TMI_868-CE(2)-01

Unique Identifier	Agency IR #	Annex	Agency / Group / Stakeholder	Reference to EIS Guidelines: Reference to EIS / Appendix Cross-reference to Round 1 IRs Context and Rationale: It is unclear if the proponent has considered all projects that could potentially interact with the valued components considered in the cumulative effects assessment. The list of projects originally identified by the Agency in CE(1)-02 has been considered in the assessment. However, this list was intended as a starting point and not an exhaustive list. There is no indication whether the proponent has undertaken its own screening of known or reasonably foreseeable future projects that could potentially interact with the valued components assessment. The Agency cannot find clear screening ofteria for future projects considered in the cumulative effects assessment. Screening for projects should take into consideration the potential for interaction with all valued components, including that with the largest spatial boundary. Further, It is unclear from the map in Figure 7.3.2-4 whether projects that could interact with the ungulates regional study area were considered, as the map does not show the full extent of the study area. Specific Question / Request for Information: A. Provide a comprehensive list of projects with the potential to interact with the valued components identified, including with ungulates and the current use of lands and resources for traditional purposes. Include clear screening criteria and how they were applied. B. Update the cumulative effects assessment as necessary to reflect the potential effects that would result from the inclusion of any additional projects identified. Response: A: The process for identifying known and reasonably foreseeable projects for inclusion in the cumulative effects assessment presented in the revised EIS (April 2018) considered information available from a range of sources, including: • The CEAA Registry (the Registry), located at: https://ceaa-acee.gc.ca/050/evaluations/?culture=en-CA. The Registry						
TMI_868-CE(2)-01	CE(2)-01	1	CEA Agency		Part 2, Section 12.1.2					
					Sections 7.2.2, 7.3.2; Figures 7.3.2-4, 7.3.2-9					
				Reference to EIS Guidelines: Reference to EIS / Appendix Cross-reference to Rund 1 IRs Context and Rationale: It is unclear if the proponent has considered all projects that could potentially interact with the valued components considered in the cumulative effects assessment. The list of projects originally identified by the Agency in CE(1)-0 has been considered in the assessment. However, this list was intended as a starting point and not an exhaustive list. There is no indication whether the proponent has undertaken its own screening of known or reasonably foreseeable future projects that could potentially interact with the valued components assessed. • The Agency cannot find clear screening criteria for future projects considered in the cumulative effects assessment Screening for projects should take into consideration the potential for interaction with all valued components, including that with the largest spatial boundary. • Further, It is unclear from the map in Figure 7.3.2-4 whether projects that could interact with the ungulates regions study area were considered, as the map does not show the full extent of the study area. Specific Question / Request for Information: A. Provide a comprehensive list of projects with the potential to interact with the valued components identified, including with ungulates and the current use of lands and resources for traditional purposes. Include clear screening criteria and how they were applied. B. Update the cumulative effects assessment as necessary to reflect the potential effects that would result from the inclusio of any additional projects identified. Response: A:						
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				 The listing of environmental assessments identified on the Ontario Ministry of Environment, Conservation and Parks website, located at: https://www.ontario.ca/page/environmental_assessment-projects-category#section-0. As with the CEAA Registry, the projects for which provincial inventories are being completed are the types of project that are likely to have potential cumulative effects if located sufficiently close to the study areas for the Goliath Gold Project.
				 Other sources of information, including feedback from Agency reviewers, which have identified additional projects that warrant consideration for inclusion in the cumulative effects assessment.
				The Registry currently lists a total of 38 projects in Ontario, which includes the Goliath Gold Project. Of those 38 projects, only 19, including the Goliath Gold Project, are located in northern Ontario and thus have any potential to interact with effects of the Goliath Gold Project. The other projects in northern Ontario that are listed on the Registry are summarized in Table 1, along with the status of the projects and their relative distance from the Goliath Gold Project. Five (5) of the projects in Table 1 have been terminated and thus would not have any potential for cumulative effects (shown with grey shading in Table 1). A further three (3) projects in Table 1 were determined by the Agency to have effects that do not require environmental assessments (shown with italics in Table 1). The relative location for the closest of these projects (i.e., those most likely to interact in a cumulative manner with the effects of the Goliath Gold Project) have been shown on TMI_868-CE(2)-01_Figure_1. The figure also shows the location of the terrestrial local study area (LSA), used for describing the effects of the Goliath Gold Project on vegetation, wetlands and wildlife (exclusive of ungulates, especially moose), the wild rice LSA, and the regional study area (RSA) for terrestrial valued components (VCs), which was used for describing the effects of the Goliath Gold Project on ungulates (specifically the moose indicator). These study areas are also used for describing the lands and resources available for traditional purposes that may be affected by the Goliath Gold Project. For other projects to overlap cumulatively with the effects of the Goliath Gold Project, their effects would need to overlap with the relevant study areas, as described in Section 7.3.2 of the revised EIS (April 2018). None of the projects listed on the Registry overlap with these study areas. The Josephine Cone Mine Project is the closest to the wildlife RSA (shown on TMI_868-CE(2)-01_Figure_1). While the Josephine Cone Mine Project is far eno



Unique Identifier	Agency IR #	Annex	Agency / Group / Stakeholder		Cross Refer	rence / Comment / I	nformation Request / R	esponse	
				Table 1: L	isting of Northern Ontario Projects on the CEA	A Registry			
				Count	Project Name	Proponent	Status	Approximate Distance (km)	Approximate Direction
				1	Marathon Platinum Group Metals and Copper Mine Project	Stillwater Canada Inc.	Environmental assessemnt terminated by proponent.	475	ESE
				2	Hammond Reef Gold Project	Agnico Eagle Mines Limited	Environmental assessment in progress	125	SE
				3	Eagle's Nest Project	Noront Resources Ltd.	Environmental assessment in progress	520	NE
				4	Cliffs Chromite Project	Cliffs Natural Resources Inc	Environmental assessment terminated	525	NE
				5	Josephine Cone Mine Project	Bending Lake Iron Group Limited	Environmental assessment in progress	60	SE
				6	Rainy River Project	New Gold Inc.	Environmental assessment completed	150	SW
				7	Range and Training Area - Thunder Bay Region	Department of National Defence	Environmental assessment not required	190	ESE
				8	Griffith Iron Ore Redevelopment Project	Northern Iron Corporation	Environmental assessment in progress	125	NNW
				9	Côté Gold Mine Project	IAMGOLD Corporation	Environmental assessment completed	825	SE
				10	Victor Diamond Mine Extension Project	De Beers Canada Inc	Environmental assessment terminated	700	ENE
				11	Magino Gold Project	Prodigy Gold Incorporated	Environmental assessment in progress	620	SE
				12	Hardrock Gold Mine Project	Greenstone Gold Mines	Environmental assessment in progress	410	E
				13	Energy East Project	Energy East Pipeline Ltd.	Environmental assessment terminated	-	_
				14	Eastern Mainline Project	TransCanada PipeLines Limited	Environmental assessment terminated	-	_
				15	Borden Gold Mine Project	Goldcorp Borden Limited	Environmental assessment not required	725	ESE
				16	Baudette-Rainy River International Bridge	Ontario's Ministry of Transportation	Environmental assessment not required	184	SW
				17	Springpole Gold Project	First Mining Gold Corp.	Environmental assessment in progress	185	N
				18	Century Gold Project	Porcupine Gold Mines	Project under consideration	840	ESE
				manne northe website 28 wer	gh the Registry represents a go er with the effects of the Goliath rn Ontario listed with environme e. Of these, ten (10) were ident re identified as waste managem nment, Conservation and Parks	Gold Project, other source ental assessments on the ified as electricity projects ent projects. It should als	ces of information were also us Ontario Ministry of Environme s, nine (9) were identified as m so be noted that some of the pr	ed. There wer nt, Conservation ining projects,	e 47 projects ir on and Parks and the remair
				with the (shown Gold P project	2 provides a summary of the ele e relevant position to the Goliat n with grey shading in Table 2). Project. Although there are nine as will never proceed. For exam the same purpose and similar co	h Gold Project. One (1) c Therefore, this project ca (9) electricity projects list ple, both the Wataynikan	If the project in the table has be annot have any potential for cui ed in the table, there is a high eyap Power and Sagatay Tran	een terminated mulative effect likelihood that smission L.P.	I by the propones with the Golia some of these



Unique Identifier	Agency IR#	Annex	Agency / Group / Stakeholder			Cross Reference /	Comme	ent / Information	ı Request / Respon	se	
				Ta	able 2: Li	sting of Northern Ontario Electricity Projects on the MECP Dtabase					
					Count	Project Name	Туре	Proponent	Status	Approximate Distance (km)	Approximate Direction
					1	Detour Lake Contingency Power Project	Electricity	Detour Gold Corporation	Environmental assessment: approved, March 22, 2012	926	E
					2	Detour Lake Power Project	Electricity	Detour Gold Corporation	Environmental assessment: approved, December 15, 2010	926	E
					3	Goldcorp Musselwhite Mine Main Power Supply Project	Electricity	Goldcorp Canada Limited	Environmental assessment: approved, November 17, 2010	350	NNE
					4	New Transmission Line to Pickle Lake	Electricity	Wataynikaneyap Power	Environmental assessment: submitted, November 3, 2017	20	SW
					5	Sagatay Pickle Lake transmission project	Electricity	Sagatay Transmission L.P.	Terms of reference: expiry of public comment period, March 28, 2016	20–80	SW
					6	SynFuel Technologies: New Energy Source for Atikokan Ontario	Electricity	SynFuel Technologies	Terms of reference: time out	125	SE
					7	SynFuel Technologies: New Energy Source for Cascades Fine Paper Group	Electricity	SynFuel Technologies	Terms of reference: approved, March 14, 2005	290	SE
					8	SynFuel Technologies: New Energy Source for Red Rock Ontario	Electricity	SynFuel Technologies	Terms of reference: approved, November 4, 2005	330	ESE
				IL	9	SynFuel Technologies: New Energy Source for Thunder Bay Ontario	Electricity	SynFuel Technologies	Terms of reference: approved, March 14, 2005	290	SE
					10	Victor Diamond Mine Power Supply Project	Electricity	De Beers Canada Exploration Inc.	Terms of reference: withdrawn, August 26, 2004	700	ENE
				Ta	able 3: Li	isting of Northern Ontario Mining Projects on the MECP Dtabase					
					Count	Project Name	Туре	Proponent	Status	Approximate Distance (km)	Approximate Direction
i					1	Bending Lake Iron Mine (Josephine Cone Mine Project)	Mining	Bending Lake Iron Group Limited	Designation: granted, November 25, 2011	60	SE
					2	Cliffs Chromite Project	Mining	Cliffs Natural Resources Inc	On November 20, 2013, Cliffs announced that it was indefinitely suspending its chromite project in Northern Ontario.	525	NE
					3	Côté Gold Project	Mining	IAMGOLD Corporation	Environmental assessment: approved, December 22, 2016	825	SE
					4	Hammond Reef gold mine	Mining	Agnico Eagle Mines Limited	Revised environmental assessment submitted January 29, 2018	125	SE
					5	Hardrock Gold Mine	Mining	Greenstone Gold Mines	Terms of reference: approved, June 24, 2015	410	E
					6	Marathon Platinum Group Metals and Copper Mine Project	Mining	Stillwater Canada Inc.	Environmental assessemnt terminated by proponent.	475	ESE
I					7	Noront Eagle's Nest Multi-metal Mine	Mining	Noront Resources Ltd.	Terms of reference – amendment: approved, June 18, 2015	520	NE
					8	Rainy River Gold Mine	Mining	New Gold Inc.	Environmental assessment: approved, January 28, 2015	150	SW
					9	Springpole Gold Project	Mining	First Mining Gold Corp.	On April 18, 2018 the First Mining Gold agreed to make the project subject to the Environmental Assessment Act.	185	N
				d	ataba	lative location for the closest of the elect ase have been shown on TMI_868-CE(2) _SA), used for describing the effects of the)-01_Figu	re_2. The figure also	shows the location of th	e terrestria	al local study



Unique Identifier	Agency IR #	Annex	Agency / Group / Stakeholder	Cross Reference / Comment / Information Request / Response
				ungulates, especially moose), the wild rice LSA, and the regional study area (RSA) for terrestrial valued components (VCs), which was used for describing the effects of the Goliath Gold Project on ungulates (specifically the moose indicator). These study areas are also used for describing the lands and resources available for traditional purposes that may be affected by the Goliath Gold Project. For other projects to overlap cumulatively with the effects of the Goliath Gold Project, their effects would need to overlap with the relevant study areas, as described in Section 7.3.2 of the revised EIS (April 2018). Of the electricity and mining projects listed on the MECP environmental assessment database, only the following two (2) projects overlap with the RSA shown on TMI_868-CE(2)-01_Figure_2.
				 New Transmission Line to Pickle Lake (Wataynikaneyap Power); and
				 Sagatay Pickle Lake Transmission Project (Sagatay Transmission L.P.).
				As noted previously, both the Wataynikaneyap Power and Sagatay Transmission L.P. projects are identified as having the same purpose and similar corridor options, and only one of these projects are likely to be built. The cumulative effects assessment presented in Section 7 of the revised EIS (April 2018) included the Wataynikaneyap Power transmission line project at the request of the Agency reviewers. As only one of these projects will be constructed, the potential cumulative effects of these projects are captured in the revised EIS.
				In addition to the Wataynikaneyap Power transmission line project, the Bending Lake Iron Mine (Josephine Cone Mine Project), which also appears on the Registry, is also located in proximity to the wildlife RSA (shown on TMI_868-CE(2)-01_Figure_1). While it is far enough away from the RSA that cumulative effects on terrestrial resources, especially moose, are not expected, this project was included as part of the cumulative effects assessment presented in Section 7 of the revised EIS (April 2018) at the specific request of the Agency reviewers.
				In addition to the electricity and mining projects listed in the MECP database, there are 28 waste management projects listed in northern Ontario. As these projects will have only a localized effect, they would not be expected to have the potential to act in a cumulative manner with the effects of the Goliath Gold Project unless located within the relevant study areas used for describing cumulative effects, as described in Section 7.3.2 of the revised EIS (April 2018). Only the "Dryden Long Term Waste Disposal Capacity" project meets these criteria. The MECP database indicates that the purpose of the project was to expand the capacity of the existing landfill site located on the southern half of Lot 11, Concession 3, in the Township Van Horne. As the environmental assessment was approved on April 19, 2000, the effects of this project will already have been captured in the existing conditions, as described in Section 7.2.1 of the revised EIS (April 2018).
				Beyond the Registry and the MECP database of current and ongoing environmental assessments, considerable information can be located through internet searches to identify potential developments that may be advanced, and could thus interact in a cumulative manner with the effects of the Goliath Gold Project. Such projects however are typically at an early stage of development and as such, little information is available regarding the size, scope and configuration of these projects that would allow for a determination of the extent and magnitude of potential cumulative effects, if any, which could interact with the effects of the Goliath Gold Project. Based on these searches, the following groups of projects of projects were evaluated:
				 The Adaptive Phase Management (APM) project for the management of spent nuclear fuel;
				Mining projects in the region;
				Wabigoon River clean-up and remediation.
				Adaptive Phase Management
				The Adaptive Phased Management (APM) project is Canada's plan for the long-term management of used nuclear fuel, which



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				requires used fuel to be contained and isolated in a deep geological repository located in a willing host community. The Nuclear Waste Management Organization (NWMO) is responsible for designing and implementing the APM project. The implementation of the APM project will span many decades, and will include the following steps, as described by NWMO:
				 Step 1: NWMO initiates the siting process with a broad program to provide information, answer questions and build awareness among Canadians about the project and siting process. Awareness-building activities will continue throughout the full duration of the siting process.
				 Step 2: Communities identify their interest in learning more, and the NWMO provides detailed briefing. An initial screening is conducted. At the request of the community, the NWMO will evaluate the potential suitability of the community against a list of initial screening criteria.
				 Step 3: For interested communities, a preliminary assessment of potential suitability is conducted. At the request of the community, the NWMO will conduct a feasibility study collaboratively with the community to determine whether a site has the potential to meet the detailed requirements for the project. Interested communities will be encouraged to inform surrounding communities, including potentially affected Aboriginal communities and governments, as early as possible to facilitate their involvement.
				 Step 4: For interested communities, potentially affected surrounding communities are engaged if they have not been already, and detailed site evaluations are completed. In this step, the NWMO will select one or more suitable sites from communities expressing formal interest for regional study and/or detailed multi-year site evaluations. The NWMO will work collaboratively with these communities to engage potentially affected surrounding communities, Aboriginal governments and the provincial government in a study of health, safety, environment, social, economic and cultural effects of the project at a broader regional level (Regional Study), including effects that may be associated with transportation. Involvement will continue throughout the siting process as decisions are made about how the project will be implemented.
				 Step 5: Communities with confirmed suitable sites decide whether they are willing to accept the project and propose the terms and conditions on which they would have the project proceed.
				 Step 6: The NWMO and the community with the preferred site enter into a formal agreement to host the project. The NWMO selects the preferred site, and the NWMO and community ratify a formal agreement.
				• Step 7: Regulatory authorities review the safety of the project through an independent, formal and public process and, if all requirements are satisfied, give their approvals to proceed. The implementation of the deep geological repository will be regulated under the Nuclear Safety and Control Act and its associated regulations to protect the health, safety and security of Canadians and the environment, and to respect Canada's international commitments on the peaceful use of nuclear energy. Regulatory requirements will be observed throughout all steps in the siting process. The documentation produced through previous steps, as well as other documentation that will be required, will be formally reviewed by regulatory authorities at this step through an Environmental Assessment and then licensing hearings related to site preparation and construction of facilities associated with the project. Various aspects of transportation of used nuclear fuel will also need to be approved by regulatory authorities.
				 Step 8: Construction and operation of an underground demonstration facility proceeds. The NWMO will develop the centre of expertise, launched in Step 4, to include and support the construction and operation of an underground demonstration facility designed to confirm the characteristics of the site before applying to regulatory authorities for



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				an operating licence. Designed in collaboration with the community, it will become a hub for knowledge-sharing across Canada and internationally.
				 Step 9: construction and operation of the facility. The NWMO begins construction of the deep geological repository and associated surface facilities. Operation will begin after an operating licence is obtained from regulatory authorities. The NWMO will continue to work in partnership with the host community in order to ensure the commitments to the community are addressed throughout the entire lifetime of the project.
				The APM project is currently in Step 3 of the process (preliminary evaluation of the sites), and have identified seven (7) possible locations in the following areas as the current focus are currently involved as a focus of study:
				Hornepayne and Area;
				Huron-Kinloss;
				Ignace and Area;
				Manitouwadge and Area; and
				South Bruce
				Of these possible sites, only the "Ignace and Area" location is close enough to have the potential for effects that could be cumulative with the effects of the Goliath Gold Project. Currently, there is no indication whether this location will advance beyond Step 3 in the APM process. Even if the Ignace area is identified as having the potential to meet the detailed requirements for the APM project, it would still need to be selected as one of the sites to move forward into the multi-year studies (Step 4). Should the site be identified as suitable, the community would need to confirm it willingness to host the APM (Step 5) and enter a formal agreement to host the APM project (Step 6), before the regulatory approval process (including an environmental assessment) can commence. The site selection process (Steps 1 through 6) were expected to take more than 10 years to complete. The regulatory approval process is identified by NWMO as likely taking 5 or more years to complete; however, the regulatory approval process for the Deep Geologic Repository (DGR) for low and intermediate level waste is still ongoing after 12 years. It would not be until the successful conclusion of the regulatory process (possibly 10–20 years from today) that the 10-year construction process would commence. Therefore, the only activities associated with the APM project with the potential to overlap with the effects of the Goliath Gold Project would be the exploratory drilling work underway as part of Step 3, and possibly additional drilling if Ignace and Area are identified as suitable for moving into Step 4. As shown on TMI_868 CE(2) 01_Figure_3, all of the identified drilling areas in the Ignace study area fall outside of the study areas used for describing the effects of the Project on lands and resources that could be used for traditional purposes by members of Indigenous communities. Thus, no effects associated of the AMP project drilling (Step 3 and Step 4, should Ignace community advance in the process) were identified as acting cumu
				Mining Projects in the Region
				A search for other potential mining project in the vicinity of the Goliath Gold Projects identified a number of potential mines across northern Ontario. Only the Goldlund Project for First Mining Gold (25 km to the northeast) is close enough however to consider as possibly having the potential for cumulative effects with those of the Goliath Gold Project. The Goldlund Project is



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				one of four (4) properties held by properties are Springpole (185 k southwest). Of these projects, or posted on the Registry to start the local study area (LSA), used for (exclusive of ungulates, especial which was used for describing the study areas are also used for de Goliath Gold Project. For other proper to overlap with the relevant Table 4 lists the resources associated by the project on lands and resources are potential cumulative effects were was not included as part of the control of the sources are project on lands and resources are potential cumulative effects were was not included as part of the control of the sources are project on lands and resources are potential cumulative effects were was not included as part of the control of the sources.	in to the north), inly the Springpol ne environmental describing the elly moose), the water effects of the escribing the land projects to overlate the study areas, as ciated with each inced by First Mile (2) phases of extended to occumulative effects to occumulative effects.	Pickle Crow (265 le Project has additional assessment proffects of the Golia wild rice LSA, and Goliath Gold Projets and resources a cumulatively were described in Second the First Mining in preference application occur lays out ed for traditional procur with the effects assessment present assessment asse	km to the norther vanced beyond the cess. The figure at Gold Project of the regional studect on ungulates available for tractith the effects of action 7.3.2 of the g Gold projects it e of the other projects of the other projects of the other projects of the study ourposes by ments associated with the cess.	east), and Camero he exploration ph also shows the lo on vegetation, we dy area (RSA) for (specifically the li litional purposes of the Goliath Gold I revised EIS (Apri n northern Ontario operties. The Golo as around the pat areas used for do others of Indigenous h the Goliath Golo	on (110 km to the west- ase, having recently been ocation of the terrestrial tlands and wildlife valued components (VCs), moose indicator). These that may be affected by the Project, their effects would I 2018). o, and shows why the flund Project, which is only ented claim (WSP 2017). escribing the effects of the us communities. Thus, no d Project, and this project
				Table 4: First Mining Gold Resource					
				Project		ed, Indicated and I		(tonnes) Total	
				Goldlund	Measured —	9,300,000	Inferred 40,900,000	50,200,000	
				Springpole		139,100,000	11,400,000	150,500,000	
				Pickle Crow	_	_	10,300,000	10,300,000	
				Cameron	3,360,000	2,170,000	6,535,000	12,065,000	
				Wabigoon River Clean-up and Fin July of 2017, the Ontario Govin the Wabigoon and English rividentified as historic releases of indicate there may still be source clean-up activities have yet to be nature of the remediation publish this project could act in a cumula effects assessment presented in having adverse effects on either Project. There would be no mea into Wabigoon Lake, and thus no associated with planned Wabigo	Remediation. ernment made a er systems, down mercury from the es of emissions. e finalized, and nhed. As such, it is ative manner with a Section 7 of the water quality an surable adverse o effects that wo	commitment to sonstream of the Cie paper mill in the While the funding to specific dates is not possible to the revised EIS (Apped fish that extendeffects of the Gould extend downs	ty of Dryden. The community; how go for the clean-up for starting the way quantitatively evalued to the Gold Pril 2018), the Gold beyond the netwister Gold Project stream of Dryden	e primary source wever, recent stud on has been set as ork released, and aluate what, if any roject. As describiath Gold Project work of stream and to neither water or to interact with the	of contamination had been dies (Rudd et al. 2016) ide, the plans for the actual no indications as to the y, effects associated with led in the cumulative was not identified as lijacent to the Goliath Gold quality or fish that extend ne possible effects



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				effects assessments under CEAA 2012 (CEAA, 2014), the only cumulative effects that need to be considered are those where there are residual adverse effects identified as a result of the Project. Therefore, the planned Wabigoon River clean-up and remediation was not considered as part of the cumulative effects assessment presented in Section 7 of the revised EIS (April 2018), as there were no residual adverse effects to either fish or water quality that extended into Wabigoon Lake, or downstream. Treasury Metals is confident that the Agency, and other interested stakeholders, will ensure that the possible effects of the planned Wabigoon River clean-up and remediation project will be subject to the same level of rigorous scrutiny applied to the Goliath Gold Project and other similar projects that have completed, or are currently completing review under the Canadian Environmental Assessment Act.
				Part B: As detailed in Part A of this response, Treasury Metals evaluated a comprehensive list of projects to identify those projects with effects that could potential interact in a cumulative manner with those of the Goliath Gold Project. No additional projects beyond those evaluated in Section 7 of the revised EIS (April 2018) were identified. As such, there is no need to revise the cumulative effects assessment presented in Section 7 of the revised EIS (April 2018).
				References Canadian Environmental Assessment Registry. 2014 Available: https://www.ceaa-acee.gc.ca/050/index-eng.cfm. Accessed: October 14, 2014. WSP Canada Inc. (WSP). 2017. Technical Report and Resource Estimation Update on the Goldlund Project, Patricia and Kenora Mining Division, Ontario. Prepared for First Mining Finance Corp.
				Agency Comment on Draft Response
				None received.
				Specific Response to Agency Comments
				Not required. Agency accepted Draft Response.
				FINAL RESPONSE:
				A: The process for identifying known and reasonably foreseeable projects for inclusion in the cumulative effects assessment presented in the revised EIS (April 2018) considered information available from a range of sources, including:
				 The CEAA Registry (the Registry), located at: https://ceaa-acee.gc.ca/050/evaluations/?culture=en-CA. The Registry lists major projects that require consideration under CEAA 2012, or its predecessor, and are likely to have potential cumulative effects if located sufficiently close to the study areas for the Goliath Gold Project.
				The listing of environmental assessments identified on the Ontario Ministry of Environment, Conservation and Parks website, located at: https://www.ontario.ca/page/environmental_assessment-projects-category#section-0 . As with the CEAA Registry, the projects for which provincial inventories are being completed are the types of project that are



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				likely to have potential cumulative effects if located sufficiently close to the study areas for the Goliath Gold Project.
				 Other sources of information, including feedback from Agency reviewers, which have identified additional projects that warrant consideration for inclusion in the cumulative effects assessment.
				The Registry currently lists a total of 38 projects in Ontario, which includes the Goliath Gold Project. Of those 38 projects, only 19, including the Goliath Gold Project, are located in northern Ontario and thus have any potential to interact with effects of the Goliath Gold Project. The other projects in northern Ontario that are listed on the Registry are summarized in Table 1, along with the status of the projects and their relative distance from the Goliath Gold Project. Five (5) of the projects in Table 1 have been terminated and thus would not have any potential for cumulative effects (shown with grey shading in Table 1). A further three (3) projects in Table 1 were determined by the Agency to have effects that do not require environmental assessments (shown with italics in Table 1). The relative location for the closest of these projects (i.e., those most likely to interact in a cumulative manner with the effects of the Goliath Gold Project) have been shown on TMI_868-CE(2)-01_Figure_1. The figure also shows the location of the terrestrial local study area (LSA), used for describing the effects of the Goliath Gold Project on vegetation, wetlands and wildlife (exclusive of ungulates, especially moose), the wild rice LSA, and the regional study area (RSA) for terrestrial valued components (VCs), which was used for describing the effects of the Goliath Gold Project on ungulates (specifically the moose indicator). These study areas are also used for describing the lands and resources available for traditional purposes that may be affected by the Goliath Gold Project. For other projects to overlap cumulatively with the effects of the Goliath Gold Project, their effects would need to overlap with the relevant study areas, as described in Section 7.3.2 of the revised EIS (April 2018). None of the projects listed on the Registry overlap with these study areas. The Josephine Cone Mine Project is the closest to the wildlife RSA (shown on TMI_868-CE(2)-01_Figure_1). While the Josephine Cone Mine Project was includ



Unique Identifier	Agency IR #	Annex	Agency / Group / Stakeholder		Cross Refe	rence / Comment / I	nformation Request / R	esponse	
				Table 1: L	isting of Northern Ontario Projects on the CEA	A Registry			
				Count	Project Name	Proponent	Status	Approximate Distance (km)	Approximate Direction
				1	Marathon Platinum Group Metals and Copper Mine Project	Stillwater Canada Inc.	Environmental assessemnt terminated by proponent.	475	ESE
				2	Hammond Reef Gold Project	Agnico Eagle Mines Limited	Environmental assessment in progress	125	SE
				3	Eagle's Nest Project	Noront Resources Ltd.	Environmental assessment in progress	520	NE
				4	Cliffs Chromite Project	Cliffs Natural Resources Inc	Environmental assessment terminated	525	NE
				5	Josephine Cone Mine Project	Bending Lake Iron Group Limited	Environmental assessment in progress	60	SE
				6	Rainy River Project	New Gold Inc.	Environmental assessment completed	150	SW
				7	Range and Training Area - Thunder Bay Region	Department of National Defence	Environmental assessment not required	190	ESE
		ĺ		8	Griffith Iron Ore Redevelopment Project	Northern Iron Corporation	Environmental assessment in progress	125	NNW
		ĺ		9	Côté Gold Mine Project	IAMGOLD Corporation	Environmental assessment completed	825	SE
	1	1		10	Victor Diamond Mine Extension Project	De Beers Canada Inc	Environmental assessment terminated	700	ENE
		ĺ		11	Magino Gold Project	Prodigy Gold Incorporated	Environmental assessment in progress	620	SE
				12	Hardrock Gold Mine Project	Greenstone Gold Mines	Environmental assessment in progress	410	E
				13	Energy East Project	Energy East Pipeline Ltd.	Environmental assessment terminated	_	_
				14	Eastern Mainline Project	TransCanada PipeLines Limited	Environmental assessment terminated	_	-
				15	Borden Gold Mine Project	Goldcorp Borden Limited	Environmental assessment not required	725	ESE
				16	Baudette-Rainy River International Bridge	Ontario's Ministry of Transportation	Environmental assessment not required	184	SW
				17	Springpole Gold Project	First Mining Gold Corp.	Environmental assessment in progress	185	N
				18	Century Gold Project	Porcupine Gold Mines	Project under consideration	840	ESE
				manne northe website 28 wer	gh the Registry represents a go or with the effects of the Goliath orn Ontario listed with environme e. Of these, ten (10) were ident re identified as waste managem onment, Conservation and Parks	Gold Project, other source ental assessments on the ified as electricity projects ent projects. It should also	ces of information were also us Ontario Ministry of Environme s, nine (9) were identified as m so be noted that some of the pr	ed. There wer nt, Conservation ining projects,	e 47 projects i on and Parks and the rema
				with the (shown Gold P project	2 provides a summary of the ele e relevant position to the Goliat n with grey shading in Table 2). troject. Although there are nine s will never proceed. For exam ne same purpose and similar co	h Gold Project. One (1) c Therefore, this project ca (9) electricity projects list ple, both the Wataynikan	If the project in the table has be annot have any potential for cull ed in the table, there is a high eyap Power and Sagatay Tran	een terminated mulative effect likelihood that smission L.P.	I by the propor s with the Goli some of these



Unique Identifier	Agency IR #	Annex	Agency / Group / Stakeholder			Cross Reference /	Comme	ent / Information	ı Request / Respon	se	
				Ta	able 2: Li	sting of Northern Ontario Electricity Projects on the MECP Dtabase					
					Count	Project Name	Туре	Proponent	Status	Approximate Distance (km)	Approximate Direction
					1	Detour Lake Contingency Power Project	Electricity	Detour Gold Corporation	Environmental assessment: approved, March 22, 2012	926	Е
					2	Detour Lake Power Project	Electricity	Detour Gold Corporation	Environmental assessment: approved, December 15, 2010	926	E
					3	Goldcorp Musselwhite Mine Main Power Supply Project	Electricity	Goldcorp Canada Limited	Environmental assessment: approved, November 17, 2010	350	NNE
					4	New Transmission Line to Pickle Lake	Electricity	Wataynikaneyap Power	Environmental assessment: submitted, November 3, 2017	20	SW
					5	Sagatay Pickle Lake transmission project	Electricity	Sagatay Transmission L.P.	Terms of reference: expiry of public comment period, March 28, 2016	20–80	SW
					6	SynFuel Technologies: New Energy Source for Atikokan Ontario	Electricity	SynFuel Technologies	Terms of reference: time out	125	SE
					7	SynFuel Technologies: New Energy Source for Cascades Fine Paper Group	Electricity	SynFuel Technologies	Terms of reference: approved, March 14, 2005	290	SE
					8	SynFuel Technologies: New Energy Source for Red Rock Ontario	Electricity	SynFuel Technologies	Terms of reference: approved, November 4, 2005	330	ESE
				IL	9	SynFuel Technologies: New Energy Source for Thunder Bay Ontario	Electricity	SynFuel Technologies	Terms of reference: approved, March 14, 2005	290	SE
					10	Victor Diamond Mine Power Supply Project	Electricity	De Beers Canada Exploration Inc.	Terms of reference: withdrawn, August 26, 2004	700	ENE
				Ta	able 3: Li	isting of Northern Ontario Mining Projects on the MECP Dtabase					
					Count	Project Name	Туре	Proponent	Status	Approximate Distance (km)	Approximate Direction
I					1	Bending Lake Iron Mine (Josephine Cone Mine Project)	Mining	Bending Lake Iron Group Limited	Designation: granted, November 25, 2011	60	SE
					2	Cliffs Chromite Project	Mining	Cliffs Natural Resources Inc	On November 20, 2013, Cliffs announced that it was indefinitely suspending its chromite project in Northern Ontario.	525	NE
					3	Côté Gold Project	Mining	IAMGOLD Corporation	Environmental assessment: approved, December 22, 2016	825	SE
1					4	Hammond Reef gold mine	Mining	Agnico Eagle Mines Limited	Revised environmental assessment submitted January 29, 2018	125	SE
					5	Hardrock Gold Mine	Mining	Greenstone Gold Mines	Terms of reference: approved, June 24, 2015	410	E
					6	Marathon Platinum Group Metals and Copper Mine Project	Mining	Stillwater Canada Inc.	Environmental assessemnt terminated by proponent.	475	ESE
I					7	Noront Eagle's Nest Multi-metal Mine	Mining	Noront Resources Ltd.	Terms of reference – amendment: approved, June 18, 2015	520	NE
					8	Rainy River Gold Mine	Mining	New Gold Inc.	Environmental assessment: approved, January 28, 2015	150	SW
					9	Springpole Gold Project	Mining	First Mining Gold Corp.	On April 18, 2018 the First Mining Gold agreed to make the project subject to the Environmental Assessment Act.	185	N
				d	ataba	lative location for the closest of the elect ase have been shown on TMI_868-CE(2) _SA), used for describing the effects of the)-01_Figu	re_2. The figure also	shows the location of th	e terrestria	al local study



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				ungulates, especially moose), the wild rice LSA, and the regional study area (RSA) for terrestrial valued components (VCs), which was used for describing the effects of the Goliath Gold Project on ungulates (specifically the moose indicator). These study areas are also used for describing the lands and resources available for traditional purposes that may be affected by the Goliath Gold Project. For other projects to overlap cumulatively with the effects of the Goliath Gold Project, their effects would need to overlap with the relevant study areas, as described in Section 7.3.2 of the revised EIS (April 2018). Of the electricity and mining projects listed on the MECP environmental assessment database, only the following two (2) projects overlap with the RSA shown on TMI_868-CE(2)-01_Figure_2.
				 New Transmission Line to Pickle Lake (Wataynikaneyap Power); and
				 Sagatay Pickle Lake Transmission Project (Sagatay Transmission L.P.).
				As noted previously, both the Wataynikaneyap Power and Sagatay Transmission L.P. projects are identified as having the same purpose and similar corridor options, and only one of these projects are likely to be built. The cumulative effects assessment presented in Section 7 of the revised EIS (April 2018) included the Wataynikaneyap Power transmission line project at the request of the Agency reviewers. As only one of these projects will be constructed, the potential cumulative effects of these projects are captured in the revised EIS.
				In addition to the Wataynikaneyap Power transmission line project, the Bending Lake Iron Mine (Josephine Cone Mine Project), which also appears on the Registry, is also located in proximity to the wildlife RSA (shown on TMI_868-CE(2)-01_Figure_1). While it is far enough away from the RSA that cumulative effects on terrestrial resources, especially moose, are not expected, this project was included as part of the cumulative effects assessment presented in Section 7 of the revised EIS (April 2018) at the specific request of the Agency reviewers.
				In addition to the electricity and mining projects listed in the MECP database, there are 28 waste management projects listed in northern Ontario. As these projects will have only a localized effect, they would not be expected to have the potential to act in a cumulative manner with the effects of the Goliath Gold Project unless located within the relevant study areas used for describing cumulative effects, as described in Section 7.3.2 of the revised EIS (April 2018). Only the "Dryden Long Term Waste Disposal Capacity" project meets these criteria. The MECP database indicates that the purpose of the project was to expand the capacity of the existing landfill site located on the southern half of Lot 11, Concession 3, in the Township Van Horne. As the environmental assessment was approved on April 19, 2000, the effects of this project will already have been captured in the existing conditions, as described in Section 7.2.1 of the revised EIS (April 2018).
				Beyond the Registry and the MECP database of current and ongoing environmental assessments, considerable information can be located through internet searches to identify potential developments that may be advanced, and could thus interact in a cumulative manner with the effects of the Goliath Gold Project. Such projects however are typically at an early stage of development and as such, little information is available regarding the size, scope and configuration of these projects that would allow for a determination of the extent and magnitude of potential cumulative effects, if any, which could interact with the effects of the Goliath Gold Project. Based on these searches, the following groups of projects of projects were evaluated:
				 The Adaptive Phase Management (APM) project for the management of spent nuclear fuel;
				Mining projects in the region;
				Wabigoon River clean-up and remediation.
				Adaptive Phase Management
				The Adaptive Phased Management (APM) project is Canada's plan for the long-term management of used nuclear fuel, which



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				requires used fuel to be contained and isolated in a deep geological repository located in a willing host community. The Nuclear Waste Management Organization (NWMO) is responsible for designing and implementing the APM project. The implementation of the APM project will span many decades, and will include the following steps, as described by NWMO:
				 Step 1: NWMO initiates the siting process with a broad program to provide information, answer questions and build awareness among Canadians about the project and siting process. Awareness-building activities will continue throughout the full duration of the siting process.
				 Step 2: Communities identify their interest in learning more, and the NWMO provides detailed briefing. An initial screening is conducted. At the request of the community, the NWMO will evaluate the potential suitability of the community against a list of initial screening criteria.
				 Step 3: For interested communities, a preliminary assessment of potential suitability is conducted. At the request of the community, the NWMO will conduct a feasibility study collaboratively with the community to determine whether a site has the potential to meet the detailed requirements for the project. Interested communities will be encouraged to inform surrounding communities, including potentially affected Aboriginal communities and governments, as early as possible to facilitate their involvement.
				 Step 4: For interested communities, potentially affected surrounding communities are engaged if they have not been already, and detailed site evaluations are completed. In this step, the NWMO will select one or more suitable sites from communities expressing formal interest for regional study and/or detailed multi-year site evaluations. The NWMO will work collaboratively with these communities to engage potentially affected surrounding communities, Aboriginal governments and the provincial government in a study of health, safety, environment, social, economic and cultural effects of the project at a broader regional level (Regional Study), including effects that may be associated with transportation. Involvement will continue throughout the siting process as decisions are made about how the project will be implemented.
				 Step 5: Communities with confirmed suitable sites decide whether they are willing to accept the project and propose the terms and conditions on which they would have the project proceed.
				 Step 6: The NWMO and the community with the preferred site enter into a formal agreement to host the project. The NWMO selects the preferred site, and the NWMO and community ratify a formal agreement.
				• Step 7: Regulatory authorities review the safety of the project through an independent, formal and public process and, if all requirements are satisfied, give their approvals to proceed. The implementation of the deep geological repository will be regulated under the Nuclear Safety and Control Act and its associated regulations to protect the health, safety and security of Canadians and the environment, and to respect Canada's international commitments on the peaceful use of nuclear energy. Regulatory requirements will be observed throughout all steps in the siting process. The documentation produced through previous steps, as well as other documentation that will be required, will be formally reviewed by regulatory authorities at this step through an Environmental Assessment and then licensing hearings related to site preparation and construction of facilities associated with the project. Various aspects of transportation of used nuclear fuel will also need to be approved by regulatory authorities.
				 Step 8: Construction and operation of an underground demonstration facility proceeds. The NWMO will develop the centre of expertise, launched in Step 4, to include and support the construction and operation of an underground demonstration facility designed to confirm the characteristics of the site before applying to regulatory authorities for



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				an operating licence. Designed in collaboration with the community, it will become a hub for knowledge-sharing across Canada and internationally.
				 Step 9: construction and operation of the facility. The NWMO begins construction of the deep geological repository and associated surface facilities. Operation will begin after an operating licence is obtained from regulatory authorities. The NWMO will continue to work in partnership with the host community in order to ensure the commitments to the community are addressed throughout the entire lifetime of the project.
				The APM project is currently in Step 3 of the process (preliminary evaluation of the sites), and have identified seven (7) possible locations in the following areas as the current focus are currently involved as a focus of study:
				Hornepayne and Area;
				Huron-Kinloss;
				Ignace and Area;
				Manitouwadge and Area; and
				South Bruce
				Of these possible sites, only the "Ignace and Area" location is close enough to have the potential for effects that could be cumulative with the effects of the Goliath Gold Project. Currently, there is no indication whether this location will advance beyond Step 3 in the APM process. Even if the Ignace area is identified as having the potential to meet the detailed requirements for the APM project, it would still need to be selected as one of the sites to move forward into the multi-year studies (Step 4). Should the site be identified as suitable, the community would need to confirm it willingness to host the APM (Step 5) and enter a formal agreement to host the APM project (Step 6), before the regulatory approval process (including an environmental assessment) can commence. The site selection process (Steps 1 through 6) were expected to take more than 10 years to complete. The regulatory approval process is identified by NWMO as likely taking 5 or more years to complete; however, the regulatory approval process for the Deep Geologic Repository (DGR) for low and intermediate level waste is still ongoing after 12 years. It would not be until the successful conclusion of the regulatory process (possibly 10–20 years from today) that the 10-year construction process would commence. Therefore, the only activities associated with the APM project with the potential to overlap with the effects of the Goliath Gold Project would be the exploratory drilling work underway as part of Step 3, and possibly additional drilling if Ignace and Area are identified as suitable for moving into Step 4. As shown on TMI_868 CE(2) 01_Figure_3, all of the identified drilling areas in the Ignace study area fall outside of the study areas used for describing the effects of the Project on lands and resources that could be used for traditional purposes by members of Indigenous communities. Thus, no effects associated of the AMP project drilling (Step 3 and Step 4, should Ignace community advance in the process) were identified as acting cumu
				Mining Projects in the Region
				A search for other potential mining project in the vicinity of the Goliath Gold Projects identified a number of potential mines across northern Ontario. Only the Goldlund Project for First Mining Gold (25 km to the northeast) is close enough however to consider as possibly having the potential for cumulative effects with those of the Goliath Gold Project. The Goldlund Project is



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				one of four (4) properties held by First Mining Gold in northern Ontario, as shown in TMI_868 CE(2) 01_Figure 3, The others properties are Springpole (185 km to the north), Pickle Crow (265 km to the northeast), and Cameron (110 km to the west-southwest). Of these projects, only the Springpole Project has advanced beyond the exploration phase, having recently been posted on the Registry to start the environmental assessment process. The figure also shows the location of the terrestrial local study area (LSA), used for describing the effects of the Goliath Gold Project on vegetation, wetlands and wildlife (exclusive of ungulates, especially moose), the wild rice LSA, and the regional study area (RSA) for valued components (VCs), which was used for describing the effects of the Goliath Gold Project on ungulates (specifically the moose indicator). These study areas are also used for describing the lands and resources available for traditional purposes that may be affected by the Goliath Gold Project. For other projects to overlap cumulatively with the effects of the Goliath Gold Project, their effects would need to overlap with the relevant study areas, as described in Section 7.3.2 of the revised EIS (April 2018). Table 4 lists the resources associated with each of the First Mining Gold projects in northern Ontario, and shows why the Springpole project is being advanced by First Mining in preference of the other properties. The Goldlund Project, which is only in the process of completing two (2) phases of exploratory drilling, focused on areas around the patented claim (WSP 2017). The areas where the past and planned drilling is to occur lays outside of the study areas used for describing the effects of the Project on lands and resources that could be used for traditional purposes by members of Indigenous communities. Thus, no potential cumulative effects were expected to occur with the effects associated with the Goliath Gold Project, and this project was not included as part of the cumulative effects assessmen					
				Table 4: First Mining Gold Resources in Northern Ontario					
				Project	Measur	ed, Indicated and Ir	ferred Resources	(tonnes)	
				-	Measured	Indicated	Inferred	Total	
				Goldlund	_	9,300,000	40,900,000	50,200,000	
				Springpole	_	139,100,000	11,400,000	150,500,000	
				Pickle Crow Cameron	3,360,000	2,170,000	10,300,000 6,535,000	10,300,000 12,065,000	
				Source: https://firstmininggold.com/			0,333,000	12,005,000	
				Wabigoon River Clean-up and Remediation. In July of 2017, the Ontario Government made a commitment to spend \$85 million to help clean up the mercury contamination in the Wabigoon and English river systems, downstream of the City of Dryden. The primary source of contamination had been identified as historic releases of mercury from the paper mill in the community; however, recent studies (Rudd et al. 2016) indicate there may still be sources of emissions. While the funding for the clean-up has been set aside, the plans for the actual clean-up activities have yet to be finalized, and no specific dates for starting the work released, and no indications as to the nature of the remediation published. As such, it is not possible to quantitatively evaluate what, if any, effects associated with this project could act in a cumulative manner with the effects of the Goliath Gold Project. As described in the cumulative effects assessment presented in Section 7 of the revised EIS (April 2018), the Goliath Gold Project was not identified as having adverse effects on either water quality and fish that extend beyond the network of stream adjacent to the Goliath Gold Project. There would be no measurable adverse effects of the Goliath Gold Project on either water quality or fish that extend into Wabigoon Lake, and thus no effects that would extend downstream of Dryden to interact with the possible effects associated with planned Wabigoon River clean-up and remediation. As set out in the guidance for completing cumulative					



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				effects assessments under CEAA 2012 (CEAA, 2014), the only cumulative effects that need to be considered are those where there are residual adverse effects identified as a result of the Project. Therefore, the planned Wabigoon River clean-up and remediation was not considered as part of the cumulative effects assessment presented in Section 7 of the revised EIS (April 2018), as there were no residual adverse effects to either fish or water quality that extended into Wabigoon Lake, or downstream. Treasury Metals is confident that the Agency, and other interested stakeholders, will ensure that the possible effects of the planned Wabigoon River clean-up and remediation project will be subject to the same level of rigorous scrutiny applied to the Goliath Gold Project and other similar projects that have completed, or are currently completing review under the Canadian Environmental Assessment Act.
				Part B: As detailed in Part A of this response, Treasury Metals evaluated a comprehensive list of projects to identify those projects with effects that could potential interact in a cumulative manner with those of the Goliath Gold Project. No additional projects beyond those evaluated in Section 7 of the revised EIS (April 2018) were identified. As such, there is no need to revise the cumulative effects assessment presented in Section 7 of the revised EIS (April 2018).
				References
				Canadian Environmental Assessment Registry. 2014 Available: https://www.ceaa-acee.gc.ca/050/index-eng.cfm. Accessed: October 14, 2014.
				WSP Canada Inc. (WSP). 2017. Technical Report and Resource Estimation Update on the Goldlund Project, Patricia and Kenora Mining Division, Ontario. Prepared for First Mining Finance Corp.







