

Prodigy has reviewed the 'Knowledge and Use Study' received in November 2018 from Garden River First Nation (GRFN) and their comments on CEEA's potential EA conditions. As discussed during both the August 15, 2018 GRFN Community Engagement session Prodigy attended and during prior meetings, Prodigy is working with each of the First Nations and Métis communities involved with the Magino project to ensure the project is developed in a respectful manner that continues to integrate Indigenous values into both project design and operation in a commercially reasonable manner. The First Nation-led Third-Party Review Process that was initially setup in early 2017 to include several First Nations, including GRFN, is now in the final stages. While Prodigy recognizes that GRFN was not comfortable with the process being led by another First Nation, the company has worked to support GRFN through this stage of project permitting and will continue to do so beyond the conclusion of the Federal Environmental Assessment process.

Prodigy wishes to continue to work with GRFN over the weeks ahead as we plan for a construction decision and move into the permit application phase. We wish to advise GRFN that between now and when we commence construction that we plan to work collaboratively together in the following manner:

- Establish an Environmental Monitoring Committee with Garden River First Nation representatives in the first quarter of 2019 that will meet on a regular basis to discuss both environmental and cultural aspects important to GRFN.
- Plan for a technical environmental management meeting in early January 2019 within GRFN. Prodigy will be pleased to come to the community with our technical advisors and present environmental management plans related to the project, discuss water quality and land systems protection measures as well as receive additional comments and feedback that we can begin to incorporate into our permit development and closure plan development processes during 2019.
- Invite GRFN representatives to tour the Magino site including both the historic mining areas as well as the newly proposed development areas. Prodigy will be holding site tours for indigenous groups on a regular basis both before and during construction as well as during operations and closure phases.
- Negotiate a commercially reasonable community benefits agreement.

Prodigy has reviewed its current First Nation engagement plans and amended the information into a form that integrates the information presented in the GRFN 'Knowledge and Use Study'. Below are the key points that Prodigy wishes to expand on together with GRFN over the months ahead as Prodigy mulls a project decision.

- 1) The ('real') potential effects of the project on water and air quality are addressed in the EIS document, several rounds of responses to CEEA's Information requests, and in the First Nation-led third-party review that GRFN initially participated in. In addition to working with other First Nations, Prodigy is prepared to work with the GRFN and hold technical sessions related to water quality and air quality planned mitigations and related issues to provide more information and greater understanding.
- 2) Prodigy believes that by ensuring effective information sharing/understanding of potential project effects, planning and reporting monitoring through the First Nation Environmental Monitoring Committee, and through direct bilateral engagement, GRFN and its members will

have a better understanding of both the real or perceived effects of the Project on water and air quality. This engagement can be started as soon as GRFN feels comfortable to do so. Prodigy will mitigate and, if necessary, accommodate, potential effects of the Project on GRFN's traditional use of lands and resources or Aboriginal cultural activities/special places. To assist with the development of a continued collaborative relationship, Prodigy and GRFN are currently finalizing a process agreement that is expected to be concluded shortly.

- 3) Prodigy believes that by ensuring effective information sharing/understanding of potential project effects on human health/the potential for contamination, planning and reporting monitoring through the First Nation Environmental Monitoring Committee, and through direct bilateral engagement, GRFN and its members will have a better understanding that will address potential negative perceptions. Prodigy has committed to adaptive environmental management meaning the company will review new information either from First Nations or from on-going environmental monitoring, and enhance project mitigations or develop new mitigations as the case may be. An example of an adaptive management opportunity arose recently related to working with other engaged First Nations communities to support the remediation of the historic pyrite mining pits south of the Magino Mine, thereby assisting the Province in remediation of these historic environmental impacts not related to the proposed Magino project. We welcome GRFN involvement in this and other collaboration efforts.
- 4) In terms of perceptions related to health, and the potency and effectiveness of medicines, Prodigy would be pleased to do a presentation to GRFN if that would be helpful. This could include a review/summary of the human health risk assessment and relevant responses to the Third-Party Review, and the clarifications provided in various IR responses,. The GRFN's Oct. 2018 "Knowledge and Use Study, Prodigy Gold's Mine Project" did not identify specific medicine gathering activities in the Magino PSA, LSA or RSA. However, the Study makes many references to the importance of medicines and harvesting in the general / larger Study Area. As noted above, Prodigy believes that by ensuring effective information sharing/understanding of potential project effects on the potential for contamination – including the potency and effectiveness of medicines, planning and reporting monitoring through the First Nation Environmental Monitoring Committee, and through direct bilateral engagement, GRFN and its members will have a better understanding that will address potential concerns. Prodigy can provide a 'plain language' review/summary of the potential for contamination of medicine plants/their potency and effectiveness, and do a presentation to GRFN if that would be helpful.
- 5) In the GRFN's 'Knowledge and Use Study' the majority of areas of use were identified in a larger regional area defined in the 'Knowledge and Use Study' (GRFN's 25-km Regional Study Area) beyond the Magino RSA. During construction and operation of the Project, Prodigy commits to ensuring that GRFN and other Indigenous peoples will still have access to the Magino LSA and RSA (and beyond). Prodigy has committed to work with First Nations to develop a Mine Closure Plan that incorporates not only best environmental practice but also First Nation knowledge related to flora and fauna. Prodigy will work with GRFN in this regard also.

- 6) First Nations groups that have been involved in the Project's environmental assessment process will be invited to participate in the First Nation Environmental Monitoring Committee (EMC). As noted in the response to IE(2)-06 (June 2018):

*"Throughout the environmental assessment process, Aboriginal groups have stated their strong support for monitoring and follow-up as an integral part of the project, to ensure the effectiveness of mitigation, changes to the environment as a result of the project, the accuracy of the prediction of effects, and compliance.*

*Aboriginal groups that have been involved in the Project's environmental assessment process will be invited to participate in the Environmental Monitoring Committee (EMC), which will review mitigation and monitoring plans, and review monitoring results (source: extract from Table 7-243, p. 7.513 of June 2017 EIS 'Project Interactions with Traditional Use of Land and Resources'). The EMC will have responsibilities related to how traditional use and traditional knowledge information is conveyed, updated and used in the design and operation of the project; review of the EEM program and regulatory permit applications; review of monitoring programs; review of environmental management plans; and development of the fish habitat Offsetting/Compensation Plan.*

*A follow-up program that would be used to ensure that any changes in traditional use patterns and updated traditional knowledge information would be used in design and operations can be developed and implemented via some or all of the following mechanisms:*

- *Implementation of the terms and conditions of bilateral agreements negotiated with Aboriginal groups;*
- *Ongoing engagement with identified land users;*
- *Aboriginal groups' participation in the EMC;*
- *Adaptive management plans; and*
- *Consideration as part of the planning process for the Closure Plan. (IE(1)-10 (BFN Follow-up Program); Appendix A (Commitments Table))"*