

Magino Project Commitments List

Environmental Component	ID	Valued Component	Commitment / Mitigation / Monitoring	Commitments	Project Phase					Source
					PC	C	O	CI	PCI	
Atmospheric Environment	1	Air Quality	Monitoring	Prodigy has committed to regular monitoring of air quality in accordance with an Air Quality Management Plan and related environmental approvals over the life of the Project. Based on a regular review of monitoring results, additional mitigation measures will be applied if required.	X	X	X	X		7.2.1.9; Canadian Environmental Assessment Agency Comment ID: HE (1)-01, HE (1)-02, HE (1)-13, FFH (1)-01, IE (1)-19; Batchewana First Nation Comment ID: G-8
Atmospheric Environment	2	Air Quality	Monitoring	During construction and operations, periodic road sampling will be undertaken which will provide site specific silt content data. The Air Quality Management Plan will detail trigger levels for implementation of additional monitoring and/or mitigation implementation.		X	X			Canadian Environmental Assessment Agency Comment ID: HE (1)-09
Atmospheric Environment	3	Air Quality	Mitigation	Prodigy has committed to the use of vehicles that meet at least Tier 3 emission standards for any offsite hauling. Like all vehicles associated with the Project, they will be managed through regular and routine maintenance programs to ensure the engines are kept in good working order.		X	X			Canadian Environmental Assessment Agency Comment ID: HE (1)-11
Atmospheric Environment	4	Air Quality	Mitigation	The Air Quality Management Plan will be updated as part of the permitting phase to include GHG mitigation measures	X					Canadian Environmental Assessment Agency Comment ID: GHG (1)-1
Atmospheric Environment	5	Air Quality	Mitigation	An Air Quality Management Plan will be developed that will include: <ul style="list-style-type: none"> • Management practices for reducing GHGs and emissions from mine fleet. • Equipment presented in ECCC's Environmental Code of Practice for Metal Mines (2009) http://www.ec.gc.ca/lcpe-cepca/default.asp?lang=En&n=CBE3CD59-1. • ECCC's guidance document, "Best Practices for the Reduction of Air Emissions from Construction and Demolition Activities" (ChemInfo, 2005). 	X	X	X			Canadian Environmental Assessment Agency Comment ID: AP-6
Atmospheric Environment	6	Air Quality	Commitment	Once the facilities are in operation and a baseline for GHG emission is established, the Company will bench-mark its operation against other similar mining operations and implement a Greenhouse Gas Emission Reduction Program.			X			TSD20-13
Atmospheric Environment	7	Light	Mitigation	Lighting for the Project will be designed to achieve the required light levels to ensure worker health and safety on sight while minimizing luminous flux and uplighting to the atmosphere.		X	X	X		7.2.4.6
Atmospheric Environment	8	Noise	Monitoring	Noise monitoring, if required, will be confirmed at the permitting stage based on discussions with the MECP during the Environmental Compliance Approval process.	X					Canadian Environmental Assessment Agency Comment ID: IR Number: IE (1)-23; Batchewana First Nation Comment ID: G-8
Atmospheric Environment	9	Noise	Monitoring	Periodic noise measurements will be carried out at the identified receptors to validate predictions of the EIS. The noise assessment can be revisited during the permitting process if changes to the site design occur.			X			TSD20-13; Canadian Environmental Assessment Agency Comment ID: IE (1)-21
Atmospheric Environment	10	Vibration	Mitigation	The proponent is committed to mitigating impacts from vibration, and will be providing further details to DFO during the permitting phase of the Project as part of their role in managing the sustainability and ongoing productivity of commercial, recreational, and Indigenous fisheries.	X	X	X			Batchewana First Nation Comment ID: TSD12-1
Biological Environment	11	Fish and Fish Habitat	Commitment	Prodigy has committed to the Department of Fisheries and Oceans Canada (DFO) to establish a Fisheries Working Group in January of 2018 in order to serve two main purposes: <ol style="list-style-type: none"> 1. Provide a venue for Prodigy, the technical consultant and the DFO to interact on a regular basis to establish a shared understanding of areas that will need fisheries offsetting and compensation under the Fisheries Act. 2. Provide a regular venue for Indigenous groups to participate in the development of the fisheries offsetting, compensation and subsequent monitoring plans that will be required prior to construction. 	X	X	X			Canadian Environmental Assessment Agency Comment ID: FFH (1)-01; FFH (1)-06a; FFH (1)-30; AP-3
Biological Environment	12	Fish and Fish Habitat	Commitment	Indigenous groups will be invited for additional site visits as fish habitat compensation and offsetting works are underway.		X	X			Métis Nation of Ontario Comment ID: 4.3.13
Biological Environment	13	Fish and Fish Habitat	Commitment	Upon discussion with Indigenous communities, at closure, the feasibility of fish spawning area construction within the pit will be assessed in order to assist with aquatic biota diversity emergence.			X	X	X	Garden River First Nation Comment ID: GRFN-3
Biological Environment	14	Fish and Fish Habitat	Mitigation	During site clearing (construction), sediment mitigation and erosion control plans will be developed to ensure protection of fish and fish habitat during construction.		X				Canadian Environmental Assessment Agency Comment ID: FFH (1)-30
Biological Environment	15	Fish and Fish Habitat	Commitment	The finalization of the Fish Habitat Compensation Plan will occur once the Project receives environmental approval and is released from the Canadian Environmental Assessment Agency review process. The general approach will be to design habitat to meet the current life history requirements of the resident fish (McVeigh Creek re-alignment will be a channel designed with form and function considered). Consideration with respect to spawning, juvenile, adult foraging and over wintering habitat will be incorporated into the compensation design as appropriate. The compensation plans will consider not only the physical habitat requirements (i.e., flow, depth, fish passage, cover, and substrate) but also the biological requirements (e.g. food).	X					7.3.3.10.3 Batchewana First Nation Comment ID: 7-32, 7-49
Biological Environment	16	Fish and Fish Habitat	Commitment	Prodigy Gold commits to continue to consult with Indigenous groups to seek input into the development and implementation of the fish habitat offsets and compensation offset and compensation plans.	X					Métis Nation of Ontario Comment ID: 4.3.3
Biological Environment	17	Fish and Fish Habitat	Mitigation	Fish salvage following industry best practices will be undertaken to the extent practicable. The timing of fish relocations will be scheduled with respect to fish life history requirements (e.g., spawning periods) and conditions in the watershed (e.g., water temperature).		X				7.4.1.6
Biological Environment	18	Fish and Fish Habitat	Mitigation	Prodigy will undertake an adaptive approach to the management of any effects from vibration of fish and fish habitat, using field observations to characterize the effects of vibrations on fish habitat.			X			7.4.1.6

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Biological Environment	19	Fish and Fish Habitat	Mitigation	In order to avoid effects of water intake structures on fish, the design of the screens or fish exclusion measures will comply with DFO guidance documents and industry best practice.		X	X			7.4.1.6
Biological Environment	20	Mammals	Commitment	Management plans will include measures to protect moose and bear and other mammals that will frequent the site.	X	X	X	X		Garden River First Nation, Michipicoten First Nation Comment ID: MFN-11; GRFN-30
Biological Environment	21	Mammals	Mitigation	<p>Mitigation measures are identified below to further avoid or reduce the severity of the adverse effects on mammals and their habitat:</p> <ul style="list-style-type: none"> • Timing of removal of habitat should be sensitive to the life cycles of mammals on this landscape. For instance, timing beaver dam or den removals to late summer when young will be moving away from upland dens may reduce mortality. Timing of draining of waterbodies and the removals of semi-aquatic species needs to be timed to avoid dens freezing in winter (i.e., no draining or removals after October 1 in order to allow beaver and otter to move to alternate habitats and accumulate food caches). • To the extent practical, clearing should occur from headwaters/upstream locations toward downstream to allow mammals associated with watercourses and wetlands (e.g., mink, beaver, shrews) to migrate to larger bodies of water downstream as opposed to being stranded in terrestrial habitat upstream where they will be more vulnerable to predation. • Retain woody debris during clearing and grubbing operations. Create piles of slash (birch and alder is particularly useful) at created edges to provide winter caches of food for disturbed furbearers and small mammals. • Compliance with speed limits on the site roads will be strictly enforced to limit the potential for vehicle collisions with wildlife in the area. New roads on the site which may be required will be designed to maximize line of site to provide safety for vehicles and reduce wildlife collisions. • The use of facility owned snowmobiles and ATV's will be strictly limited for specific uses such as remote sampling, and only by personnel trained in their use. Training will include speed and noise caution to avoid wildlife harassment. Recreational use of such vehicles by mine personnel will be strictly prohibited. • Hunting and fishing on the mine property will be prohibited. Only mine designated personnel responsible for wildlife control will be allowed. • Where technically and economically feasible, measures will be implemented to exclude access by mammals to water quality ponds. • Soils or sediments contaminated during operations shall be removed or capped to sequester contamination. • Lighting will be directed downward and not toward adjacent wildlife habitat. • The seed collection program in support of restoration may include Dwarf Raspberry (<i>Rubus pubescens</i>), Pin Cherry (<i>Prunus pensylvanica</i>), Velvet-leaf Blueberry (<i>Vaccinium myrtilloides</i>), and Dwarf Blueberry (<i>Vaccinium caespitosum</i>) plus other species that may be recommended by Indigenous communities in the area. • Ensure that putrescent garbage is managed to avoid attracting omnivores such as bear, raccoons and fox. Staff will be prohibited from feeding wildlife. 		X	X	X		7.4.6.6; Batchewana First Nation Comment ID: 7-54
Biological Environment	22	Mammals	Mitigation	Staff will be educated to maintain clean facilities, store food in places not accessible to mammals and under no circumstances make wildlife human tolerant by feeding them.		X	X	X		7.4.6.8.4
Biological Environment	23	Mammals	Commitment	A requirement for planting of berry-producing species will be included in the forest restoration plan.			X	X		7.4.6.9.1
Biological Environment	24	Mammals	Monitoring	<p>Monitoring shall be undertaken to confirm the effectiveness of:</p> <ul style="list-style-type: none"> • Wildlife exclusion from kitchen waste disposal areas; dining facilities and human activity where food might be available. • Wildlife/human interactions that include wildlife use of water quality ponds and the pit, the mortality due to vehicular collisions, and the use of ecopassages. 		X	X	X		7.4.6.9.1
Biological Environment	25	Mammals	Commitment	Post closure, the wide spill way channel as well as access road to the TMF embankment will provide for access by wildlife				X	X	Batchewana First Nation Comment ID: 5-1
Biological Environment	26	Migratory and Breeding Birds	Mitigation	Best management practices will be used where practical to minimize the potential for collisions and electrocution.		X	X	X		Canadian Environmental Assessment Agency Comment ID: TW (1)-08
Biological Environment	27	Migratory and Breeding Birds	Monitoring	<p>There will be a breeding birds and canopy warblers monitoring plan that will:</p> <ul style="list-style-type: none"> - Determine and verify the predictions of potential effects of the project on breeding birds and canopy warblers. - Evaluate the effectiveness of the proposed mitigation measures. - Detect and measure changes in avian species diversity, density and richness. Monitoring will be conducted immediately after closure and repeated on a regular frequency. 		X	X	X	X	Canadian Environmental Assessment Agency Comment ID: TW (1)-03
Biological Environment	28	Migratory and Breeding Birds	Monitoring	<p>The objectives of the raptors follow up monitoring plan are to:</p> <ul style="list-style-type: none"> • Determine and verify the predictions of potential effects of the project on raptors. • Evaluate the effectiveness of the proposed mitigation measures, such as habitat restoration. • Detect and measure changes in raptor species diversity, density and richness. <p>Monitoring will be conducted immediately after closure and repeated on a regular frequency.</p>		X	X	X	X	Canadian Environmental Assessment Agency Comment ID: TW (1)-04
Biological Environment	29	Migratory and Breeding Birds	Commitment	Prodigy will consider Métis Nation of Ontario (MNO) recommendations regarding breeding bird preservation consistent with both Canadian Wildlife Service and MNR regulations.	X					Métis Nation of Ontario Comment ID: 4.4.8

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Biological Environment	30	Migratory and Breeding Birds	Mitigation	Mitigation measures are identified below which could further avoid or reduce the severity of the adverse effects on Migratory and Breeding Birds: <ul style="list-style-type: none"> Activities with the potential to destroy migratory birds, including vegetation clearing, filling, and demolition/removal of structures used by cavity nesters, shall not take place in migratory bird habitat during the breeding season, generally defined (for different habitat types) as May 1 to July 31 for this region. The Emergency Response and Spills Control Plan will ensure that spills are contained and cleaned up effectively to minimize exposure of birds to potential contaminants. Compliance with speed limits on the site roads will be strictly enforced to limit the potential for vehicle collisions with wildlife in the area. New roads on the site which may be required will be designed to maximize line of site to provide safety for vehicle and wildlife collisions. Hunting on the mine property will be prohibited. Only mine designated personnel responsible for wildlife control will be allowed. Lighting should be directed downward and not toward adjacent wildlife habitat. 		X	X	X		7.4.5.6
Biological Environment	31	Significant Wildlife Habitat	Mitigation	Additional mitigation measures are identified below to further avoid or reduce the severity of the adverse effects specific to Significant Wildlife Habitat. These include <ul style="list-style-type: none"> Timing of removal of habitat to adhere to the requirements of the Migratory Birds Convention Act. Removal of active nests will be prohibited, and typically clearing should not occur between May 15 and July 31 (additional restrictions apply to Threatened and Endangered Species). Restoring forest at the mine site should include objectives for habitat elements that are important to SSC such as mixed shelterwood woodlands and floating-leaved wetlands for moose; open woodlands with rock barren openings for Common Nighthawk; and sources of a water supply and shrubby understory for Canada Warbler. 		X	X	X		7.4.4.7
Biological Environment	32	Species at Risk (Aquatic and Terrestrial)	Mitigation	Mitigation measures for bats will be determined pending MNRF review of an Information Gathering Form through the Endangered Species Act permitting process.	X	X				Batchewana First Nation Comment ID: 7-56; Canadian Environmental Assessment Agency Comment ID: TW (1)-07
Biological Environment	33	Species at Risk (Aquatic and Terrestrial)	Mitigation	Potentially provide alternate artificial hibernacula and roost sites for bats prior to removal of the existing hibernacula (the adit) to allow acclimation to new site conditions.		X	X			7.4.7.6
Biological Environment	34	Species at Risk (Aquatic and Terrestrial)	Commitment	Prodigy would be willing to work cooperatively with the MFN, outside of the environmental assessment framework, to support their efforts directed at Woodland Caribou recovery. The exact nature of any such support would have to be determined cooperatively with the MFN.		X	X			IR-3 (Part 2), MFN-8
Biological Environment	35	Terrestrial Vegetation	Commitment	Prodigy Gold will forward MNO's concern of herbicide use over the transmission line to the project proponent.	X	X	X	X	X	Métis Nation of Ontario Comment ID: 4.4.6
Biological Environment	36	Terrestrial Vegetation	Commitment	Tailings surface will potentially be stabilized with a dry vegetated cover, possibly with wetlands at the entrance of the spillway and other localized areas.			X	X	X	Batchewana First Nation Comment ID: TSD19-20
Biological Environment	37	Terrestrial Vegetation	Monitoring	Vegetation monitoring will include ecosite classification and percent cover of vegetation strata including trees, shrubs, herbs, and mosses		X	X	X	X	Canadian Environmental Assessment Agency Comment ID: TW (1)-03
Biological Environment	38	Terrestrial Vegetation	Commitment	In consultation with Indigenous groups, vegetation trials will be undertaken during operations to assess best pioneer and long-term floral species to aid in natural area succession. A Progressive Restoration Plan will be developed to include the following key aspects: <ul style="list-style-type: none"> Test sites will be monitored for success, allowing intervention where regeneration has failed and the improvement of restoration techniques over time. The establishment of communities capable of developing into representative, healthy, boreal forest and wetlands will be used as a restoration target. Forest and wetland restoration methods will be developed on a site by site basis utilizing the best techniques appropriate for each site. The construction laydown areas and other disturbed areas not required for operations will be rehabilitated at an early stage of project operations. 		X	X	X		Batchewana First Nation Comment ID: 7-35, 19-7; TSD19-4
Biological Environment	39	Terrestrial Vegetation	Mitigation	Measures to be taken when Black birch and Mushkeygoosh are identified during construction or operation phases will be addressed in the Construction Environmental Protection Plan (CEPP).	X	X	X			Canadian Environmental Assessment Agency Comment ID: IE (1)-03
Biological Environment	40	Terrestrial Vegetation	Mitigation	The following mitigation measures as outlined in the Construction Environmental Protection Plan (CEPP) are designed to avoid the removal of, or damage to, terrestrial vegetation due to clearing or other physical disturbances beyond defined construction working areas: <ul style="list-style-type: none"> Protect vegetated areas bordering working areas with temporary fencing. Equipment, storage of materials, and other construction activities will not be permitted outside of working areas. Restrict tree grubbing and removal to the working areas. Where possible, cut tree stumps flush to the ground and avoid grubbing to minimize soil disturbance, particularly in erosion-prone areas. Fell trees into the construction zone to avoid damaging standing vegetation that is to be preserved, and away from any watercourse where it is safe to do so. Retain woody debris during clearing and grubbing operations. Slash should be chipped and stockpiled, and large woody debris should be stockpiled for use in bioengineering and aquatic habitat improvement. 		X	X			7.4.2.6

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Biological Environment	41	Terrestrial Vegetation	Mitigation	The following additional mitigation measures have been identified to minimize any reduction in the quality / function of the retained portion of vegetation and habitat in the PS: <ul style="list-style-type: none"> Minimize the extent and width of construction and maintenance access roads and trails outside of the public bypass road. Apply wood chip material to created edges. This material will help retain soil moisture, promote germination of native seeds, and prevent weed spread. Undertake hazard tree management along the new edge as required. Prepare an Invasive Species Management Plan as part of an overall Environmental Management Plan. 	X	X	X			7.4.2.6
Biological Environment	42	Terrestrial Vegetation	Commitment	A rehabilitation plan that will aim to restore some of the forest with rock barren inclusions on the disturbed areas in the PSA will be developed and will include: Native species to be used in the seed mix for revegetation. Grass seeding to be prioritized to sites with the greatest risk of erosion or where site and soil conditions do not allow restoration of native vegetation. The vegetation plan will be incorporated into the Closure Plan and will include planting of berry-producing species, and stockpiling of topsoil for use in the construction and progressive restoration of the Project.		X	X	X		7.4.2.9; 7.4.3.6.2; Batchewana First Nation Comment ID: 7-35, 5-1; Garden River First Nation, Michipicoten First Nation Comment ID: GRFN-40; MFN-19; Canadian Environmental Assessment Agency Comment ID: TW (1)-01
Biological Environment	43	Wetlands	Mitigation	Prodigy will determine if wetlands can be created along the water collection and diversion channels.						Batchewana First Nation Comment ID: 7-31
Biological Environment	44	Wetlands	Mitigation	Prodigy can work with Indigenous communities to develop a wetland mosaic, within the tailings management area and other disturbed locations.	X	X	X	X		Batchewana First Nation Comment ID: 7-31
Biological Environment	45	Wetlands	Mitigation	The following mitigation measures have been identified to minimize the reduction in the quality/function of the retained wetlands in the PSA <ul style="list-style-type: none"> Wherever possible, retain wetlands in areas within the PSA by not requiring grading or other work (e.g., Water Body 10). Minimize extent and width of construction and maintenance access roads and trails outside of the public bypass road. Protect wetland areas bordering working areas with sediment fencing. Storage of equipment, or materials, and other construction activities will not be permitted in these areas. Implement Best Management Practices to control dust deposition. 		X	X	X		7.4.3.8
Economic Environment	46	Employment and Business Opportunities	Commitment	Prodigy will work cooperatively with the primary communities and regional economic development organizations to confirm key social and economic monitoring indicators, and report on and respond to monitoring results.	X	X	X	X		7.5.1.9, 7.5.2.9, 7.5.3.9, 7.6.2.9
Economic Environment	47	Employment and Business Opportunities	Commitment	The following enhancement measures have been identified that will maximize the local and regional beneficial effects of the project on Employment and Business Opportunities: <ul style="list-style-type: none"> Prodigy will apply the adjacency principle by encouraging local hiring to allow existing residents /families to stay in Dubreuilville (as well as Wawa and White River), and contributing to the social and economic viability of community while providing a locally invested labour force. Former residents may choose to return if employment or other opportunities are available. Measures include: <ul style="list-style-type: none"> Provision of training opportunities for the local/regional work force. Implementation of corporate policies regarding hiring. Collaboration with regional labour and economic development organizations to enhance training and skill development opportunities; Implementation of corporate policies with respect to purchasing, contracting opportunities and procurement; Proactive provision of information on the mine supply chain and available business opportunities to businesses, the primary communities, and local/regional economic development organizations; and Establishment of a database of local / regional businesses that may be able to service the Project. 		X	X	X		7.6.2.6
Economic Environment	48	Land Use and Tourism	Mitigation	Mitigation measures are identified below to further avoid or reduce the severity of the adverse effects on Land Use and Tourism: <ul style="list-style-type: none"> Inform holders of commercial fuel wood licences (if still active) of the Project schedule, to allow for the recovery of wood in advance of site preparation activities. Monitor progress on the Northeast Superior Enhanced Sustainable Forest Licence development process in terms of any implications for the Project. Conduct ongoing engagement with the commercial outfitters, trappers, and individuals with bear management areas and baitfish licences that will have portions of their resources displaced, or otherwise affected by the Project. This will assist with an understanding of their use of the area, the nature of the effects that will be experienced, and potential impact management measures (e.g., mitigation, monitoring, possible compensation where appropriate). Conduct regular consultation with the Ontario Ministry of Natural Resources and Forestry. Evaluate the suitability and classification of overburden in the PSA for use by the Project or other parties, as per the Mined Materials Management Plan (TSD 20-08). A material testing protocol would be used to ensure that it would be suitable for on-site or off-site uses. Stockpiling of materials suitable for Project construction purposes during site preparation and construction phases. 	X	X	X	X		7.6.1.6
Economic Environment	49	Land Use and Tourism	Commitment	Prodigy will work cooperatively with tenure holders (e.g. outfitter, trappers, baitfish and bear management licence holders), the primary communities and regional economic development organizations to confirm key social and economic monitoring indicators, reporting and responding to monitoring results.	X	X	X	X		7.6.1.9.1.2

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Economic Environment	50	Land Use and Tourism	Commitment	<ol style="list-style-type: none"> Prodigy has identified monitoring and adaptive management and other commitments that are common to two or more social or economic VCs: <ul style="list-style-type: none"> Relevant effects management measures and/or other commitments to communities are to be consolidated into the Human Resources Management Plan. Relevant effects management measures and/or other commitments to employees are to be consolidated in the Human Resources Management Plan. Continued liaison and dialogue with the primary communities, and others throughout all Project phases, will form part of a Public and Stakeholder Engagement Plan Social and economic change is not solely within the control of Prodigy. However, Prodigy will discuss with the primary communities and others the method for confirming social and economic indicators, reporting and responding to monitoring results. Key indicators for the Project will be monitored by Prodigy. 	X	X	X	X		7.6.1.9.1.3, 7.6.3.9.1
Economic Environment	51	Land Use and Tourism	Commitment	<p>The Project will be decommissioned and rehabilitated in a manner that will:</p> <ul style="list-style-type: none"> Enable the project site to be self-sustaining. Ensure that rehabilitated areas are physically, biologically and chemically stable and in a safe condition. Provide for progressive rehabilitation at all phases of mining. Meet surface water effluent and groundwater quality criteria. Provide for post-closure use and functions as defined through consultation with Indigenous and non-Indigenous communities, government and the Proponent. Utilize available proven technology. Comply with relevant financial assurance requirements during all phases of mining. 				X	X	TSD-19
Human Health	52	Public Health	Commitment	Prodigy will notify relevant parties as determined by the Health and Safety; Emergency Response. Indigenous groups will be notified in the event of an emergency.	X	X	X	X	X	Batchewana First Nation Comment ID: 8-1
Human Health	53	Public Health	Monitoring	<p>Further details of the monitoring plan are provided below and will be formalized in an environmental monitoring plan during the permitting process:</p> <ul style="list-style-type: none"> Monitoring of water quality, including arsenic, mercury and cobalt, at specified locations as indicated in the monitoring plan (Table 7-85 of EIS). Monitored water quality concentrations will be compared to baseline concentrations past the mixing zone; if concentrations remain below baseline concentrations, no further monitoring commitments are proposed. If monitored water quality concentrations are greater than baseline concentrations past the mixing zone, then fish tissue monitoring would be triggered in the locations where exceedances were identified and would be monitored for the same chemicals identified to exceed baseline concentrations. Monitored fish tissue concentrations would be compared to baseline fish tissue concentrations monitored in the nearby water bodies. If fish tissue concentrations are greater than established baseline concentrations, further assessment would be required to determine whether changes to current fish consumption advisories would be warranted or whether additional mitigation measures would be required to lower fish tissue concentrations. 		X	X	X		Canadian Environmental Assessment Agency Comment ID: HE (3)-19A
Human Health	54	Worker Safety	Monitoring	Prior to operation of the TMF, a detailed inspection and monitoring program will be developed for the TMF.		X	X			TSD20-13
Human Health	55	Worker Safety	Monitoring	Geotechnical monitoring of the stability of the pit wall will take place continuously during the excavation of the pit by licensed geotechnical engineers who will be responsible for evaluating the excavation and making changes if required.			X			8.1.4.1
Human Health	56	Worker Safety	Mitigation	A key operational safeguard will be the development and implementation of a site-specific Operation, Supervision and Maintenance (OSM) Manual that establishes clear TMF performance standards. These standards will be in accordance with principles in the Mining Association of Canada (MAC) Guide to the Management of Tailings Facilities; Canadian Dam Association (CDA) Dam Safety Guidelines, applicable international guidelines and standards; and all commitments to regulators and stakeholders.			X			8.1.4.2
Human Health	57	Worker Safety	Mitigation	All transport of the explosive chemicals will be by a licensed explosive contractor with the driver trained in handling and spill management of the components.			X			8.1.5.1

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Human Health	58	Worker Safety	Commitment	<p>Prodigy shall provide information, instruction, and supervision to all its workers to protect their health and safety. More specifically, Prodigy shall:</p> <ul style="list-style-type: none"> • Comply with the practice of, arranging safety meetings and refresher training for returning workers at the beginning of season. • Take every precaution reasonable in the circumstances for the protection of workers. • Ensure workers meet minimum age requirements. • Ensure equipment, materials and protective devices are well maintained and used as per manufacturer's instructions. • Ensure workers are provided with appropriate supervision and personal protective equipment. • Prepare and review, at least annually, a written occupational health and safety policy, and develop and maintain a program to implement that policy. • Post a copy of the Occupational Health and Safety Act (OHSA), as well as the name and phone number of the MOL inspector for the district, prominently in the workplace. • Advise contract truck drivers on traffic control procedures and policies at the workplace. • Ensure all workers receive appropriate training, including site orientation and core courses depending on their duties (Ministry of Labour, 2012). 		X	X	X		8.2.6
Human Health	59	Worker Safety	Commitment	<p>Prodigy will become a signatory to the International Cyanide Management Code (ICMC or Cyanide Code) for the gold mining industry prior to the Project becoming operational.</p>	X	X				8.2.6
Indigenous Interests	60	Indigenous Cultural Activities and Special Places	Mitigation	<p>The Environmental Monitoring Committee (EMC) will be consulted to ensure that changes in traditional use patterns and updated traditional knowledge information can be used in design and operations and can be developed and implemented via some or all of the following mechanisms:</p> <ul style="list-style-type: none"> • Ongoing engagement with Indigenous groups. • Ongoing engagement with identified land users. • Indigenous groups' participation in the Environmental Monitoring Committee. • Adaptive management plans. • Consideration as part of the planning process for the final Closure Plan. 	X	X	X	X	X	7.7.2.6, 7.7.3.6 (updated in response to IE(2)-06); Garden River First Nation, Michipicoten First Nation Comment ID: MFN-18; GRFN-37; Canadian Environmental Assessment Agency Comment ID: IE (1)-03
Indigenous Interests	61	Indigenous Cultural Activities and Special Places	Mitigation	<p>The following mitigation measures have been identified for Archaeological Sites that could potentially be discovered during site development:</p> <ul style="list-style-type: none"> • Prodigy shall develop a protocol and provide its staff and/or contractors (where relevant) with orientation to allow for the quick identification of a potential archaeological resource that may be discovered in the course of conducting work on-site. • Should archaeological resources be discovered in the course of conducting work on-site, Prodigy shall ensure that those activities that could result in an alteration of the site are ceased immediately. Further, Prodigy shall engage a licensed consultant archaeologist to carry out archaeological fieldwork, in compliance with Section 48 (1) of the Ontario Heritage Act to determine next steps for the protection of the resource. • In accordance with the Cemeteries Act, R.S.O. 1990 c. C.4 and the Funeral, Burial and Cremation Services Act, 2002, S.O. 2002, c.33 (when proclaimed in force) Prodigy shall ensure that the police or coroner and the Registrar of Cemeteries at the Ministry of Consumer Services are notified immediately. Appropriate Indigenous groups will be contacted and informed of such a discovery to assist in determining appropriate next steps for the respectful treatment of remains that are of Indigenous origin. • Prodigy shall ensure that any archaeological sites recommended for further archaeological fieldwork or protection are not altered, or have artifacts removed from them, except by a person holding an archaeological licence. • Protocols will be established to determine the procedures required for access to these sites. 	X	X	X	X	X	7.7.3.6; Canadian Environmental Assessment Agency Comment ID: IE (3)-30
Indigenous Interests	62	Indigenous Cultural Activities and Special Places	Commitment	<p>Prodigy will prepare a Historic Resources Management Plan to identify and manage any objects or artifacts found during project development. All Indigenous groups involved in the Project's environmental assessment process will be provided with the opportunity to review the management plan once a draft has been completed. The plan will:</p> <ul style="list-style-type: none"> • Identify and manage the treatment any objects or artifacts found during project development. • Be prepared in advance of construction. • Be available for review by all Indigenous communities. • Will list who should be contacted in the event of an archaeological find. 	X	X	X	X		Batchewana First Nation Comment ID: 7-1; 7-28 Canadian Environmental Assessment Agency Comment ID: IE (1)-04 Garden River First Nation, Michipicoten First Nation Comment ID: MFN-8; GRFN-27

Environmental Component	ID	Valued Component	Commitment / Mitigation / Monitoring	Commitments	Project Phase					Source
					PC	C	O	CI	PCI	
Indigenous Interests	63	Indigenous Employment and Business Opportunities	Commitment	The following enhancement measures have been identified to maximize the positive effects of the Project: <ul style="list-style-type: none"> • Encouraging development of an Indigenous workforce and business participation through a suite of measures (see below). • Development and implementation of corporate policies regarding Indigenous employment, contracting and procurement. • Collaboration with Indigenous groups and regional economic development / education/training organizations to identify needs, gaps and opportunities with respect to training and skill development. • Ongoing liaison with regional education/training planning organizations and providers (e.g., regional colleges such as Confederation College/universities; Algoma Workforce Investment Corporation; Superior East Labour Development Task Force). • Provision of training opportunities for the Indigenous workforce. • Ongoing discussions with Indigenous groups to establish conditions that will maximize the participation of qualified and competitive businesses in economic opportunities associated with the Project. • Proactive provision of information on the mine supply chain and available opportunities to Indigenous groups and businesses. • Establishment of a database of Indigenous businesses that may be able to service the Project. • Provision of cross-cultural training as part of Project orientation provided to all employees. 	X	X	X	X		7.7.1.6
Indigenous Interests	64	Indigenous Employment and Business Opportunities	Commitment	Prodigy will work cooperatively with the Indigenous groups and regional economic development organizations to confirm social and economic monitoring indicators, reporting and responding to monitoring results.	X	X	X			7.7.1.9
Indigenous Interests	65	Indigenous Employment and Business Opportunities	Commitment	Indigenous workers will be provided with opportunities for training prior to and during their employment at the Project.		X	X	X		7.7.1.5.2
Indigenous Interests	66	Indigenous Employment and Business Opportunities	Monitoring	Prodigy will monitor the number and home communities of Indigenous Employees, and the number and nature of successful contracting / procurement opportunities by Indigenous businesses, Joint Ventures and other partnerships	X	X	X	X		7.7.1.9.1
Indigenous Interests	67	Indigenous Employment and Business Opportunities	Commitment	Contracting opportunities will be tendered during all Project phases, and Indigenous groups/business will have the opportunity to bid.	X	X	X	X		7.7.1.5.4
Indigenous Interests	68	Traditional Use of Lands and Resources	Monitoring	A follow-up program to ensure that any changes in traditional use patterns and updated traditional knowledge information that would be used in design and operations, can be developed and implemented via some or all of the following mechanisms <ul style="list-style-type: none"> • Ongoing engagement with identified land users. • Indigenous groups' participation in the Environmental Monitoring Committee. • Adaptive management plans. • Consideration as part of the planning process for the final Closure Plan. 	X	X	X			Garden River First Nation Comment ID: GRFN-39
Indigenous Interests	69	Traditional Use of Lands and Resources	Commitment	Habitat restoration will occur as part of closure. Prodigy (by way of the EMC) will work with Indigenous communities on terrestrial habitat creation (including wetlands) during the closure phase.				X	X	Garden River First Nation, Michipicoten First Nation Comment ID: MFN-9, GRFN-28; Métis Nation of Ontario Comment ID: 4.4.3; Canadian Environmental Assessment Agency Comment ID: IE (1)-06
Indigenous Interests	70	Traditional Use of Lands and Resources	Commitment	Prodigy indicated that the Company would present possible options for terrestrial restoration, including reclamation objectives prior to preparation of the Closure Plan.	X	X				Garden River First Nation, Michipicoten First Nation Comment ID: MFN-9, GRFN-28
Indigenous Interests	71	Traditional Use of Lands and Resources	Commitment	The percentage of habitat that can be restored will be described in the Closure Plan.		X	X			Garden River First Nation, Michipicoten First Nation Comment ID: GRFN-30; MFN-11
Indigenous Interests	72	Traditional Use of Lands and Resources	Commitment	The EMC will provide a stand-alone forum for discussion of potential cumulative effects.	X	X	X	X	X	Canadian Environmental Assessment Agency Comment ID: CE (1)-01
Indigenous Interests	73	Traditional Use of Lands and Resources	Commitment	The EMC will have a mandate to include further traditional knowledge as the project proceeds.	X	X	X	X	X	Batchewana First Nation Comment ID: 7-34; Garden River First Nation, Michipicoten First Nation Comment ID: MFN-8, GRFN-27
Indigenous Interests	74	Traditional Use of Lands and Resources	Monitoring	Adaptive management will be based on periodic reporting of indicators related to Traditional Use of Lands and Resources for the Project, and ongoing engagement with Indigenous groups. The company will discuss with Indigenous groups (through the Environmental Monitoring Committee) and others the method for confirming key indicators, reporting and responding to monitoring results. Key indicators for the Project will be monitored by Prodigy.	X	X	X	X	X	Canadian Environmental Assessment Agency Comment ID: IE (1)-03
Indigenous Interests	75	Traditional Use of Lands and Resources	Mitigation	Prodigy has committed to continuing to work collaboratively with Indigenous communities to accommodate potential effects of the Project on their respective traditional activities and Aboriginal and Treaty rights."	X					IE(2)-06 MFN, MCFN, BFN, MNO, RSMIN: Bilateral Agreements
Indigenous Interests	76	Traditional Use of Lands and Resources	Mitigation	Prodigy is proactively engaged with Indigenous groups with respect to fisheries offset plans.	X	X				Canadian Environmental Assessment Agency Comment ID: IE (1)-B11
Indigenous Interests	77	Traditional Use of Lands and Resources	Mitigation	Prodigy will complete the independent third-party review process with Indigenous groups.	X					Canadian Environmental Assessment Agency Comment ID: IE (2)-06
Physical Environment	78	Groundwater	Monitoring	Groundwater quality discharge from the pit lake will meet the receiving water quality objectives.			X	X		Garden River First Nation, Comment ID: GRFN-5

Environmental Component	ID	Valued Component	Commitment / Mitigation / Monitoring	Commitments	Project Phase					Source
					PC	C	O	CI	PCI	
Physical Environment	79	Groundwater	Commitment	The groundwater monitoring plan will be finalized at the Licensing stage in discussion with the MECC and Indigenous communities	X					Canadian Environmental Assessment Agency Comment ID: IR Number: FFH (1)-02
Physical Environment	80	Groundwater	Monitoring	Groundwater monitoring will be performed to track TMF seepage water quality and determine if there are any indirect effects on surface water and other VCs. Should monitoring determine a need for additional mitigation, improvements to the toe drain seepage collection system and/or the installation of contingency seepage collection wells would be undertaken as necessary. The adaptive management measure consists of constructing pump back wells in low point areas in the bedrock surrounding the TMF.		X	X			7.3.2.11; Canadian Environmental Assessment Agency Comment ID: IR Number: FFH (1)-36; HE (1)-26
Physical Environment	81	Groundwater	Commitment	Additional investigation of hydrogeologic conditions at the liner tie-in will be performed as part of detailed design of the TMF.	X					Batchewana First Nation Comment ID: TSD1-5
Physical Environment	82	Groundwater	Mitigation	A grout curtain is proposed between Goudreau Lake and the open pit.		X	X			Garden River First Nation, Michipicoten First Nation Comment ID: GRFN-23; MFN-4
Physical Environment	83	Groundwater	Monitoring	A groundwater monitoring program will be established prior to construction and continue into the closure phase of the Project; the EMC will review the groundwater monitoring program prior to its commencement during operations and closure.		X	X	X	X	Métis Nation of Ontario Comment ID: 4.2.1, 4.2.2
Physical Environment	84	Significant Wildlife Habitat	Commitment	Through consultation, the principal post-closure habitats will be identified and reference sites will be used to develop the Progressive Rehabilitation plan.			X	X	X	TSD-19
Physical Environment	85	Stream and Lake Sediments	Commitment	Prodigy Gold commits to consult with Indigenous communities on the management of the Webb Lake sediments.	X	X	X			Métis Nation of Ontario Comment ID: 4.3.6
Physical Environment	86	Stream and Lake Sediments	Monitoring	Monitoring of the effectiveness of the seepage collection system will be conducted and, if needed, appropriate adaptive management will be used to ensure the receiving environment is protected.		X	X	X		7.3.5.5.1.3
Physical Environment	87	Stream and Lake Sediments	Mitigation	The mitigation measures identified below consider the project design and effects analysis and will be implemented to avoid or reduce the severity of any adverse effects on sediment quality: <ul style="list-style-type: none"> • Staging of the WQCP, runoff channels and erosion controls at the outset of the project so they are functional before wider site-preparation. • Implementation of Erosion and Sediment Control through BMPs and engineering design to limit erosion and mobilization of sediments, promote settling of sediments and mitigate the migration of suspended solids into nearby surface water features. BMPs for erosion and sediment control include: the use of earthwork methods to minimize slope length and grade, ditching, sediment ponds/traps, use of natural vegetation buffers, re-vegetation of disturbed soil, natural channel design, and runoff controls (i.e., sediment fencing and small check dams). These will be implemented through all phases of the Project (Site Preparation through Post-Closure) to limit the change to water quality from erosion and runoff and will be elaborated in a Sediment and Erosion Control Plan for the project. • Use of BMPs during pond and lake dewatering to limit the potential for erosion and sedimentation of stream banks and shorelines. Shoreline areas susceptible to erosion will be addressed by appropriate erosion protection measures to reduce erosion and re-suspension of fine sediment. These include diverting water to constructed channels designed to prevent erosion and maintain stability, use of natural drainage patterns to reduce the use of ditches or diversion berms, release of water from dewatering activities only when water quality discharge criteria are met, management of water to prevent the release to receiving environment if TSS concentrations exceed established water quality criteria, and incorporation of monitoring and adaptive management. • Implementation of a construction inspection program for all phases of the Project. As part of the program a surface water sampling program and TSS/turbidity threshold values will be established for the surface water receivers. If water quality monitoring finds that TSS/turbidity concentrations are greater than threshold values, activities will stop until sufficient sediment and erosion control measures are in place or alternative methods will be used that do not cause runoff to surface water receivers or produce runoff in order to meet the threshold values. • Development of a Spills Prevention and Response Plan that provides a framework for action, clean up and monitoring. • Implementation of BMPs for explosives and blasting to reduce the blast waste rate and the amount of residual explosives available for contact with water. • Application of dust suppression practices on exposed soils and construction features including stockpiles, use of covers on transportation trucks, and enforcement of speed limits, dust suppression during dumping and grading and from conveyors. • Development of a Fugitive Dust Best Management Practices Plan to control fugitive particulate emissions from on-site roadways and handling. • Monitoring to assess effectiveness of mitigation and enhancement measures. 	X	X	X	X	X	7.3.5.6
Physical Environment	88	Stream and Lake Sediments	Monitoring	Sediment will be sampled every three years, as changes to sediment quality occur slowly, and three years will provide sufficient temporal resolution to track changes.		X	X			7.3.5.9.1
Physical Environment	89	Stream and Lake Sediments	Monitoring	Visual inspections of watercourses will be conducted on a regular basis as part of the construction monitoring programs and in response to events such as rain storms and freshet in order to identify any changes in sediment accumulation.		X	X			7.3.5.9.2
Physical Environment	90	Surface Water Hydrology	Commitment	Prodigy's Environmental Monitoring Plan will include an Adaptive Management Plan for Surface Water as well as an associated monitoring program, once finalized.	X	X	X	X	X	Garden River First Nation, Michipicoten First Nation Comment ID: GRFN-34; MFN-15
Biological Environment	91	Fish and Fish Habitat	Commitment	On closure, a portion of the McVeigh Creek watershed may be returned to its natural watercourse and flows.				X	X	Batchewana First Nation Comment ID: 7-46
Physical Environment	92	Surface Water Hydrology	Commitment	During the post-closure phase, pit filling could be accelerated using water pumped from Goudreau Lake.					X	7.3.3.7.5
Physical Environment	93	Surface Water Hydrology	Mitigation	Throughout the Project life, water recycling and reuse will be maximized to reduce freshwater make-up requirements.		X	X	X	X	7.3.3.8

Environmental Component	ID	Valued Component	Commitment / Mitigation / Monitoring	Commitments	Project Phase					Source
					PC	C	O	CI	PCI	
Physical Environment	94	Surface Water Hydrology	Mitigation	All water conveyance and retention structures, including diversions, ditches, culverts and water quality control ponds, will be appropriately sized, designed, and constructed using best management practices and to accommodate large storm events. Natural channel design will be incorporated into linkages between waterbodies and in diversion channels.	X	X	X	X		7.3.3.8
Physical Environment	95	Surface Water Hydrology	Monitoring	Ongoing monitoring of pit lake level and water quality will be conducted until it can be demonstrated that the water quality is stable and the projected pit lake levels can be achieved.				X	X	TSD-19
Physical Environment	96	Surface Water Hydrology	Monitoring	The Water Quality Control Pond will be fitted with a weir overflow and continuous flow rate monitoring of discharge when it occurs.			X	X		TSD20-13
Physical Environment	97	Surface Water Quality	Mitigation	Water within the TMF will be recycled and only TMF seepage and site contact water will be discharged to the receiving environment. Furthermore, effluent will only be discharged seasonally to Otto Lake via a submerged multiport diffuser.			X			7.4.1.6
Physical Environment	98	Surface Water Quality	Commitment	Following construction and initial pit overburden removal, the area that drains toward and into Goudreau Lake will be evaluated; sediment ponds reclaimed and additional permanent sediment control features will be installed as necessary.		X	X			Canadian Environmental Assessment Agency Comment ID: FFH (1)-06a
Physical Environment	99	Surface Water Quality	Commitment	In support of the permitting phase of the Project, the effluent plume will be remodelled to reflect final discharge quality and to incorporate appropriate site-specific conditions.	X					Canadian Environmental Assessment Agency Comment ID: FFH (1)-05
Physical Environment	100	Surface Water Quality	Commitment	The single point of discharge is the controlled discharge of the Water Quality Control Pond. Both quantity and quality of this water discharge will be measured on a regular basis when the discharge occurs. Prodigy notes that water quality criteria for the discharge of effluent to the environment during all phases will be finalized in discussion with the MECP at the Licencing stage. Therefore, a contingency water treatment plant is included as the ultimate measure for "adaptive management" should the site monitoring of water quality negate the prediction in the EIS. The water quality of the WQCP will be monitored on a regular basis.			X			Canadian Environmental Assessment Agency Comment ID: FFH (1)-04; TSD 20-13
Physical Environment	101	Surface Water Quality	Monitoring	The existing geochemical data and assessments presented in TSDs 2, 20-8, and 7 (Site Water Balance and Quality) demonstrate that significant impacts from Potentially Acid Generating (PAG) mine wastes will not occur. PAG waste rock will be permanently submerged below the groundwater level within the TMF. Monitoring will be performed with adaptive management to address conditions observed during operations.		X	X			Canadian Environmental Assessment Agency Comment ID: IR Number: FFH (1)-09b
Physical Environment	102	Surface Water Quality	Monitoring	A comprehensive monitoring plan will be developed as part of the application for the MECC approvals process and the federal EEM program. Prodigy will consider if turbidity should be part of the effluent parameter monitoring regime as the monitoring program is developed. Total Phosphorous will be monitored as an effluent parameter and measured in the receiving environment.	X	X				7.3.4.9; Batchewana First Nation Comment ID: TSD19-26; Garden River First Nation, Michipicoten First Nation Comment ID: GRFN-29; MFN-10; Métis Nation of Ontario Comment ID: 4.1.6; Canadian Environmental Assessment Agency Comment ID: IE (1)-25, TW (1)-02
Physical Environment	103	Surface Water Quality	Monitoring	The Indigenous groups will participate in the development of the company's surface water and ground water monitoring program.	X	X				Garden River First Nation, Michipicoten First Nation Comment ID: GRFN-26, MFN-7
Physical Environment	104	Surface Water Quality	Monitoring	During operations, effluent monitoring for acute toxicity will be routinely monitored as required under the Metal and Diamond Mining Effluent Regulations, using rainbow trout and Daphnia magna. The requirement for non-lethal effluent will also be incorporated into effluent limits as part of the site ECA.			X			Canadian Environmental Assessment Agency Comment ID: FFH (1)-22
Physical Environment	105	Surface Water Quality	Monitoring	Additional field monitoring of temperature and pH will be conducted in Otto Lake in support of permit applications.	X	X				Canadian Environmental Assessment Agency Comment ID: FFH (1)-26
Physical Environment	106	Surface Water Quality	Mitigation	The CEPP will be developed prior to the commencement of construction, and will outline best management practices to be utilized by contractors during earthwork and construction activities particularly to control TSS. Indigenous groups will have the opportunity to review and comment on the CEPP prior to the completion of the plan and prior to construction.	X					Canadian Environmental Assessment Agency Comment ID: FFH (1)-06c; FFH (1)-04; Métis Nation of Ontario Comment ID: 4.3.11
Physical Environment	107	Surface Water Quality	Commitment	The EMC will review the EEM program which includes the analysis of cyanide, copper and heavy metals, including discussion on adaptive management and if a water treatment plant is required for Otto Lake.	X	X	X			Garden River First Nation, Michipicoten First Nation Comment ID: MFN-6 GRFN-25 Batchewana First Nation Comment ID: 6-20
Physical Environment	108	Surface Water Quality	Monitoring	The EMC will participate in the development of the company's surface water and ground water sampling and monitoring program for operations and closure.			X	X	X	Garden River First Nation, Michipicoten First Nation Comment ID: MFN-7 –GRFN-26
Physical Environment	109	Terrain and Soils	Commitment	During the construction phase the historical infrastructure (e.g., core shack, maintenance shop, communications tower, vent raise, mine offices, electrical station) will be demolished and removed and the materials will be disposed in a licensed facility. The non-mining waste landfill site (0.5 ha), located up gradient of Otto Lake, will be removed and waste from this facility will be disposed of in a licensed facility. The historic tailings will be reprocessed or will be closed pursuant to the Closure Plan.		X				7.3.4.5.1.2
Physical Environment	110	Surface Water Quality	Mitigation	During operations, hazardous materials and fuel will be stored according to regulatory requirements to protect the receiving environment. Reagent preparation and storage facilities will be located within a containment area to accommodate 110% of the content of the largest tank to ensure spill containment. In addition, each reagent will be prepared within a berm area in order to limit spillage and facilitate its return to its respective mixing tank.			X			7.3.4.5.1.3
Physical Environment	111	Surface Water Quality	Mitigation	Dust will be managed by watering and the progressive re-vegetation of stockpiles, TMF and MRMF.			X			7.3.4.5.1.3

Environmental Component	ID	Valued Component	Commitment / Mitigation / Monitoring	Commitments	Project Phase					Source
					PC	C	O	CI	PCI	
Physical Environment	112	Surface Water Quality	Mitigation	<p>Mitigation measures are identified below which consider the design of the Project and the results of the effects analysis, to avoid or reduce the severity of effects on water quality:</p> <ul style="list-style-type: none"> • Use of best management practices and protocols for in-water construction activities. • De-watering of waterbodies and discharge of waters at a rate to minimize erosion and effects to water quality including avoiding the resuspension of potentially contaminated sediments. • Integration of the clearing and grubbing and topsoil stripping with overburden stripping in sub-area phases, so as to reduce the footprint of disturbed areas from several square kilometers to manageable phases with soil erosion and runoff management practices in place. • Staging of construction activities to allow for the construction of the runoff detention ponds and the toe collectors and drainage channels at the outset of the Project such that these become stabilized and functional before excessive clearing of the site and soil and over burden stripping. • Use of the bypass road alignment such that it represents the outward extent of construction and disturbance activities. For example, all stockpiles will be located within this alignment. • Implementation of Erosion and Sediment Control through BMPs and engineering design to limit erosion and mobilization of sediments, promote settling of sediments and mitigate the migration of suspended solids into nearby surface water features. BMPs for erosion and sediment control include: the use of earthwork methods to minimize slope length and grade, ditching, sediment ponds/traps, use of natural vegetation buffers, re-vegetation of disturbed soil, natural channel design, and runoff controls (i.e., sediment fencing and small check dams). These will be implemented through all phases of the Project (Site Preparation through Post-Closure) to limit the change to water quality from erosion and runoff and will be documented in an Environmental Management Plan for the Project. • Use of best management practices during pond and lake dewatering to limit potential for erosion and sedimentation of stream banks and shorelines. Shoreline areas susceptible to erosion will be addressed by appropriate erosion protection measures to reduce erosion and re-suspension of fine sediment. These include diverting water to constructed channels designed to prevent erosion and maintain stability, use of natural drainage patterns to reduce the use of ditches or diversion berms, release of water from dewatering activities only when water quality discharge criteria are met, management of water to prevent the release to receiving environment if TSS concentrations exceed established water quality criteria, and incorporation of monitoring and adaptive management. • Implementation of a construction inspection program for all phases of the Project. As part of the program a surface water sampling program and TSS/turbidity threshold values will be established for the surface water receivers. If water quality monitoring finds that TSS/turbidity concentrations are greater than threshold values, activities will stop until sufficient sediment and erosion control measures are in place, or alternative methods will be used that do not cause runoff to surface water receivers or that produce runoff to meet the threshold values. • Development of a Spills Prevention and Response Plan that provides a framework for action, clean up and monitoring. • Development of management plans to control fugitive particulate emissions from on-site roadways and handling. • Implementation of BMPs for explosives and blasting to reduce the blast waste rate and residual explosives available for contact with water;- Application of dust suppression practices on exposed soils and construction features including stockpiles, use of covers on transportation trucks, and enforcement of speed limits, and dust suppression during dumping and grading and from conveyors. • Installation of a multipoint diffuser at the effluent discharge with the management of water volume discharge to control discharge volume.. • Monitoring the water quality of the Pit Lake during the post closure phase. If the water quality meets water quality objectives then the pit will be allowed to discharge into Goudreau Lake. If the Pit Lake does not meet water quality objectives, then the lake will not be allowed to spill until sufficient treatment measures are in place or alternative methods are evaluated and implemented; and • Monitoring to assess effectiveness of mitigation and enhancement measures. 		X	X	X		7.3.4.6
Physical Environment	113	Surface Water Quality	Monitoring	During the post-closure phase, groundwater and surface water monitoring will continue until it can be demonstrated that the closure activities have met targets and closure will be sustainable.				X	X	TSD-19
Physical Environment	114	Terrain and Soils	Mitigation	Transportation of fuels will be contracted to a licenced qualified contractor. Fuels will be transported in trucks specifically designed to carry these materials. The transporters will be fully licensed to carry these materials and spill kits will be supplied on each vehicle. The drivers will be trained in spill management and have a means of communication with the mine and fuel company. The equipment and supplies required to be carried on the trucks will be defined in the ERSPC Plan		X	X			8.1.5.4
Physical Environment	115	Terrain and Soils	Mitigation	Tanks in the mill containing hazardous chemicals will be equipped with secondary containment which is sufficient to contain the volume of the full contents of the tank.			X			8.1.5.6
Physical Environment	116	Visual Resources	Commitment	Project buildings and structures will be closed and removed as appropriate. The mine site area will be regarded to resemble the natural topography of the local area and revegetated to the extent possible.			X	X		7.3.6.7

Environmental Component	ID	Valued Component	Commitment / Mitigation / Monitoring	Commitments	Project Phase					Source
					PC	C	O	CI	PCI	
Social Environment	117	Community Vitality	Mitigation	<p>Taking into consideration the design of the Project and the results of the effects analysis, further mitigation measures are identified below to further avoid or reduce the severity of the adverse effects on Community Vitality:</p> <ul style="list-style-type: none"> • Prodigy will continue to engage with cabin owners that may experience effects from the Project to understand their use of the property and the nature of any effects that will be experienced, and to discuss management measures (e.g., mitigation, monitoring). • Prodigy will continue to engage with recreational users and organizations to communicate the potential Project effects on users in the LSA, and identify potential impact management measures as appropriate (e.g., possibly establishing a Project viewpoint/kiosk along Goudreau Road or other vantage point; mitigation, monitoring). • Develop and implement a policy restricting Project employees and contractors from hunting, fishing or berry picking in the PSA/LSA while on the job at any time throughout the life of the Project. • Provide for daily transportation of community-based personnel from Dubreuilville. • Establish an on-site staff accommodations complex for workers during construction, and a permanent accommodation complex for the operations phase of the Project. • Provide a trained on-site Emergency Response Team that includes the necessary vehicles and equipment • Undertake liaison activities with local and regional service providers (e.g., health care, education and training, safety and emergency services) and economic development officials. • Undertake liaison activities with community leaderships in the primary communities which focuses on Project updates and issues management. • Implement a 'zero tolerance' policy for Project employees and contractors with respect to drug and alcohol use at the on-site accommodations complex. • Establish and enforce a code of conduct for workers housed in the Project's accommodation complexes, local motels, and other accommodations in the primary communities. 	X	X	X	X		7.5.2.6
Social Environment	118	Infrastructure and Services	Mitigation	<p>Taking into consideration the design of the Project and the results of the effects analysis, further mitigation measures are identified below to further avoid or reduce the severity of the adverse effects on Infrastructure and Services:</p> <ul style="list-style-type: none"> • An on-site worker accommodation complex will be constructed for use during the construction phase, and a permanent accommodations complex potentially built in Dubreuilville for the operations phase, as the size of the workforce during construction and operations will exceed available housing/accommodation in the primary communities. • Ongoing liaison will occur with leadership and real estate professionals regarding housing supply in the primary communities; • The Project will have a trained on-site Emergency Response Team including vehicles and equipment. • An detailed Emergency Response Plan will be established for the Project. • Liaison and consultation with local and regional emergency service providers will occur to plan for potential Project-related on- and off-site events, and develop mitigation as appropriate (e.g., comprehensive sharing of information related to hazards, resources, materials and the emergency response plan, inspections, training related to transportation, and possible responses to on-site calls). • The Prodigy Emergency Response Team will be made available for mutual aid; • Some improvements will be made to the Goudreau Road in anticipation of Project transportation needs. • In-town traffic from the accommodation complex in Dubreuilville will be minimized by utilizing bus transportation of workers to the Project site and/or selection of a location that would allow for direct access to Goudreau Road (avoiding use of residential streets in the community). • Prodigy will work with stakeholders as the proposed road access plans are finalized, and develop mitigation measures as appropriate. • Public access to the site will be restricted by installation of a security gate. • To mitigate potential safety issues with added traffic in Dubreuilville, Prodigy will make provisions for daily transport of all community-based personnel (residents and those housed in any accommodations). • If necessary, shift changes could occur at times that do not coincide with school start or finish times. • Planning and coordination with Algoma Power will be undertaken on transmission line ROW upgrade. 	X	X	X	X		7.5.3.6
Social Environment	119	Population and Demographics	Mitigation	Ensure that corporate Human Resources and travel policies do not serve as disincentives to in-migration to the primary communities, or even encourage employees to move elsewhere.	X	X	X			7.5.1.6
	120	Applies Broadly	Commitment	The TMF dam will be buttressed by the mine rock management facility (MRMF). The outer slopes of the embankments will be rehabilitated.		X	X	X		Batchewana First Nation Comment ID: TSD19-18
	121	Applies Broadly	Monitoring	Routine tailings topographic surveys will also be conducted during mine start-up and operation to confirm tailings density values and adjust the tailings embankment raising schedule as necessary to provide adequate tailings storage and freeboard		X	X			Batchewana First Nation Comment ID: TSD6-5
	122	Applies Broadly	Mitigation	The open pit infrastructure will likely include a gravel access road and a subsurface barrier constructed with either slurry wall or jet grouting technology.	X	X	X			Canadian Environmental Assessment Agency Comment ID: FFH (1)-06a
	123	Applies Broadly	Commitment	All management plans are currently preliminary and will be updated to reflect detailed design considerations during project permitting.	X	X				Batchewana First Nation Comment ID: TSD20-5

Environmental Component	ID	Valued Component	Commitment / Mitigation / Monitoring	Commitments	Project Phase					Source
					PC	C	O	CI	PCI	
	124	Applies Broadly	Commitment	The EMS and its management/monitoring plans are tools used by Prodigy to ensure that the Company's objectives and environmental commitments are achieved. As part of adaptive management, these Plans will be living documents and will be updated on a regular basis to ensure that they capture/incorporate the requirements outlined in the terms and conditions of the Project authorization and permits, as well as other commitments made to Indigenous and other local communities.	X	X	X	X		Canadian Environmental Assessment Agency Comment ID: TW (1)-01
	125	Applies Broadly	Commitment	Prodigy Gold commits to Indigenous groups being involved in the oversight of Environmental Management Plans.	X	X	X	X		Métis Nation of Ontario Corporate communication: November 2017
	126	Applies Broadly	Commitment	The Mine Material Management Plan (TSD20-8) will be incorporated in the Plan of Operations for the mine.	X	X	X			Canadian Environmental Assessment Agency Comment ID: FFH (1)-09b
	127	Applies Broadly	Commitment	TSD 20-8 will be updated prior to construction and Indigenous groups can review the segregation protocol.	X					Métis Nation of Ontario Comment ID: 4.8.2
	128	Applies Broadly	Commitment	A Mine Materials Management Plan (which includes soil management) will also be prepared as the Project progresses. Topsoil and overburden will be stored during construction and operation.	X	X	X			Batchewana First Nation Comment ID: TSD19-15
	129	Applies Broadly	Commitment	The final Closure plan will be informed by EIS/EA commitments as well as consultation input.	X	X	X	X		Canadian Environmental Assessment Agency Comment ID: TW (1)-01
	130	Applies Broadly	Commitment	Prodigy Gold commits to consult with Indigenous communities on the Closure Plan development.	X	X	X	X		Garden River First Nation, Michipicoten First Nation Comment ID: MFN-1, GRFN-20
	131	Applies Broadly	Monitoring	The Closure Plan will include a "post-closure" monitoring plan, with the objective of achieving the Closure objectives and will continue until objectives have been met.				X	X	Garden River First Nation Comment ID: GRFN-7 Batchewana First Nation Comment ID: 6-12
	132	Applies Broadly	Commitment	Installation of a boulder fence around the open pit and/or an earthfill berm with appropriate signage around perimeter will be reviewed as part of closure planning.				X	X	Batchewana First Nation Comment ID: TSD19-16
	133	Applies Broadly	Monitoring	It is anticipated that monitoring will continue until it can be demonstrated the tailings have consolidated and the land surface is stable. As necessary, maintenance will be conducted to repair any areas damaged by erosion before the vegetative cover is fully developed.			X	X	X	Canadian Environmental Assessment Agency Comment ID: IE (1)-28
	134	Applies Broadly	Mitigation	The CEPP will include a protocol and mitigation measures if turtles or turtle eggs are detected during construction and operations.	X	X	X			Canadian Environmental Assessment Agency Comment ID: TW (1)-11 Batchewana First Nation Comment ID: TSD17-4 Garden River First Nation, Michipicoten First Nation Comment ID: GRFN-31; MFN-12
	135	Applies Broadly	Commitment	The Emergency Response and Spill Contingency plan will be fully developed prior to commencing construction.	X					Canadian Environmental Assessment Agency Comment ID: FFH (1)-04
	136	Applies Broadly	Commitment	Prodigy Gold commits that the EMC will have the opportunity to review the EEM, federal and provincial permit applications.	X					Métis Nation of Ontario Comment ID: 4.3.7
	137	Applies Broadly	Mitigation	Prodigy will utilize a conservative approach to differentiate and segregate construction material from non-construction material. TSD 20-8 will be updated prior to construction and Indigenous communities and review the segregation protocol.	X	X	X			Métis Nation of Ontario Comment ID: 4.8.2
	138	Applies Broadly	Commitment	Prodigy is committed to establishing an Independent TMF Review Board (ITRB) for the Project. The ITRB will consist of three independent senior subject matter experts and meet a minimum of once per year. The purpose of the ITRB is to review and advise on the design, construction, operation, performance, and closure planning for the TMF, with the objective of long-term safety and environmental protection. The ITRB will be in place prior to construction and provide review and advice through to closure. ITRB reports and actions undertaken by Prodigy to address ITRB feedback will be made available to interested stakeholders.		X	X	X	X	BFN Third Party EIS Review
	139	Applies Broadly	Commitment	Each of the Indigenous Environmental Monitoring Committees will be invited to participate in site tours on a regular basis starting prior to construction.	X	X	X	X	X	