and avoid redundancy. For the purpose of this IR response, the same mitigation measures that were presented in the revised EIS (April 2018) have been reworded to provide more specific, relevant mitigation measures to Aboriginal people with respect to</p> <ul style="list-style-type: none"> <li>o restricted access to sites for current use of lands and resources and physical and cultural heritage; and</li> <li>o decreased quality “on the land experience”.</li> </ul> <p><b><u>Change in access to the operations area and surrounding area</u></b></p> <p>As described in Sections 3.11 and 6.21.4 of the revised EIS (April 2018), access to the operations area will not be permitted throughout the active life of the Project (i.e., site preparation and construction, operations, and closure) for safety and security reasons. Treasury Metals recognizes that restricting access to members of Indigenous communities could affect their Aboriginal and Treaty Rights, specifically the current use of lands and resources for traditional purposes, and physical and cultural heritage. To help avoid effects on access for current use of lands, resources, physical and cultural heritage, Treasury Metals details the following mitigation measures (as modified to make them more specific for the Aboriginal peoples VCs):</p> <ul style="list-style-type: none"> <li>J The areas where access is restricted (i.e., the Operations Area) will be minimized by keeping the size of the surface features as small as practical. This includes minimizing the size of the waste rock storage area will be minimized (both footprint and height) by placing PAG waste rock in the mined out areas of the open pit, to the extent practical [Mit_020].</li> <li>J By minimizing the overall Project footprint, Treasury Metals will reduce the loss of habitat required by wildlife species relied on to support hunting and trapping, as well as minimizing the loss of habitat suitable for harvesting and gathering of plant materials [Mit_050].</li> </ul>

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				<p>J Minimized the amount of impacted habitat suitable for harvesting and gathering of plant materials, as well as habitat used by indicator species relied on to support the hunting and trapping VCs, by siting Project infrastructure, to the extent practicable, in previously disturbed areas and optimizing the use of existing roadways [Mit_065].</p> <p>J Minimize the effect on access to Crown lands by minimizing the Crown land taken up within the Project footprint [Mit_090]. As detailed in the response to TMI_599-AC(1)-272, the Operations Area for the Project will only take up 34.2 ha of Crown land. The remaining portion of the Operations Area is comprised of patent land with surface and mineral rights held by Treasury Metals, or patent land with surface rights held by Treasury Metals and mineral rights leased from the Crown.</p> <p>J Treasury Metals will undertake additional land and resources use studies to ensure a pre-construction baseline of the land and resource users as supported by local communities [Mit_094].</p> <p>In addition to the Operations Area, there are lands to the north of the Operations Area that can only be accessed via the Tree Nursery Rd. As these areas will include mine related vehicles, for safety and security reasons Treasury Metals cannot allow free access to these areas. However, Treasury Metals will allow “accompanied access” to Aboriginal peoples wishing to use lands and resources for traditional purposes in these areas (clearly illustrated on Figure 6.21.4-1 of the revised EIS), although firearms will not be allowed for safety reasons. The mitigation measure is described as follows:</p> <p>J During the operating life of the Project, no access will be permitted to the operations area for security and safety reasons. Access to the former MNRF tree nursery will be controlled for safety and security reasons, however Aboriginal peoples will be able to arrange for accompanied access to these areas with Treasury Metals and to minimize the total area where access is restricted. Appropriate signage will be places around areas where access is limited. [Mit_092]</p> <p>Treasury Metals understands that some Aboriginal peoples may not wish to use these lands for traditional purposes if they require accompaniment by Treasury Metals. This concern has been raised in TMI_940-AC(2)-07 in the Round 2 information requests and asks Treasury Metals to assess the area classified as “accompanied access” as lost for traditional land use purposes. To accommodate this, Treasury Metals has provided a revised assessment of effects to Aboriginal peoples in the response to TMI_940-AC(2)-07</p> <p><u>Decreased on the land experience</u></p> <p>Treasury Metals recognizes that the operations of the Project will have an effect on aspects of the environment that could alter the experience of being on the land, specifically the potential effects visual disturbance, increased noise levels and changes in air quality. The assessment of terrain and soils presented in Section 6.2 of the revised EIS (April 2018) identified that the waste rock storage area (WRSA) would be visible from portions of Thunder Lake starting during the operations phase and continuing through the post-closure phase. Although visualizations show that the WRSA would difficult to distinguish from any of the surrounding landscape features (see Figures 6.2.4.1-4, 6.2.4.1-5, and 6.2.4.1-6 of the revised EIS [April 2018]), its presence could affect the enjoyment for people. In addition to possible visual disturbance, the noise associated with the equipment and activities at the Project would be</p>

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				<p>noticeable beyond the Project property boundary during the site preparation and construction, operations and closure phases.</p> <p>Finally, the equipment and activities associated with the Project would result in air emissions during the site preparation and construction, operations and closure phases. However, the results of the dispersion modelling (see responses to TMI_877-AE(2)-01, TMI_879-AE(2)-03 and TMI-890-AE(2)-04) none of the maximum concentrations predicted during the site preparation and construction, operations, and closure phases confirmed that none of the predicted maximum concentrations at the sensitive receptor locations (the locations according to CCME [2000] were achievement with ambient air quality criteria are to be demonstrated) were in excess of the ambient criteria, including the new CAAQS to come into force in 2025. Additionally, the modelling shows that only the 1-hour NO<sub>2</sub> concentrations at the property boundary were predicted to exceed any of the ambient criteria, and that the maximum concentrations do not exceed the current criteria, or the new CAAQS to come in force in 2020. The only predicted exceedance of an ambient criteria was predicted infrequent (less than 0.3% of the time) exceedances of the 1-hour NO<sub>2</sub> CAAQS that is to come into force in 2025 at receptors on the property boundary. The effects of the Project on air quality at these predicted 1-hour NO<sub>2</sub> concentrations would not be noticeable, and would not have an effect on the “on the land experience”.</p> <p>Mitigation measures to reduce the effects of the Project to the on-the-land experience were included in Section 6.21 and 6.22 of the revised EIS (April 2018) and the mitigation summary table in Section 10 of the revised EIS (April 2018). These mitigation measures aim to limit the noticeability of the Project by Aboriginal peoples practicing traditional land uses in the vicinity of the Project. These mitigation measures include:</p> <p><u>Natural landscape</u></p> <p>The following list the mitigation measures aimed at reducing the visual effects of the on-site features, especially the WRSA, which is the only feature identified as being visible from beyond the operations area.</p> <ul style="list-style-type: none"> <li>J Reduce the overall height of the constructed features to the extent possible to limit the visibility of the Project from off-site for Aboriginal peoples practicing traditional land uses [Mit_001]</li> <li>J Construct WRSA and overburden stockpiles with an overall a 3:1 (horizontal to vertical) side slope to maintain a more natural appearance so it is less noticeable for Aboriginal peoples practicing traditional land uses [Mit_002]</li> <li>J Initiate construction of the WRSA from the western edge to minimize the visibility of the WRSA so that it is less noticeable for Aboriginal peoples practicing traditional land uses [Mit_003]</li> <li>J Vegetate the western facing side of the WRSA as soon as practicable to make the WRSA appear more natural so it is less noticeable for Aboriginal peoples practicing traditional land uses [Mit_004]</li> <li>J Vegetation of the overburden stockpile as soon as practicable so that it is less noticeable for Aboriginal peoples practicing traditional land uses [Mit_005]</li> <li>J Decommission the low-grade ore (LGO) stockpile at the end of operations to return the landscape to more of a natural state for Aboriginal peoples practicing traditional land uses [Mit_006]</li> </ul>

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				<p><u>Noise</u></p> <p>The following lists the mitigation measures that will help reduce the noise levels from the Project. As shown on Figure 6.4.6-1 of the revised EIS (April 2018), the areas where maximum predicted noise levels will exceed the 50 dBA threshold to affect wildlife behavior are restricted to the Operations Area and adjacent areas where access will be restricted throughout the active life (site preparation and construction, operations, and closure phases) of the Project. Beyond the Operations Area, there is a relatively small area of land where maximum noise levels were predicted to exceed 40 dBA, and could be noticeable. For context, 40 dBA is the level of noise in a quiet room or library. The following lists mitigation measures to reduce effects to the on the land experience due to noise:</p> <ul style="list-style-type: none"> <li>J Heavy equipment activity will be conducted between the hours of 07:00 and 22:00, if feasible, to limit nighttime noise [Mit_025]</li> <li>J Endeavor to schedule noise causing events, such as blasting, to reduce disruption to residents. [Mit_026]</li> <li>J Advise nearby residents of significant noise-causing activities, such as blasting. [Mit_027]</li> <li>J All internal combustion engines will be fitted with appropriate muffler systems to limit the audibility of the Project for Aboriginal peoples using the land for traditional purposes. [Mit_028]</li> <li>J Implement a modern blasting program that minimizes the blast area, the overall amount of explosives required, and through detonating procedures, minimize the amount of explosives per delay. This will reduce the overall audibility of the Project for Aboriginal peoples practicing traditional land uses [Mit_029]</li> <li>J Material will be loaded into haul trucks in a manner that minimizes the drop height from the loader or excavator bucket to the bed of the truck. This will limit the audibility of the Project for Aboriginal people using the land for traditional purposes. [Mit_031]</li> <li>J Blasting will likely be restricted to once per day, and only a few times per week to limit the audibility of the Project for Aboriginal people using the land for traditional purposes [Mit_043]</li> </ul> <p><u>Air Quality</u></p> <p>For the most part, changes in air quality are a concern from the perspective of the health of those people exposed. As defined by CCME (2000) achievement of the ambient air quality criteria should be established at community-based receptors. There are no community based receptors within the Operations Area, and the revised modelling (TMI_877-AE(2)-01) shows that none of the predicted maximum concentrations at the sensitive receptors (which correspond to the CCME [2000] definition of community-oriented receptors) are in excess of the ambient criteria, including the new CAAQS set to come into force in 2025.</p> <ul style="list-style-type: none"> <li>J Material will be loaded into haul trucks in a manner that minimizes the drop height from the loader or excavator bucket to the bed of the truck. This will help limit the quantity of dust emitted from the Project and will reduce the noticeability of the Project for Aboriginal people using the land for traditional purposes. [Mit_031]</li> </ul>

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				<p>J Best management practices plan for dust control will be implemented on the site during site preparation and construction, operations and closure to limit any noticeable dust from the Project affecting the enjoyment of Aboriginal people using the land for traditional purposes [Mit_046]</p> <p>B. These mitigation measures will minimize some of the effects to both change in access of lands and resources as well as the noticeability of the Project by Aboriginal peoples practicing traditional land uses. There will still be residual effects to Aboriginal people following the implementation of the mitigation measures as discussed in Part A of the response. These residual effects were identified in the revised EIS (April 2018) and carried forward to both the cumulative effects assessment (Section 7) and the determination of significance (Section 8). It is Treasury Metals' opinion that these effects would not greatly impact the ability of Aboriginal peoples to practice traditional land uses around the Project.</p> <p>C. The residual effects to both "changes in access" and "on-the-land experience" as a result of the Project were provided in Section 6.21.6 of the revised EIS (April 2018). The extent of the residual effect is dependent on the specific traditional land use practice, but the maximum extent for the "changed views" was modelled to be 852 ha of Thunder Lake where the WRSA would be visible and the "noticeable changes in noise" was modelled to be 171 ha outside of the operations area.</p> <p>As stated in Part A of the response, Treasury Metals has also provided a revised assessment of effects to Aboriginal peoples in the response to TMI_940-AC(2)-07 to include the "accompanied access" areas as "restricted access". As this assessment shows, the residual effect to changes in access is 743 ha, which is not considered a significant effect.</p> <p>D. As part of the Round 2 information requests provided to Treasury Metals by the Agency, a number of information requests asked for an update to the follow-up program presented in the EIS (April 2018). To effectively capture any changes to the follow-up program, a stand-alone document titled the "Goliath Gold Project Follow-up Program Addendum" has been provided as part of the Round 2 information requests submission to the Agency. This document includes all areas of uncertainty identified by the Agency as well as any changes to the follow-up program as a result of changes to the effects assessment through answering the Round 2 information requests.</p> <p><b>Agency Comment on Draft Response:</b></p> <p>A) It is not clear from the mitigation measures described in the response where ongoing engagement and consultation with Indigenous groups will occur. Additionally, it is not clear if Indigenous groups will be consulted on the mitigation, follow-up and monitoring. The proponent's response for IR# AC(2)-05 discusses the on-going engagement with Indigenous groups as part of mitigation, follow-up and monitoring. However this was not mentioned in the response to this IR# AC(2)-01.</p> <p>Provide information that demonstrates where Indigenous groups will be consulted or engaged as part of the mitigation measures or a rationale as to why they will not be engaged. Ensure that mitigation proposed in this IR response speaks to your response for AC(2)-05.</p>

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				<p>B) Information provided for the mitigation for alternate access does not provide enough detail. Provide further information for the mitigation for access, specifically, how alternate / accompanied access will be maintained (ex. fencing, security gate, protocol for visitors) and how Indigenous groups will be engaged in the development of the plan for alternate access.</p> <p><b><u>Specific response to Agency Comment:</u></b></p> <p>(A) In addition to the specific comments from the Agency regarding the draft Round 2 responses, feedback on the draft responses were also received from ELFN and MNO. On November 26, 2018, ELFN shared their review of the draft responses with Treasury Metals, and Treasury Metals held a teleconference with ELFN and their consultant on December 4, 2018 to discuss their feedback regarding the draft responses. A teleconference was held with MNO and their consultants on October 10, 2018 to discuss the revised EIS (April 2018) and the draft responses to the Round 2 information requests. Official feedback from MNO regarding the meeting and outstanding issues were shared on October 11, 2018.</p> <p>Treasury Metals have advanced their engagement with ANA, NFN and WLON and currently have a framework in place to provide funding to support their technical review of the revised EIS (April 2018) and response to the information requests. Treasury Metals looks forward to working all Indigenous communities to develop specific plan for addressing changes in access, restricted access and changes to the quality “on the land experience”. Treasury Metals is working with Indigenous communities to develop community specific mitigation measures, monitoring programs, access management plans (including access), and risk communication plan.</p> <p>(B) During the active life of the Project, access to the operations area will be restricted for safety and security reasons. There will be no traditional land and resource use allowed within the operation area during the active life of the Project (site preparation and construction, operations, closure, and post-closure up to the point that institutional controls are no longer required).</p> <p>During the active life of the Project, Treasury Metals has agreed to provide controlled access through the active mine site to members of Indigenous communities to practice traditional uses of the lands and resources in those areas that would otherwise be inaccessible. Specifically, access to the former MNRF tree nursery, currently owned by Treasury Metals, will be controlled during the active life of the Project for safety purposes. Members of Indigenous communities will be able to arrange for accompanied access to these areas with Treasury Metals.</p> <p>Finally, Treasury Metals has agreed to provide access to members of Indigenous communities to areas within the property boundary that can be safely accessed for traditional land and resource use.</p> <p>The intention of providing accompanied access to members of Indigenous communities is to ensure their safety while they are on Treasury Metals property. It is the intention of Treasury Metals to work with Indigenous communities to determine how accompanied access can be conducted in a manner to ensure the safety of the members without infringing on their privacy and enjoyment of the traditional use activities to the former MNRF Tree Nursery. Treasury</p>

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				<p>Metals will work with Indigenous communities to develop community-specific access management plans consistent with site safety needs, and the sensitive nature of traditional and recreational harvest.</p> <p><b><u>FINAL RESPONSE</u></b></p> <p>Part A. In the revised EIS (April 2018), all mitigation measures were identified with a unique identifier (e.g., Mit_094). The mitigation measures presented in the revised EIS (April 2018) were worded in a way so as to avoid repetition in those situations where mitigation measures could be applied to a number of disciplines, and would help to reduce the predicted effects of the Project for multiple VCs. An example of this is Mit_024, which states:</p> <p style="padding-left: 40px;">The pit lake will be monitored as it is filling to determine whether batch treatment will be required to ensure the water meets PWQO, or background if background levels exceed the PWQO, prior to the discharge from the pit lake to a tributary of Blackwater Creek.</p> <p>This mitigation measure applies to a number of different disciplines, including: surface water quality, fish and fish habitat, wildlife and wildlife habitat, wetlands and vegetation, human health, land use, as well mitigating the effects of the Project to multiple Aboriginal peoples VCs. Although the mitigation measure only discusses the biophysical effect, the intent of the wording is to allow for applicability to more disciplines and avoid redundancy.</p> <p>As part of the Round 2 process, the Agency and all Indigenous communities were provided draft responses for comment. In addition to the specific comments from the Agency regarding the draft Round 2 responses, feedback on the draft responses were also received from ELFN and MNO. On November 26, 2018, ELFN shared their review of the draft responses with Treasury Metals, and Treasury Metals held a teleconference with ELFN and their consultant on December 4, 2018 to discuss their feedback regarding the draft responses. A teleconference was held with MNO and their consultants on October 10, 2018 to discuss the revised EIS (April 2018) and the draft responses to the Round 2 information requests. Official feedback from MNO regarding the meeting and outstanding issues were shared on October 11, 2018. Further to this, extended dialogue was held with ELFN and their consultant on January 29, 2019 to discuss their feedback regarding the draft responses, with focused discussion related to proposed mitigation measures. During this meeting both groups came to an understanding on a number of issues that would be further discussed with ELFN community members at a later date.</p> <p>Treasury Metals have advanced their engagement with ANA, NFN and WLON and currently have a framework in place to provide funding to support their technical review of the revised EIS (April 2018) and response to the information requests. Treasury Metals will continue to work with ANA and NFN to discuss scope plans for the completion of a TK study. Treasury Metals looks forward to working all Indigenous communities to develop specific plans for addressing changes in access, restricted access and changes to the quality “on the land experience”. Treasury Metals is working with Indigenous communities to develop community specific mitigation measures, monitoring programs, access management plans (including access), and risk communication plan.</p> <p><u>Change in access to the operations area and surrounding area</u></p> <p>As described in Sections 3.11 and 6.21.4 of the revised EIS (April 2018), access to the operations area will not be permitted throughout the active life of the Project (i.e., site preparation and construction, operations, closure, and post-closure up to the point that institutional controls are no longer required) for safety and security reasons. Treasury</p>



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				<p>Metals recognizes that restricting access to members of Indigenous communities could affect their Aboriginal and Treaty Rights, specifically the current use of lands and resources for traditional purposes, and physical and cultural heritage. To help avoid effects on access for current use of lands, resources, physical and cultural heritage, Treasury Metals details the following mitigation measures (as modified to make them more specific for the Aboriginal peoples VCs):</p> <ul style="list-style-type: none"> <li>J The areas where access is restricted (i.e., the Operations Area) will be minimized by keeping the size of the surface features as small as practical. This includes minimizing the size of the waste rock storage area which will be minimized (both footprint and height) by placing PAG waste rock in the mined out areas of the open pit, to the extent practical [Mit_020].</li> <li>J By minimizing the overall Project footprint, Treasury Metals will reduce the loss of habitat required by wildlife species relied on to support hunting and trapping, as well as minimizing the loss of habitat suitable for harvesting and gathering of plant materials [Mit_050].</li> <li>J Minimized the amount of impacted habitat suitable for harvesting and gathering of plant materials, as well as habitat used by indicator species relied on to support the hunting and trapping VCs, by siting Project infrastructure, to the extent practicable, in previously disturbed areas and optimizing the use of existing roadways [Mit_065].</li> <li>J Minimize the effect on access to Crown lands by minimizing the Crown land taken up within the Project footprint [Mit_090]. As detailed in the response to TMI_599-AC(1)-272, the Operations Area for the Project will only take up 34.2 ha of Crown land. The remaining portion of the Operations Area is comprised of patent land with surface and mineral rights held by Treasury Metals, or patent land with surface rights held by Treasury Metals and mineral rights leased from the Crown.</li> <li>J Treasury Metals will undertake additional land and resources use studies to ensure a pre-construction baseline of the land and resource users as supported by local communities [Mit_094].</li> </ul> <p>During the active life of the Project, Treasury Metals has agreed to provide controlled access through the active mine site to members of Indigenous communities to practice traditional uses of the lands and resources in those areas that would otherwise be inaccessible. Specifically, access to the former MNRF tree nursery, currently owned by Treasury Metals, will be controlled during the active life of the Project for safety purposes. Members of Indigenous communities will be able to arrange for accompanied access to these areas with Treasury Metals.</p> <p>The intention of providing accompanied access to members of Indigenous communities is to ensure their safety while they are on Treasury Metals property. It is the intention of Treasury Metals to work with Indigenous communities to determine how accompanied access can be conducted in a manner to ensure the safety of the members without infringing on their privacy and enjoyment of the traditional use activities to the former MNRF Tree Nursery. Treasury Metals will work with Indigenous communities to develop community-specific access management plans consistent with site safety needs, and the sensitive nature of traditional and recreational harvest.</p> <p>Treasury Metals understands that some Aboriginal peoples may not wish to use these lands for traditional purposes if they require accompaniment by Treasury Metals. This concern has been raised in TMI_940-AC(2)-07 in the Round 2 information requests and asks Treasury Metals to assess the area classified as “accompanied access” as lost for</p>

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				<p>traditional land use purposes. To accommodate this, Treasury Metals has provided a revised assessment of effects to Aboriginal peoples in the response to TMI_940-AC(2)-07.</p> <p>Finally, Treasury Metals has agreed to provide access to members of Indigenous communities to areas within the property boundary that can be safely accessed for traditional land and resource use.</p> <p><u>Decreased on the land experience</u></p> <p>Treasury Metals recognizes that the operations of the Project will have an effect on aspects of the environment that could alter the experience of being on the land, specifically the potential effects visual disturbance, increased noise levels and changes in air quality. The assessment of terrain and soils presented in Section 6.2 of the revised EIS (April 2018) identified that the waste rock storage area (WRSA) would be visible from portions of Thunder Lake starting during the operations phase and continuing through the post-closure phase. Although visualizations show that the WRSA would difficult to distinguish from any of the surrounding landscape features (see Figures 6.2.4.1-4, 6.2.4.1-5, and 6.2.4.1-6 of the revised EIS [April 2018]), its presence could affect the enjoyment for people. In addition to possible visual disturbance, the noise associated with the equipment and activities at the Project would be noticeable beyond the Project property boundary during the site preparation and construction, operations and closure phases.</p> <p>Finally, the equipment and activities associated with the Project would result in air emissions during the site preparation and construction, operations and closure phases. However, the results of the dispersion modelling (see responses to TMI_877-AE(2)-01, TMI_879-AE(2)-03 and TMI-890-AE(2)-04) none of the maximum concentrations predicted during the site preparation and construction, operations, and closure phases confirmed that none of the predicted maximum concentrations at the sensitive receptor locations (the locations according to CCME [2000] were achievement with ambient air quality criteria are to be demonstrated) were in excess of the ambient criteria, including the new CAAQS to come into force in 2025. Additionally, the modelling shows that only the 1-hour NO<sub>2</sub> concentrations at the property boundary were predicted to exceed any of the ambient criteria, and that the maximum concentrations do not exceed the current criteria, or the new CAAQS to come in force in 2020. The only predicted exceedance of an ambient criteria was predicted infrequent (less than 0.3% of the time) exceedances of the 1-hour NO<sub>2</sub> CAAQS that is to come into force in 2025 at receptors on the property boundary. The effects of the Project on air quality at these predicted 1-hour NO<sub>2</sub> concentrations would not be noticeable, and would not have an effect on the "on the land experience".</p> <p>Mitigation measures to reduce the effects of the Project to the on-the-land experience were included in Section 6.21 and 6.22 of the revised EIS (April 2018) and the mitigation summary table in Section 10 of the revised EIS (April 2018). These mitigation measures aim to limit the noticeability of the Project by Aboriginal peoples practicing traditional land uses in the vicinity of the Project. These mitigation measures include:</p> <p><u>Natural landscape</u></p> <p>The following list the mitigation measures aimed at reducing the visual effects of the on-site features, especially the WRSA, which is the only feature identified as being visible from beyond the operations area.</p>

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				<p>J Reduce the overall height of the constructed features to the extent possible to limit the visibility of the Project from off-site for Aboriginal peoples practicing traditional land uses [Mit_001]</p> <p>J Construct WRSA and overburden stockpiles with an overall a 3:1 (horizontal to vertical) side slope to maintain a more natural appearance so it is less noticeable for Aboriginal peoples practicing traditional land uses [Mit_002]</p> <p>J Initiate construction of the WRSA from the western edge to minimize the visibility of the WRSA so that it is less noticeable for Aboriginal peoples practicing traditional land uses [Mit_003]</p> <p>J Vegetate the western facing side of the WRSA as soon as practicable to make the WRSA appear more natural so it is less noticeable for Aboriginal peoples practicing traditional land uses [Mit_004]</p> <p>J Vegetation of the overburden stockpile as soon as practicable so that it is less noticeable for Aboriginal peoples practicing traditional land uses [Mit_005]</p> <p>J Decommission the low-grade ore (LGO) stockpile at the end of operations to return the landscape to more of a natural state for Aboriginal peoples practicing traditional land uses [Mit_006]</p> <p><u>Noise</u></p> <p>The following lists the mitigation measures that will help reduce the noise levels from the Project. As shown on Figure 6.4.6-1 of the revised EIS (April 2018), the areas where maximum predicted noise levels will exceed the 50 dBA threshold to affect wildlife behavior are restricted to the Operations Area and adjacent areas where access will be restricted throughout the active life (site preparation and construction, operations, and closure phases) of the Project. Beyond the Operations Area, there is a relatively small area of land where maximum noise levels were predicted to exceed 40 dBA, and could be noticeable. For context, 40 dBA is the level of noise in a quiet room or library. The following lists mitigation measures to reduce effects to the on the land experience due to noise:</p> <p>J Heavy equipment activity will be conducted between the hours of 07:00 and 22:00, if feasible, to limit nighttime noise [Mit_025]</p> <p>J Endeavor to schedule noise causing events, such as blasting, to reduce disruption to residents. [Mit_026]</p> <p>J Advise nearby residents of significant noise-causing activities, such as blasting. [Mit_027]</p> <p>J All internal combustion engines will be fitted with appropriate muffler systems to limit the audibility of the Project for Aboriginal peoples using the land for traditional purposes. [Mit_028]</p> <p>J Implement a modern blasting program that minimizes the blast area, the overall amount of explosives required, and through detonating procedures, minimize the amount of explosives per delay. This will reduce the overall audibility of the Project for Aboriginal peoples practicing traditional land uses [Mit_029]</p> <p>J Material will be loaded into haul trucks in a manner that minimizes the drop height from the loader or excavator bucket to the bed of the truck. This will limit the audibility of the Project for Aboriginal people using the land for traditional purposes. [Mit_031]</p>

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				<p>J Blasting will likely be restricted to once per day, and typically only a few times per week to limit the audibility of the Project for Aboriginal people using the land for traditional purposes [Mit_043]</p> <p><u>Air Quality</u></p> <p>For the most part, changes in air quality are a concern from the perspective of the health of those people exposed. As defined by CCME (2000) achievement of the ambient air quality criteria should be established at community-based receptors. There are no community based receptors within the Operations Area, and the revised modelling (TMI_877-AE(2)-01) shows that none of the predicted maximum concentrations at the sensitive receptors (which correspond to the CCME [2000] definition of community-oriented receptors) are in excess of the ambient criteria, including the new CAAQS set to come into force in 2025.</p> <p>J Material will be loaded into haul trucks in a manner that minimizes the drop height from the loader or excavator bucket to the bed of the truck. This will help limit the quantity of dust emitted from the Project and will reduce the noticeability of the Project for Aboriginal people using the land for traditional purposes. [Mit_031]</p> <p>J Best management practices plan for dust control will be implemented on the site during site preparation and construction, operations and closure to limit any noticeable dust from the Project affecting the enjoyment of Aboriginal people using the land for traditional purposes [Mit_046]</p> <p>The Final HHERA provides updated details of the air quality assessment on the health of Indigenous community members. The results of the health assessment indicated that health risks to residents or visitors/ harvesters who may practice traditional land and resource use are considered essentially negligible. No residual adverse effects were identified. Although the results of the HHERA do not indicate that risk management or mitigation measures are required during traditional land and resource use, as part of the sign in and access policy, Treasury Metals will offer personal protective equipment to those who prefer to wear it while within the Property Boundary. Treasury Metals recognizes that the perception of risk, safety and well-being is a concern to members of Indigenous communities and has proposed to work with each community to develop a risk communication plan to help mitigate the perceptions of risk, safety and well-being associated with the Goliath Gold Project.</p> <p>Treasury Metals has also committed to consult with Indigenous communities regarding the placement of dustfall monitoring jars to target areas of potential impact that overlap with areas where traditional land and resource occurs (this information will be shared confidentially by the community in the formal Traditional Knowledge studies completed, underway or expected in the future).</p> <p>B. These mitigation measures will minimize some of the effects to both change in access of lands and resources as well as the noticeability of the Project by Aboriginal peoples practicing traditional land uses. There will still be residual effects to Aboriginal people following the implementation of the mitigation measures as discussed in Part A of the response. These residual effects were identified in the revised EIS (April 2018) and carried forward to both the cumulative effects assessment (Section 7) and the determination of significance (Section 8). It is Treasury Metals'</p>

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				<p>opinion that these effects would not greatly impact the ability of Aboriginal peoples to practice traditional land uses around the Project.</p> <p>C. The residual effects to both “changes in access” and “on-the-land experience” as a result of the Project were provided in Section 6.21.6 of the revised EIS (April 2018). The extent of the residual effect is dependent on the specific traditional land use practice, but the maximum extent for the “changed views” was modelled to be 852 ha of Thunder Lake where the WRSA would be visible and the “noticeable changes in noise” was modelled to be 171 ha outside of the operations area.</p> <p>As stated in Part A of the response, Treasury Metals has also provided a revised assessment of effects to Aboriginal peoples in the response to TMI_940-AC(2)-07 to include the “accompanied access” areas as “restricted access”. As this assessment shows, the residual effect to changes in access is 743 ha, which is not considered a significant effect.</p> <p><b>D.</b> As part of the Round 2 information requests provided to Treasury Metals by the Agency, a number of information requests asked for an update to the follow-up program presented in the EIS (April 2018). To effectively capture any changes to the follow-up program, a stand-alone document title the “Goliath Gold Project Follow-up Program Addendum” has been provided as part of the Round 2 information requests submission to the Agency. This document includes all areas of uncertainty identified by the Agency as well as any changes to the follow-up program as a result of changes to the effects assessment through answering the Round 2 information requests.</p>

TMI\_862-AC(2)-02

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TMI_862-AC(2)-02	AC(2)-02	1	CEA Agency	Reference to EIS Guidelines:	Part 2 Section 10.1.3
				Reference to EIS / Appendix	Section 5.13; Section 6. 17; Table 6.1.3.20-1
				Cross-reference to Round 1 IRs	TMI_226-HE(1)-33, TMI_227-HE(1)-34, TMI_228-HE(1)-35, TMI_348-AC(1)-22, TMI_349-AC(1)-23, TMI_430-AC(1)-105, TMI_490-AC(1)-164, TMI_507-AC(1)-181
				<p><b><u>Context and Rationale:</u></b></p> <p>    ) Section 10.1.3 of the EIS Guidelines directs the proponent to describe the effects of changes to the environment on Aboriginal peoples, including socio- economic conditions. The effects expected to be assessed must be caused by a change to the environment. For example: changes to the availability of wild rice cause effects to the income made from the sale of wild rice.</p> <p>    ) Section 5.13, 6.17 and 6.18 of the revised EIS provide baseline information and effects assessments for effects that are not considered under CEAA (2012) such as employment, housing and demographics. However, Table 6.1.3.20-1 "Aboriginal People VCs, Indicators and Measures" outlines a number of socio-economic factors that the Agency do not consider in their assessment.</p>	
<p><b><u>Specific Question / Request for Information:</u></b></p> <p>A. Provide an assessment for socio-economic effects related to harvesting of foods or materials for subsistence consumption or commercial sale (e.g. wild rice, blueberries, animals, timber). Include the following:</p> <ul style="list-style-type: none"> <li>o use of site-specific baseline information;</li> <li>o specific and measurable mitigation measures;</li> </ul> <p>B. Characterize residual effects, if any, after the mitigation measures have been implemented.</p> <p>C. Update the follow-up program for potential effects to fish and fish habitat, including objectives and any monitoring measures that will be implemented to verify the predictions of effects and evaluate the effectiveness of the proposed mitigation measures. If follow-up is not required, provide a rationale.</p> <p>D. Consider the effects of changes to the environment on socio-economic conditions as part of the cumulative effects assessment.</p>					

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				<p><b><u>Draft Response:</u></b></p> <p>Part A.</p> <p>An assessment of socio-economic effects related to harvesting of foods or materials for subsistence consumption or commercial sale (e.g., wild rice, blueberries, animals, timber) was provided in Section 6.21 of the revised EIS (April 2018), and relied upon site-specific baseline information (where available) (Section 5 of the revised EIS), and the mitigation measures identified in Section 6 of the revised EIS. A brief summary is as follows.</p> <p>In the revised EIS (April 2018), baseline information for social and economic conditions were presented in Sections 5.12.2 and 5.12.3, respectively. As part of engagement activities, Indigenous communities including Wabigoon Lake Ojibway Nation, Whitefish Bay First Nation (Naoakamegwaning First Nation), and Métis Nation of Ontario (MNO) shared with Treasury Metals traditional knowledge with respect to baseline conditions for foods that are of materials for subsistence as well as other information with respect to baseline socio-economic conditions, which were summarized in Section 5.12.5 of the revised EIS (April 2018). The information in Section 5 of the revised EIS was then used in Section 6 of the EIS to select the valued components relied upon in the assessment of effects of the Project. The following valued components (and indicators) were specifically selected as they are related to harvesting of foods or are material of subsistence consumption of commercial sale) and as stated in the revised EIS “of economic or cultural significance”:</p> <ul style="list-style-type: none"> <li>J Ungulates (moose);</li> <li>J Furbearers (American Marten, American Beaver)</li> <li>J Uplands Birds;</li> <li>J Wetlands Birds;</li> <li>J Small Mammals;</li> <li>J Stream-resident fish population;</li> <li>J Migratory fish populations;</li> <li>J Lake-resident fish populations</li> <li>J Wetland Vegetation (wild rice)</li> <li>J Vegetation Communities (coniferous forest, deciduous forest, successional areas, berry harvesting areas)</li> </ul> <p>The assumptions regarding the methodology of this approach was that the results of a comprehensive assessment of the bio-physical disciplines (Sections 6.2 through 6.15 of the revised EIS [April 2018]) that were then used to perform a comprehensive investigation of the human environment (Sections 6.16 through 6.22 of the revised EIS). Specifically, with respect to effects of the Project on Indigenous communities and their ability to continue to practice their current uses of land and resources the valued components, indicators and measures presented in Table 1 were relied upon in the assessment of effects. Specific and measurable mitigation measures were provided in Section 6.21.5 and considered the specific and measurable mitigation measured applied in each of the biophysical technical disciplines. In support of the Round 2 information request process, a human health and ecological risk assessment</p>

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				<p>(2018 HHERA) was completed, which included a country foods pathway to evaluate how changes to quality of country foods used for consumption was addressed (shown by the shaded cells in Table 1). The results of the country foods assessment indicated that no mitigation measures were required for the country foods pathway.</p> <p>Table 1: Valued Components, Indicators, and Measures Applied in the EIS to Assess the Effects of the Project on Aboriginal People &amp; Indigenous Communities</p> <table border="1" data-bbox="800 456 1959 1458"> <thead> <tr> <th data-bbox="800 456 1136 488">Valued Components (VCs)</th> <th data-bbox="1136 456 1461 488">Indicators</th> <th data-bbox="1461 456 1959 488">Measures</th> </tr> </thead> <tbody> <tr> <td data-bbox="800 488 1136 857" rowspan="10">Harvesting and gathering of plant material</td> <td data-bbox="1136 488 1461 597" rowspan="4">Wild rice</td> <td data-bbox="1461 488 1959 513">Loss of wild rice areas</td> </tr> <tr> <td data-bbox="1461 513 1959 537">Changes in water quality</td> </tr> <tr> <td data-bbox="1461 537 1959 561">Changes in water levels</td> </tr> <tr> <td data-bbox="1461 561 1959 597">Changes in quality for consumption</td> </tr> <tr> <td data-bbox="1136 597 1461 654">Berry Harvesting</td> <td data-bbox="1461 597 1959 621">Loss of potential harvest areas</td> </tr> <tr> <td data-bbox="1461 621 1959 654">Changes in quality for consumption</td> </tr> <tr> <td data-bbox="1136 654 1461 743" rowspan="3">Medicinal plant harvesting</td> <td data-bbox="1461 654 1959 678">Loss of forest</td> </tr> <tr> <td data-bbox="1461 678 1959 703">Loss of wetland</td> </tr> <tr> <td data-bbox="1461 703 1959 743">Changes in quality for consumption</td> </tr> <tr> <td data-bbox="1136 743 1461 800">Changes in access</td> <td data-bbox="1461 743 1959 768">Land where access is controlled</td> </tr> <tr> <td data-bbox="1461 768 1959 800">Lands removed from access</td> </tr> <tr> <td data-bbox="1136 800 1461 857">Diminished on-the-land experience</td> <td data-bbox="1461 800 1959 824">Changed views</td> </tr> <tr> <td data-bbox="1461 824 1959 857">Noticeable changes in noise</td> </tr> <tr> <td data-bbox="800 857 1136 1117" 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				<p><b><u>Agency Comment on Draft Response:</u></b></p> <p>A) Section 6.21 contains an assessment of effects on the current use of lands and resources for traditional purposes. It is not clear where the socioeconomic effects assessment is presented in this section. An assessment for the current use of lands and resource is not a proxy for an assessment for effects to socio-economic conditions. A low or not significant effect to a current use or biophysical component does not equal no socio-economic effect. Moreover, several aspects must be taken into consideration for a complete, well-rounded assessment of socio-economic effects, including the following:</p> <ul style="list-style-type: none"> <li>- habitat loss of an animal or plant underpinning the socio-economic activity</li> <li>- disturbance of an animal or plant underpinning the socio-economic activity ,</li> <li>- quality of the animal or plant underpinning the socio-economic activity, real or perceived</li> <li>- access to the animal or plant being underpinning the socio-economic activity ,</li> <li>- quality of the experience, in the case of a current use.</li> </ul> <p>Provide a completed socio-economic assessment that shows a description of potential socio economic effects due to effects on subsistence resources or those used for economic purposes.</p> <hr/> <p><b><u>Specific Response to Agency Comment:</u></b></p> <p>In order to fully assess how the socio-economic conditions of Indigenous peoples change as a result of the Project effects, the following four key pieces of information are required:</p> <ul style="list-style-type: none"> <li>J How does the Project affect physical / biological resources that could be used by Indigenous peoples?</li> <li>J Are these physical / biological resources used by Indigenous communities for subsistence harvesting or economic gain?</li> <li>J What percentage of the physical / biological resources used by the community come from the area affected by the Project.</li> <li>J What percentage of their diet or income is comprised from harvesting these physical / biological resources?</li> </ul> <p>Treasury Metals has assessed how the Project affects physical / biological resources that could be used by Indigenous peoples (provided in Section 6.21 of the revised EIS [April 2018]) and the use of these resources for each specific community (provided in Section 6.22 of the revised EIS [April 2018]). In order to obtain the other two key pieces of information required to fully assess the potential socio-economic effects to traditional land and resource use, Treasury Metals is working with Indigenous communities to obtain the areas where physical / biological resources are harvested in relation to the Project, and what the resources in these areas represent to subsistence use or income of Indigenous communities. This information is being obtained through traditional knowledge / traditional land use (TK/TLU) studies which Treasury Metals is funding for communities that are located closest to the Project and most likely to use the areas for land and resource use. The communities that have a TK/TLU study underway or completed are detailed in Table 1.</p>

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				<table border="1" data-bbox="806 313 1959 722"> <thead> <tr> <th colspan="2" data-bbox="806 313 1959 358">Table 1: TK/TLU Studies Status</th> </tr> <tr> <th data-bbox="806 358 1402 406">Indigenous Community</th> <th data-bbox="1402 358 1959 406">Status of TK/TLU Study</th> </tr> </thead> <tbody> <tr> <td data-bbox="806 406 1402 454">Metis Nation of Ontario</td> <td data-bbox="1402 406 1959 454">Complete</td> </tr> <tr> <td data-bbox="806 454 1402 503">Eagle Lake First Nation</td> <td data-bbox="1402 454 1959 503">Underway</td> </tr> <tr> <td data-bbox="806 503 1402 552">Wabigoon Lake Ojibway Nation</td> <td data-bbox="1402 503 1959 552">Awaiting proposal</td> </tr> <tr> <td data-bbox="806 552 1402 600">Whitefish Bay First Nation</td> <td data-bbox="1402 552 1959 600">Proposal received</td> </tr> <tr> <td data-bbox="806 600 1402 649">Asubpeeschoseewagong Netum Anishinabek</td> <td data-bbox="1402 600 1959 649">Awaiting proposal</td> </tr> <tr> <td data-bbox="806 649 1402 722">Lac des Mille Lacs</td> <td data-bbox="1402 649 1959 722">Not Required (as per conversation with the community January 20, 2019)</td> </tr> </tbody> </table> <p data-bbox="806 732 1959 917">The TK/TLU study completed by MNO in 2018 provided further information about the physical / biological resources used by the community and the specific locations that these resources are harvested in relation to the Project. The information that was not provided is what percentage of the physical / biological resources used by the community come from the area affected by the Project and what percentage of their diet or income is comprised from harvesting these physical / biological resources. Treasury Metals continues to work with MNO to obtain the information needed to provide a more fulsome socio-economic effects assessment for the community.</p> <p data-bbox="806 927 1959 1040">In order to elicit the information required to provide a fulsome socio-economic effects assessment for the other communities, Treasury Metals has asked as part of the TK/TLU studies that community members are asked if they traditional harvest or use resources. Some of the questions that have been formally asked to Indigenous communities are:</p> <ul data-bbox="852 1050 1707 1206" style="list-style-type: none"> <li data-bbox="852 1050 1499 1088">J How many meals of per would be consumed of country foods?</li> <li data-bbox="852 1092 1707 1130">J How often do they hunt, fish or trap or collect plants for food or medicinal purposes?</li> <li data-bbox="852 1135 1583 1172">J How many meals per week purchased from supermarket or restaurant?</li> <li data-bbox="852 1177 1667 1214">J Do you purchase country foods from a neighbor, friend, or community member?</li> </ul> <p data-bbox="806 1216 1959 1307">Treasury Metals will complete a more detailed socio-economic effects assessment for traditional land and resource use, once the information is collected and use the results to develop community specific monitoring and management plans, as well as specific mitigation measures.</p> <p data-bbox="806 1320 1050 1352"><b><u>FINAL RESPONSE:</u></b></p> <p data-bbox="806 1377 873 1409">Part A)</p>	Table 1: TK/TLU Studies Status		Indigenous Community	Status of TK/TLU Study	Metis Nation of Ontario	Complete	Eagle Lake First Nation	Underway	Wabigoon Lake Ojibway Nation	Awaiting proposal	Whitefish Bay First Nation	Proposal received	Asubpeeschoseewagong Netum Anishinabek	Awaiting proposal	Lac des Mille Lacs	Not Required (as per conversation with the community January 20, 2019)
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				<p>Treasury Metals recognizes that members of Indigenous communities are concerned that there may be socio-economic effects of the Goliath Gold Project that could arise over the life of the Project. The revised EIS (April 2018) prepared by Treasury Metals, shows that there would be no significant adverse environmental effects of the Project when appropriate mitigation measures are implemented. Therefore, it is reasonable to expect that if the Project, mitigation measures, follow-up program and monitoring plans are functioning as designed, there would not be significant socio-economic effects to Indigenous communities who rely on the lands and resources.</p> <p>As part of the completeness check completed by the Agency and discussions between Treasury Metals and the Agency on February 26, 2019 and February 28, 2019, the Agency asked that Treasury Metals provide six new commitments with respect to the assessment of socio-economic impacts on Indigenous communities to provide the Agency and the Indigenous stakeholders confidence that any potential effects (both real and perceived) are appropriately mitigated and monitored as part of the follow-up program for the life of the Project. The Agency also requested that an expanded evaluation of potential socio-economic effects of the Project on those Indigenous communities that have identified commercial interests that may be affected by the Project be completed. This information is provided in TMI_862-AC(2)-02_Attachment_1, entitled "Indigenous Socio-Economic Assessment". At the request of the Agency, this attachment includes the following:</p> <ul style="list-style-type: none"> <li>J a description of the existing commercial interests identified by Indigenous communities through the environmental assessment process to date;</li> <li>J an identification of the potential impacts of effects of the Project on those commercial interests;</li> <li>J a description of the mitigation measures and commitments by Treasury Metals to manage the potential effects; and</li> <li>J any amendments required to the follow-up program to verify the effectiveness of the mitigation and management efforts.</li> </ul> <p>The aforementioned six new commitments intended to help identify, mitigate and manage the potential negative socio-economic effects that may arise over the life of the Project, are provided in Section ISE4 of TMI_862-AC(2)-02_Attachment_1, entitled "Indigenous Socio-Economic Assessment", as well as in the Goliath Gold Project Mitigation, Monitoring and Commitments List. They are also provided herein for completeness:</p> <p>The six commitments with respect to socio-economic have been made by Treasury Metals:</p> <ol style="list-style-type: none"> <li>1. Engagement and Communications: Treasury Metals is committed to working collaboratively with Indigenous communities to ensure informed and engaged dialogue throughout the life of the Project. This goal will be achieved through the implementation of the following, at a minimum:             <ol style="list-style-type: none"> <li>i. Continued dialogue with all Indigenous stakeholders for the life of the Project;</li> <li>ii. The development of community specific mitigation and accommodation measures as required; and</li> <li>iii. Amendments to the follow up program over the life of the Project to ensure that the community-specific mitigation measures are effective.</li> </ol> </li> </ol> <p>Treasury Metals has proposed the formation of an Environmental Management Committee to aid in the above. This committee would be made up of members from Indigenous communities and would meet with representatives from</p>

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				<p>Treasury Metals on a to-be-determined basis, possibly quarterly or semi-annually. Treasury Metals would present any reportable information on the monitoring and management plans as well as the results of the follow up programs to the Environmental Management Committee. If exceedances or issues arise that show mitigation measures have not been as effective as expected, the potential for further actions would be discussed with the committee. The Environmental Management Committee is intended to provide a forum for discussing other environmental matters with the potentially affect Indigenous communities such as upcoming regulatory permitting, the continued evolution of community-specific monitoring, the incorporation of traditional knowledge or items of cultural significant that might have been collected since completion of the EA process, and any other environmental matters of relevance to the committee including financial support for operation of the Committee. Environmental matters that the Environmental Management Committee would review include but not limited to: fish compensation opportunities, closure planning, environmental sampling results and proposed efforts, and as previously noted adaptive review and dialogue on follow up programs and environmental monitoring efforts for the Goliath Gold Project. Further the Environmental Management Committee will aid in the collation and distribution of the reviewed information to each respective community, reflecting the direction and concerns brought forward.</p> <p>Treasury Metals is committed to sharing information regarding the Project with all Indigenous community members and will do so, via the following reporting mechanisms:</p> <ul style="list-style-type: none"> <li>i. Sharing updates on notable events inclusive of environment, social/community, operational, and exploration aspects occurring at the Project with the communities on a quarterly basis. Treasury Metals envisions the notable events report to be posted publicly to the Treasury Metals website, and or delivered to each community in the form of a news letter, with the overall objective to provide the Indigenous communities and the Agency the confidence that the Project, mitigation measures, follow-up program and monitoring plans are functioning as designed, and therefore that there are no socio-economic effects anticipated to Indigenous communities who rely on the lands and resources.;</li> <li>ii. Providing a summary of the ongoing activities of the Environmental Management Committee, as part of the annual reporting for the Goliath Gold Project; and</li> <li>iii. Providing the annual environmental report, summarizing all of the environmental monitoring results associated with the Project.</li> </ul> <p>To facilitate public access of this information, Treasury Metals will establish a link on their website where the above information can be readily accessed. Additionally, Treasury Metals will share the above information with each of the communities in the form most suitable for the specific community members. Further, Treasury Metals is committed to reflect the needs of its Indigenous stakeholders, and as part of continued dialogue and engagement will only provide data to the public sphere that has been mutually agreed upon and reviewed by applicable stakeholders.</p> <p>2. Wild Rice: Treasury Metals is committed to sharing updates on notable events inclusive of environment, social/community, operational, and exploration aspects occurring at the Project with the communities on a quarterly basis to ensure that the community is kept apprised of the operational results that may affect the commercial wild rice harvest. Treasury Metals envisions the notable events report to be posted publicly to the Treasury Metals website thus being available to Indigenous communities and to nearby recreational or commercial land users.</p>

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				<p>Treasury Metals is committed to the collection of wild rice samples as part of continued dialogue and engagement activities with Indigenous communities for the life of the Project. Wild rice samples will be collected annually, or as needed, prior to the harvest season and sent for chemical analysis to capture any potential effects of the Project on the quality of wild rice harvested commercially and used for consumption and in turn socio-economic effects. According to the Ontario Ministry of Agriculture, Food and Rural Affairs (OMAFRA), wild rice is typically harvested from late August to September, but this would vary by the region of the province. As part of the program, collocated samples of sediment and surface water will also be collected annually or as needed. Treasury Metals will work with the Indigenous communities and applicable commercial enterprises to identify suitable timing, and location for sample collection prior to the rice harvest. Treasury Metals has currently proposed three sampling locations within Wabigoon Lake to effectively capture possible effects of the Project on wild rice, as well as a reference location on Rice Lake against which the samples can be compared (Figure TMI_942-AC(2)-09_Figure 1) the locations of these sites will be confirmed as part of continuing dialogue with Indigenous communities notably Wabigoon Lake Ojibway Nation. The results of the annual wild rice sampling program will be shared with the Indigenous communities currently commercially harvesting wild rice within Wabigoon Lake once the results are available, allowing them to share the information with their members, with the option for them to also share information publicly. If the Indigenous communities currently commercially harvesting wild rice within Wabigoon Lake authorize Treasury Metals to publish this information, it will be included in the annual environmental report. If required, Treasury Metals is committed to the development of community-specific mitigation measures and accommodation measures. Treasury Metals is also committed to amending the follow up program, if required, to verify the effectiveness of those the community-specific mitigation measures.</p> <p>Given that wild rice is typically harvested once a season, and that the growing season in Northwestern Ontario near Dryden is relatively short (i.e. &lt; 100 days), it is only practicable to sample wild rice and report once per year.</p> <p>3. Commercial Fisheries: Treasury Metals is committed to sharing updates on notable events occurring at the Project on a quarterly basis with the communities to ensure that the community is kept apprised of the operational results that may affect the commercial fish harvest. Treasury Metals envisions the notable events report to be posted publicly to the Treasury Metals website thus being available to Indigenous communities and to nearby recreational or commercial land users.</p> <p>Treasury Metals is committed to the collection of fish tissue samples as part of continued dialogue and engagement activities with Indigenous communities for the life of the Project. Fish tissue samples collected from fish of various trophic levels will be collected annually and sent for chemical analysis to capture any potential effects of the Project on the quality of fish for consumption harvested commercially or for subsistence use and in turn socio-economic effects. As part of the program, collocated samples of sediment and surface water will also be collected annually. Treasury Metals will work with the Indigenous communities to identify preferred species for consumption and/or sale in both Wabigoon Lake and Thunder Lake. The results of the annual fish sampling program will be shared with the Indigenous communities. Additionally, Treasury Metals will include the results of the fish sampling program in the annual environmental report. If required, Treasury Metals is committed to the development of community-specific mitigation measures and accommodation measures. Examples of additional mitigation measures include Treasury Metals commitment to the development of community specific risk communication plans to help reassure the</p>

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				<p>community members and the public that the Project is not impacting the quality of the fish for consumption. Additionally, Treasury Metals will work with Indigenous communities holding commercial fishing licenses on Wabigoon Lake and Thunder Lake to develop mutually acceptable strategies to help manage perceived risks (both existing and future concerns) associated with the fish harvest. Treasury Metals is also committed to amending the follow up program, if required, to verify the effectiveness of those additional community-specific mitigation measures. Treasury Metals will also work with the affected communities, either through the Environmental Management Committee, or community specific committees, for the life of the Project to aid communications regarding fish and aquatic habitat research, monitoring, mitigation, and offsetting. To the reasonable extent possible Treasury Metals would establish, fund and operationalize this collaborative committee.</p> <p>Given the time required for trophic transfer of chemicals within the food web, fish tissue sampling will be conducted and reported on annually.</p> <p>4. Chanterelle Mushroom: Based on input received from Indigenous communities in 2015, Treasury Metals is aware of the potential for the Project to have an effect on the harvesting of chanterelle mushrooms located proximal to the former MNRF Tree Nursery, which is within the property boundary (but outside of the operations area) of the Goliath Gold Project. Based on the comments received Treasury Metals acknowledges that these resources have the potential to provide economic benefits to those that harvest the resource. Although the Project will not directly impact any areas known for chanterelle mushroom harvesting, for health and safety purposes, access to the known harvesting areas will be controlled for the life of the Project. Treasury Metals is committed to developing community-specific access management plans in consultation with the Indigenous communities. Treasury Metals envisions these plans would detail how community members would be escorted safely through the operations area, and then allowed to safely harvest chanterelle mushrooms in those areas identified outside of the operations area, unaccompanied. The plan would also detail how Indigenous community members would then be escorted safely back through the operation area, once traditional harvesting of chanterelle mushrooms has been completed as well as communications protocols for while community members are onsite. Treasury Metals will install gates as needed on Tree Nursery Road to the north and south of the operations area, demarking those areas through which members of Indigenous communities will require an escort for safety reasons.</p> <p>Treasury Metals will collect opportunistic chanterelle mushrooms samples and collocated soil samples, as required, and send all samples for chemical analysis to capture any potential effects of the Project on the quality of chanterelle mushrooms for consumption harvested by Indigenous communities for commercial or subsistence purposes, and in turn socio-economic effects. The results of the annual opportunistic chanterelle mushrooms sampling program will be shared with the Indigenous communities. Additionally, Treasury Metals will include the results of the chanterelle mushrooms sampling program (if any) in the annual environmental report. If required, Treasury Metals is committed to the development of community-specific mitigation measures and accommodation measures. Examples of additional mitigation measures include Treasury Metals commitment to the development of community specific risk communication plans to help reassure the community members and the public that the Project is not impacting the quality of chanterelle mushrooms for consumption. Treasury Metals is also committed to amending the follow up program, if required, to verify the effectiveness of those additional community-specific mitigation measures.</p>

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				<p>Given the opportunistic nature of sample collection of chanterelle mushroom, it is only practicable to collect on a seasonal basis and hence report once per year. However, Treasury Metals is committed to sharing with the communities' updates on notable events inclusive of environment, social/community, operational, and exploration aspects occurring at the Project on a quarterly basis. Treasury Metals envisions the notable events report to be posted publicly to the Treasury Metals website thus being available to Indigenous communities and to nearby recreational or commercial land users.</p> <p>5. Tourism with respect to WLON: Based on input received from Wabigoon Lake Ojibway Nation (WLON) in 2015, Treasury Metals is aware that the community is concerned regarding the potential impacts of the Project on local tourism activities including: sport and recreational fishing, tourist camps, and local employment as fishing guides. Treasury Metals is committed to sharing with WLON updates on notable events inclusive of environment, social/community, operational, and exploration aspects occurring at the Project on a quarterly basis and will work with WLON as to the preferred method for public distribution. Treasury Metals is committed to working with WLON for the life of the Project to manage and mitigate the possible effects of the Project on local tourism and associated activities specifically with respect to fishing and guiding. Treasury Metals is committed to the development of community-specific mitigation measures and accommodation measures. An example of additional mitigation is Treasury Metals commitment to the development of community specific risk communication plans to help reassure the community members and the public that the Project is not impacting the water quality or quality of fish in Thunder Lake and Wabigoon Lake which would include specific mention in the quarterly updates of notable events. Treasury Metals will also look for opportunities to contribute to the growth of local tourism through sponsorship of local events designed to enhance tourism in the area. Treasury Metals is also committed to amending the follow up program, if required, to verify the effectiveness of those additional community-specific mitigation measures. Treasury Metals will include the results of the surface water quality program and the fish sampling program in the annual environmental report.</p> <p>6. Access and Blueberries: Treasury Metals is aware of the potential for the Project to have an effect on the harvesting of blueberries within the property boundary. The Project will overprint an area of known blueberry harvesting near the proposed tailings storage facility (TSF). For health and safety purposes, access to other known harvesting areas proximal to the former MNR Tree Nursery will be controlled for the life of the Project. Treasury Metals is committed to developing community-specific access management plans in consultation with the Indigenous communities. Treasury Metals envisions that these plans would detail how community members would be escorted safely through the operations area, and then allowed to safely harvest blueberries in those areas identified outside of the operations area, unaccompanied. The plan would also detail how Indigenous community members would then be escorted safely back through the operations area, once harvest activities have been completed. Treasury Metals will install gates as needed on Tree Nursery Road to the north and south of the operations area, demarking those areas through which members of Indigenous communities will require an escort for safety reasons.</p> <p>Treasury Metals will collect blueberry samples, collocated with soil and dustfall samples, as required and send all samples for chemical analysis to capture any potential effects of the Project on the quality of blueberries for consumption harvested by Indigenous communities for commercial or subsistence purposes, and in turn socio-economic effects. The sampling locations will be chosen as part of continued dialogue and engagement activities with Indigenous communities. The results of the annual blueberry sampling program will be shared with the Indigenous</p>



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				<p>communities. Additionally, Treasury Metals will include the results of the blueberry sampling program in the annual environmental report. If required, Treasury Metals is committed to the development of community-specific mitigation measures and accommodation measures. Examples of additional mitigation measures include Treasury Metals commitment to the development of community specific risk communication plans to help reassure the community members and the public that the Project is not impacting the quality of blueberries for consumption. Treasury Metals is also committed to amending the follow up program, if required, to verify the effectiveness of those additional community-specific mitigation measures.</p> <p>Given the nature of blueberry growth and blueberry harvest patterns, it is only practicable to sample and report once per year. Treasury Metals is committed to sharing updates on notable events inclusive of environment, social/community, operational, and exploration aspects occurring at the Project with the communities on a quarterly basis to ensure that the community is kept apprised of the operational conditions that may affect the harvest of blueberries. Treasury Metals envisions the notable events report to be posted publicly to the Treasury Metals website thus being available to Indigenous communities and to nearby recreational or commercial land users.</p> <p>Part B) The predicted residual effects were described in Section 6.21.6 and Section 6.22 of the revised EIS (April 2018), as amended by the Round 2 responses. Treasury Metals has made firm commitments with respect to social-economic impacts associated with commercial wild rice harvesting, commercial and subsistence fisheries, tourism, chanterelle mushroom harvesting, and blueberry harvesting. For each socio-economic related land and resource use, Treasury Metals is committed to the development of community-specific mitigation measures and accommodation measures.</p> <p>Part C) Treasury Metals has made firm commitments with respect to social-economic impacts associated with commercial wild rice harvesting, commercial and subsistence fisheries, tourism, chanterelle mushroom harvesting, and blueberry harvesting. For each socio-economic related land and resource use, Treasury Metals is committed to the development of community-specific mitigation measures and accommodation measures. Treasury Metals is also committed to amending the follow up program, if required, to verify the effectiveness of those the community-specific mitigation measures.</p> <p>Part D) The revised EIS (April 2018) prepared by Treasury Metals, shows that there are no predicted residual adverse effects on socio-economics. Therefore, there was no requirement for a cumulative effects assessment as per the EIS Guidelines for the Goliath Gold Project. To address data gaps concerns identified by the Agency and the Indigenous stakeholders, Treasury Metals made six commitments specific to the assessment of socio-economic impacts on Indigenous communities as detailed in Part A of this response. These six commitments will help identify, mitigate and manage the potential negative socio-economic effects that may arise over the life of the Project.</p>

TMI\_863-AC(2)-03

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TMI_863-AC(2)-03	AC(2)-03	1	CEA Agency	Reference to EIS Guidelines:	Sections 2.3, 3.4.2, 7.2.1, 7.2.2, 9.1.1, 10.2, 11.2
				Reference to EIS / Appendix	Section 6.1.6
				Cross-reference to Round 1 IRs	TMI_01-EA(1)-01, TMI_407-AC(1)-82, TMI_485-AC(1)-159, TMI_496-AC(1)-170, TMI_558-AC(1)-232, TMI_561-AC(1)-235, TMI_564-AC(1)-238, TMI_578-AC(1)252, TMI_581-AC(1)-255, TMI_660-AC(1)-333, TMI_674-AC(1)-346
				<p><b><u>Context and Rationale:</u></b></p> <ul style="list-style-type: none"> <li>) IR# EA(1)-01 requested that the proponent include baseline information about Indigenous Aboriginal groups' uses and practices. Additionally, IR# AC(1)-159 requested that baseline information be disaggregated by Indigenous group.</li> <li>) The proponent's responses to the IRs and the revised EIS do demonstrate inclusions of traditional knowledge and that more engagement has occurred. However Sections 6.1.6 and 6.21.1 and throughout the revised EIS there are</li> </ul>	

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				<p>references to the proponent taking a pan-Aboriginal approach to the collection of traditional knowledge, baseline information and effects assessment with little to no rationale for this approach.</p> <p>) In Section 5, some baseline information was aggregated by Indigenous groups, however while no similar reference is made, there are a number of instances where the baseline information presented in tables is identical for multiple groups (e.g. tables 5.13.3.1-1, 5.13.3.2-1, 5.13.3.3-1, 5.13.3.4-1 and 5.13.3.9-1). For example for fishing, there are 2 baitfish and minnow sites located outside the Project footprint but inside the Project Area referenced for Wabigoon Lake Ojibway Nation, Eagle Lake First Nation, Wabauskang First Nation, Lac Seul First Nation and Aboriginal People of Wabigoon.</p> <p>) Further, in neither section is there an explanation for the aggregation of baseline information or a pan-Aboriginal approach for assessment of effects.</p> <p><b><u>Specific Question / Request for Information:</u></b></p> <p>A. Provide a rationale for the use of a pan-Aboriginal/disaggregated approach for both the baseline and effects assessment for the effect of changes to the environment on Indigenous peoples' health and socio-economic conditions, physical and cultural heritage, current use of lands and resources for traditional purposes and any structure site or thing that is of historical, archaeological or paleontological significance including a description of how the approach was undertaken.</p> <p><b><u>Draft Response:</u></b></p> <p>The reviewers have misrepresented the approach taken in the revised EIS (April 2018) for characterizing baseline data regarding the Indigenous communities and the use of the baseline data for evaluating the effects of the Project to member of Indigenous communities presented in the revised EIS (April 2018). In presenting baseline data regarding the Indigenous communities use of lands and resources for traditional purposes (Section 5 of the revised EIS [April 2018]), the available information was presented in a disaggregated format. The reviewers have noted that there were instances where the same baseline information is presented for multiple Indigenous communities. This apparent duplication has occurred in those instances when the Agency provided only aggregated questions regarding the use of lands and resources by Indigenous communities. Without the Agency providing the information from individual Indigenous communities, information shared as part of the Round 1 information request process was assigned equally to each of the Indigenous communities that the Agency indicated made the request about their traditional uses of lands and resources.</p> <p>The evaluation of the effects of the Project on members of Indigenous communities was presented in Section 6.21 and Section 6.22 of the revised EIS (April 2018). In Section 6.21, the potential effects of the Project on the Aboriginal peoples VCs is presented in a pan-Aboriginal manner. This was done to ensure the all of the potential effects of the Project on the VCs were captured, whether or not a specific Indigenous community identified they are currently, of had they had historically exercised their rights to use the affected lands and resources for traditional purposes. As explained in Section 6.21.1 of the revised EIS (April 2018), the predicted effects of the Project on the Aboriginal peoples VCs (as presented in Section 6.21) were then attributed to the individual Indigenous communities based upon their identified current of historic use of the lands and resources for traditional purposes. This dis-aggregated evaluation of the effects of the Project on the individual Indigenous communities was presented in Section 6.22 of the revised EIS (April 2018).</p>

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				<p>The use of a pan-Aboriginal approach is Section 6.21 for assessing the potential effects of the Project on the Aboriginal peoples VCs was done to provide a conservative approach to assessing all potential effects of the Project to all Indigenous peoples. The use of a pan-Aboriginal assessment allows for an assessment of all potential effects to traditional land uses to each community whether they have identified that they practice traditional land uses in the area or not. For example, potential effects to changes in water quality to Wabigoon Lake would have the potential to affect each community as each community has the opportunity to use Wabigoon Lake for traditional purposes. If a community had not identified that they currently use Wabigoon Lake, but decide to use it for traditional purposes in the future, the effects to that community are still captured within the assessment.</p> <p>As requested by the Agency and Indigenous communities as part of the Round 1 information requests, Treasury Metals also provided an evaluation of the potential effects of the Project to Indigenous communities through a disaggregated approach. This assessment was provided in Section 6.22 of the revised EIS (April 2018) and disaggregates the potential effects from the Project on each Indigenous community based on the traditional knowledge and traditional land use information received from each community (presented throughout Section 5 of the revised EIS). This assessment allows for each community to easily identify what the residual adverse effects of the Project might be on the traditional land uses that they've identified through the EA process, they can verify that Treasury Metals has incorporated their concerns into the effects assessment of the revised EIS and the mitigation methods that Treasury Metals has proposed for each.</p> <p>To restate, Section 5.13.3 of the revised EIS (April 2018), presents the traditional land and resource of Indigenous communities in a disaggregated approach. In a similar manner, traditional knowledge shared with Treasury Metals has been presented in a disaggregated manner within the relevant areas of Section 5 of the revised EIS (April 2018). This was done as each community that has engaged with Treasury Metals has uniquely different traditional knowledge and traditional land use that is unique to each community. Instances where traditional knowledge or traditional land use was presented as coming from more than one Indigenous community are where the Agency presented the information in the Round 1 information requests as coming from more than one community. An example of this is the information shared from TMI_336-AC(1)-10 which states that the baseline information presented in the IR as coming from Eagle Lake First Nation, Wabigoon Lake First Nation, and Naoitkamegwann First Nation. Where possible, Treasury Metals has tried to disaggregate TK/TLU information in the baseline section as much as is possible.</p> <p><b><u>Agency Comment on Draft Response:</u></b></p> <p>A) The Agency did notice that there were individual tables and sections for each Indigenous group's baseline information. However upon examining the information, it appeared that most of the information was the same for each group with no specificity. For example, for a number of the Indigenous groups the tables all state that there are 2 baitfishing sites located in the Project Area. It is therefore hard to understand if these are the same for each Indigenous group or different.</p>

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				<p>Provide a description of whether these sites are different for each group, or provide a rationale or explanation for using this approach.</p> <p>B) With respect to the comment “the Agency only provided aggregated questions regarding the use of lands and resources by Indigenous communities. Without the Agency providing information from individual Indigenous communities, information shared as part of the Round 1 information request process was assigned equally to each of the communities...”, the Agency provided both Information Requests on the initial Environmental Impact Statement as well as forwarded all raw comments received from Indigenous groups. Therefore, the proponent will have received disaggregated information.</p> <p>Revise your response based on this comment.</p> <p><b><u>Specific Response to Agency Comment:</u></b></p> <p>A) Changes to community specific traditional land and resource uses provided in Tables 5.13.3.1-1 to 5.13.3.9-1 of the revised EIS (April 2018) have been updated to reflect the comments from the Agency and further review of all available engagement logs. These changes have been summarized in Tables 1a through 1f provided below. The specific areas where traditional resources are harvested is not known to Treasury Metals, but a number of TK/TLU studies are underway with funding from Treasury Metals that will provide a better understanding of community specific traditional land and resource uses as well as specific locations of use in relation to the Project.</p> <table border="1" data-bbox="730 935 1944 1466"> <thead> <tr> <th colspan="4" data-bbox="730 935 1944 980">Table 1a: Changes to Table 5.13.3.1-1 of the Revised EIS (Wabigoon Lake Ojibway Nation)</th> </tr> <tr> <th data-bbox="730 980 963 1065">Traditional Land and Resource Use</th> <th data-bbox="963 980 1335 1065">Specific Detail Shared</th> <th colspan="2" data-bbox="1335 980 1944 1065">Removed / Changed / Added</th> </tr> </thead> <tbody> <tr> <td data-bbox="730 1065 963 1284" rowspan="3">Harvesting of Plants</td> <td data-bbox="963 1065 1335 1284">Blueberries- North of Project area and directly south of Tree Nursery (and Tree Nursery itself), area of proposed TSF. Berries were harvested in Johnsons Beach area</td> <td data-bbox="1335 1065 1619 1284">Changed</td> <td data-bbox="1619 1065 1944 1284">Blueberries, Low bush cranberries, snowbush berry are harvested by the community - Berries were harvested in Johnsons Beach area</td> </tr> <tr> <td data-bbox="963 1284 1335 1377">Mushrooms- chanterelles and morels</td> <td data-bbox="1335 1284 1619 1377">Changed</td> <td data-bbox="1619 1284 1944 1377">Mushrooms harvested – chanterelles and stump mushrooms</td> </tr> <tr> <td data-bbox="963 1377 1335 1466">Medicinal plants such as cedar and white birch</td> <td data-bbox="1335 1377 1619 1466">Changed</td> <td data-bbox="1619 1377 1944 1466">Medicinal plants harvested – Labrador Tea, Low bush hemlock / Ground hemlock</td> </tr> </tbody> </table>	Table 1a: Changes to Table 5.13.3.1-1 of the Revised EIS (Wabigoon Lake Ojibway Nation)				Traditional Land and Resource Use	Specific Detail Shared	Removed / Changed / Added		Harvesting of Plants	Blueberries- North of Project area and directly south of Tree Nursery (and Tree Nursery itself), area of proposed TSF. Berries were harvested in Johnsons Beach area	Changed	Blueberries, Low bush cranberries, snowbush berry are harvested by the community - Berries were harvested in Johnsons Beach area	Mushrooms- chanterelles and morels	Changed	Mushrooms harvested – chanterelles and stump mushrooms	Medicinal plants such as cedar and white birch	Changed	Medicinal plants harvested – Labrador Tea, Low bush hemlock / Ground hemlock
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					—	Added	Peat resources are used by the community															
				Hunting and Trapping	Hunting and trapping within LSA along secondary roads and those used for timber forest access	Changed	Hunting trails and roads are used throughout the Project area															
					—	Added	Communities members are guides for hunting															
				Fishing	Fishing of Pike + other species	Changed	Preferred species have been indicated to be walleye and northern pike															
					Fishing of Walleye + other species	Changed	Preferred species have been indicated to be walleye and northern pike															
					—	Added	WLON has fishing licenses on Thunder Lake and Wabigoon Lake															
					—	Added	Community members are guide for fishing															
					Baitfish and minnow trapping conducted within the local area – 2 locations identified within Project area but outside Project footprint	Changed	Three baitfish harvesting locations have been observed within the Project area (Visual Observation)															
				Cultural	Rocks and boulders south of the community of Wabigoon [on Wabigoon Lake] are of cultural significance	Removed	—															
<table border="1"> <thead> <tr> <th colspan="4">Table 1b: Changes to Table 5.13.3.2-1 of the Revised EIS (Eagle Lake First Nation)</th> </tr> <tr> <th>Traditional Land and Resource Use</th> <th>Specific Detail Shared</th> <th colspan="2">Removed / Changed / Added</th> </tr> </thead> <tbody> <tr> <td rowspan="2">Harvesting</td> <td>Plants-proximity to the project</td> <td>Removed</td> <td>—</td> </tr> <tr> <td>Mushrooms- chanterelles and morels</td> <td>Removed</td> <td>—</td> </tr> </tbody> </table>								Table 1b: Changes to Table 5.13.3.2-1 of the Revised EIS (Eagle Lake First Nation)				Traditional Land and Resource Use	Specific Detail Shared	Removed / Changed / Added		Harvesting	Plants-proximity to the project	Removed	—	Mushrooms- chanterelles and morels	Removed	—
Table 1b: Changes to Table 5.13.3.2-1 of the Revised EIS (Eagle Lake First Nation)																						
Traditional Land and Resource Use	Specific Detail Shared	Removed / Changed / Added																				
Harvesting	Plants-proximity to the project	Removed	—																			
	Mushrooms- chanterelles and morels	Removed	—																			

Unique Identifier	Agency IR #	Annex	Agency / Group / Stakeholder	Cross Reference / Comment / Information Request / Response			
					Wild Rice	Changed	ELFN has traditionally used this area for wild rice harvesting
				Hunting and Trapping	Hunting and Trapping within LSA along secondary roads and those used for timber forest access	Changed	Historical trapping and hunting in the area
					Hunting white-tail deer- within general project area	Changed	There are a lot of people who live on moose and deer. Moose and deer have been identified as the target species of harvest
					Hunting moose- within general project area	Changed	There are a lot of people who live on moose and deer. Moose and deer have been identified as the target species of harvest
				Fishing	Fishing of Pike + other species	Removed	—
					Fishing of Walleye + other species	Removed	—
					Baitfish and minnow trapping conducted within the local area – 2 locations identified within Project area but outside Project footprint	Removed	—
				Cultural and Spiritual	Historical travel route through Eagle Lake	Removed	—
Table 1c: Changes to Table 5.13.3.3-1 of the Revised EIS (Wabauskang First Nation)							
Traditional Land and Resource Use		Specific Detail Shared		Removed / Changed / Added			
Hunting and Trapping		Hunting and Trapping within LSA along secondary roads and those used for timber forest access		Removed		—	
		Hunting white-tail deer- within general project area		Removed		—	

Unique Identifier	Agency IR #	Annex	Agency / Group / Stakeholder	Cross Reference / Comment / Information Request / Response			
					—	Added	Hunting rabbit – within general project area
				Fishing	Fishing of Pike + other species	Removed	—
					Fishing of Walleye + other species	Removed	—
				Cultural	Camping and access roads	Removed	—
<b>Table 1d: Changes to Table 5.13.3.4-1 of the Revised EIS (Lac Seul First Nation)</b>							
				<b>Traditional Land and Resource Use</b>	<b>Specific Detail Shared/Collected</b>	<b>Removed / Changed / Added</b>	
				Harvesting	Blueberries- North of Project area and directly south of Tree Nursery (and Tree Nursery itself), area of proposed TSF	Removed	—
					Mushrooms- chanterelles and morels	Removed	—
				Hunting and Trapping	Hunting and Trapping within LSA along secondary roads and those used for timber forest access	Removed	—
					Hunting white-tail deer- within general Project area	Removed	—
					Hunting partridge - within general project area	Removed	—
					Hunting moose- within general project area	Removed	—
				Fishing	Fishing of Pike + other species	Removed	—
					Fishing of Walleye + other species	Removed	—



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					Baitfish and minnow trapping conducted within the local area – 2 locations identified within Project area but outside Project footprint	Removed	—																									
<table border="1"> <thead> <tr> <th colspan="4">Table 1e: Changes to Table 5.13.3.5-1 of the Revised EIS (Naotkamegwaning First Nation)</th> </tr> <tr> <th>Traditional Land and Resource Use</th> <th>Specific Detail Shared/Collected</th> <th colspan="2">Removed / Changed / Added</th> </tr> </thead> <tbody> <tr> <td rowspan="3">Hunting and Trapping</td> <td>Hunting and Trapping within LSA along secondary roads and those used for timber forest access</td> <td>Added</td> <td>NFN have traplines in the area</td> </tr> <tr> <td>Hunting partridge - within general project area</td> <td>Removed</td> <td>—</td> </tr> <tr> <td>Hunting moose- within general project area</td> <td>Added</td> <td>Hunting in and around the regional Project site due to low moose numbers around community</td> </tr> </tbody> </table>								Table 1e: Changes to Table 5.13.3.5-1 of the Revised EIS (Naotkamegwaning First Nation)				Traditional Land and Resource Use	Specific Detail Shared/Collected	Removed / Changed / Added		Hunting and Trapping	Hunting and Trapping within LSA along secondary roads and those used for timber forest access	Added	NFN have traplines in the area	Hunting partridge - within general project area	Removed	—	Hunting moose- within general project area	Added	Hunting in and around the regional Project site due to low moose numbers around community							
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				Fishing	Baitfish and minnow trapping conducted within the local area – 2 locations identified within Project area but outside Project footprint	Removed	—																
					—	Added	APOW traditional fishes in the area																
<p>B) Treasury Metals received both the Indigenous communities' raw comments and official information requests from the Agency for the Round 2 comments, but none of the Indigenous communities' raw comments were received for the Round 1 information requests in 2015. Without these raw comments from individual Indigenous communities, Treasury Metals was unable to determine which specific community certain comments associated with the Round 1 information requests came from. That stated, it appears that the aggregated comments that came from multiple Indigenous communities appear to only be regarding traditional knowledge and not related to traditional land uses. Traditional knowledge received from Indigenous communities is presented by discipline in their respective Subsections in 5.1 to 5.12 of the revised EIS. If the Agency has the raw comments from the Indigenous communities on file, Treasury Metals will be happy to update the table to reflect the disaggregated comments. A few traditional knowledge comments that were provided in the official Round 1 information request package from the Agency that reference multiple communities can be found in Table 2 below.</p>																							
<p><b>Table 2: Aggregated Traditional Knowledge Information from the Round 1 Information Request</b></p>																							
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					<p>the water bodies in the region in a counterclockwise direction;</p> <ul style="list-style-type: none"> <li>• spawning areas in Thunder Creek and Nugget Creek (walleye), Blackwater Creek (sucker), and along the shoreline of Wabigoon Lake (northern pike); and</li> <li>• Blackwater Creek has one main bed that branches off into at least 10 other creeks, then into bogs. Identified baseline conditions are not adequately described in the EIS. More detailed mapping of potentially affected habitat is needed, including a scaled figure delineating the potentially affected watershed. The EIS is missing fishing areas in Wabigoon Lake and within the project area. Requested that mitigation measures for prevention of contamination of water bodies and impacts on fish and fish habitat be described.</li> </ul>
			<p>TMI_336-AC(1)-10</p> <p>Eagle Lake First Nation Wabigoon Lake Ojibway Nation Naotkamegwaning First Nation</p>		<p>Shared information about baseline migratory bird and bird habitat conditions, including:</p> <ul style="list-style-type: none"> <li>• owls (barn and long horn), wild turkeys and robins observed in the project area;</li> <li>• project area is a fly through area for migratory birds that may be impacted by the Project;</li> <li>• migratory bird nesting area located to the north of the site; and</li> <li>• blueberry areas attract robins and other birds.</li> </ul>
			<p>TMI_340-AC(1)14</p> <p>Wabigoon Lake Ojibway Nation Aboriginal People of Wabigoon</p>		<p>Provided comments about potential effects to groundwater quantity and the information presented in the EIS:</p> <ul style="list-style-type: none"> <li>• concerns with data in the EIS, including gaps in seasonal flow measurements in Thunder Creek;</li> <li>• ground and surface water interactions in Blackwater Creek, may result in contamination of groundwater from effluent discharge;</li> <li>• Identified private and artesian wells located in the vicinity of the Project that are not identified in the EIS.</li> </ul>

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						<ul style="list-style-type: none"> <li>• Asked how TMI will manage additional water if artesian wells are hit during drilling, as pit will overflow if water is not managed</li> <li>• Asked if TMI can identify the depth at which the artesian wells flow;</li> <li>• Shared that community member's artesian well runs at 55g/min. The water comes out at 47 degrees.</li> </ul>																					
<p><b>Final Response:</b></p> <p>A) Changes to community specific traditional land and resource uses provided in Tables 5.13.3.1-1 to 5.13.3.9-1 of the revised EIS (April 2018) have been updated to reflect the comments from the Agency and further review of all available engagement logs. These changes have been summarized in Tables 1a through 1f provided below. The specific areas where traditional resources are harvested is not known to Treasury Metals, but a number of TK/TLU studies are underway with funding from Treasury Metals that will provide a better understanding of community specific traditional land and resource uses as well as specific locations of use in relation to the Project.</p>																											
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Unique Identifier	Agency IR #	Annex	Agency / Group / Stakeholder	Cross Reference / Comment / Information Request / Response																									
					—	Added	Communities members are guides for hunting																						
				Fishing	Fishing of Pike + other species	Changed	Preferred species have been indicated to be walleye and northern pike																						
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					—	Added	WLON has fishing licenses on Thunder Lake and Wabigoon Lake																						
					—	Added	Community members are guide for fishing																						
					Baitfish and minnow trapping conducted within the local area – 2 locations identified within Project area but outside Project footprint	Changed	Three baitfish harvesting locations have been observed within the Project area (Visual Observation)																						
				Cultural	Rocks and boulders south of the community of Wabigoon [on Wabigoon Lake] are of cultural significance	Removed	—																						
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Unique Identifier	Agency IR #	Annex	Agency / Group / Stakeholder	Cross Reference / Comment / Information Request / Response				
					Hunting white-tail deer- within general project area	Changed	There are a lot of people who live on moose and deer. Moose and deer have been identified as the target species of harvest	
					Hunting moose- within general project area	Changed	There are a lot of people who live on moose and deer. Moose and deer have been identified as the target species of harvest	
				Fishing	Fishing of Pike + other species	Removed	—	
					Fishing of Walleye + other species	Removed	—	
					Baitfish and minnow trapping conducted within the local area – 2 locations identified within Project area but outside Project footprint	Removed	—	
				Cultural and Spiritual	Historical travel route through Eagle Lake	Removed	—	
<b>Table 1c: Changes to Table 5.13.3.3-1 of the Revised EIS (Wabauskang First Nation)</b>								
				Traditional Land and Resource Use	Specific Detail Shared	Removed / Changed / Added		
				Hunting and Trapping	Hunting and Trapping within LSA along secondary roads and those used for timber forest access	Removed	—	
						Hunting white-tail deer- within general project area	Removed	—
						—	Added	Hunting rabbit – within general project area
				Fishing	Fishing of Pike + other species	Removed	—	

Unique Identifier	Agency IR #	Annex	Agency / Group / Stakeholder	Cross Reference / Comment / Information Request / Response			
					Fishing of Walleye + other species	Removed	—
				Cultural	Camping and access roads	Removed	—
Table 1d: Changes to Table 5.13.3.4-1 of the Revised EIS (Lac Seul First Nation)							
Traditional Land and Resource Use		Specific Detail Shared/Collected		Removed / Changed / Added			
Harvesting		Blueberries- North of Project area and directly south of Tree Nursery (and Tree Nursery itself), area of proposed TSF		Removed		—	
		Mushrooms- chanterelles and morels		Removed		—	
Hunting and Trapping		Hunting and Trapping within LSA along secondary roads and those used for timber forest access		Removed		—	
		Hunting white-tail deer- within general Project area		Removed		—	
		Hunting partridge - within general project area		Removed		—	
		Hunting moose- within general project area		Removed		—	
Fishing		Fishing of Pike + other species		Removed		—	
		Fishing of Walleye + other species		Removed		—	
		Baitfish and minnow trapping conducted within the local area – 2 locations identified within Project area but outside Project footprint		Removed		—	
Table 1e: Changes to Table 5.13.3.5-1 of the Revised EIS (Naotkamegwaning First Nation)							

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				<p>B) This response has been revised to acknowledge that the Agency provided disaggregated comments in support of the Round 1 IRs. These disaggregated comments, along with other specific disaggregated information shared with Treasury</p>																																			



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				Metals during engagement activities, were used while updating the tables presented in Part A of this response. At the request of the Agency on February 26, 2019, Treasury Metals has also carefully reviewed the Tables provided in Part A of this response (previously identified as complete) to ensure that they are consistent with the disaggregated comments provided by the Agency in 2015 as part of the Round 1 information request process.

TMI\_864-AC(2)-04

Unique Identifier	Agency IR #	Annex	Agency / Group / Stakeholder	Cross Reference / Comment / Information Request / Response
TMI_864-AC(2)-04	AC(2)-04	1	CEA Agency	Reference to EIS Guidelines: Sections 12.2,12.3
				Reference to EIS / Appendix Section 8.9.3
				Cross-reference to Round 1 IRs TMI_11-AC(1)-02, TMI_369-AC(1)-43, TMI_536-AC(1)-210, TMI_554-AC(1)-228, TMI_607-AC(1)-280
				<p><b><u>Context and Rationale:</u></b></p> <ul style="list-style-type: none"> <li>) IR# AC(1)-02 requested the proponent to “Describe the potential adverse impacts on potential or established Aboriginal and treaty rights and related interests that have not been fully mitigated as part of the environmental assessment and associated engagement with Aboriginal groups.”</li> <li>) The proponent’s revised EIS does mention potential or established Aboriginal and treaty rights and related interests but does not state a conclusion as to whether the project has the potential to impact these potential or established Aboriginal and treaty rights based on the analysis done for effects of changes the environment on Aboriginal peoples.</li> </ul>

Unique Identifier	Agency IR #	Annex	Agency / Group / Stakeholder	Cross Reference / Comment / Information Request / Response
				<p><b><u>Specific Question / Request for Information:</u></b></p> <p>A. Provide an opinion as to whether the project will impact potential or established Aboriginal and Treaty rights including those that have not been fully mitigated.</p> <hr/> <p><b><u>Response:</u></b></p> <p>A. As described in Section 6.21.1 of the revised EIS (April 2018), "Aboriginal and Treaty Rights are defined as the historic and current uses of lands and resources for traditional purposes by members of Indigenous communities. It is Treasury Metals' understanding that Aboriginal peoples are entitled to access to their lands according to their Aboriginal and Treaty #3 (1873) Rights. Treasury Metals is committed to working with the Indigenous communities to ensure that the effects of the Project on their traditional land and resource use, or alternatively referred to as Aboriginal and Treaty Rights, are appropriately considered and protected. Section 6.21 of the revised EIS described how the Project could affect VCs that have been identified as being important to members of Aboriginal communities in the uses of lands and resources for traditional purposes, and thus their Aboriginal and Treaty Rights. Section 6.22 of the revised EIS (April 2018) combines the predicted effects to the Aboriginal peoples VCs with the identified uses of lands and resources for traditional purposes by each of the potentially affected Indigenous communities to characterize the potential impacts on Aboriginal and Treaty rights of those communities. As detailed in Sections 6.21 and 6.22 of the revised EIS, there will be a limited number residual effects in the immediate vicinity of the Project that will alter the ability of members of some of the potentially affected Indigenous communities uses of lands and resources for traditional purposes, and therefore could impact their potential or established Aboriginal and Treaty rights.</p> <hr/> <p><u>Agency Comment on Draft Response</u></p> <p>None Received</p> <hr/> <p><u>FINAL RESPONSE</u></p> <p>Agency accepted Draft Response as Final.</p>

TMI\_938-AC(2)-05

Unique Identifier	Agency IR #	Annex	Agency / Group / Stakeholder	Cross Reference / Comment / Information Request / Response	
TMI_938-AC(2)-05	AC(2)-05	4	Eagle Lake First Nation Asubpeeschosesewagon Netum Anishinabek (Grassy Narrows First Nation) Nootkamegwanning First Nation Wabigoon Lake Ojibway Nation Métis Nation of Ontario	Reference to EIS Guidelines:	Part 2 Section 11.1
				Reference to EIS / Appendix	Section 6.21.5 Table 6.23-20
				Cross-reference to Round 1 IRs	n/a
				<p><b><u>Context and Rationale:</u></b></p> <p>Section 6.21.5 and Table 6.23.20 outline mitigation measures for effects of changes to the environment on Indigenous peoples’ health and socio- economic conditions, physical and cultural heritage, current use of lands and resources for traditional purposes and any structure site or thing that is of historical, archaeological or paleontological significance. However, the listed mitigation measures are directed to the change in the biophysical environment rather than the effect or impact on Indigenous people.</p> <p>Eagle Lake First Nation, Grassy Narrows First Nation, Métis Nation of Ontario, Nootkamegwanning First Nation and Wabigoon Lake Ojibway First Nation expressed concerns with a lack of engagement and consideration of their views in the development of mitigation measures for effects to effects of changes to the environment on Indigenous peoples’ health and socio-economic conditions, physical and cultural heritage, current use of lands and resources for traditional purposes and any structure site or thing that is of historical, archaeological or paleontological significance.</p>	

Unique Identifier	Agency IR #	Annex	Agency / Group / Stakeholder	Cross Reference / Comment / Information Request / Response
				<p>In considering paragraph 5(1)(c) of CEEA 2012, it is important to consider the impact on Indigenous people by not only confirming whether there has been an impact on the quality of the resource (bio- physical environment, including flora and fauna of interest to Indigenous people) due to a change in the environment caused by the Project, but also to consider whether any changes in the environment impact Indigenous people, specifically in relation to continued access and experience in relation to health and socio-economic conditions, physical and cultural heritage, current use of lands and resources for traditional purposes and any structure site or thing that is of historical, archaeological or paleontological significance.</p>
				<p><b><u>Specific Question / Request for Information:</u></b></p> <p>A. Taking into account the response to IR# AC(02)-01 and comments submitted by Indigenous groups, confirm whether impacts to Indigenous groups have been mitigated by providing a response to the concerns raised, proposing mitigation measures, if applicable, and confirming those mitigation measures with the appropriate Indigenous groups.</p> <p>B. Identify mitigation measures that Treasury Metals has accepted which were proposed by an Indigenous group, or provide a rationale as to why this mitigation has not been taken.</p>
				<p><b><u>Draft Response:</u></b></p> <p>Part A. Treasury Metals, as part of the Round 1 information requests, received dialogue from Indigenous communities that informed Treasury Metals about the communities that hold traditional knowledge and practice traditional activities within proximity of the proposed Goliath Gold Project. Each of the communities have indicated aspects of value, and that local resources users undertake harvesting and gathering of plant material, hunting, fishing, trapping, and hold cultural and heritage resources within the area. Where specific information with respect to these components was shared with Treasury Metals, it was incorporated into Section 5 of the revised EIS (April 2018) “Existing Conditions” and aided Treasury Metals in the development of the valued components as reflected Section 6.1.3 of the revised EIS (April 2018). The valued components were in turn used in the assessment of effects of the Project. With respect to the species specifically mentioned in the “context and rationale block”, in the revised EIS (April 2018), the effects of the Project on fish and fish habitat were assessed in Section 6.14 using the following VCs: Stream-resident fish population, Migratory fish populations and Lake-resident fish populations (which would include northern pike and crappie), the effects of the Project on wildlife and wildlife habitat were assessed in Section 6.12 using ungulates (which would include deer) and upland birds (which would include partridge) as VCs, and the effects of the Project on wetlands and vegetation were assessed in Section 6.15 using vegetation communities (which would include berries) as a VC. The results of the effects assessment on the various biological technical disciplines (including fish and fish habitat, wildlife and wild life habitat, wetlands and vegetation, and human health) were then used to form the foundation of the assessment of effects of the Project on Aboriginal Peoples (Section 6.21 of the revised EIS [April 2018]) and on Indigenous communities including the Métis Nation of Ontario (Section 6.22 of the revised EIS [April 2018]). The VCs relied upon in the assessment of the effects of the Project on the ability of Indigenous communities to practice their current use of land and resources for traditional purposes included the following VCs in the revised EIS (April 2018):</p>

Unique Identifier	Agency IR #	Annex	Agency / Group / Stakeholder	Cross Reference / Comment / Information Request / Response
				<ul style="list-style-type: none"> <li>) Human Health</li> <li>) Harvesting/ Gathering of Plant Materials (including but not limited to berries)</li> <li>) Hunting (including but not limited to ungulates such as deer and upland birds such as partridge)</li> <li>) Trapping</li> <li>) Fishing (including but not limited to sportfish, baitfish, and commercial fishing)</li> <li>) Cultural and Spiritual Practices</li> <li>) Socio-economic factors</li> </ul> <p>As described in Section 9 of the revised EIS, Treasury Metals have been engaged with Indigenous communities regarding the Project for several years. As part of the process of engagement, feedback received from members of the Indigenous communities has been used to influence the design of the Project to help avoid potential environmental effects. Additionally, the feedback from members of Indigenous communities have also been used to guide the mitigation measures proposed for the Project. An example of a change in the Project to reflect input from stakeholders, including members of Indigenous communities was the change in location for obtaining fresh, make-up water. Originally fresh, make-up water was going to be obtained from Thunder Lake, but was changed to the ponds on Thunder Lake Tributaries 2 and 3 within the former MNR tree nursery as part of the revised EIS (April 2018). An example of one of the mitigation measures implemented to reflect input from the Indigenous communities was the commitment by Treasury Metals that effluent released during operations would be treated to meet the Provincial Water Quality Objectives (PWQO), or background if the background levels were above the PWQO. In the case of mercury, Treasury Metals have committed to treat the effluent during operations to meet the background levels in Blackwater Creek, which are an order of magnitude lower than the current PWQO.</p> <p>Treasury Metals continues to engage all communities and actively seeks out comment regarding the potential effect or impact of the Project to the ability of Indigenous communities to practice their current use of land and resources for traditional purposes. Treasury Metals remains committed to working with all communities to identify, mitigate, and avoid, or otherwise minimize, these potential effects to the extent practicable. Treasury Metals continues to reach out to delineate these resources to ensure responsible development but at this time has only received formal reporting from the Métis Nation of Ontario.</p> <p>As stated in the revised EIS (April 2018), Treasury Metals recognizes that Indigenous people including members of the Métis Nation of Ontario live, work, hunt, fish, trap, drink water, and gather/harvest throughout their lands and rely on them for their individual as well as their community's overall cultural, social, spiritual, physical, and economic well-being. Further to this, Treasury Metals recognizes that these traditional lands are inextricably connected to an Indigenous community's identity and culture, inclusive of ceremonial and spiritual recognition. Treasury Metals, in respect to this, understands the importance of assessing any potential effects of the Project. Treasury Metals understands the importance of assessing any potential effects of the Project as they relate to traditional land and resource use activities and practices; and acknowledges that the Project may affect the availability of resources or practices within the Project area. Treasury Metals remains committed to working with all communities to identify, mitigate, and avoid, or otherwise minimize, these potential effects to the extent practicable.</p>

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				<p>Treasury Metals continues to engage and promote open dialogue with all Indigenous communities regarding the mitigation measures and conclusions of the EIS. Treasury Metals, as part of the Round 2 information request process and subsequent communications, has reached out to the all Indigenous communities including the Métis Nation of Ontario to schedule an informative meeting to discuss the Round 2 information request documentation provided, and to gather continued dialogue and validation on the mitigation measures to be put into place.</p> <p><u>Part B.</u> Mitigation measures as suggested by Indigenous communities include a number of components. These mitigation measures include significant commitments to ensure both regulatory and protection to values within the area. Major commitments inclusive of reporting requirements are listed below:</p> <ul style="list-style-type: none"> <li>- Water Management                             <ul style="list-style-type: none"> <li>o Significant alternation to water management have been made (Section 3.15, Section 3.16 of the EIS (April 2018)), water use and management has been identified as a key item to Indigenous stakeholders. Items of significant within this strategy include the use of a water treatment facility, maximization of recycling, effluent characteristics, and long term safety commitments.</li> </ul> </li> <li>- Alteration of the overall general arrangement                             <ul style="list-style-type: none"> <li>o Alteration of the site layout was based on communication with Indigenous and public stakeholders.</li> </ul> </li> <li>- Access and Resource Use                             <ul style="list-style-type: none"> <li>o Treasury Metals has noted continued access to resources is a primary concern of Indigenous communities. Treasury Metals is committed to working with Indigenous communities to define traditional land use aspects within the Project area, and define a suitable procedure for safe access to these resources. Treasury Metals is continuing to promote dialogue on the validation of this mitigation measure to ensure Indigenous contemporary values are reflected within the follow up program.</li> </ul> </li> <li>- Monitoring and Follow Up Programmes                             <ul style="list-style-type: none"> <li>o Treasury Metals is committed to ensure that Indigenous communities have input into the effectiveness of the Environmental Management Plans and Follow-up Programs, Treasury Metals proposes to form an Environmental Management Committee. This committee would be made up of members from Indigenous communities and would meet with representatives from Treasury Metals on a to-be-determined basis, possibly quarterly or semi-annually. The overall management and terms of reference of this committee is to be determined. Treasury Metals would present any reportable information on the management plans as well as the results of the follow up programs. If exceedances or issues arise that show mitigation measures have not been as effective as expected, the potential for further actions would be discussed with the committee. The Environmental Management Committee is intended to provide a forum for discussing other environmental matters with the potentially affect Indigenous communities such as upcoming permits, the incorporation of traditional knowledge or items of cultural significant that might have been collected since completion of the EA process, and any other</li> </ul> </li> </ul>

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				<p>environmental matters of relevance to the committee including financial support for operation of the committee. The establishment of this committee was a direct result of communication with the potentially impact Indigenous communities.</p> <ul style="list-style-type: none"> <li>o In lieu of the formal establishment of the Environmental Management Committee Treasury Metals will continue to follow the guidance of the Agency, and work with all individual communities to promote dialogue on the proposed environmental monitoring and follow up programmes including the validation of the methodology and community reporting needs. Furthermore, Treasury Metals will continue to ensure that all communities are aware of activities being conducted on site.</li> </ul> <p>Treasury Metals continues to engage and promote open dialogue with all Indigenous communities regarding the mitigation measures and conclusions of the EIS. Treasury Metals as part of the revision of IR#2 and subsequent communication has reached out to the all Indigenous communities including the Métis Nation of Ontario to schedule an informative meeting to discuss the IR#2's, documentation provided, and to gather continued dialogue and validation on the mitigation measures to be put into place.</p> <p>Treasury Metals will take all proposed mitigation measures under consideration to ensure the continued responsible development of the Project. No formal mitigation measures requested have been denied at this time.</p> <p><b><u>Agency Comment on Draft Response:</u></b></p> <p>A) Update this response based on planned engagement conducted while finalizing this response, including a description of the engagement around proposed mitigation for 5 1(c) effects, if applicable.</p> <p><b><u>Specific response to Agency Comment:</u></b></p> <p>Treasury Metals are currently working towards the development of community specific monitoring and management plans, as well as specific mitigation measures. Treasury Metals welcomes the opportunity to work with all Indigenous communities to develop the monitoring plans, management plans and mitigation measures specific for the community. Since the time that the Round 2 information request responses were submitted to the Agency in Draft on September 12, 2018, a number of key milestones with respect to engagement have occurred as provided in Table 1. Specific engagement regarding mitigation measures have been bolded for clarity.</p> <table border="1" data-bbox="835 1198 1957 1414"> <thead> <tr> <th colspan="2" data-bbox="835 1198 1957 1247">Table 1: Engagement Activities Since Receiving Round 2 IR package</th> </tr> <tr> <th data-bbox="835 1247 1087 1295">Date</th> <th data-bbox="1087 1247 1957 1295">Description of Engagement Activity</th> </tr> </thead> <tbody> <tr> <td data-bbox="835 1295 1087 1344">September 21, 2018</td> <td data-bbox="1087 1295 1957 1344">Treasury Metals delivers Draft Round 2 responses to all Indigenous communities</td> </tr> <tr> <td data-bbox="835 1344 1087 1414">September 25, 2018</td> <td data-bbox="1087 1344 1957 1414">Treasury Metals sends formal letter to Indigenous communities (Wabigoon Lake Ojibway Nation, Naotkamegwaning First Nation, Wabauskang First Nation, Lac Seul First Nation</td> </tr> </tbody> </table>	Table 1: Engagement Activities Since Receiving Round 2 IR package		Date	Description of Engagement Activity	September 21, 2018	Treasury Metals delivers Draft Round 2 responses to all Indigenous communities	September 25, 2018	Treasury Metals sends formal letter to Indigenous communities (Wabigoon Lake Ojibway Nation, Naotkamegwaning First Nation, Wabauskang First Nation, Lac Seul First Nation
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				November 21, 2018	Treasury Metals provides presentation to Wabauskang First Nation discussing incorporation of traditional knowledge, validation of the assessment of traditional knowledge, EIS methodology (study areas, magnitude, and valued components), and key concerns of water, fish, and human health. Lastly, the presentation and dialogue captured commitments and future engagement opportunities such as the environmental management committee, follow up programs/monitoring, mitigation measures, and the proposed fish compensation plan.
				December 3, 2018	Treasury Metals provides letter of congratulations to Lac Seul First Nation, and reconfirms commitment to capacity funding on request.
				December 4, 2018	Treasury Metals meets with ELFN and their consultants to address/ resolve outstanding concerns related to the revised EIS and Draft Round 2 responses
				December 6, 2018	Treasury Metals delivers response to comments from NFN regarding the revised EIS and Draft Round 2 information request responses. It is stated that Treasury Metals will work with NFN to develop a socio-economic monitoring and management plan with the community and highlights that a funding agreement has been secured to support this process. Further, the correspondence highlights Treasury Metals past commitment to incorporation of NFN comments and dialogue prior to formal submission of the Round 2 package. Treasury Metals has a set meeting with NFN on January 17, 2019.
				December 6, 2018	Treasury Metals delivers response to comments from ANA regarding the revised EIS and Draft Round 2 information request responses. It is stated that Treasury Metals recognizes that the perception of risk, safety and well-being is a concern to members of ANA and proposes to work with ANA to develop a risk communication plan to help mitigate the perceptions of risk, safety and well-being associated with the Goliath Gold project. Treasury Metals is also committed to working with ANA to develop community specific monitoring and management plans as well as mitigation measures. A funding agreement has been secured to support this process. Further, the correspondence highlights Treasury Metals past commitment to incorporation of ANA comments and dialogue prior to formal submission of the Round 2 package. Treasury Metals has a set meeting with ANA on January 16, 2019.
				December 14, 2018	Treasury Metals delivers response to comments from WLON regarding the revised EIS and Draft Round 2 information request responses. Treasury Metals commits to working cooperatively with WLON in the review and submission of regulatory documentation, monitoring, mitigation, and relevant policies. The relationship between Treasury Metals and WLON is hoped to help guide and aid in the development of these policies and inform the mitigation and monitoring to be finalized within the environmental assessment, and provincial permitting. Treasury Metals stated to WLON that they recognize that the perception of risk, safety and well-being is a concern to members of WLON and proposes to

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				<p>work with WLON to develop a risk communication plan to help mitigate the perceptions of risk, safety and well-being associated with the Goliath Gold Project.</p>
				<p>December 28, 2018</p> <p>Treasury Metals delivers to ELFN written responses to three sets of comments on the revised EIS and Draft Round 2 responses. Treasury Metals has continued dialogue with ELFN as it relates to the potential effects of the Project, capacity for informed dialogue, acceptable protocols, plans and timelines, as well as the overall objectives and scope of engagement activities. Treasury Metals in good faith has executed two separate funding agreements to allow for continued dialogue, and execution of critical support items to the development of the Project (TKLUS). Further, this funding has allowed for the development of a Memorandum of Understanding, which formalizes the relationship between Eagle Lake First Nation and Treasury Metals.</p> <p>Treasury Metals committed to working cooperatively with ELFN and its community liaison moving forward in the review and submission of regulatory documentation, monitoring, mitigation, and relevant policies. The TKLUS and the capacity funding made available is anticipated to help guide and aid in the development of these policies, and inform the mitigation and monitoring to be finalized within the environmental assessment, and provincial permitting. Further, Treasury Metals recognizing that communication and dialogue will continue following the conclusion of the Federal environmental assessment, and the Memorandum of Understanding will guide dialogue moving forward as part of the development and the potential benefits to the community of ELFN as a result of the Project. Treasury Metals has another set meeting with ELFN on January 24 2019.</p>
				<p>January 14, 2019</p> <p>Treasury Metals and ELFN formally enter in a Memorandum of Understanding. The MOU provides a structure for additional opportunities and pathways to participate in the Project through employment, training and business development, in addition to ongoing engagement on key aspects of the Project. The MOU supports community capacity funding, the completion of a Traditional Knowledge and Land Use Study, and a commitment to a process towards negotiating and concluding an IBA before commencement of mine construction.</p>
				<p>January 15, 2019</p> <p>Treasury Metals and WLON meet to discuss suitable path forward for inclusive and informed dialogue and introduce senior management to Chief and Council.</p>
				<p>January 16, 2019</p> <p>Treasury Metals meets with ANA and their consultants. Treasury Metals informs ANA and their consultants that they would like to complete a TKLU study with the community.</p>
				<p>January 17, 2019</p> <p>Treasury Metals meets with NFN and their consultants. Treasury Metals informs NFN and their consultants that they would like to complete a TKLU study with the community.</p>

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				January 28, 2019	Treasury Metals receives proposal form NFN for TKLU and Harvest studies. The company is in the process of reviewing the proposal.
				January 29, 2018	<p>Treasury Metals meets with ELFN and their consultants to discuss outstanding technical concerns regarding the revised EIS and Round 2 responses. Outstanding concerns were largely resolved and key commitments made during the meeting include:</p> <ul style="list-style-type: none"> <li>) Commitment to hold a seminar regarding the results of the TK study once available.</li> <li>) Commitment to share information with ELFN as it is available including additional baseline studies</li> <li>) Commitment to have a qualified third party review of mine waste features (specifically cyanide management and transport practices, and an independent tailings review board)</li> <li>) Commitment to consult with ELFN regarding the placement of dustfall monitoring jars to target areas of potential impact that overlap with areas where traditional land and resource occurs</li> </ul> <p>Commitment to engage with ELFN during all phases of the Project including long-term (i.e. post-closure).</p>
				January 30, 2019	Treasury Metals meets with Lac des Mille Lacs First Nation. Representatives of Lac des Mille Lacs First Nation Chief and Council indicate that the Community is prepared to move forward with Treasury Metals as part of a formal agreement, and is supportive of the development and industry within the Treaty #3 area. LDMLFN indicates initial satisfaction with commitments to environmental performance, and current traditional knowledge collection efforts. LDMLFN indicates no concerns, recognizing continued dialogue with regional Treaty #3 Nations. LDMLFN notes their previous workings with regional Projects, indicating their expertise and contracting experience and the potential opportunities related to the Project.
				<p><b><u>FINAL RESPONSE:</u></b></p> <p>Part A. Treasury Metals, as part of the Round 1 information requests, received dialogue from Indigenous communities that informed Treasury Metals about the communities that hold traditional knowledge and practice traditional activities within proximity of the proposed Goliath Gold Project. Each of the communities have indicated aspects of value, and that local resources users undertake harvesting and gathering of plant material, hunting, fishing, trapping, and hold cultural and heritage resources within the area. Where specific information with respect to these components was shared with Treasury Metals, it was incorporated into Section 5 of the revised EIS (April 2018) “Existing Conditions” and aided Treasury Metals in the development of the valued components as reflected Section 6.1.3 of the revised EIS (April 2018). The valued components were in turn used in the assessment of</p>	

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				<p>effects of the Project. With respect to the species specifically mentioned in the “context and rationale block”, in the revised EIS (April 2018), the effects of the Project on fish and fish habitat were assessed in Section 6.14 using the following VCs: Stream-resident fish population, Migratory fish populations and Lake-resident fish populations (which would include northern pike and crappie), the effects of the Project on wildlife and wildlife habitat were assessed in Section 6.12 using ungulates (which would include deer) and upland birds (which would include partridge) as VCs, and the effects of the Project on wetlands and vegetation were assessed in Section 6.15 using vegetation communities (which would include berries) as a VC. The results of the effects assessment on the various biological technical disciplines (including fish and fish habitat, wildlife and wild life habitat, wetlands and vegetation, and human health) were then used to form the foundation of the assessment of effects of the Project on Aboriginal Peoples (Section 6.21 of the revised EIS [April 2018]) and on Indigenous communities (Section 6.22 of the revised EIS [April 2018]). The VCs relied upon in the assessment of the effects of the Project on the ability of Indigenous communities to practice their current use of land and resources for traditional purposes included the following VCs in the revised EIS (April 2018):</p> <ul style="list-style-type: none"> <li>) Human Health</li> <li>) Harvesting/ Gathering of Plant Materials (including but not limited to berries)</li> <li>) Hunting (including but not limited to ungulates such as deer and upland birds such as partridge)</li> <li>) Trapping</li> <li>) Fishing (including but not limited to sportfish, baitfish, and commercial fishing)</li> <li>) Cultural and Spiritual Practices</li> <li>) Socio-economic factors</li> </ul> <p>As described in Section 9 of the revised EIS, Treasury Metals have been engaged with Indigenous communities regarding the Project for several years. As part of the process of engagement, feedback received from members of the Indigenous communities has been used to influence the design of the Project to help avoid potential environmental effects. Additionally, the feedback from members of Indigenous communities have also been used to guide the mitigation measures proposed for the Project. An example of a change in the Project to reflect input from stakeholders, including members of Indigenous communities was the change in location for obtaining fresh, make-up water. Originally fresh, make-up water was going to be obtained from Thunder Lake, but was changed to the ponds on Thunder Lake Tributaries 2 and 3 within the former MNR tree nursery as part of the revised EIS (April 2018). An example of one of the mitigation measures implemented to reflect input from the Indigenous communities was the commitment by Treasury Metals that effluent released during operations would be treated to meet the Provincial Water Quality Objectives (PWQO), or background if the background levels were above the PWQO. In the case of mercury, Treasury Metals have committed to treat the effluent during operations to meet the background levels in Blackwater Creek, which are an order of magnitude lower than the current PWQO.</p> <p>Treasury Metals continues to engage all communities and actively seeks out comment regarding the potential effect or impact of the Project to the ability of Indigenous communities to practice their current use of land and resources for traditional purposes. Treasury Metals remains committed to working with all communities to identify, mitigate, and avoid, or otherwise minimize, these potential effects to the extent practicable.</p>

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				<p>Further to this, Treasury Metals has strived to continued dialog with Indigenous communities throughout the Round 2 information request process regarding the Project, including discussions on mitigation measures, and are currently working towards the development of community specific monitoring programs, management plans and mitigation measures. Since the time that the Round 2 information request responses were submitted to the Agency in Draft on September 12, 2018, a number of key milestones with respect to engagement have occurred as provided in Table 1. Specific engagement regarding mitigation measures have been bolded for clarity.</p>														
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				<p>proposes to work with ANA to develop a risk communication plan to help mitigate the perceptions of risk, safety and well-being associated with the Goliath Gold project. Treasury Metals is also committed to working with ANA to develop community specific monitoring and management plans as well as mitigation measures. A funding agreement has been secured to support this process. Further, the correspondence highlights Treasury Metals past commitment to incorporation of ANA comments and dialogue prior to formal submission of the Round 2 package. Treasury Metals has a set meeting with ANA on January 16, 2019.</p>
				<p>December 14, 2018</p> <p>Treasury Metals delivers response to comments from WLON regarding the revised EIS and Draft Round 2 information request responses. Treasury Metals commits to working cooperatively with WLON in the review and submission of regulatory documentation, monitoring, mitigation, and relevant policies. The relationship between Treasury Metals and WLON is hoped to help guide and aid in the development of these policies and inform the mitigation and monitoring to be finalized within the environmental assessment, and provincial permitting. Treasury Metals stated to WLON that they recognize that the perception of risk, safety and well-being is a concern to members of WLON and proposes to work with WLON to develop a risk communication plan to help mitigate the perceptions of risk, safety and well-being associated with the Goliath Gold Project.</p>
				<p>December 28, 2018</p> <p>Treasury Metals delivers to ELFN written responses to three sets of comments on the revised EIS and Draft Round 2 responses. Treasury Metals has continued dialogue with ELFN as it relates to the potential effects of the Project, capacity for informed dialogue, acceptable protocols, plans and timelines, as well as the overall objectives and scope of engagement activities. Treasury Metals in good faith has executed two separate funding agreements to allow for continued dialogue, and execution of critical support items to the development of the Project (TKLUS). Further, this funding has allowed for the development of a Memorandum of Understanding, which formalizes the relationship between Eagle Lake First Nation and Treasury Metals.</p> <p>Treasury Metals committed to working cooperatively with ELFN and its community liaison moving forward in the review and submission of regulatory documentation, monitoring, mitigation, and relevant policies. The TKLUS and the capacity funding made available is anticipated to help guide and aid in the development of these policies, and inform the mitigation and monitoring to be finalized within the environmental assessment, and provincial permitting. Further, Treasury Metals recognizing that communication and dialogue will continue following the conclusion of the Federal environmental assessment, and the Memorandum of Understanding will guide dialogue moving forward as part of the development and the potential benefits to the community of ELFN as a result of the Project. Treasury Metals has another set meeting with ELFN on January 24 2019.</p>

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				January 14, 2019	Treasury Metals and ELFN formally enter in a Memorandum of Understanding. The MOU provides a structure for additional opportunities and pathways to participate in the Project through employment, training and business development, in addition to ongoing engagement on key aspects of the Project. The MOU supports community capacity funding, the completion of a Traditional Knowledge and Land Use Study, and a commitment to a process towards negotiating and concluding an IBA before commencement of mine construction.
				January 15, 2019	Treasury Metals and WLON meet to discuss suitable path forward for inclusive and informed dialogue and introduce senior management to Chief and Council.
				January 16, 2019	Treasury Metals meets with ANA and their consultants. Treasury Metals informs ANA and their consultants that they would like to complete a TKLU study with the community.
				January 17, 2019	Treasury Metals meets with NFN and their consultants. Treasury Metals informs NFN and their consultants that they would like to complete a TKLU study with the community.
				January 28, 2019	Treasury Metals receives proposal form NFN for TKLU and Harvest studies. The company is in the process of reviewing the proposal.
				January 29, 2018	<p>Treasury Metals meets with ELFN and their consultants to discuss outstanding technical concerns regarding the revised EIS and Round 2 responses. Outstanding concerns were largely resolved and key commitments made during the meeting include:</p> <ul style="list-style-type: none"> <li data-bbox="1150 894 1955 954">) Commitment to hold a seminar regarding the results of the TK study once available.</li> <li data-bbox="1150 963 1955 1023">) Commitment to share information with ELFN as it is available including additional baseline studies</li> <li data-bbox="1150 1031 1955 1128">) Commitment to have a qualified third party review of mine waste features (specifically cyanide management and transport practices, and an independent tailings review board)</li> <li data-bbox="1150 1136 1955 1226">) Commitment to consult with ELFN regarding the placement of dustfall monitoring jars to target areas of potential impact that overlap with areas where traditional land and resource occurs</li> </ul> <p>Commitment to engage with ELFN during all phases of the Project including long-term (i.e. post-closure).</p>
				January 30, 2019	Treasury Metals meets with Lac des Mille Lacs First Nation. Representatives of Lac des Mille Lacs First Nation Chief and Council indicate that the Community is prepared to move forward with Treasury Metals as part of a formal agreement, and is supportive of the development and industry within the Treaty #3 area. LDMLFN indicates initial satisfaction with commitments to environmental performance, and current traditional knowledge



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				<p>collection efforts. LDMLFN indicates no concerns, recognizing continued dialogue with regional Treaty #3 Nations. LDMLFN notes their previous workings with regional Projects, indicating their expertise and contracting experience and the potential opportunities related to the Project.</p> <p>As stated in the revised EIS (April 2018), Treasury Metals recognizes that Indigenous people live, work, hunt, fish, trap, drink water, and gather/harvest throughout their lands and rely on them for their individual as well as their community's overall cultural, social, spiritual, physical, and economic well-being. Further to this, Treasury Metals recognizes that these traditional lands are inextricably connected to an Indigenous community's identity and culture, inclusive of ceremonial and spiritual recognition. Treasury Metals, in respect to this, understands the importance of assessing any potential effects of the Project. Treasury Metals understands the importance of assessing any potential effects of the Project as they relate to traditional land and resource use activities and practices; and acknowledges that the Project may affect the availability of resources or practices within the Project area. Treasury Metals remains committed to working with all communities to identify, mitigate, and avoid, or otherwise minimize, these potential effects to the extent practicable.</p> <p>Treasury Metals continues to engage and promote open dialogue with all Indigenous communities regarding the mitigation measures and conclusions of the EIS. Treasury Metals, as part of the Round 2 information request process and subsequent communications, has reached out to the all Indigenous communities to schedule an informative meeting to discuss the Round 2 information request documentation provided, and to gather continued dialogue and validation on the mitigation measures to be put into place.</p> <p><u>Part B.</u> Mitigation measures as suggested by Indigenous communities include a number of components. These mitigation measures include significant commitments to ensure both regulatory and protection to values within the area. Major commitments inclusive of reporting requirements are listed below:</p> <ul style="list-style-type: none"> <li>- Water Management             <ul style="list-style-type: none"> <li>o Significant alterations to water management have been made (Section 3.15, Section 3.16 of the EIS (April 2018)), water use and management has been identified as a key item to Indigenous stakeholders. Items of significant within this strategy include the use of a water treatment facility, maximization of recycling, effluent characteristics, and long term safety commitments.</li> </ul> </li> <li>- Alteration of the overall general arrangement             <ul style="list-style-type: none"> <li>o Alteration of the site layout was based on communication with Indigenous and public stakeholders.</li> </ul> </li> <li>- Access and Resource Use             <ul style="list-style-type: none"> <li>o Treasury Metals has noted continued access to resources is a primary concern of Indigenous communities. Treasury Metals is committed to working with Indigenous communities to define traditional land use aspects within the Project area, and define a suitable procedure for safe access to these resources. Treasury Metals is continuing to promote dialogue on the validation</li> </ul> </li> </ul>

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				<p>of this mitigation measure to ensure Indigenous contemporary values are reflected within the follow up program.</p> <ul style="list-style-type: none"> <li>- Monitoring and Follow Up Programmes                             <ul style="list-style-type: none"> <li>o Treasury Metals is committed to ensure that Indigenous communities have input into the effectiveness of the Environmental Management Plans and Follow-up Programs, Treasury Metals proposes to form an Environmental Management Committee. This committee would be made up of members from Indigenous communities and would meet with representatives from Treasury Metals on a to-be-determined basis, possibly quarterly or semi-annually. The overall management and terms of reference of this committee is to be determined. Treasury Metals would present any reportable information on the management plans as well as the results of the follow up programs. If exceedances or issues arise that show mitigation measures have not been as effective as expected, the potential for further actions would be discussed with the committee. The Environmental Management Committee is intended to provide a forum for discussing other environmental matters with the potentially affect Indigenous communities such as upcoming permits, the incorporation of traditional knowledge or items of cultural significant that might have been collected since completion of the EA process, and any other environmental matters of relevance to the committee including financial support for operation of the committee. The establishment of this committee was a direct result of communication with the potentially impact Indigenous communities.</li> <li>o In lieu of the formal establishment of the Environmental Management Committee Treasury Metals will continue to follow the guidance of the Agency, and work with all individual communities to promote dialogue on the proposed environmental monitoring and follow up programmes including the validation of the methodology and community reporting needs. Furthermore, Treasury Metals will continue to ensure that all communities are aware of activities being conducted on site.</li> </ul> </li> </ul> <p>Treasury Metals continues to engage and promote open dialogue with Indigenous communities regarding mitigation measures and the conclusions of the EIS. Treasury Metals as part of the revision of the Round 2 information requests and subsequent communication has reached out to Indigenous communities to schedule informative meetings to discuss the Round 2 information requests, and to gather continued dialogue and validation on the mitigation measures to be implemented. As noted in Part A, significant efforts have been completed to support this on-going dialogue and inclusion. Treasury Metals continues to strive, and will work with all Indigenous communities to reflect all formal and informal TKLU information received, and determine a suitable pathway to resolve all outstanding concerns.</p> <p>Treasury Metals will take all proposed mitigation measures under consideration to ensure the continued responsible development of the Project.</p>

TMI\_939-AC(2)-06

Unique Identifier	Agency IR #	Annex	Agency / Group / Stakeholder	Cross Reference / Comment / Information Request / Response	
TMI_939-AC(2)-06	AC(2)-06	4	Eagle Lake First Nation	Reference to EIS Guidelines:	Part 2 Section 13.1.1
				Reference to EIS / Appendix	Section 6.1.4.20; Section 7.3.2, Table 7.3.2-1
				Cross-reference to Round 1 IRs	n/a
				<p><b><u>Context and Rationale:</u></b></p> <p>Sections 6.1.4.20 and 7.3.2 of the revised EIS discuss the selection of the spatial boundaries for the effects of changes to the environment, including cumulative effects, on Indigenous peoples. However, the rationales provided are incomplete.</p> <p>The rationale provided in Section 6.1.4.20 states that for each activity, the local study area (LSA) and regional study area (RSA) are the same as those provided for the corresponding biophysical effects. For example, the LSA and RSA used for the effects of the Project on the fishing by Aboriginal peoples valued component (VC) corresponds to the LSA and RSA used for evaluating the effects on fish and fish habitat (Section 6.1.4.13 and Figure 6.1.4.13-1). Further, the selection of spatial boundaries for the cumulative effects assessment is based on the extent of biophysical effects from the Project. The rationale to support this states that cumulative effects would only occur if another activity were to overlap with the biophysical component relevant to hunting, trapping, fishing or gathering.</p> <p>While basing the LSA and RSA on the most relevant change to the environment is an appropriate start in their definition for an Indigenous activity or practice, the area used by an Indigenous group to exercise their use of the land or resource should also be taken into consideration, including those which would contribute to effects to the “on-the-land experience” of the activity or practice.</p> <p>Further, the selection of a spatial boundary for the assessment of cumulative effects should be VC-specific and take into account the extent of the VC being examined (in this case, the current use of lands and resources for traditional purposes).</p> <p>Indigenous groups’ views on the LSA and RSA and spatial boundaries for cumulative effects should also be incorporated into the development of the definitions.</p>	
<p><b><u>Specific Question / Request for Information:</u></b></p> <p>A. Demonstrate consideration of Indigenous groups’ uses of land and resources and their views in the development of the spatial boundaries for the local and regional study areas for the assessment of effects on Indigenous peoples’</p>					

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				<p>physical and cultural heritage, current use of lands and resources for traditional purposes and any structure site or thing that is of historical, archaeological or paleontological significance.</p> <p><b><u>Response:</u></b></p> <p>A. The spatial boundaries used in the revised EIS (i.e., the local study areas [LSA] and regional study areas [RSA]) were developed early in the assessment process, and were selected to be of sufficient size to capture all potential effects from the Project, including both biophysical and non-biophysical effects, without being too large so as to dilute the effects. The study areas were shared with members of Indigenous communities as part of the engagement activities, prior filing the original EIS in 2015. The feedback provided from members of the Indigenous communities regarding these study areas was restricted to the formal information response process and has been reflected in the spatial boundaries used for the revised EIS (April 2018). For example, the revised EIS (April 2018) includes a specific wild rice LSA that reflects the importance of wild rice to members of the potentially affected Indigenous communities. The spatial boundaries for the study areas for the Aboriginal peoples discipline includes non-biophysical potential effects including the area where there will be a perceptible change to "on-the-land experience" as well as a change in access. The spatial boundaries that were chosen for each discipline therefore did not just consider the potential biophysical effects and consideration of Aboriginal peoples use of the lands and resources directly influenced the development of each spatial boundary.</p> <p><b><u>Agency Comment on Draft Response:</u></b></p> <p>No comments received on draft response.</p> <p><b><u>Specific response to Agency Comment:</u></b></p> <p>Not required. Agency accepted draft response. However, comments were received regarding the draft response from ELFN. A revised response is provided below, which addresses the comments from ELFN.</p> <p><b><u>FINAL RESPONSE:</u></b></p> <p>A. The spatial boundaries used in the revised EIS (i.e., the local study areas [LSA] and regional study areas [RSA]) were developed early in the assessment process and were selected to be of sufficient size to capture all potential effects from the Project, including both biophysical and non-biophysical effects, without being too large so as to dilute the effects. The study areas were shared with members of Indigenous communities as part of the engagement activities, prior filing the original EIS in 2015. The feedback provided from members of the Indigenous communities regarding these study areas was restricted to the formal information response process and has been reflected in the spatial boundaries used for the revised EIS (April 2018). For example, the revised EIS (April 2018) includes a specific wild rice LSA that reflects the importance of wild rice to members of the potentially affected Indigenous communities. The spatial boundaries for the study areas for the Aboriginal peoples discipline includes non-biophysical potential effects including the area where there will be a perceptible change to "on-the-land experience" as well as a change in access. The spatial boundaries that were chosen for each discipline therefore did not just consider the potential</p>

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				<p>biophysical effects and consideration of Aboriginal peoples use of the lands and resources directly influenced the development of each spatial boundary.</p> <p>As part of the Round 2 process, Treasury Metals shared draft responses to the Round 2 information requests from the Agency with all Indigenous communities interested in the Project. On November 26, 2018, ELFN shared their review of the draft responses with Treasury Metals. With respect to TMI_939-AC(2)-06, ELFN indicated to Treasury Metals that they feel the spatial boundaries used in the revised EIS (April 2018) do not incorporate an appropriate level of consideration of the traditional knowledge, current land and resource use, or social and cultural considerations of ELFN.</p> <p>Treasury Metals has continued dialogue with Eagle Lake First Nation as it relates to the potential effects of the Project, capacity for informed dialogue, acceptable protocols, plans and timelines, as well as the overall objectives and scope of engagement activities. Treasury Metals in good faith has executed two separate funding agreements to allow for continued dialogue, and execution of critical support items to the development of the Project (TKLUS). Further, this funding has allowed for the development of a Memorandum of Understanding, which formalizes the relationship between Eagle Lake First Nation and Treasury Metals.</p> <p>As noted in TMI_938-AC(1)-05, Treasury Metals has met with ELFN and their consultants to discuss outstanding technical concerns regarding the revised EIS and Round 2 responses. Further to issue resolution a number of commitments were agreed upon including the commitment to engage with ELFN during all phases of the Project including long-term (i.e. post-closure).</p>

TMI\_940-AC(2)-07

Unique Identifier	Agency IR #	Annex	Agency / Group / Stakeholder	Cross Reference / Comment / Information Request / Response	
TMI_940-AC(2)-07	AC(2)-07	4	Métis Nation of Ontario	Reference to EIS Guidelines:	Part 2 Section 13.1
				Reference to EIS / Appendix	Section 8.1.1.20, 8.21.2, Table 8.21.2.5-1
				Cross-reference to Round 1 IRs	TMI_937-AC(2)-03
				<p><b><u>Context and Rationale:</u></b></p> <p>In addressing this question, please also consider IR# AA(2)-03. In Section 8.1.1.20 of the revised EIS, the methodology used in the determination of significance of residual effects on Indigenous peoples relies on a number of indicators for each valued component (VC). These indicators are based on biophysical changes and do not take into consideration impacts to the exercise of the Aboriginal or treaty right itself. For example, loss of specific harvest locations for berry or plant gathering may carry more weight than the total area lost. This lack of granularity can affect the determination of magnitude of the impact.</p> <p>In addition, interactions of selected indicators should be considered. For example, the “change in access” may have an impact on “on-the-land experience” and ultimately on “berry harvesting”. This interaction may change the determination of magnitude. However, in order to capture these interactions, the criteria for levels of magnitude described in Section 8.1.1.20 would have to rely on more than biophysical changes.</p> <p>Finally, there is no evidence that Indigenous groups’ views about the indicators chosen for each VC were considered. For example, where controlled access to a certain area would not be acceptable to Indigenous people. If this is the case, the area would be considered as “removed from access” rather than controlled. As a result, the total area could increase and may alter the conclusions of significance.</p>	
<p><b><u>Specific Question / Request for Information:</u></b></p> <p>A. Revise the selection and integration of indicator measures for effects to Indigenous peoples, to include non-biophysical changes to land and resource uses.</p> <p>B. Revise the significance assessment to include Indigenous groups’ input on the use of the selected indicator measures and the determination of magnitude of effect.</p>					

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				<p><b><u>Draft Response:</u></b></p> <p><u>Part A:</u> As described in Section 6.21 of the revised EIS (April 2018), non-biophysical changes to land and resources uses were included in the assessment for each Valued Component (VC) that non-biophysical changes would be applicable to. Table 6.1.3.20-1 of the revised EIS (April 2018) provides the VCs, Indicators and Measures assessed for potential effects from the Project on Aboriginal peoples. "Changes in access" and "Diminished on-the-land experience" were included as separate indicators for each applicable Aboriginal peoples VC to capture the non-biophysical changes on those resources from the Project.</p> <p>The Context and Rationale of TMI_940-AC(2)-07 indicates that the magnitude for these bio-physical and non-biophysical effects are assessed separately in the significance section of the EIS, and if assessed collectively may alter the results in changes to the conclusions presented in the revised EIS (April 2018) regarding the significance of the effects. To capture the requested analysis, a revised assessment has been presented that includes both "Changes in access" and "Diminished on-the-land experience" as measures within the resource indicators. In this way, Treasury Metals has evaluated the effects to the resource-based indicators collectively for the bio-physical and non-biophysical changes to verify that this assessment method would not result in a change in the level of significance determined in Section 8.21 of the revised EIS (April 2018). Additionally, a total effected area has also been calculated for each Indicator and VC to assess the total effects on each resource-based effect to Aboriginal peoples.</p> <p>The revised calculation of predicted effects for the resource use VCs and indicators for Aboriginal peoples has been provided in TMI_940-AC(2)-07_Table_1 and includes the collective assessment of non-biophysical and biophysical effects under each applicable VC and indicator. Subsequently, a revised table showing the updated levels of magnitude has been provided in TMI_940-AC(2)-07_Table_2. The results shown are consistent with the conclusions presented in Section 8.21 of the revised EIS (April 2018).</p> <p>As shown in TMI_940-AC(2)-07_Table_2, the magnitude to resource-based Aboriginal peoples' VCs, indicators and measures were mostly classified as a Level I, with some Level II magnitudes. There were no Level III classifications for magnitude to Aboriginal peoples and does not change the outcome of the assessment presented Section 8.21 of the revised EIS (April 2018).</p> <p><u>Part B:</u> In preparing the revised EIS (April 2018), VCs, Indicators and Measures were added to the assessment to reflect input from Aboriginal peoples through the EA process. This involved the inclusion of beaver, wild rice, blueberries, and cultural and spiritual aspects due to input from Aboriginal peoples provided through direct dialogue with Indigenous communities and the information provided to Treasury Metals through the Round 1 information request process. Any residual effects to these VCs, Indicators and Measures were carried forward to the determination of significance. There were no residual effects classified as being significant impacts to Aboriginal peoples as a result of the Project.</p> <p>For the specific example provided in the Context and Rationale of TMI_940-AC(2)-07 regarding the potential use of the area classified as "accompanied access", Treasury Metals understands that some Aboriginal peoples may not wish to make use of those lands and resources that will require them to be accompanied by a Treasury Metals</p>

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				<p>representative to ensure they are safe and secure while in the areas used by Treasury Metals as part of the Project operations.</p> <p>The lands designated as “accompanied access” were identified by Treasury Metals as a possible mitigation measure that would allow access to more lands for to members of Indigenous communities for practicing traditional uses of lands and resources. Treasury Metals are committed to focusing on the safety first mentality. The lands designated as “accompanied access” are located north of the Operations Area. These lands can only be accessed using Tree Nursery Road that will be used by a variety of mining equipment. For safety and security reasons, Treasury Metals has decided to classify these lands as “accompanied access” only, for members of the potentially affected Indigenous communities who wish to access these lands and resources for traditional purposes.</p> <p>To provide a fulsome assessment and address the concerns of the reviewer, Treasury Metals has assessed the collective effects and significance of both the “controlled access” and “removed from access” areas to both be assessed as removed from access. This assessment has been included in the revised assessment provided in Part A in TMI_940-AC(2)-07_Table_1, and TMI_940-AC(2)-07_Table_2. The added measure that includes both the areas of changed access is “Total area with changed access” for each applicable VC.</p> <p><b><u>Agency Comment on Draft Response:</u></b></p> <p>A) The response does not answer the question. It is still not clear how preferred locations have been considered in the definitions and classification of magnitude for effects. For example, when looking at access to specific harvesting locations the proponent still not does describe if the specific harvesting locations are preferred locations. Provide an explanation for how preferred locations were considered in the definition of magnitude.</p> <p><b><u>Specific response to Agency Comment:</u></b></p> <p>Shortly after the submission of the draft Round 2 responses to the Agency, the Métis Nation of Ontario (MNO) shared the “Traditional Knowledge and Land Use Study for the Goliath Gold Project” report with Treasury Metals. Although the specific information presented in this TKLU study is to remain confidential, after careful review of the TKLU study it can be confirmed that there is overlap of the impacts and effects of the Goliath Gold Project with areas currently used by the MNO for hunting large game, non-commercial fishing and gathering of plant material. This TKLU study did identify specific harvesting areas within the vicinity of the Goliath Gold Project that were identified as being preferred by those participants in the TKLU study. On October 10, 2018 Treasury Metals had a meeting with the MNO Consultation Committee who were clear in stating that the results presented in the TKLUS were just a snapshot of their community and although specific areas of country foods harvesting were identified confidentially, all areas potentially impacted or affected by the Goliath Gold Project are suitable for their members. Therefore, all areas impacted or affected by the Goliath Gold Project should be considered as “preferred areas”. At that meeting, Treasury Metals communicated to the MNO consultation committee that the revised EIS (April 2018) and draft Round 2 responses conservatively assumed that all areas where the Project was predicted to have an effect, was in turn assumed to have an effect on current use of land and resources for traditional purposes by members of Indigenous communities. Given the explanation provided by Treasury Metals as to the approach relied on in the revised EIS (April</p>



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				<p>2018) and the draft Round 2 responses, the MNO Consultation Committee were satisfied with this conservative approach to ensure their potential effects on their Rights were appropriately considered.</p> <p>For the purpose of the MNO, the only community to have completed a TKLU study thus far, there would not be a distinction between the total areas affected by the Project (as described in the revised EIS [April 2018] and the draft Round 2 responses) and those areas identified as “preferred” areas. As there is no distinction for MNO between the total affected areas and the “preferred areas”, the method for assigning magnitude for the environment as a whole, as described in Section 8.1.1.20, and specifically Table 8.1.1.20-2, of the revised EIS (April 2018) would remain valid, and there is no need to revise the classification of magnitude for effects at this time.</p> <p>In addition to the specific comments from the Agency addressed above, comments were received regarding the draft response from MNO and ELFN. Treasury Metals is working with these communities to develop community specific mitigation measures, monitoring programs, management plans (including access), risk communication plan, dietary survey, and emergency response plans The revised response provided below also addresses the comments from MNO and ELFN.</p> <p><b><u>FINAL RESPONSE:</u></b></p> <p><u>Part A:</u></p> <p>As described in Section 6.21 of the revised EIS (April 2018), non-biophysical changes to land and resources uses were included in the assessment for each Valued Component (VC) that non-biophysical changes would be applicable to. Table 6.1.3.20-1 of the revised EIS (April 2018) provides the VCs, Indicators and Measures assessed for potential effects from the Project on Aboriginal peoples. “Changes in access” and “Diminished on-the-land experience” were included as separate indicators for each applicable Aboriginal peoples VC to capture the non-biophysical changes on those resources from the Project.</p> <p>The Context and Rationale of TMI_940-AC(2)-07 indicates that the magnitude for these bio-physical and non-biophysical effects are assessed separately in the significance section of the EIS, and if assessed collectively may alter the results in changes to the conclusions presented in the revised EIS (April 2018) regarding the significance of the effects. To capture the requested analysis, a revised assessment has been presented that includes both “Changes in access” and “Diminished on-the-land experience” as measures within the resource indicators. In this way, Treasury Metals has evaluated the effects to the resource-based indicators collectively for the bio-physical and non-biophysical changes to verify that this assessment method would not result in a change in the level of significance determined in Section 8.21 of the revised EIS (April 2018). Additionally, a total effected area has also been calculated for each Indicator and VC to assess the total effects on each resource-based effect to Aboriginal peoples.</p> <p>The revised calculation of predicted effects for the resource use VCs and indicators for Aboriginal peoples has been provided in TMI_940-AC(2)-07_Table_1 and includes the collective assessment of non-biophysical and biophysical effects under each applicable VC and indicator. Subsequently, a revised table showing the updated levels of magnitude has been provided in TMI_940-AC(2)-07_Table_2. The results shown are consistent with the conclusions presented in Section 8.21 of the revised EIS (April 2018).</p>

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				<p>As shown in TMI_940-AC(2)-07_Table_2, the magnitude to resource-based Aboriginal peoples' VCs, indicators and measures were mostly classified as a Level I, with some Level II magnitudes. There were no Level III classifications for magnitude to Aboriginal peoples and does not change the outcome of the assessment presented Section 8.21 of the revised EIS (April 2018). This conclusion remains valid given that the available traditional knowledge and land use study (discussed below) identified that all areas potentially affected by the Project were "preferred" areas for their community, and thus a separate level of magnitude for "preferred" areas was not required.</p> <p>Shortly after the submission of the draft Round 2 responses to the Agency, the Métis Nation of Ontario (MNO) shared the "Traditional Knowledge and Land Use Study for the Goliath Gold Project" report with Treasury Metals. Although the specific information presented in this TKLU study is to remain confidential, after careful review of the TKLU study it can be confirmed that there is overlap of the impacts and effects of the Goliath Gold Project with areas currently used by the MNO for hunting large game, non-commercial fishing and gathering of plant material. This TKLU study did identify specific harvesting areas within the vicinity of the Goliath Gold Project that were identified as being preferred by those participants in the TKLU study. On October 10, 2018 Treasury Metals had a meeting with the MNO Consultation Committee who were clear in stating that the results presented in the TKLUS were just a snapshot of their community and although specific areas of country foods harvesting were identified confidentially, all areas potentially impacted or affected by the Goliath Gold Project are suitable for their members. Therefore, all areas impacted or affected by the Goliath Gold Project should be considered as "preferred areas". At that meeting, Treasury Metals communicated to the MNO consultation committee that the revised EIS (April 2018) and draft Round 2 responses conservatively assumed that all areas where the Project was predicted to have an effect, was in turn assumed to have an effect on current use of land and resources for traditional purposes by members of Indigenous communities. Given the explanation provided by Treasury Metals as to the approach relied on in the revised EIS (April 2018) and the draft Round 2 responses, the MNO Consultation Committee were satisfied with this conservative approach to ensure their potential effects on their Rights were appropriately considered.</p> <p>For the purpose of the MNO, the only community to have completed a TKLU study thus far, there would not be a distinction between the total areas affected by the Project (as described in the revised EIS [April 2018] and the draft Round 2 responses) and those areas identified as "preferred" areas. As there is no distinction for MNO between the total affected areas and the "preferred areas", the method for assigning magnitude for the environment as a whole, as described in Section 8.1.1.20, and specifically Table 8.1.1.20-2, of the revised EIS (April 2018) would remain valid, and there is no need to revise the classification of magnitude for effects at this time.</p> <p>The participants in the TKLUS were asked a series of questions concerning the perceived impacts of the Goliath Gold Project. These findings were shared privately with MNO, but MNO indicated that the participants felt that country foods were a health benefit and of better quality than store bought foods. Treasury Metals recognizes the importance country foods to MNO members and have assessed the potential of changes to the quality of country foods for consumption in the Human health and Ecological Risk Assessment (2018 HHERA) undertaken as part of the Round 2 process. The 2018 HHERA included a country foods assessment that evaluated the effects on human health of Indigenous peoples who consume wildlife and birds affected by the Project. To confirm the conservatism of the findings of the 2018 HHERA, and to help ensure that adverse effects to wildlife and birds, and individuals who may harvest wildlife and birds affected by the Project are not impacted, an extensive follow-up program for ecological</p>

Unique Identifier	Agency IR #	Annex	Agency / Group / Stakeholder	Cross Reference / Comment / Information Request / Response
				<p>receptors and country foods has been proposed in the Goliath Gold Project Follow-up Program Addendum. Treasury Metals would welcome the opportunity to work with MNO to perform a country food survey and to collect small samples of various country foods for chemical analysis to ensure the country foods consumption patterns of members of MNO are captured and that MNO is satisfied with the level of effort for which Treasury Metals has put forth to ensure that the health of members of indigenous communities have been appropriately considered and protected. Treasury Metals recognizes that the perception of risk and safety of country foods is a concern to members of MNO and proposes to work with MNO to develop a risk communication plan to help mitigate the perceptions of risk and safety of country foods potentially affected by the Goliath Gold Project.</p> <p>Since the submission of the draft Round 2 responses, Treasury Metals have continued to engage meaningfully with a number of potentially affected Indigenous communities. On November 26, 2018, ELFN shared their review of the draft responses with Treasury Metals. With respect to TMI_940 AC(2)-07, ELFN indicated to Treasury Metals that they feel the valued components, indicators, measures and magnitude levels used in the revised EIS (April 2018) do not incorporate an appropriate level of consideration of the traditional knowledge, current land and resource use, or social and cultural considerations of ELFN. Treasury Metals has continued dialogue with Eagle Lake First Nation as it relates to the potential effects of the Project, capacity for informed dialogue, acceptable protocols, plans and timelines, as well as the overall objectives and scope of engagement activities. Treasury Metals in good faith has executed two separate funding agreements to allow for continued dialogue, and execution of critical support items to the development of the Project (TKLUS). Further, this funding has allowed for the development of a Memorandum of Understanding, which formalizes the relationship between Eagle Lake First Nation and Treasury Metals.</p> <p>As further TKLU studies are completed, there may be Indigenous communities that identify specific areas preferred by their members for practicing traditional uses of lands and resources. Treasury Metals has expressed a willingness to complete specific assessments on the effects of the project on "preferred areas" for those communities willing to share the GIS or quantitative information on preferred locations, in confidence, with Treasury Metals. At that time, Treasury Metals would revisit the levels of magnitude on a community-specific basis. Treasury Metals is working with these communities to develop community specific mitigation measures, monitoring programs, management plans (including access), risk communication plan, dietary survey, and emergency response plans.</p> <p><u>Part B:</u></p> <p>In preparing the revised EIS (April 2018), VCs, Indicators and Measures were added to the assessment to reflect input from Aboriginal peoples through the EA process. This involved the inclusion of beaver, wild rice, blueberries, and cultural and spiritual aspects due to input from Aboriginal peoples provided through direct dialogue with Indigenous communities and the information provided to Treasury Metals through the Round 1 information request process. Any residual effects to these VCs, Indicators and Measures were carried forward to the determination of significance. There were no residual effects classified as being significant impacts to Aboriginal peoples as a result of the Project.</p> <p>For the specific example provided in the Context and Rationale of TMI_940-AC(2)-07 regarding the potential use of the area classified as "accompanied access", Treasury Metals understands that some Aboriginal peoples may not</p>

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				<p>wish to make use of those lands and resources that will require them to be accompanied by a Treasury Metals representative to ensure they are safe and secure while in the areas used by Treasury Metals as part of the Project operations.</p> <p>The lands designated as "accompanied access" were identified by Treasury Metals as a possible mitigation measure that would allow access to more lands for to members of Indigenous communities for practicing traditional uses of lands and resources. Treasury Metals are committed to focusing on the safety first mentality. The lands designated as "accompanied access" are located north of the Operations Area. These lands can only be accessed using Tree Nursery Road that will be used by a variety of mining equipment. For safety and security reasons, Treasury Metals has decided to classify these lands as "accompanied access" only, for members of the potentially affected Indigenous communities who wish to access these lands and resources for traditional purposes.</p> <p>To provide a fulsome assessment and address the concerns of the reviewer, Treasury Metals has assessed the collective effects and significance of both the "controlled access" and "removed from access" areas to both be assessed as removed from access. This assessment has been included in the revised assessment provided in Part A in TMI_940-AC(2)-07_Table_1, and TMI_940-AC(2)-07_Table_2. The added measure that includes both the areas of changed access is "Total area with changed access" for each applicable VC.</p>

TMI\_941-AC(2)-08

Unique Identifier	Agency IR #	Annex	Agency / Group / Stakeholder	Cross Reference / Comment / Information Request / Response	
TMI_941-AC(2)-08	AC(2)-08	4	Métis Nation of Ontario	Reference to EIS Guidelines:	Part 2 Sections 9, 10
				Reference to EIS / Appendix	Sections 5, 6, 9
				Cross-reference to Round 1 IRs	TMI_937-AC(2)-03
				<p><b><u>Context and Rationale:</u></b></p> <p>The Agency understands that the Métis Nation of Ontario (MNO) provided a preliminary traditional knowledge and land use study (TKLUS) to the proponent prior to the submission of the revised EIS. However, it appears that the proponent may not have used all available information to inform the selection of the VCs, indicators and measures in the Revised EIS. For example, species including crappie, northern pike, deer and partridge were not studied. MNO gathers many varieties of berries and harvests a variety of species, their exclusion from consideration in the assessment highlights issues within the EIS.</p>	
<p><b><u>Specific Question / Request for Information:</u></b></p> <p>A. Describe how the information from the TKLUS provided by the MNO, changes the conclusions for the following sections:</p> <ul style="list-style-type: none"> <li>- Existing conditions, including                             <ul style="list-style-type: none"> <li>o Traditional land and resource use and of interest to Métis Nation of Ontario</li> </ul> </li> <li>- Predicted impacts on the Métis Nation of Ontario , including on:                             <ul style="list-style-type: none"> <li>o Heritage resources, cultural and spiritual components</li> <li>o Harvesting and gathering of plant material</li> <li>o Hunting</li> <li>o Effects on Indigenous peoples health and socio- economics</li> </ul> </li> <li>- Mitigation to address predicted impacts on Métis Nation of Ontario (paragraph 5(1)(c) of CEEA 2012)</li> <li>- Impacts on Métis Nation of Ontario rights and identified traditional land use practices</li> </ul> <p>B. Demonstrate that the newly incorporated information has been validated with the Métis Nation of Ontario prior to submission.</p>					

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				<p><b><u>Draft Response:</u></b></p> <p>Part A. Treasury Metals, as part of the Round 1 information request process, received dialogue from the Métis Nation of Ontario Region 1 Consultation Committee that Métis citizens practice traditional land use and hold traditional knowledge within proximity of the proposed Goliath Gold Project. Treasury Metals, as part of on-going communication with the Métis Nation of Ontario, undertook a Traditional Knowledge and Land Use Study (TKLUS) and incorporated the preliminary data shared by members of the Métis Nation of Ontario during the Round 1 information request process, into the revised EIS (April 2018). The Métis Nation of Ontario had indicated that local resources users undertake harvesting and gathering of plant material, hunting, fishing, trapping, and hold cultural and heritage resources within the area. Where specific information with respect to these components was shared it was incorporated into Section 5 of the EIS (April 2018) “Existing Conditions” and aided Treasury Metals in the development of the valued components as reflected within the EIS (April 2018). The valued components were in turn used in the assessment of effects of the Project. With respect to the species specifically mentioned in the “context and rationale block”, in the revised EIS (April 2018), the effects of the Project on fish and fish habitat were assessed in Section 6.14 using the following VCs: Stream-resident fish population, Migratory fish populations and Lake-resident fish populations (which would include northern pike and crappie), the effects of the Project on wildlife and wildlife habitat were assessed in Section 6.12 using ungulates (which would include deer) and upland birds (which would include partridge) as VCs, and the effects of the Project on wetlands and vegetation were assessed in Section 6.15 using vegetation communities (which would include berries) as a VC. The results of the effects assessment on the various biological technical disciplines (including fish and fish habitat, wildlife and wild life habitat, wetlands and vegetation, and human health) were then used to form the foundation of the assessment of effects of the Project on Aboriginal Peoples (Section 6.21 of the revised EIS [April 2018]) and on Indigenous communities including the Métis Nation of Ontario (Section 6.22 of the revised EIS [April 2018]). The VCs relied upon in the assessment of the effects of the Project on the ability of Indigenous communities to practice their current use of land and resources for traditional purposes included the following VCs in the April 2018 version of the EIS:</p> <ul style="list-style-type: none"> <li>J Human Health</li> <li>J Harvesting/ Gathering of Plant Materials (including but not limited to berries)</li> <li>J Hunting (including but not limited to ungulates such as deer and upland birds such as partridge)</li> <li>J Trapping</li> <li>J Fishing (including but not limited to sportfish, baitfish, and commercial fishing)</li> <li>J Cultural and Spiritual Practices</li> <li>J Socio-economic factors</li> </ul> <p>The final TKLUS report entitled “Traditional Knowledge and Land Use Study for the Goliath Gold Project” submitted to Bonnie Bartlett of the Métis Nation of Ontario by Know History Inc. dated August 14, 2018 was provided to Treasury Metals on August 27, 2018. Given that preliminary information from the TKLUS study had previously been provided to Treasury Metals, no new data was incorporated into the revised EIS (April 2018). Instead the findings of</p>

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				<p>the TKLUS study were used to confirm that the approach employed in the revised EIS (April 2018), including the selection of VCs, was valid, and will be relied upon as part of follow-up programs and ongoing monitoring requirements to support the verification of the predictions made in the revised EIS (April 2018). Therefore, the information from the TKLUS provided by the Métis Nation of Ontario does not change the conclusions made in the EIS (April 2018).</p> <p>As stated in the revised EIS (April 2018), Treasury Metals recognizes that Indigenous people including members of the Métis Nation of Ontario live, work, hunt, fish, trap, drink water, and gather/harvest throughout their lands and rely on them for their individual as well as their community's overall cultural, social, spiritual, physical, and economic well-being. Further to this, Treasury Metals recognizes that these traditional lands are inextricably connected to an Indigenous community's identity and culture, inclusive of ceremonial and spiritual recognition. Treasury Metals, in respect to this, understands the importance of assessing any potential effects of the Project. Treasury Metals understands the importance of assessing any potential effects of the Project as they relate to traditional land and resource use activities and practices; and acknowledges that the Project may affect the availability of resources or practices within the Project area. Treasury Metals remains committed to working with all communities to identify, mitigate, and avoid, or otherwise minimize, these potential effects to the extent practicable.</p> <p><u>PART B:</u> As described in Part A of this response, no new information was incorporated into the revised EIS (April 2018) from the report entitled "Traditional Knowledge and Land Use Study for the Goliath Gold Project" submitted to Bonnie Bartlett of the Métis Nation of Ontario by Know History Inc. dated August 14, 2018 and provided to Treasury Metals on August 27, 2018. Instead, the information contained in this report was used to verify the approach used in the EIS and will be relied upon to aid in the development of monitoring and follow-up programs. Treasury Metals has formally committed as part of on-going relationship development to working with the Métis Nation of Ontario to ensure that all outstanding concerns are addressed. Treasury Metals, as part of the Round 2 information request process and subsequent communications, has reached out to the Métis Nation of Ontario to schedule an informative meeting to discuss the IR#2's, documentation provided, and to gather dialogue validation on the responses and the incorporation of the values presented within the TKLUS. In addition, Treasury Metals as part of the continuing development of facets outside of the EIS, will continue to work with the Métis Nation of Ontario to integrate all values presented within the TKLUS, and use this constructive dialogue to help inform the mitigation methodology proposed.</p> <p><b><u>Agency Comment on Draft Response:</u></b></p> <p>A) The response does not indicate how the information from the Traditional Knowledge Land Use Study was incorporated into section 6.21 and 6.22 (the assessment of effects to Aboriginal peoples). While it is good to use Traditional Knowledge to capture the correct species in the biophysical section, it is as important to incorporate Traditional Knowledge into understanding of the types of activities, timing of activities and locations of activities.</p>

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				<p>Revise your response to demonstrate that information from the Métis Nation of Ontario's Traditional Knowledge and Land Use Study was used in the assessment of effects on Aboriginal peoples (5.1 (c) of CEAA, 2012).</p> <p><b><u>Specific response to Agency Comment:</u></b></p> <p>The Métis Nation of Ontario (MNO) shared the "Traditional Knowledge and Land Use Study for the Goliath Gold Project" report, in confidence, with Treasury Metals on August 27, 2018. Although the specific information presented in this TKLU study is to remain confidential, after careful review of the TKLU study it can be confirmed that there is overlap of the impacts and effects of the Goliath Gold Project with areas currently used by the MNO for hunting large game, non-commercial fishing and gathering of plant material. This TKLU study did identify specific harvesting areas within the vicinity of the Goliath Gold Project that were identified as being preferred by those participants in the TKLU study. On October 10, 2018 Treasury Metals had a meeting with the MNO Consultation Committee who were clear in stating that the results presented in the TKLU study were just a snapshot of their community. Although specific areas of country foods harvesting were identified confidentially, the MNO Consultation Committee went on to state that all areas potentially impacted or affected by the Goliath Gold Project are suitable for their members. At that meeting, Treasury Metals communicated to the MNO consultation committee that the revised EIS (April 2018) and draft Round 2 responses conservatively assumed that all areas where the Project was predicted to have an effect, was in turn assumed to have an effect on current use of land and resources for traditional purposes by members of Indigenous communities. Given the explanation provided by Treasury Metals as to the approach relied on in the revised EIS (April 2018) and the draft Round 2 responses, the MNO Consultation Committee were satisfied with this conservative approach to ensure their potential effects on their Rights were appropriately considered. Although the specific information provided in the TKLU study remains confidential, it was used to confirm the types of activities, timing of activities and location of activities. The approach taken in the revised EIS (April 2018) is consistent with the information shared in the TKLU study and confirmed during the October 10, 2018 meeting with the MNO Consultation Committee.</p> <p>In addition to the specific comments from the Agency addressed above, comments were received regarding the draft response from MNO. Treasury Metals is working with MNO to develop community specific mitigation measures, monitoring programs, management plans (including access), risk communication plan, dietary survey, and emergency response plans. The revised response provided below also addresses the comments from MNO.</p> <p>Comments were received regarding the draft response from ELFN. A revised response is provided below, which addresses the comments from ELFN. On November 26, 2018, ELFN shared their review of the draft responses with Treasury Metals. With respect to TMI_941-AC(2)-08, ELFN indicated to Treasury Metals that they feel the baseline and effects information in the revised EIS (April 2018) that relate to ELFN do not incorporate an appropriate level of consideration of the traditional knowledge, current land and resource use, or social and cultural considerations of ELFN.</p>



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				<p>Treasury Metals has continued dialogue with Eagle Lake First Nation as it relates to the potential effects of the Project, capacity for informed dialogue, acceptable protocols, plans and timelines, as well as the overall objectives and scope of engagement activities. Treasury Metals in good faith has executed two separate funding agreements to allow for continued dialogue, and execution of critical support items to the development of the Project (TKLUS). Further, this funding has allowed for the development of a Memorandum of Understanding, which formalizes the relationship between Eagle Lake First Nation and Treasury Metals.</p> <p><b><u>FINAL RESPONSE:</u></b></p> <p><u>Part A</u></p> <p>The Métis Nation of Ontario (MNO) shared the "Traditional Knowledge and Land Use Study for the Goliath Gold Project" report, in confidence, with Treasury Metals on August 27, 2018. Although the specific information presented in this TKLU study is to remain confidential, after careful review of the TKLU study it can be confirmed that there is overlap of the impacts and effects of the Goliath Gold Project with areas currently used by the MNO for hunting large game, non-commercial fishing and gathering of plant material. This TKLU study did identify specific harvesting areas within the vicinity of the Goliath Gold Project that were identified as being preferred by those participants in the TKLU study. On October 10, 2018 Treasury Metals had a meeting with the MNO Consultation Committee who were clear in stating that the results presented in the TKLU study were just a snapshot of their community. Although specific areas of country foods harvesting were identified confidentially, the MNO Consultation Committee went on to state that all areas potentially impacted or affected by the Goliath Gold Project are suitable for their members. At that meeting, Treasury Metals communicated to the MNO consultation committee that Sections 6.21 and 6.22 the revised EIS (April 2018) and draft Round 2 responses conservatively assumed that all areas where the Project was predicted to have an effect, was in turn assumed to have an effect on current use of land and resources for traditional purposes by members of Indigenous communities. Given the explanation provided by Treasury Metals as to the approach relied on in the revised EIS (April 2018) and the draft Round 2 responses, the MNO Consultation Committee were satisfied with this conservative approach to ensure their potential effects on their Rights were appropriately considered. Although the specific information provided in the TKLU study remains confidential, it was used to confirm the types of activities, timing of activities and location of activities. The approach taken in the revised EIS (April 2018) is consistent with the information shared in the TKLU study and confirmed during the October 10, 2018 meeting with the MNO Consultation Committee.</p> <p>At this time it has been validated that members of MNO currently practice the following use of lands and resources for traditional purposes in area:</p> <ul style="list-style-type: none"> <li>• Hunting small game;</li> <li>• Hunting of large game;</li> <li>• Hunting of waterfowl;</li> <li>• Trapping;</li> <li>• Commercial fishing;</li> </ul>

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				<ul style="list-style-type: none"> <li>• Non-commercial fishing;</li> <li>• Plant and Natural Material Harvesting;</li> <li>• Land or Water Routes;</li> <li>• Traditional Ecological Knowledge Site/Area; and</li> <li>• Metis Cultural Practice Sites/Routes</li> </ul> <p>It has also been validated that members of MNO currently traditional uses in specific areas that overlap with the predicted effects of the Project, but Treasury Metals should assume that all areas potentially impacted or affected by the Goliath Gold Project are suitable for by their members.</p> <p>Therefore, the TKLUS information provided by the MNO, did not change the conclusions for the following sections of the revised EIS (April 2018), however will be critical for developing programs specifically intended to mitigate and monitor the effects of the Project on MNO:</p> <ul style="list-style-type: none"> <li>- Existing conditions, including             <ul style="list-style-type: none"> <li>o Traditional land and resource use and of interest to Métis Nation of Ontario</li> </ul> </li> <li>- Predicted impacts on the Métis Nation of Ontario, including on:             <ul style="list-style-type: none"> <li>o Heritage resources, cultural and spiritual components</li> <li>o Harvesting and gathering of plant material</li> <li>o Hunting</li> <li>o Effects on Indigenous peoples health and socio- economics</li> </ul> </li> <li>- Mitigation to address predicted impacts on Métis Nation of Ontario (paragraph 5(1)(c) of CEEA 2012)</li> <li>- Impacts on Métis Nation of Ontario rights and identified traditional land use practices</li> </ul> <p>Treasury Metals is working with MNO to develop community specific mitigation measures, monitoring programs, management plans (including access), risk communication plan, dietary survey, and emergency response plans. The revised response provided below also addresses the comments from MNO.</p> <p>Although this response is specific to MNO, Treasury Metals is endeavoring a similar approach with local First Nation Communities including ELFN, WLON, ANA, and NFN. Specific comments were received from ELFN on TMI_941-AC(2)-08 that they wished to see incorporated into the final response. Specifically, on November 26, 2018, ELFN shared their review of the draft responses with Treasury Metals. With respect to TMI_941-AC(2)-08, ELFN indicated to Treasury Metals that they feel the baseline and effects information in the revised EIS (April 2018) that relate to ELFN do not incorporate an appropriate level of consideration of the traditional knowledge, current land and resource use, or social and cultural considerations of ELFN.</p> <p>Treasury Metals has continued dialogue with Eagle Lake First Nation as it relates to the potential effects of the Project, capacity for informed dialogue, acceptable protocols, plans and timelines, as well as the overall objectives and scope of engagement activities. Treasury Metals in good faith has executed two separate funding agreements to</p>

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				<p>allow for continued dialogue, and execution of critical support items to the development of the Project (TKLUS). Further, this funding has allowed for the development of a Memorandum of Understanding, which formalizes the relationship between Eagle Lake First Nation and Treasury Metals.</p> <p><u>Part B</u></p> <p>Treasury Metals discussed the effects of the Project with respect to the TKLU study as described in Part A of this response. The MNO asked to review this revised response prior to submission to the Agency. Although it was the intention of Treasury Metals to share the revision of this response with MNO prior to the submission to the Agency, the timing did not accommodate this step. Treasury Metals have had fulsome engagements with multiple Indigenous communities since filing the draft Round 2 submissions and have endeavored to incorporate all of this feedback in the responses to the Agency. The integration and feedback from MNO shared during the October 10, 2018 meeting has been documented in a correspondence on October 11, 2018 from MNP, the consultants retained by the MNO. This October 11, 2018 correspondence confirms that during discussions Treasury Metals and the MNO agreed to a strategy for Treasury Metals to incorporate the results of the MNO TKLU study into the final Round 2 information request responses. However, this correspondence was a confidential document shared with Treasury Metals and should not be shared directly with the Agency without the permission of MNO. Treasury Metals and MNO have continued dialogue and have agreed upon an initial framework for review of the final Round 2 information request responses, mitigation measures, commitments, and monitoring which will allow the MNO to assess the adequacy of the incorporated response. The framework also addresses future permitting activities.</p>

TMI\_942-AC(2)-09

Unique Identifier	Agency IR #	Annex	Agency / Group / Stakeholder	Cross Reference / Comment / Information Request / Response	
TMI_942-AC(2)-09	AC(2)-09	4	Eagle Lake First Nation	Reference to EIS Guidelines:	Part 2 Section
				Reference to EIS / Appendix	Section 4.3.2.4
				Cross-reference to Round 1 IRs	n/a
				<p><b><u>Context and Rationale:</u></b></p> <p>Section 4.3.2.4 of the revised EIS states that in the event of a TSF failure, a monitoring program will be developed to include wild rice samples from the mouth of Blackwater Creek that would be tested for metal concentrations. These samples would be compared against other wild rice stands in the Wabigoon Lake area. However, other industrial activities and historical sources of contamination present in other areas of the Wabigoon Lake area may result in background metal concentrations in wild rice stands that are variable from the true baseline found at the mouth of Blackwater Creek.</p> <p>Wild rice harvesting is of high socio-economic and cultural value to Indigenous communities in the area, and as such baseline information on wildrice stands should be collected prior to the Project being in place and this should be as accurate as possible in order to have comparable results and an accurate determination of the Project's effects on wild rice stands, including that from any potential accidents and malfunctions.</p>	
<p><b><u>Specific Question / Request for Information:</u></b></p> <p>A. Describe how baseline metal concentration in wild rice stands at the mouth of Blackwater Creek will be determined prior to Project construction, and utilized in a monitoring program for wild rice stands in the event of a TSF failure during operation.</p>					
<p><b><u>Draft Response:</u></b></p> <p>As part of the process for responding to the Round 2 information requests, Treasury Metals has completed a comprehensive Human Health and Ecological Risk Assessment (2018 HHERA). Baseline metal concentrations in wild rice stands in the mouth of Blackwater Creek were predicted as described in the 2018 HHERA submitted in support of the Round 2 information requests. The predicted metal concentration in wild rice were determined using an uptake equation, where the predicted metal concentrations in surface water were multiplied by a peer-reviewed uptake factor (water to macrophytes provided in Sheppard et al., 2010). The uncertainty section provided in the 2018 HHERA identified that the collection of additional baseline data with respect to wild rice (and other country foods) and the derivation of site-specific uptake factors should be performed as part of the Follow-Up Program. The appropriate regulatory guidance document relied upon in the 2018 HHERA assessment was Health Canada's June 2018</p>					

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				<p>Guidance document entitled "Guidance for Evaluating Human Health Impacts in Environmental Assessments: Country Foods".</p> <p>As per 2018 Health Canada guidance, baseline levels of metals (and other contaminants of concern [COC]) in country foods should be measured as part of the environmental assessment prior to the project start. If measured levels were not available for use in the environmental assessment, then it is recommended that they be identified prior to project start. As detailed in the Follow-Up Program section of the 2018 HHERA, Treasury Metals will measure concentrations of COCs in environmental media, including country foods items. Given that this guidance document was only made available following the submission of the revised EIS (April 2018), Section 13 of the revised EIS (April 2018) does not include specific details regarding establishing baseline concentrations in country foods. Details regarding the collection of baseline concentrations in country foods is provided in both the 2018 HHERA Report and the Goliath Gold Follow-Up Addendum, which are included as part of the overall Round 2 information request responses. Treasury Metals, as part of the follow-up program, will collect samples at the wild rice at the mouth of Blackwater Creek prior to the start of the Project, and will also include a reference site (i.e., nearby site with similar environmental conditions, but outside the zone of influence of the Project) to established baseline conditions. This approach is considered acceptable as per the 2018 Health Canada country foods guidance document.</p> <p>As described in Section 4 of the revised EIS (April 2018), meaningful metals uptake by plants, including wild rice, would not be anticipated in the highly unlikely event of a TSF failure as remediation activities would commence immediately it is safe to do so, and exposures would therefore be localized and short-term. However, to ensure that this finding is accurate, sampling of the potentially affected wild rice at the mouth of Blackwater Creek would be done. Section 4.3.2.4 of the revised EIS (April 2018) describes that in "the highly unlikely event of a TSF failure, a monitoring program would be developed that would include wild rice samples taken from the mouth of Blackwater Creek and tested for metals against other wild rice stands in Wabigoon lake (and a control lake outside of the system in practical) in order to provide confidence to potential consumers." This will allow Treasury Metals, regulators and members of Indigenous communities to understand what effects, if any, a highly unlikely failure of the TSF would have on the stands of wild rice at the mouth of Blackwater Creek.</p> <p>References:                      Health Canada (HC). 2018. Guidance for Evaluating Human Health Impacts in Environmental Assessment: Country Foods. Dated June 2018.                      Sheppard S.C., Long J.M., Sanipelli B. 2010. Measured elemental transfer factors for boreal hunter/gatherer scenarios: fish, game and berries. Journal of Environmental Radioactivity 101 (2010) 902e909.</p>

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				<p><b><u>Agency Comment on Draft Response:</u></b></p> <p>A) The response states that “Baseline metal concentrations in wild rice stands in the mouth of Blackwater Creek were predicted as described in the 2018 HHERA submitted in support of the Round 2 information requests.” However the Agency is unable to find these baseline concentrations in the updated HHERA.</p> <p>Provide the baseline concentrations or a reference to where the baseline concentrations in wild rice stands are in the 2018 HHERA.</p> <p>B) The response states that “Treasury Metals, as part of the follow-up program, will collect samples at the wild rice at the mouth of Blackwater Creek prior to the start of the Project, and will also include a reference site (i.e., nearby site with similar environmental conditions, but outside the zone of influence of the Project) to established baseline conditions.”</p> <p>Identify the location of the reference site as other industrial activities and historical sources of contamination present in other areas of the Wabigoon Lake area may result in background metal concentrations in wild rice stands that are variable from the true baseline found at the mouth of Blackwater Creek.</p> <p><b><u>Specific response to Agency Comment:</u></b></p> <p>In addition to the specific comments from the Agency addressed above, comments were received regarding the draft response from ELFN. In addition, WLON has also raised specific concerns regarding the effects of the Project on wild rice within Wabigoon Lake, Treasury Metals is working with ELFN and other communities to develop community specific mitigation measures, monitoring programs, management plans (including access), risk communication plan, dietary survey, and emergency response plans. The revised response provided below also addresses the comments from ELFN, and incorporates information to reflect feedback from WLON and other communities.</p> <p>(A) The predicted baseline concentrations for all media including wild rice, are defined in the Base Case Assessment Scenario. Section 3.6.3 “Chemical Concentrations in Country Foods” of the 2018 HHERA, states “the modelled EPCs of COCs in country foods at the three Study Areas for the Base Case Assessment Scenario, Project Alone Assessment Scenario, and Project Assessment Scenario are provided in Appendix IV - Model Inputs.” The predicted concentrations of COCs in wild rice for all assessment scenarios (including Base Case), study areas, and Project phases, is provided in Table IV-9: Chemical Concentrations in Macrophytes (e.g., Wild Rice) the 2018 HHERA reproduced as TMI_942-AC(2)-09_Table_1 (the baseline concentrations have been highlighted in the table). The predicted concentrations in wild rice are the same at all three study areas because the maximum surface water concentration (predicted in Blackwater Creek) was conservatively applied at all three study areas to ensure potential risk was not underestimated. Full details regarding the definition of the assessment scenarios, rationale for the three-</p>

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				<p>study areas chosen, and the use of Sheppard et al., 2010's water to macrophyte uptake factor, are provided in the 2018 HHERA report and associated appendices.</p> <p>(B) In order to understand what effect, if any, the Goliath Gold Project may have on the concentrations of metals in wild rice, it is important to understand the baseline levels of metals that are present in the wild rice today. Those baseline levels will, arguably, reflect the effects of other industrial activities and historical sources of contamination within Wabigoon Lake. These are the levels against which Treasury Metals would compare the measured concentrations to see if they are contributing to the levels of metal in wild rice.</p> <p>In selecting reference sites for use in follow-up program, those sites should include the same environmental conditions as the wild rice at the mouth of Blackwater Creek (i.e., reflect the effects of other industrial activities and historical sources of contamination within Wabigoon Lake), but be far enough removed to be outside the influence of the Project. Guidance for selecting reference sites is provided by the CCME in their document entitled "Guidance Manual for Environmental Site Characterization in support of Environmental and Human Health Risk Assessment- Volume 1 Guidance Manual" dated 2016. As stated by the CCME in the 2016 guidance manual, it is advisable that more than one reference location be chosen. TMI_942-AC(2)-09_Figure_1 shows the proposed sampling for rice, and includes the following:</p> <ul style="list-style-type: none"> <li>J The wild rice at the mouth of Blackwater Creek—to confirm the predictions regarding the effects of the Project;</li> <li>J The wild rice stand on the south shore of Wabigoon Lake, adjacent to the Butler Lake Nature Reserve—a reference site within Wabigoon Lake, in close proximity to the Project but outside the predicted influence of the Project based on the finite element modelling of Wabigoon Lake (Appendix GG);</li> <li>J The wild rice stand in the channel connecting Dinorwic Lake and Wabigoon Lake— a reference site upstream of Wabigoon Lake, and well outside the influence of the Project; and</li> <li>J The south end of Rice Lake—a background site, free of the effects of other industrial activities and historical sources of contamination within Wabigoon Lake.</li> </ul> <p>However, the location for the sampling site will be finalized prior to the start of the Project through input received from the Indigenous communities who currently harvest wild rice in these areas.</p> <p>As part of the Round 2 information request process, Treasury Metals received a number of questions regarding the Follow-Up Program. As a result, Treasury Metals has prepared the Goliath Gold Project Follow-Up Program Addendum to capture the responses to these issues and provide a consolidated update to the Follow-Up Program. The Follow-Up Program for human health (Section FUP1.19) of the Goliath Gold Follow-Up Addendum has been revised to capture the information regarding the selection of a reference site for measuring baseline chemical concentrations in wild rice.</p> <p>References:</p> <p>CCME, 2016: Guidance Manual for Environmental Site Characterization in support of Environmental and Human Health Risk Assessment- Volume 1 Guidance Manual. PIN 1551 ISBN 978-1-77202-026-7.</p>

Unique Identifier	Agency IR #	Annex	Agency / Group / Stakeholder	Cross Reference / Comment / Information Request / Response
				<p><b><u>FINAL RESPONSE:</u></b></p> <p>As part of the process for responding to the Round 2 information requests, Treasury Metals has completed a comprehensive Human Health and Ecological Risk Assessment (2018 HHERA). Baseline metal concentrations in wild rice stands in the mouth of Blackwater Creek were predicted as described in the 2018 HHERA submitted in support of the Round 2 information requests. The predicted metal concentration in wild rice were determined using an uptake equation, where the predicted metal concentrations in surface water were multiplied by a peer-reviewed uptake factor (water to macrophytes provided in Sheppard et al., 2010). The predicted baseline concentrations for all media including wild rice, are defined in the Base Case Assessment Scenario. Section 3.6.3 “Chemical Concentrations in Country Foods” of the 2018 HHERA, states “the modelled EPCs of COCs in country foods at the three Study Areas for the Base Case Assessment Scenario, Project Alone Assessment Scenario, and Project Assessment Scenario are provided in Appendix IV - Model Inputs.” The predicted concentrations of COCs in wild rice for all assessment scenarios (including Base Case), study areas, and Project phases, is provided in Table IV-9: Chemical Concentrations in Macrophytes (e.g., Wild Rice) the 2018 HHERA reproduced as TMI_942-AC(2)-09_Table_1 (the baseline concentrations have been highlighted in the table). The predicted concentrations in wild rice are the same at all three study areas because the maximum surface water concentration (predicted in Blackwater Creek) was conservatively applied at all three study areas to ensure potential risk was not underestimated. Full details regarding the definition of the assessment scenarios, rationale for the three-study areas chosen, and the use of Sheppard et al., 2010’s water to macrophyte uptake factor, are provided in the 2018 HHERA report and associated appendices. The uncertainty section provided in the 2018 HHERA identified that the collection of additional baseline data with respect to wild rice (and other country foods) and the derivation of site-specific uptake factors should be performed as part of the Follow-Up Program. The appropriate regulatory guidance document relied upon in the 2018 HHERA assessment was Health Canada’s June 2018 Guidance document entitled “Guidance for Evaluating Human Health Impacts in Environmental Assessments: Country Foods”.</p> <p>As per 2018 Health Canada guidance, baseline levels of metals (and other contaminants of concern [COC]) in country foods should be measured as part of the environmental assessment prior to the project start. If measured levels were not available for use in the environmental assessment, then it is recommended that they be identified prior to project start. As detailed in the Follow-Up Program section of the 2018 HHERA, Treasury Metals will measure concentrations of COCs in environmental media, including country foods items. Given that this guidance document was only made available following the submission of the revised EIS (April 2018), Section 13 of the revised EIS (April 2018) does not include specific details regarding establishing baseline concentrations in country foods. Details regarding the collection of baseline concentrations in country foods is provided in both the 2018 HHERA Report and the Goliath Gold Follow-Up Addendum, which are included as part of the overall Round 2 information request responses. Treasury Metals, as part of the follow-up program, will collect samples of the wild rice at the mouth of Blackwater Creek prior to the start of the Project, and will also include a reference site (i.e., nearby site with similar environmental conditions, but outside the influence of the Project) to established baseline conditions. This approach is considered acceptable as per the 2018 Health Canada country foods guidance document.</p>



Unique Identifier	Agency IR #	Annex	Agency / Group / Stakeholder	Cross Reference / Comment / Information Request / Response
				<p>In order to understand what effect, if any, the Goliath Gold Project may have on the concentrations of metals in wild rice, it is important to understand the baseline levels of metals that are present in the wild rice today. Those baseline levels will, arguably, reflect the effects of other industrial activities and historical sources of contamination within Wabigoon Lake. These are the levels against which Treasury Metals would compare the measured concentrations to see if they are contributing to the levels of metal in wild rice.</p> <p>In selecting reference sites for use in follow-up program, those sites should include the same environmental conditions as the wild rice at the mouth of Blackwater Creek (i.e., reflect the effects of other industrial activities and historical sources of contamination within Wabigoon Lake), but be far enough removed to be outside the influence of the Project. Guidance for selecting reference sites is provided by the CCME in their document entitled "Guidance Manual for Environmental Site Characterization in support of Environmental and Human Health Risk Assessment- Volume 1 Guidance Manual" dated 2016. As stated by the CCME in the 2016 guidance manual, it is advisable that more than one reference location be chosen. TMI_942-AC(2)-09_Figure_1 shows the proposed sampling for rice, and includes the following:</p> <ul style="list-style-type: none"> <li>J The wild rice at the mouth of Blackwater Creek—to confirm the predictions regarding the effects of the Project;</li> <li>J The wild rice stands on the south shore of Wabigoon Lake, adjacent to the Butler Lake Nature Reserve—a reference site within Wabigoon Lake, in close proximity to the Project but outside the predicted influence of the Project based on the finite element modelling of Wabigoon Lake (Appendix GG);</li> <li>J The wild rice stands in the channel connecting Dinorwic Lake and Wabigoon Lake— a reference site upstream of Wabigoon Lake, and well outside the influence of the Project; and</li> <li>J The south end of Rice Lake—a background site, free of the effects of other industrial activities and historical sources of contamination within Wabigoon Lake.</li> </ul> <p>However, the location for the sampling site will be finalized prior to the start of the Project through input received from the Indigenous communities who currently harvest wild rice in these areas. Treasury Metals is working with ELFN and other communities to develop community specific mitigation measures, monitoring programs, management plans (including access), risk communication plan, dietary survey, and emergency response plans. This would also include the collection of small samples of wild rice for chemical analysis to ensure the country foods consumption patterns of members of WLON, and other Indigenous communities are captured and that members of the Indigenous communities are satisfied with the level of effort for which Treasury Metals has put forth to ensure that the health of members of Indigenous communities have been appropriately considered and protected.</p> <p>As part of the Round 2 information request process, Treasury Metals received a number of questions regarding the Follow-Up Program. As a result, Treasury Metals has prepared the Goliath Gold Project Follow-Up Program Addendum to capture the responses to these issues and provide a consolidated update to the Follow-Up Program. The Follow-Up Program for human health (Section 13.19) of the Goliath Gold Follow-Up Addendum has been revised to capture the information regarding the selection of a reference site for measuring baseline chemical concentrations in wild rice.</p>

Unique Identifier	Agency IR #	Annex	Agency / Group / Stakeholder	Cross Reference / Comment / Information Request / Response
				<p>As described in Section 4 of the revised EIS (April 2018), meaningful metals uptake by plants, including wild rice, would not be anticipated in the highly unlikely event of a TSF failure as remediation activities would commence immediately it is safe to do so, and exposures would therefore be localized and short-term. However, to ensure that this finding is accurate, sampling of the potentially affected wild rice at the mouth of Blackwater Creek would be done. Section 4.3.2.4 of the revised EIS (April 2018) describes that in “the highly unlikely event of a TSF failure, a monitoring program would be developed that would include wild rice samples taken from the mouth of Blackwater Creek and tested for metals against other wild rice stands in Wabigoon lake (and a control lake outside of the system in practical) in order to provide confidence to potential consumers.” This will allow Treasury Metals, regulators and members of Indigenous communities to understand what effects, if any, a highly unlikely failure of the TSF would have on the stands of wild rice at the mouth of Blackwater Creek.</p> <p>Treasury Metals will work with Indigenous communities to develop a community-specific risk communication plan that could be implemented in the highly unlikely event of a TSF failure to mitigate any potential negative perceptions associated with the wild rice harvest.</p> <p>References:                      CCME, 2015: Federal Contaminated Sites Action Plan Guidance, Module 5: Defining background conditions and using background concentrations.                      CCME, 2016: Guidance Manual for Environmental Site Characterization in support of Environmental and Human Health Risk Assessment- Volume 1 Guidance Manual. PIN 1551 ISBN 978-1-77202-026-7.                      Health Canada (HC). 2018. Guidance for Evaluating Human Health Impacts in Environmental Assessment: Country Foods. Dated June 2018.                      Sheppard S.C., Long J.M., Sanipelli B. 2010. Measured elemental transfer factors for boreal hunter/gatherer scenarios: fish, game and berries. Journal of Environmental Radioactivity 101 (2010) 902e909.</p>

# **TMI\_862-AC(2)-02\_ATTACHMENT\_1 (INDIGENOUS SOCIO-ECONOMIC ASSESSMENT)**

## **ISE1 Introduction**

In April of 2018, Treasury Metals submitted a revised version of the Environmental Impact Statement (EIS) for the proposed Goliath Gold Project (the Project) to the Canadian Environmental Assessment Agency (the Agency) for consideration under the Canadian Environmental Assessment Act (CEAA), 2012. The Agency reviewed the submission and informed Treasury Metals that the requirements of the EIS Guidelines for the Project were met and that the Agency would issue a series of information requests to Treasury Metals regarding the technical review of the EIS and supporting appendices (referred to herein as the Round 2 information requests). The Round 2 information requests were issued to Treasury Metals from July 6 to July 27<sup>th</sup>, 2018 and included questions from the Agency, other Federal and Provincial reviewers, Indigenous communities and interested stakeholders.

As part of the completeness check completed by the Agency, additional information has been requested regarding an expanded evaluation of potential socio-economic effects of the Project on those Indigenous communities that have identified commercial interests that may be affected by the Project. At the request of the Agency, this attachment includes the following:

- J a description of the existing commercial interests identified by Indigenous communities through the environmental assessment process to date;
- J an identification of the potential impacts of effects of the Project on those commercial interests;
- J a description of the mitigation measures and commitments by Treasury Metals to manage the potential effects; and
- J any amendments required to the follow-up program to verify the effectiveness of the mitigation and management efforts.

## **ISE2 Existing Identified Commercial Interests**

During the EA process, including ongoing meaningful engagement activities, members of two Indigenous communities, Wabigoon Lake Ojibway Nation (WLON) and Naotkamegwaning First Nation (NFN) identified that they have commercial interests tied to lands and resources that may be affected by the Project. The information about baseline uses of lands and resources in the area surrounding the Goliath Gold Project, including information with respect to baseline socio-economic conditions shared by all Indigenous communities including WLON and NFN is provided in Section 5.13 of the revised EIS (April 2018) and has been updated as part of the response provided to TMI\_863-AC(2)-03 as part of the Round 2 information request process. The identified commercial interests include the following:

- J Commercial fisheries held by NFN in Thunder Lake and Wabigoon Lake;
- J Harvesting and sale of wild rice from Wabigoon Lake by WLON;
- J Harvesting and sale of chanterelle mushrooms from the Goliath Gold Property by WLON;
- J Harvesting and sale of blueberries from the Goliath Gold Property by WLON; and

- ) Potential effects on tourism, specifically potential effects on sport and recreational fishing, tourist camps, and local employment as fishing guides.

Although meaningful engagement has been held with the other Indigenous stakeholders, none of the Indigenous stakeholders other than NFN and WLON have identified commercial interests tied to lands and resources that may be affected by the Project. The socio-economic assessment presented herein focuses on characterizing, mitigating and following-up on potential socio-economic effects to members of WLON and NFN associated with the above identified commercial interests. That stated, the predicted effects, mitigation, commitments, and follow-up, where required, presented respectively in Section ISE3, Section ISE4 and Section ISE5 would also be applicable for any other Indigenous community that may come forward in the future and identify commercial interests associated with the lands and resources potentially affected by the Project.

It should be noted that the assessment of the effects of the Project on the traditional use of lands and resources by members of Indigenous communities presented in the revised EIS (April 2018) focused on describing how changes in the bio-physical environment as a result of the Project could affect the lands and resources traditionally relied on by members of Indigenous communities. The revised EIS (April 2018) and draft Round 2 responses then conservatively assumed that all areas where the Project was predicted to have an effect, was in turn assumed to have an effect on current use of land and resources for traditional purposes by members of Indigenous communities. It is expected that additional traditional knowledge studies may help identify preferred areas of harvesting for those community members interviewed. However, the revised EIS (April 2018) takes the most conservative approach by effectively assuming all areas affected by the Project are areas of preferred use. Additionally, experience through the engagement process has identified that the traditional knowledge studies represent snapshots of community use, which cannot be assumed to represent the limits of use by all community members. Therefore, additional traditional knowledge studies are not expected to alter the conclusions presented in the revised EIS (April 2018) as each of the Indigenous communities were assumed to use the lands and resources affected by the Project for traditional purposes.

### **ISE3 Potential Effects of the Project on Identified Commercial Interests**

As described in the revised EIS (April 2018), then evaluation of potential effects of the Project to Indigenous peoples placed an emphasis on describing how changes in the bio-physical environment as a result of the Project could affect the lands and resources traditionally relied on by members of Indigenous communities, including commercial uses of those lands and resources. The revised EIS (April 2018) prepared by Treasury Metals, indicated that there would be no significant adverse environmental effects on biophysical resources as a result of the Project, when appropriate mitigation measures are implemented. Therefore, it was stated that if the Project, mitigation measures, follow-up program and monitoring plans are functioning as designed, there would not be negative socio-economic effects to Indigenous communities who rely on the lands and resources.

Notwithstanding the absence of predicted significant adverse biophysical effects, Treasury Metals recognizes that members of Indigenous communities are concerned that the Goliath Gold Project could result in socio-economic effects, especially where commercial interests are involved. The following outlines the potential for the Goliath Gold Project to affect those commercial interests described in Section ISE2.

### **ISE3.1 Commercial Fisheries in Thunder Lake and Wabigoon Lake**

The updated surface water quality modelling continues to indicate that surface water quality will be largely unchanged as a result of the Project, with resulting water quality being the same as, or slightly improved from the existing condition for most parameters. For those parameters where the Project is predicted to result in a concentration above the existing conditions, the resulting concentrations remain below the PWQO for the protection of aquatic life. Given that there are no predicted residual adverse effects on surface water quality, there are no predicted effects on the fish and fish health in Wabigoon Lake or Thunder Lake. As a result, the Goliath Gold Project is not predicted to have a direct negative effect on the commercial fisheries in either Thunder Lake or Wabigoon Lake, and thus no direct socio-economic effects on members of NFN.

Members of NFN have shared with Treasury Metals and the Agency (meeting held on January 17, 2019) that the community currently experiencing difficulties selling fish harvested from Wabigoon Lake because of perceived issues regarding the suitability of the fish for consumption. It is understood that the negative perceptions of fish from Wabigoon Lake relate to the mercury issues downstream of Dryden. Members of NFN have also expressed concerns to the Agency and Treasury Metals that the presence of the Project near Thunder Lake and Wabigoon Lake could also result in additional negative perceptions regarding the suitability of the fish for consumption and result in additional commercial losses.

As detailed in Section 6 of the revised EIS (April 2018), the proposed Project will have a small environmental footprint, and would not be noticeable beyond the Goliath Gold property boundary. In fact, the only indication of the presence of the Goliath Gold Project would be the limited views of the WRSA that may be visible from areas of Thunder Lake. Viewscapes of the WRSA from Thunder Lake were provided as Figures 6.2.4.1-4 through 6.2.4.1.6 of the revised EIS (April 2018), and show that the WRSA would not be obviously visible in the viewscapes and would likely be undistinguishable once fully vegetated. No part of the Project would be visible from Wabigoon Lake. Therefore, there would appear to be little associated with the Project that would identify the presence of the Project to individuals who are in the area, or fishing on either Thunder Lake or Wabigoon Lake, thereby minimizing the potential for negative perceptions.

Although there are no predicted direct effects to the commercial fisheries in either Thunder Lake or Wabigoon Lake, and there appear to be limited opportunities for perceived negative effects, Treasury Metals have proposed additional commitments to help manage, mitigate and accommodate, as required, potential; effects of the Goliath Gold Project on the commercial fisheries in Thunder Lake and Wabigoon Lake, as detailed in Section ISE4.

### **ISE3.2 Harvesting and Commercial Sale of Wild Rice by WLON**

The updated surface water quality modelling continues to indicate that surface water quality will be largely unchanged as a result of the Project, with resulting water quality being the same as, or slightly improved from the existing condition for most parameters. For those parameters where the Project is predicted to result in a concentration above the existing conditions, the resulting concentrations remain below the PWQO for the protection of aquatic life. In the derivation of the Ontario objectives for surface water the protection values are designed to provide a scientifically defensible and reasonable conservative level of protection for most aquatic organisms including plants. Given that there are no predicted residual adverse effects on surface water quality, there are no predicted effects on wild rice and the quality of wild rice for commercial sale for human consumption in Wabigoon Lake. Therefore, the Goliath Gold Project is

not predicted to have a direct negative effect on the commercial sale of wild rice in Wabigoon Lake, and thus no direct socio-economic effects on members of WLON.

Members of WLON have expressed concerns to the Agency and Treasury Metals that the presence of the Project in the vicinity of Wabigoon Lake could result in negative perceptions regarding the suitability of wild rice harvested commercially for consumption and result in commercial losses. To date, nothing has been communicated to Treasury Metals to indicate that WLON or its members are currently experiencing difficulty selling wild rice harvested from Wabigoon Lake as a result of perceived safety issues as a result of the known methylmercury contamination in the Wabigoon River downstream of Dryden. However, the experiences shared by NFN regarding perception of the risk associated with the commercial fisheries in Wabigoon Lake would indicate that care need to be exercised with reporting information to the public with respect to the commercial wild rice harvest by WLON and its members from Wabigoon Lake.

As detailed in Section 6 of the revised EIS (April 2018), the proposed Project will have a small environmental footprint, and would not be noticeable beyond the Goliath Gold property boundary. No part of the Project will be noticeable from Wabigoon Lake in areas where wild rice harvesting occurs. Given that wild rice does not occur in areas where the Project is visible, there is expected to be minimal potential for risk of indirect negative perceptions that could in turn have an indirect negative effect on socio-economics.

Although there are no predicted direct effects to the commercial sale of wild rice from Wabigoon Lake, and there appear to be limited opportunities for perceived negative effects, Treasury Metals have proposed additional commitments to help manage, mitigate and accommodate, as required, potential effects of the Goliath Gold Project on the commercial sale of wild rice, as detailed in Section ISE4.

### **ISE3.3 Harvesting and Commercial Sale of Chanterelle Mushrooms by WLON**

As part of the detailed quantitative risk assessment for human health provided in support of the Round 2 information request process, the quality of country foods for consumption was evaluated. Baseline soils and changes in soil concentrations, including the effects of dustfall from the Project, were assessed for their potential risk to human health. There were no predicted changes to soil quality as a result of the Project; therefore, there were no predicted changes to the quality of country foods (which would include chanterelle mushrooms) for consumption. As such, there would be no direct effects on the commercial sale of chanterelle mushrooms harvested from the Goliath Gold Project property and thus no direct socio-economic effects on members of WLON.

Members of WLON have communicated to Treasury Metals that they harvest chanterelle mushrooms from a 7.5 ha area within the property boundary near the former MNRF Tree Nursery. This area was identified in Appendix EE as being within the regional study area (RSA), which includes the local study area (LSA) as shown on Figure 4.1 of Appendix EE. The LSA and RSA used in Appendix EE are not relied on the revised EIS (April 2018). The 7.5 ha area was identified through discussions with local harvesters, including members of WLON, and direct observations for the presence of chanterelle mushrooms. In the four years since Appendix EE was created, no other specific areas of chanterelle mushroom harvesting were identified within the Goliath Gold property boundary or surrounding area. For other country food items, it was possible to identify potential harvest areas and effects using ecosite mapping data. However, ecosite mapping is not suitable for identifying potential chanterelle mushroom harvesting areas in the vicinity of the Goliath Gold Project. Therefore, the identified 7.5 ha of known chanterelle mushroom harvesting near the former MNRF Tree Nursery represents the total known area of chanterelle mushroom harvesting that could be potentially affected by the Project. For health and safety purposes, Treasury Metals is unable to

provide members of WLON unrestricted access to this area of the property, thus a residual effect as a result of loss in access was identified in the revised EIS (April 2018). Treasury Metals will be working with WLON to develop an access management plan so that they may continue to safely access the chanterelle mushrooms harvesting area near the former MNRF Tree Nursery if they choose to do so, as detailed in Section ISE4. Treasury Metals envisions these plans would detail how community members would be escorted safely through the operations area, and then allowed to safely harvest chanterelle mushrooms in those areas identified outside of the operations area, unaccompanied. Given the relatively small area of chanterelle mushrooms harvesting identified for commercial purposes and that Treasury Metals has stated that they will provide the community members safe access, the residual effect identified is unlikely to have a meaningful effect overall on the commercial sale of chanterelle mushrooms.

As detailed in Section 6 of the revised EIS (April 2018), the proposed Project will have a small environmental footprint, and would not be noticeable beyond the Goliath Gold property boundary. There would be no access within the property boundary to members of the general community, as only members of Indigenous communities are entitled to practice their current use of lands and resources for traditional purposes within the property boundary. Therefore, areas where harvesting occurs would remain confidential, which would minimize the potential for risk of indirect negative perceptions that could in turn have an indirect negative effect on socio-economics.

Although there are no predicted direct effects to the commercial sale of chanterelle mushrooms and there appear to be limited opportunities for perceived negative effects, Treasury Metals have proposed additional commitments to help manage, mitigate and accommodate, as required, potential; effects of the Goliath Gold Project on the commercial sale of chanterelle mushrooms, as detailed in Section ISE4.

### **ISE3.4 Harvesting and Commercial Sale of Blueberries by WLON**

As part of the detailed quantitative risk assessment for human health provided in support of the Round 2 information request process, the quality of country foods for consumption was evaluated. Baseline soils and changes in soil concentrations, including the effects of dustfall from the Project, were assessed for their potential risk to human health. There were no predicted changes to soil quality as a result of the Project; therefore, there were no predicted changes to the quality of country foods (which would include blueberries) for consumption. As such, there would be no direct effects on the commercial sale of blueberries harvested from the Goliath Gold Project property and thus no direct socio-economic effects on members of WLON.

Members of WLON have communicated to Treasury Metals that they harvest blueberries from an area within the property boundary near the former MNRF Tree Nursery and areas that will be directly overprinted by the tailings storage facility. For health and safety purposes, Treasury Metals is unable to provide members of WLON unrestricted access to this area of the property, thus a residual effect as a result of loss in access was identified in the revised EIS (April 2018). A residual effect with respect to blueberry habitat was also identified for the areas that will be permanently loss by overprinting of the tailings storage facility. Treasury Metals will be working with WLON to develop an access management plan so that they may continue to safely access the blueberry harvesting area near the former MNRF Tree Nursery if they choose to do so. Treasury Metals envisions that these plans would detail how community members would be escorted safely through the operations area, and then allowed to safely harvest blueberries in those areas identified outside of the operations area, unaccompanied. Given the relatively small area of blueberries permanently lost for commercial harvesting purposes and that Treasury Metals has stated that they will provide the community members safe access to areas near the MNRF Tree

Nursery, the residual effects identified are unlikely to have a meaningful effect overall on the commercial sale of blueberries.

As detailed in Section 6 of the revised EIS (April 2018), the proposed Project will have a small environmental footprint, and would not be noticeable beyond the Goliath Gold property boundary. There would be no access within the property boundary to members of the general public, as only members of Indigenous communities are entitled to practice their current use of lands and resources for traditional purposes within the property boundary. Therefore, the areas where harvesting occurs would remain confidential which would minimize the potential for the risk of indirect negative perceptions that could in turn have an indirect negative effect on socio-economics.

Although there are no predicted direct effects to the commercial sale of blueberries and there appear to be limited opportunities for perceived negative effects, Treasury Metals have proposed additional commitments to help manage, mitigate and accommodate, as required, potential; effects of the Goliath Gold Project on the commercial sale of blueberries, as detailed in Section ISE4.

### **ISE3.5 Potential Effects on WLON Tourism Industry**

The primary concerns raised by WLON with respect to tourism were largely tied to the potential effects of the Project on water quality, and thus potential effects on fish and fish habitat, which in turn could have an effect on tourism camps, fish tourism industry, and local guiding opportunities. The updated surface water quality modelling continues to indicate that surface water quality will be largely unchanged as a result of the Project, with resulting water quality being the same as, or slightly improved from the existing condition for most parameters. For those parameters where the Project is predicted to result in a concentration above the existing conditions, the resulting concentrations remain below the PWQO for the protection of aquatic life. Given that there are no predicted residual adverse effects on surface water quality, there are no predicted effects on the fish and fish health in Wabigoon Lake of Thunder Lake.

As detailed in Section 6 of the revised EIS (April 2018), the proposed Project will have a small environmental footprint, and would not be noticeable beyond the Goliath Gold property boundary. In fact, the only indication of the presence of the Goliath Gold Project would be the limited views of the WRSA that may be visible from areas of Thunder Lake. Viewscapes of the WRSA from Thunder Lake were provided as Figures 6.2.4.1-4 through 6.2.4.1.6 of the revised EIS (April 2018), and show that the WRSA would not be obviously visible in the viewscapes and would likely be undistinguishable once fully vegetated. No part of the Project would be visible from Wabigoon Lake. Therefore, there would appear to be little associated with the Project that would identify the presence of the Project to individuals who are in the area for tourism and fishing on either Thunder Lake or Wabigoon Lake, thereby minimizing the potential for negative perceptions.

Members of WLON have expressed concerns to the Agency and Treasury Metals that the presence of the Project in the vicinity of Wabigoon Lake could result in negative perceptions that could have effects on tourism; specifically, potential effects on sport and recreational fishing, tourist camps, and local employment as fishing guides. To date, nothing has been communicated to Treasury Metals to indicate that WLON or its members are currently aware of negative effects on tourism or experiencing difficulty as a result of perceived safety issues with respect to water quality and fisheries from the known methylmercury contamination in the Wabigoon River downstream of Dryden.

Although there are no predicted direct effects to WLON's tourism industry and there appear to be limited opportunities for perceived negative effects, Treasury Metals have proposed additional commitments to



help manage, mitigate and accommodate, as required, potential; effects of the Goliath Gold Project on WLON's tourism industry, as detailed in Section ISE4.

## **ISE4 Mitigation and Commitments to Manage Potential Effects on Commercial Interests**

In an effort to provide the Agency and members of Indigenous communities confidence that Treasury Metals is and will remain committed to ensuring that the Project (over the life of the Project) is not having negative socio-economic effects to those Indigenous communities who rely on the lands and resources, Treasury Metals is making the following additional commitments to help identify, mitigate and manage the potential negative socio-economic effects that may arise over the life of the Project. Treasury Metals has made these firm commitments with respect to social-economic impacts associated with commercial wild rice harvesting, commercial fisheries, tourism, commercial chanterelle mushroom harvesting, and commercial blueberry harvesting. For each socio-economic related land and resource use, Treasury Metals is committed to the development of community-specific mitigation measures and accommodation measures.

The six commitments with respect to socio-economic have been made by Treasury Metals:

1. **Engagement and Communications:** Treasury Metals is committed to working collaboratively with Indigenous communities to ensure informed and engaged dialogue throughout the life of the Project. This goal will be achieved through the implementation of the following, at a minimum:
  - i. Continued dialogue with all Indigenous stakeholders for the life of the Project;
  - ii. The development of community specific mitigation and accommodation measures as required; and
  - iii. Amendments to the follow up program over the life of the Project to ensure that the community-specific mitigation measures are effective.

Treasury Metals has proposed the formation of an Environmental Management Committee to aid in the above. This committee would be made up of members from Indigenous communities and would meet with representatives from Treasury Metals on a to-be-determined basis, possibly quarterly or semi-annually. Treasury Metals would present any reportable information on the monitoring and management plans as well as the results of the follow up programs to the Environmental Management Committee. If exceedances or issues arise that show mitigation measures have not been as effective as expected, the potential for further actions would be discussed with the committee. The Environmental Management Committee is intended to provide a forum for discussing other environmental matters with the potentially affect Indigenous communities such as upcoming regulatory permitting, the continued evolution of community-specific monitoring, the incorporation of traditional knowledge or items of cultural significant that might have been collected since completion of the EA process, and any other environmental matters of relevance to the committee including financial support for operation of the Committee. Environmental matters that the Environmental Management Committee would review include but not limited to: fish compensation opportunities, closure planning, environmental sampling results and proposed efforts, and as previously noted adaptive review and dialogue on follow up programs and environmental monitoring efforts for the Goliath Gold Project. Further the Environmental Management Committee will aid in the

collation and distribution of the reviewed information to each respective community, reflecting the direction and concerns brought forward.

Treasury Metals is committed to sharing information regarding the Project with all Indigenous community members and will do so, via the following reporting mechanisms:

- i. Sharing updates on notable events inclusive of environment, social/community, operational, and exploration aspects occurring at the Project with the communities on a quarterly basis. Treasury Metals envisions the notable events report to be posted publicly to the Treasury Metals website, and or delivered to each community in the form of a news letter, with the overall objective to provide the Indigenous communities and the Agency the confidence that the Project, mitigation measures, follow-up program and monitoring plans are functioning as designed, and therefore that there are no socio-economic effects anticipated to Indigenous communities who rely on the lands and resources;
- ii. Providing a summary of the ongoing activities of the Environmental Management Committee, as part of the annual reporting for the Goliath Gold Project; and
- iii. Providing the annual environmental report, summarizing all of the environmental monitoring results associated with the Project.

To facilitate public access of this information, Treasury Metals will establish a link on their website where the above information can be readily accessed. Additionally, Treasury Metals will share the above information with each of the communities in the form most suitable for the specific community members. Further, Treasury Metals is committed to reflect the needs of its Indigenous stakeholders, and as part of continued dialogue and engagement will only provide data to the public sphere that has been mutually agreed upon and reviewed by applicable stakeholders.

2. **Wild Rice:** Treasury Metals is committed to sharing updates on notable events inclusive of environment, social/community, operational, and exploration aspects occurring at the Project with the communities on a quarterly basis to ensure that the community is kept apprised of the operational results that may affect the commercial wild rice harvest. Treasury Metals envisions the notable events report to be posted publicly to the Treasury Metals website thus being available to Indigenous communities and to nearby recreational or commercial land users.

Treasury Metals is committed to the collection of wild rice samples as part of continued dialogue and engagement activities with Indigenous communities for the life of the Project. Wild rice samples will be collected annually, or as needed, prior to the harvest season and sent for chemical analysis to capture any potential effects of the Project on the quality of wild rice harvested commercially and used for consumption and in turn socio-economic effects. According to the Ontario Ministry of Agriculture, Food and Rural Affairs (OMAFRA), wild rice is typically harvested from late August to September, but this would vary by the region of the province. As part of the program, collocated samples of sediment and surface water will also be collected annually or as needed. Treasury Metals will work with the Indigenous communities and applicable commercial enterprises to identify suitable timing, and location for sample collection prior to the rice harvest. Treasury Metals has currently proposed three sampling locations within Wabigoon Lake to effectively capture possible effects of the Project on wild rice, as well as a reference location on Rice Lake against which the samples can be compared (Figure TMI\_942-AC(2)-09\_Figure 1) the locations of these sites will be confirmed as part of continuing dialogue with Indigenous communities notably Wabigoon Lake Ojibway Nation. The results of the annual wild rice sampling program will be

shared with the Indigenous communities currently commercially harvesting wild rice within Wabigoon Lake once the results are available, allowing them to share the information with their members, with the option for them to also share information publicly. If the Indigenous communities currently commercially harvesting wild rice within Wabigoon Lake authorize Treasury Metals to publish this information, it will be included in the annual environmental report. If required, Treasury Metals is committed to the development of community-specific mitigation measures and accommodation measures. Treasury Metals is also committed to amending the follow up program, if required, to verify the effectiveness of those the community-specific mitigation measures.

Given that wild rice is typically harvested once a season, and that the growing season in Northwestern Ontario near Dryden is relatively short (i.e. < 100 days), it is only practicable to sample wild rice and report once per year.

3. **Commercial Fisheries:** Treasury Metals is committed to sharing updates on notable events occurring at the Project on a quarterly basis with the communities to ensure that the community is kept apprised of the operational results that may affect the commercial fish harvest. Treasury Metals envisions the notable events report to be posted publicly to the Treasury Metals website thus being available to Indigenous communities and to nearby recreational or commercial land users.

Treasury Metals is committed to the collection of fish tissue samples as part of continued dialogue and engagement activities with Indigenous communities for the life of the Project. Fish tissue samples collected from fish of various trophic levels will be collected annually and sent for chemical analysis to capture any potential effects of the Project on the quality of fish for consumption harvested commercially or for subsistence use and in turn socio-economic effects. As part of the program, collocated samples of sediment and surface water will also be collected annually. Treasury Metals will work with the Indigenous communities to identify preferred species for consumption and/or sale in both Wabigoon Lake and Thunder Lake. The results of the annual fish sampling program will be shared with the Indigenous communities. Additionally, Treasury Metals will include the results of the fish sampling program in the annual environmental report. If required, Treasury Metals is committed to the development of community-specific mitigation measures and accommodation measures. Examples of additional mitigation measures include Treasury Metals commitment to the development of community specific risk communication plans to help reassure the community members and the public that the Project is not impacting the quality of the fish for consumption. Additionally, Treasury Metals will work with Indigenous communities holding commercial fishing licenses on Wabigoon Lake and Thunder Lake to develop mutually acceptable strategies to help manage perceived risks (both existing and future concerns) associated with the fish harvest. Treasury Metals is also committed to amending the follow up program, if required, to verify the effectiveness of those additional community-specific mitigation measures. Treasury Metals will also work with the affected communities, either through the Environmental Management Committee, or community specific committees, for the life of the Project to aid communications regarding fish and aquatic habitat research, monitoring, mitigation, and offsetting. To the reasonable extent possible Treasury Metals would establish, fund and operationalize this collaborative committee.

Given the time required for trophic transfer of chemicals within the food web, fish tissue sampling will be conducted and reported on annually.

4. **Chanterelle Mushroom:** Based on input received from Indigenous communities in 2015, Treasury Metals is aware of the potential for the Project to have an effect on the harvesting of chanterelle mushrooms located proximal to the former MNRF Tree Nursery, which is within the property boundary (but outside of the operations area) of the Goliath Gold Project. Based on the comments received Treasury

Metals acknowledges that these resources have the potential to provide economic benefits to those that harvest the resource. Although the Project will not directly impact any areas known for chanterelle mushroom harvesting, for health and safety purposes, access to the known harvesting areas will be controlled for the life of the Project. Treasury Metals is committed to developing community-specific access management plans in consultation with the Indigenous communities. Treasury Metals envisions these plans would detail how community members would be escorted safely through the operations area, and then allowed to safely harvest chanterelle mushrooms in those areas identified outside of the operations area, unaccompanied. The plan would also detail how Indigenous community members would then be escorted safely back through the operation area, once traditional harvesting of chanterelle mushrooms has been completed as well as communications protocols for while community members are onsite. Treasury Metals will install gates as needed on Tree Nursery Road to the north and south of the operations area, demarking those areas through which members of Indigenous communities will require an escort for safety reasons.

Treasury Metals will collect opportunistic chanterelle mushrooms samples and collocated soil samples, as required, and send all samples for chemical analysis to capture any potential effects of the Project on the quality of chanterelle mushrooms for consumption harvested by Indigenous communities for commercial or subsistence purposes, and in turn socio-economic effects. The results of the annual opportunistic chanterelle mushrooms sampling program will be shared with the Indigenous communities. Additionally, Treasury Metals will include the results of the chanterelle mushrooms sampling program (if any) in the annual environmental report. If required, Treasury Metals is committed to the development of community-specific mitigation measures and accommodation measures. Examples of additional mitigation measures include Treasury Metals commitment to the development of community specific risk communication plans to help reassure the community members and the public that the Project is not impacting the quality of chanterelle mushrooms for consumption. Treasury Metals is also committed to amending the follow up program, if required, to verify the effectiveness of those additional community-specific mitigation measures.

Given the opportunistic nature of sample collection of chanterelle mushroom, it is only practicable to collect on a seasonal basis and hence report once per year. However, Treasury Metals is committed to sharing with the communities' updates on notable events inclusive of environment, social/community, operational, and exploration aspects occurring at the Project on a quarterly basis. Treasury Metals envisions the notable events report to be posted publicly to the Treasury Metals website thus being available to Indigenous communities and to nearby recreational or commercial land users.

5. **Tourism with respect to WLON:** Based on input received from Wabigoon Lake Ojibway Nation (WLON) in 2015, Treasury Metals is aware that the community is concerned regarding the potential impacts of the Project on local tourism activities including: sport and recreational fishing, tourist camps, and local employment as fishing guides. Treasury Metals is committed to sharing with WLON updates on notable events inclusive of environment, social/community, operational, and exploration aspects occurring at the Project on a quarterly basis and will work with WLON as to the preferred method for public distribution. Treasury Metals is committed to working with WLON for the life of the Project to manage and mitigate the possible effects of the Project on local tourism and associated activities specifically with respect to fishing and guiding. Treasury Metals is committed to the development of community-specific mitigation measures and accommodation measures. An example of additional mitigation is Treasury Metals commitment to the development of community specific risk communication plans to help reassure the community members and the public that the Project is not impacting the water quality or quality of fish in Thunder Lake and Wabigoon Lake which would include specific mention in the quarterly updates of notable events. Treasury Metals will also look for opportunities to contribute to the growth of local

tourism through sponsorship of local events designed to enhance tourism in the area. Treasury Metals is also committed to amending the follow up program, if required, to verify the effectiveness of those additional community-specific mitigation measures. Treasury Metals will include the results of the surface water quality program and the fish sampling program in the annual environmental report.

6. **Access and Blueberries:** Treasury Metals is aware of the potential for the Project to have an effect on the harvesting of blueberries within the property boundary. The Project will overprint an area of known blueberry harvesting near the proposed tailings storage facility (TSF). For health and safety purposes, access to other known harvesting areas proximal to the former MNRF Tree Nursery will be controlled for the life of the Project. Treasury Metals is committed to developing community-specific access management plans in consultation with the Indigenous communities. Treasury Metals envisions that these plans would detail how community members would be escorted safely through the operations area, and then allowed to safely harvest blueberries in those areas identified outside of the operations area, unaccompanied. The plan would also detail how Indigenous community members would then be escorted safely back through the operations area, once harvest activities have been completed. Treasury Metals will install gates as needed on Tree Nursery Road to the north and south of the operations area, demarking those areas through which members of Indigenous communities will require an escort for safety reasons.

Treasury Metals will collect blueberry samples, collocated with soil and dustfall samples, as required and send all samples for chemical analysis to capture any potential effects of the Project on the quality of blueberries for consumption harvested by Indigenous communities for commercial or subsistence purposes, and in turn socio-economic effects. The sampling locations will be chosen as part of continued dialogue and engagement activities with Indigenous communities. The results of the annual blueberry sampling program will be shared with the Indigenous communities. Additionally, Treasury Metals will include the results of the blueberry sampling program in the annual environmental report. If required, Treasury Metals is committed to the development of community-specific mitigation measures and accommodation measures. Examples of additional mitigation measures include Treasury Metals commitment to the development of community specific risk communication plans to help reassure the community members and the public that the Project is not impacting the quality of blueberries for consumption. Treasury Metals is also committed to amending the follow up program, if required, to verify the effectiveness of those additional community-specific mitigation measures.

Given the nature of blueberry growth and blueberry harvest patterns, it is only practicable to sample and report once per year. Treasury Metals is committed to sharing updates on notable events inclusive of environment, social/community, operational, and exploration aspects occurring at the Project with the communities on a quarterly basis to ensure that the community is kept apprised of the operational conditions that may affect the harvest of blueberries. Treasury Metals envisions the notable events report to be posted publicly to the Treasury Metals website thus being available to Indigenous communities and to nearby recreational or commercial land users.

## **ISE5 Amendments to the Follow-up Program to Verify Effectiveness of Mitigation for Commercial Interests**

Treasury Metals has made firm commitments with respect to social-economic impacts associated with commercial wild rice harvesting, fisheries, tourism, chanterelle mushroom harvesting, and blueberry harvesting. For each socio-economic related land and resource use, Treasury Metals is committed to the development of community-specific mitigation measures and accommodation measures. Treasury Metals

is also committed to amending the follow up program, if required, to verify the effectiveness of those the community-specific mitigation measures.

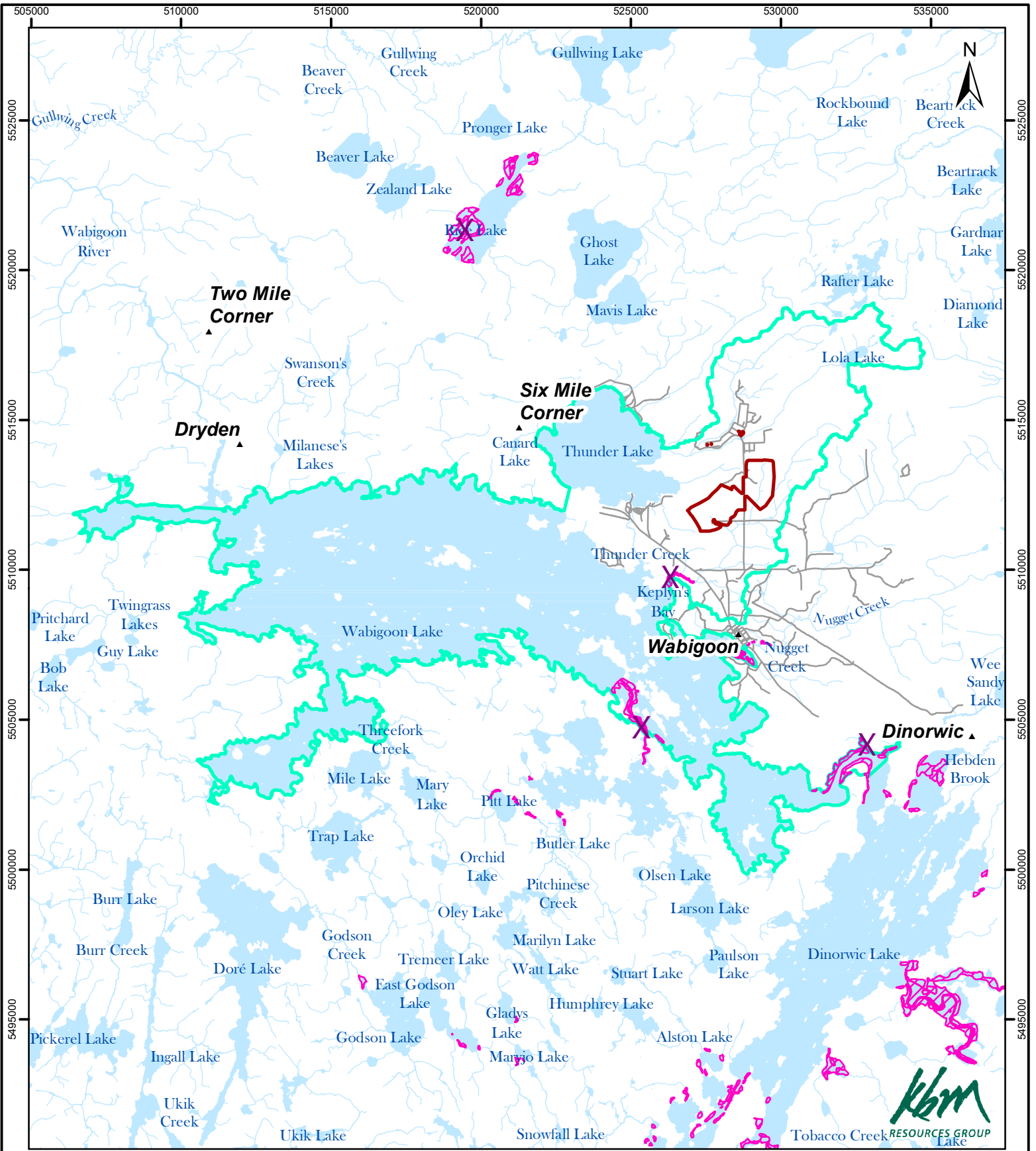
TMI\_940-AC(2)-07\_Table\_1: Revised Effects Assessment for Aboriginal Peoples

Valued Components (VCs)	Indicators	Measures	Site preparation and construction	Operations	Closure	Post-closure		
Harvesting and gathering of plant material	Wild rice	Changes in water quality		None	None	None	None	
		Changes in water levels		None	None	None	None	
		Quality for consumption		None	None	None	None	
		Wild rice harvesting areas affected	Loss of potential wild rice harvesting areas		0	0	0	0
			Lands removed from access		0	0	0	0
			Land where access is controlled		0	0	0	0
			Total Areas with Changed Access		0	0	0	0
			Areas with Changed views		0	0	0	0
	Noticeable changes in noise		0	0	0	0		
	Total Areas with Changed Experience		0	0	0	0		
	Total Area of Wild Rice Affected		0	0	0	0		
	Berry Harvesting	Quality for consumption		None	None	None	None	
		Potential Berry Harvesting Areas Affected	Loss of potential berry harvest areas		260	260	260	168
			Lands removed from access		40	40	40	0
			Land where access is controlled		242	242	242	0
			Total Areas with Changed Access		282	282	282	0
			Areas with Changed views		0	0	0	0
			Noticeable changes in noise		120	120	120	0
		Total Areas with Changed Experience		120	120	120	0	
	Total Area of Berry Harvesting Affected		662	662	662	168		
	Medicinal plant harvesting	Quality for consumption		None	None	None	None	
		Potential medicinal plant harvesting areas affected	Loss of forest		208	208	208	168
			Loss of wetland		33	47	47	0
			Lands removed from access		44	44	44	0
			Land where access is controlled		282	282	282	0
			Total Areas with Changed Access		326	326	326	0
			Areas with Changed views		0	0	0	0
		Noticeable changes in noise		167	167	167	0	
	Total Areas with Changed Experience		167	167	167	0		
	Total Area of Medicinal Plant Harvesting Affected		734	748	748	168		
Total Area of Harvesting and Gathering of Plant Material Affected			734	748	748	168		
Hunting	Ungulates	Quality for consumption		None	None	None	None	
		Potential ungulate hunting areas affected	Habitat loss		141	118	137	0
			Lands removed from access		10	10	10	0
			Land where access is controlled		16	16	16	0
			Total Areas with Changed Access		26	26	26	0
			Areas with Changed views		0	0	0	0
			Noticeable changes in noise		92	92	92	0
		Total Areas with Changed Experience		92	92	92	0	
	Total Area of Ungulate Hunting Affected		259	236	255	0		
	Furbearers	Potential furbearers hunting areas affected	Habitat loss		80	76	80	0
			Lands removed from access		33	33	33	0
			Land where access is controlled		234	234	234	0
			Total Areas with Changed Access		267	267	267	0
			Areas with Changed views		0	0	0	0
			Noticeable changes in noise		67	67	67	0
		Total Areas with Changed Experience		67	67	67	0	
		Total Area of Furbearers Hunting Affected		414	410	414	0	
	Waterfowl	Quality for consumption		None	None	None	None	
		Potential waterfowl hunting areas affected	Habitat loss		33	47	47	0
			Lands removed from access		9	9	9	0
			Land where access is controlled		10	10	10	0
			Total Areas with Changed Access		19	19	19	0
			Areas with Changed views		0	0	0	0
			Noticeable changes in noise		0.3	0.3	0.3	0
		Total Areas with Changed Experience		0.3	0.3	0.3	0	
	Total Area of Waterfowl Hunting Affected		52.3	66.3	66.3	0		
	Total Area of Hunting Affected			685	685	685	685	
	Trapping	Furbearers	Habitat loss		80	76	80	0
			Lands removed from access		33	33	33	0
			Land where access is controlled		234	234	234	0
Total Areas with Changed Access			267	267	267	0		
Areas with Changed views			0	0	0	0		
Noticeable changes in noise			67	67	67	0		
Total Areas with Changed Experience		67	67	67	0			
Total Area of Furbearers Trapping Affected		414	410	414	0			
Total Area of Trapping Affected			414	410	414	0		
Fishing	Sport fish	Change in abundance		None	None	None	None	
		Quality for consumption		None	None	None	None	
		Potential sport fishing areas affected	Lands removed from access		0	0	0	0
			Land where access is controlled		0	0	0	0
			Total Areas with Changed Access		0	0	0	0
			Areas with Changed views		0	852	852	852
			Noticeable changes in noise		0	0	0	0
			Total Areas with Changed Experience		0	852	852	852
	Total Area of Sport Fishing Affected		0	852	852	852		
	Baitfish	Change in abundance		None	None	None	None	
		Potential baitfishing areas affected	Lands removed from access		0.2	0.2	0.2	0
			Land where access is controlled		3.3	3.3	3.3	0
			Total Areas with Changed Access		3.5	3.5	3.5	0
			Areas with Changed views		0.0	0.0	0.0	0
		Noticeable changes in noise		0.3	0.3	0.3	0	
	Total Areas with Changed Experience		0.3	0.3	0.3	0		
	Total Area of Baitfishing Affected		3.7	3.7	3.7	0		
	Commercial fishing	Fish for consumption (sport fish)		None	None	None	None	
Potential commercial fishing areas affected		Lands removed from access		0.2	0.2	0.2	0	
		Land where access is controlled		3.3	3.3	3.3	0	
		Total Areas with Changed Access		3.5	3.5	3.5	0	
		Areas with Changed views		0.0	852.0	852.0	852	
Noticeable changes in noise		0.3	0.3	0.3	0			
Total Areas with Changed Experience		0.3	852.3	852.3	852			
Total Area of Fishing Affected			3.7	855.7	855.7	852		

TMI\_940-AC(2)-07\_Table 2: Revised Effects Magnitude Levels for Aboriginal Peoples

Valued Components (VCs)	Indicators	Measures	Site preparation and construction	Operations	Closure	Post-closure		
Harvesting and gathering of plant material	Wild rice	Changes in water quality		—	—	—	—	
		Changes in water levels		—	—	—	—	
		Quality for consumption		—	—	—	—	
		Wild rice harvesting areas affected	Loss of potential wild rice harvesting areas		—	—	—	—
			<i>Lands removed from access</i>		—	—	—	—
			<i>Land where access is controlled</i>		—	—	—	—
			Total Areas with Changed Access		—	—	—	—
			<i>Areas with Changed views</i>		—	—	—	—
	<i>Noticeable changes in noise</i>		—	—	—	—		
	Total Areas with Changed Experience		—	—	—	—		
	Total Area of Wild Rice Affected		—	—	—	—		
	Berry Harvesting	Quality for consumption		—	—	—	—	
		Potential Berry Harvesting Areas Affected	Loss of potential berry harvest areas		Level I	Level I	Level I	Level I
			<i>Lands removed from access</i>		Level I	Level I	Level I	Level I
			<i>Land where access is controlled</i>		Level I	Level I	Level I	Level I
			Total Areas with Changed Access		Level I	Level I	Level I	Level I
			<i>Areas with Changed views</i>		Level I	Level I	Level I	Level I
			<i>Noticeable changes in noise</i>		Level I	Level I	Level I	Level I
		Total Areas with Changed Experience		Level I	Level I	Level I	Level I	
	Total Area of Berry Harvesting Affected		Level II	Level II	Level II	Level I		
	Medicinal plant harvesting	Quality for consumption		—	—	—	—	
		Potential medicinal plant harvesting areas affected	Loss of forest		Level I	Level I	Level I	Level I
			Loss of wetland		Level II	Level II	Level II	Level I
			<i>Lands removed from access</i>		Level I	Level I	Level I	Level I
			<i>Land where access is controlled</i>		Level I	Level I	Level I	Level I
			Total Areas with Changed Access		Level I	Level I	Level I	Level I
			<i>Areas with Changed views</i>		Level I	Level I	Level I	Level I
		<i>Noticeable changes in noise</i>		Level I	Level I	Level I	Level I	
	Total Areas with Changed Experience		Level I	Level I	Level I	Level I		
	Total Area of Medicinal Plant Harvesting Affected		Level II	Level II	Level II	Level I		
Total Area of Harvesting and Gathering of Plant Material Affected			Level II	Level II	Level II	Level I		
Hunting	Ungulates	Quality for consumption		—	—	—	—	
		Potential ungulate hunting areas affected	Habitat loss		Level I	Level I	Level I	Level I
			<i>Lands removed from access</i>		Level I	Level I	Level I	Level I
			<i>Land where access is controlled</i>		Level I	Level I	Level I	Level I
			Total Areas with Changed Access		Level I	Level I	Level I	Level I
			<i>Areas with Changed views</i>		Level I	Level I	Level I	Level I
			<i>Noticeable changes in noise</i>		Level I	Level I	Level I	Level I
		Total Areas with Changed Experience		Level I	Level I	Level I	Level I	
	Total Area of Ungulate Hunting Affected		Level I	Level I	Level I	Level I		
	Furbearers	Potential furbearers hunting areas affected	Habitat loss		Level I	Level I	Level I	Level I
			<i>Lands removed from access</i>		Level I	Level I	Level I	Level I
			<i>Land where access is controlled</i>		Level I	Level I	Level I	Level I
			Total Areas with Changed Access		Level I	Level I	Level I	Level I
			<i>Areas with Changed views</i>		Level I	Level I	Level I	Level I
			<i>Noticeable changes in noise</i>		Level I	Level I	Level I	Level I
		Total Areas with Changed Experience		Level I	Level I	Level I	Level I	
		Total Area of Furbearers Hunting Affected		Level II	Level II	Level II	Level I	
	Waterfowl	Quality for consumption		—	—	—	—	
		Potential waterfowl hunting areas affected	Habitat loss		Level I	Level I	Level I	Level I
			<i>Lands removed from access</i>		Level I	Level I	Level I	Level I
			<i>Land where access is controlled</i>		Level I	Level I	Level I	Level I
			Total Areas with Changed Access		Level I	Level I	Level I	Level I
			<i>Areas with Changed views</i>		Level I	Level I	Level I	Level I
			<i>Noticeable changes in noise</i>		Level I	Level I	Level I	Level I
Total Areas with Changed Experience		Level I	Level I	Level I	Level I			
Total Area of Waterfowl Hunting Affected		Level I	Level I	Level I	Level I			
Total Area of Hunting Affected			Level I	Level I	Level I	Level I		
Trapping	Furbearers	Habitat loss		Level I	Level I	Level I	Level I	
		<i>Lands removed from access</i>		Level I	Level I	Level I	Level I	
		<i>Land where access is controlled</i>		Level I	Level I	Level I	Level I	
		Total Areas with Changed Access		Level I	Level I	Level I	Level I	
		<i>Areas with Changed views</i>		Level I	Level I	Level I	Level I	
		<i>Noticeable changes in noise</i>		Level I	Level I	Level I	Level I	
	Total Areas with Changed Experience		Level I	Level I	Level I	Level I		
	Total Area of Furbearers Trapping Affected		Level II	Level II	Level II	Level I		
Total Area of Trapping Affected			Level II	Level II	Level II	Level I		
Fishing	Sport fish	Change in abundance		—	—	—	—	
		Quality for consumption		—	—	—	—	
		Potential sport fishing areas affected	<i>Lands removed from access</i>		Level I	Level I	Level I	Level I
			<i>Land where access is controlled</i>		Level I	Level I	Level I	Level I
			Total Areas with Changed Access		Level I	Level I	Level I	Level I
			<i>Areas with Changed views</i>		Level I	Level I	Level I	Level I
			<i>Noticeable changes in noise</i>		Level I	Level I	Level I	Level I
			Total Areas with Changed Experience		Level I	Level I	Level I	Level I
	Total Area of Sport Fishing Affected		Level I	Level I	Level I	Level I		
	Baitfish	Change in abundance		—	—	—	—	
		Potential baitfishing areas affected	<i>Lands removed from access</i>		Level I	Level I	Level I	Level I
			<i>Land where access is controlled</i>		Level I	Level I	Level I	Level I
			Total Areas with Changed Access		Level I	Level I	Level I	Level I
			<i>Areas with Changed views</i>		Level I	Level I	Level I	Level I
		<i>Noticeable changes in noise</i>		Level I	Level I	Level I	Level I	
	Total Areas with Changed Experience		Level I	Level I	Level I	Level I		
	Total Area of Baitfishing Affected		Level I	Level I	Level I	Level I		
	Commercial fishing	Fish for consumption (sport fish)		—	—	—	—	
Potential commercial fishing areas affected		<i>Lands removed from access</i>		Level I	Level I	Level I	Level I	
		<i>Land where access is controlled</i>		Level I	Level I	Level I	Level I	
		Total Areas with Changed Access		Level I	Level I	Level I	Level I	
		<i>Areas with Changed views</i>		Level I	Level I	Level I	Level I	
<i>Noticeable changes in noise</i>		Level I	Level I	Level I	Level I			
Total Areas with Changed Experience		Level I	Level I	Level I	Level I			
Total Area of Fishing Affected			Level I	Level I	Level I	Level I		





**TMI\_942-AC(2)-09\_**  
**Figure 1**  
**Potential Reference Sites for**  
**Wild Rice Sampling**

Projection: NAD 1983 UTM Zone 15N

Date created: 2018-03-15

**Legend**

Wild Rice LSA

Operations Area

Road

Wild Rice Stand

Waterbody

Stream

Potential Reference Site

(subject to change)

SCALE: 1:166,984

