

## Garden River First Nation Summary of Traditional Use of Lands & Resources, Aboriginal Cultural Activities & Special Places in PSA, LSA, RSA & Mitigation

### GRFN Aboriginal and Treaty Rights Context:

Garden River First Nation (GRFN) is an Ojibway First Nation and signatory to the Robinson-Huron Treaty (1850). The GRFN reserve is located approximately 300 km south of Dubreuilville and the Project site (EIS; p. 4.352). Refer to Figure 4-109: 'Magino Mine First Nation and Community Context' in Section 4.6.1 of the EIS (p.4.334) for the location of these lands.

Documents submitted to CEAA in May 2017 included a 2006 map produced by the Ontario Ministry of Natural Resources and Forestry (MNR) that shows the GRFN traditional territory encompasses the Project site. The traditional territory identified on the map overlaps areas of the Robinson-Huron and Robinson-Superior treaties; it is bounded by Lakes Superior and Huron to the south, and by the northern boundaries of the Robinson-Superior and Robinson-Huron treaties to the north. The shared territory extends south to Sault Ste. Marie and Batchewana, northeast to Chapleau and northwest of Michipicoten.

In November 2014, GRFN was identified by Ontario MNR as an Aboriginal group for Prodigy Gold to engage with respect to closure planning and Prodigy is continuing to engage with GRFN around the environmental assessment and closure planning. As noted in the response to IE(2)-04 (*Assessment of Effects of Changes to the Environment on GRFN*), Prodigy Gold has committed to a process of working with the GRFN to continue to address GRFN's concerns regarding the EIS and the community's interest in the project. Prodigy supports the GRFN's ongoing participation in the proposed Project. In January 2018, Prodigy committed to fund additional Traditional Knowledge work. Prodigy was subsequently advised by GRFN on May 3 of 2018 of a proposed new process between the GRFN and Prodigy that allows the Parties to further discuss and address any environmental technical issues, Traditional Knowledge and GRFN's participation in the project. Prodigy is actively supporting the proposed process and as such has funded a Traditional Knowledge study.

GRFN participated in the third-party review of the EIS and identified environmental management and monitoring measures with respect to their ongoing participation in the Project:

"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:

- Ongoing engagement with identified land users;
- Aboriginal groups' participation in the Environmental Monitoring Committee;
- Adaptive management plans, and
- Consideration as part of the planning process for the final Closure Plan." [Appendix A: Commitments Table IR(1) submission – Comment ID# GRFN-39]

Other mitigation measures identified by GRFN address components that include water quality, fish/fish habitat, vegetation, site operations, and closure planning. Prodigy has included these measures in its Commitments Table (see Appendix A – IR(1) submission).

Prior to June 2018, based on communications, meetings, and materials provided to Prodigy, GRFN had not indicated traditional use of lands and resources in the PSA, LSA and RSA. Prodigy's review of secondary source publicly available information in both 2015 and 2018 did not provide any further understanding of any GRFN potential uses in the Magino area (PSA, LSA or RSA). This understanding was reflected in the GRFN summary of uses in the June 2018 response to IE(2)-06 (Table 6).

Prodigy Gold Inc. had engaged with GRFN to develop a process to move forward with a Traditional Knowledge study. In May 2018, Prodigy agreed to and supported the process and timelines presented by GRFN, and funded the study. Prodigy Gold Inc. engaged with GRFN to ensure that GRFN's knowledge and rights are properly acknowledged and accommodated. Through the engagement, Prodigy Gold Inc. provided GRFN with the information that they requested, including maps showing the mining location, project and area and GIS data. On November 27, 2018 Prodigy received GRFN's '*Knowledge and Use Study, Prodigy Gold's Mine Project*' (K&U Study). The updated table below captures the information in that study about GRFN's use of the Magino mine area, and is an update of the June 2018 response to IE(2)-06.

Prodigy Gold will mitigate and, if necessary, accommodate, any potential effects of the Project on GRFN's traditional use of lands and resources or Aboriginal cultural activities/special places, or potential for effects, or impact on their Aboriginal rights. Prodigy Gold and GRFN are currently negotiating a process agreement that will lead to an Impact Benefits Agreement between the two parties.

It is important to note that the GRFN's K&U Study uses different study area boundaries for the PSA, LSA and RSA than those used in Magino Gold EIS. Specifically, page 20 of the GRFN's K&U Study states that the LSA is within 5 km of the proposed Project and the K&U Study's RSA is within 25 km of the proposed Project. The GRFN's K&U Study's LSA is larger than Magino Gold RSA, excepting an area northeast of the LSA, in which Magino Gold's RSA extends a few km (less than 5) beyond the K&U Study's. For consistency with the rest of the EIS and the manner in which project impacts have been determined, the PSA, LSA and RSA boundaries in the following table are as per Magino Gold EIS.

Figure 1 below shows the study areas used as provided in the GRFN K&U Study; Prodigy has generated Figure 2 below to show the use values identified in the GRFN K&U Study in the context of the Magino PSA, LSA and RSA. .

Various traditional activities were identified in the GRFN K&U Study which are outside the RSA and are therefore not included in the summary table (Table 1) included in this response. They are summarized below.

Hunting:

- Hunting caribou in Pukaskwa
- Hunting moose in Dubreuilville all the way across to Chapleau.

Fishing:

- Fishing for speckled trout and pike in Heyden Creek, Heyden Lake, East Heyden, Buck Lake
- Fishing for walleyes in Squanka River and Stranded Lake
- Fishing for trout in Hawk Junction
- Fishing for pickerel, perch, whitefish bass, trout in Manitowik Lake, Dog Lake, Missinaibi Lake, Watabongushi Lake, Whitefish Lake, Rogers Lake, and the Magpie River
- Ice fishing in Cedar Lakes
- Fishing for pickerel in White River and White Lake

Cultural activities:

- Portaging and canoeing in Dog Lake
- Building camps by Manitowik, Wanda, Otter
- Camping at Gong Lake and Agawa Canyon

Figure 1: Reported GRFN Site-Specific Use Values by Activity Class in GRFN Study Areas

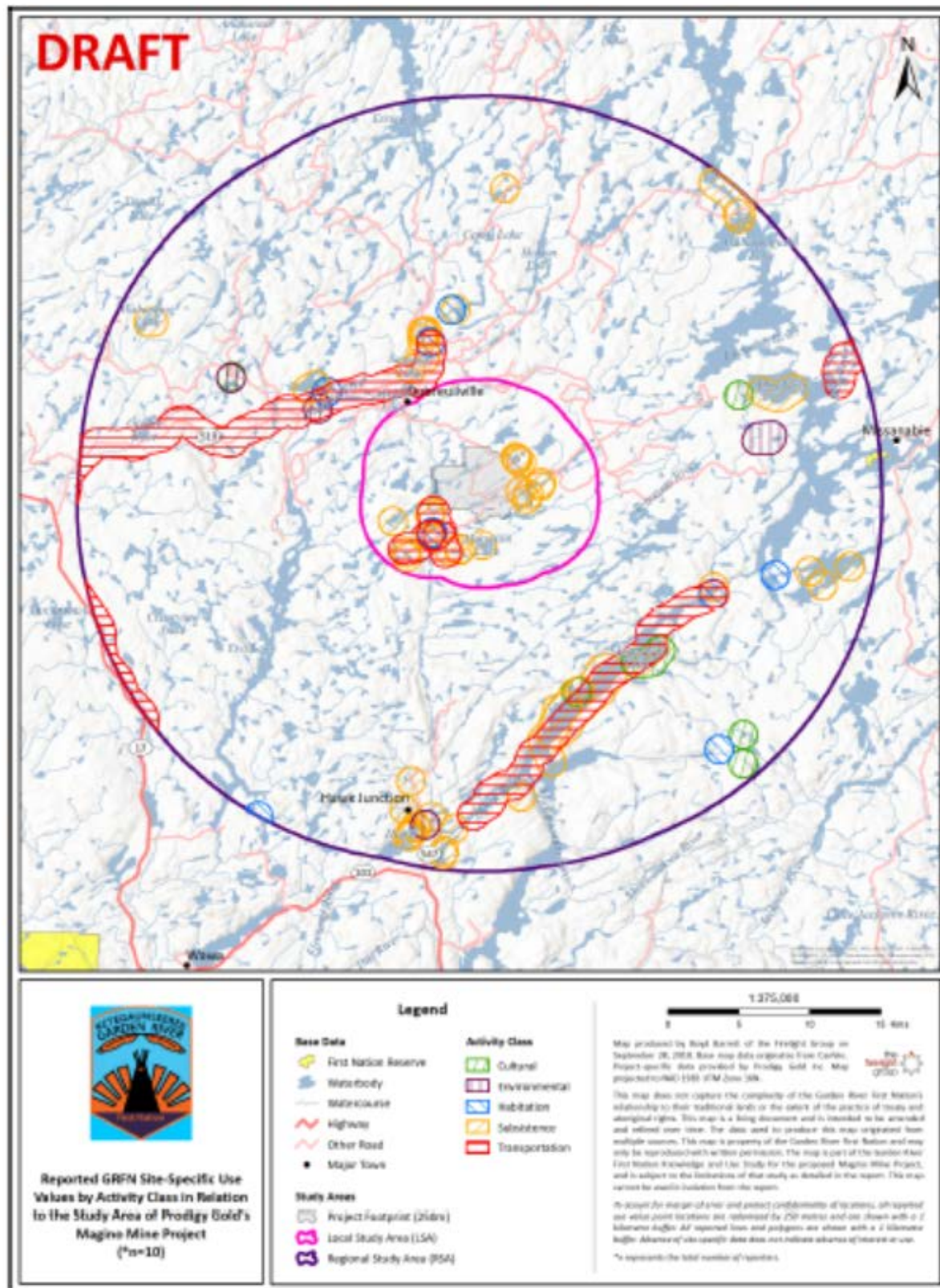


Figure 2: GRFN Use Values by Activity Class in the Magino PSA, LSA and RSA

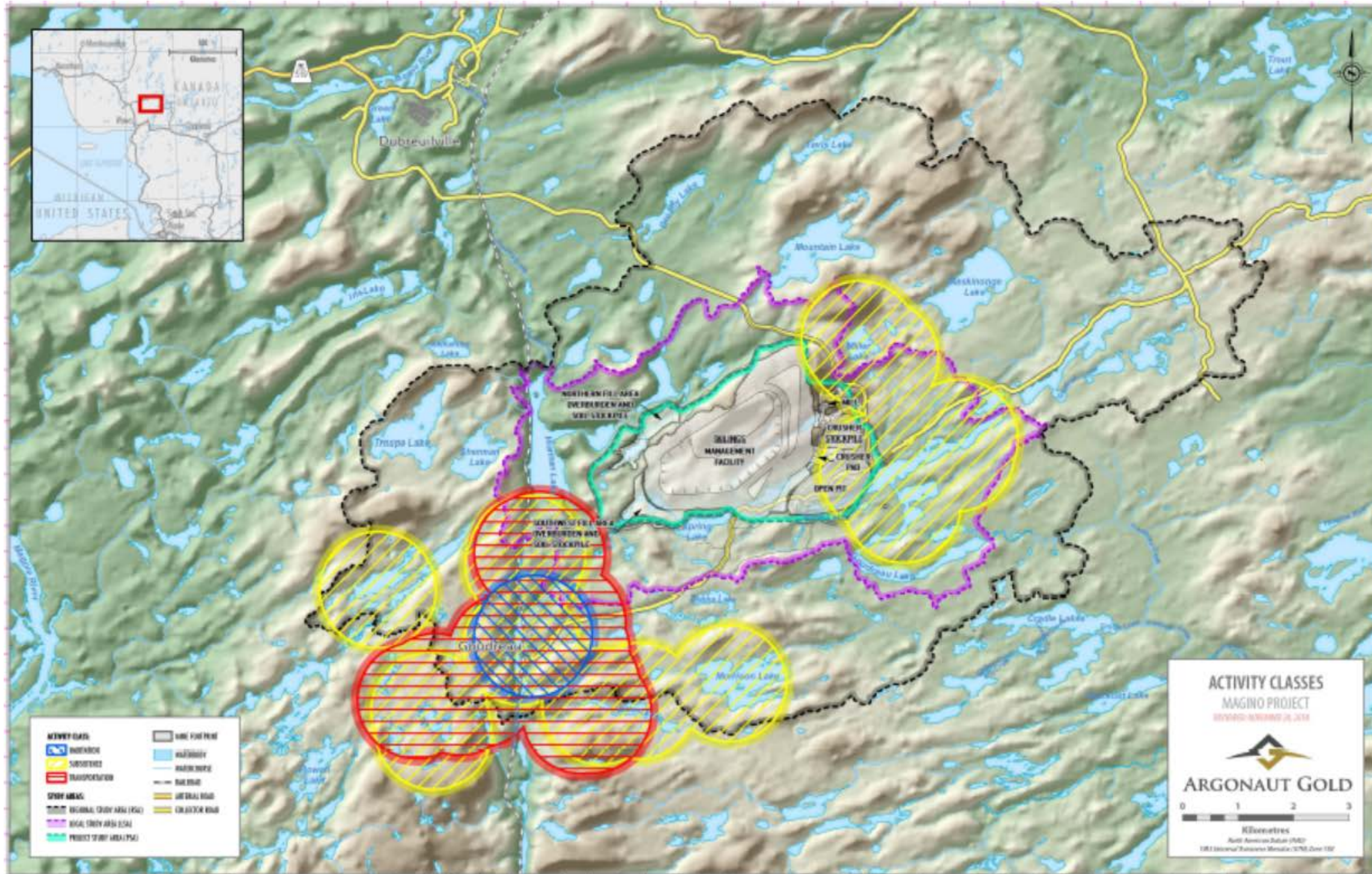


Table 1: GRFN Summary of Traditional Use of Lands & Resources, Aboriginal Cultural Activities & Special Places in PSA, LSA, RSA & Mitigation					
Traditional Use/ Practice	Area of Use / Practice Magino (PSA, LSA, RSA)	Summary of Aboriginal Traditional Uses & Practices	Mitigation Measures	Change in Quality of User Experience	Summary of Adverse Effects and Impact on Rights
<b>GRFN Hunting</b>  <b>Overview:</b> <ul style="list-style-type: none"> <li>PSA: no hunting</li> <li>LSA/RSA: 2 sites</li> </ul>	PSA	No GRFN hunting identified	N/A	N/A	N/A
	LSA/RSA	GRFN's Knowledge and Use K&U study identified a moose kill site and a trail used to access the area via skidoo and ATV for hunting and fishing purposes	<p><b>1. 3<sup>rd</sup> Party Review Process and Outcomes</b> GRFN participated in the 3<sup>rd</sup> party review process along with MFN, BFN and MCFN.</p> <p><b>2. Environmental Management System</b></p> <p><u>Wildlife Habitat</u></p> <p>a. Management plans will include measures to protect moose and bear and other mammals that frequent the site. [Commitments Table – ID# MFN-11; GRFN-30]</p> <p>b. Clearing should occur from headwaters/upstream locations toward downstream to allow mammals associated with watercourses and wetlands to migrate to larger bodies of water downstream. [Commitments Tables – ID# BFN 7-54]</p> <p><b>3. Closure and Reclamation Planning</b></p> <p><u>Terrestrial Vegetation and Habitat Rehabilitation</u></p> <p>a. 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. [Commitments Tables – ID# BFN 19-7]</p> <p>b. Prodigy indicated that the Company would present possible options for terrestrial restoration, including reclamation objectives prior to preparation of the Closure Plan. [Commitments Table – ID# MFN-9, GRFN-28] The percentage of habitat that can be reversed will be described in the Closure Plan. [Commitments Tables – ID# GRFN-30; MFN-11]</p> <p>c. The planting of berry-producing species will be carried forward in the Closure Plan. [Commitments Table – ID# TW(1)-01]</p> <p><b>4. Follow-up and Monitoring</b> 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:</p> <p>a. Ongoing engagement with identified land users;</p> <p>b. Aboriginal groups' participation in the Environmental Monitoring Committee;</p> <p>c. Adaptive management plans, and</p> <p>d. Consideration as part of the planning process for the final Closure Plan. [Commitments Tables – ID# GRFN-39]</p>	<p>The broader area beyond the RSA and particularly to the NE includes an abundance of bird, small animal and large animal value sites. The vast majority of GRFN's identified kill sites are beyond the RSA.</p> <p>EIS Section 7.7.2.7 'Residual Effects on Traditional Use of Lands and Resources' (p. 7.404) states:</p> <ul style="list-style-type: none"> <li>Until wildlife (e.g., moose and bear) are habituated to noise, their behaviour and range patterns could be affected in the LSA.</li> <li>Diversion of moose away from the PSA may result in an increased density in the LSA, but no effects are anticipated on moose populations in the long-term. Animals will return to the site as it is re-vegetated in the post-closure phase.</li> <li>Depending on a location in the LSA, users involved in traditional uses such as hunting may experience some noise, vibration, light (sky glow, light trespass), or visual effects i.e., subtle change on the horizon at some locations on Trout and Wabatongushi lakes) that may result in minor visual degradation of scenic quality (see EIS, Sec. 7.7.2.7). Generally speaking, these will decrease with distance from the Project, but be influenced by topography</li> </ul>	No significant adverse effects to GRFN hunting practices; no impacts after mitigation to GRFN rights in respect of hunting practices.

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<p><b>GRFN Fishing</b></p> <p><b>Overview:</b></p> <ul style="list-style-type: none"> <li>PSA: 12 fishing sites (within 250 m)</li> <li>LSA/RSA: 8 fishing sites</li> </ul>	PSA	GRFN's K&U study identified sites for catching pickerel, pike, speckled trout, and lake trout	<p><b>1. 3rd Party Review Process and Outcomes:</b> GRFN participated in the 3rd party review process along with MFN, BFN and MCFN.</p> <p><b>2. Fish Offsetting/Compensation Plan:</b> The EIS includes a clear commitment to offset the Project-impacts to fish habitat. An <b>offsetting/compensation plan</b> will need to be developed and approved for a Fisheries Act Authorization, and an MMER Schedule 2 Amendment, such that no productive loss of fish habitat occurs. These offset plans will be prepared in consultation with DFO, ECCC, MNRF, and Aboriginal groups. [Commitments Table – ID# FFH (1)-31b]</p> <ol style="list-style-type: none"> <li>Upon discussion with Indigenous communities, at closure, the feasibility of <b>fish spawning area construction</b> within the pit will be assessed in order to assist with aquatic biota diversity emergence. [Commitments Table – ID# GRFN-3]</li> <li>Prodigy intends to construct a drainage channel north of Water Body 10 to enhance flow and drainage from this marshy area. This diversion will be constructed in a manner to enhance fish habitat. [Commitments Table – ID# BFN 6-15]</li> <li>The objective of the fish relocation will be to remove as many fish as possible, therefore relocation activities will include gradual dewatering and using a variety of fishing techniques, to ensure that fish are able to be caught and safely relocated. [Commitments Tables – ID# BFN 7-10]</li> <li>The study design will be refined by the Fisheries Working Group during the permitting phase of the Project. [Commitments Table – ID# BFN TSD-1; AP-10]</li> <li>Aboriginal groups will be invited for <b>additional site visits</b> as fish habitat compensation and offsetting works are underway. [Commitments Table – ID# MNO 4.3.13]</li> </ol> <p><b>3. Follow-up and Monitoring</b> 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:</p> <ol style="list-style-type: none"> <li>Ongoing engagement with identified land users;</li> <li>Aboriginal groups' participation in the Environmental Monitoring Committee;</li> <li>Adaptive management plans, and</li> <li>Consideration as part of the planning process for the final Closure Plan. [Commitments Tables – ID# GRFN-39]</li> </ol> <p><u>Environmental Monitoring</u> Prodigy is engaged with Aboriginal groups in ongoing discussions with respect to fisheries offset plans. [IE(1)-B11] Prodigy Gold commits to consult with the <b>Environmental Monitoring Committee (EMC)</b> to seek direct input into the development of the fish habitat offsets and compensation offset and compensation plans. [Commitments Table – ID# 4.3.3]</p>	<p>In the PSA, fish habitat will be reduced on-site at the upper McVeigh Creek system, and at Webb and Lovell lakes (drained as part of the Project; see EIS Sec. 7.7.2.7 'Residual Effects on Traditional Use of Lands and Resources' (p. 7.404)).</p> <p>Any fishing at Webb and Lovell lakes in the PSA will be displaced. Refer to the response to IE(1)-B11 (<i>Value/Use for Indigenous Fishing at Webb, Goudreau &amp; Lovell Lakes</i>) for further clarification.</p> <p>The vast majority of GRFN fishing is beyond the RSA and unaffected by the project.</p>	No significant adverse effects to GRFN fishing practices; no impacts after mitigation to GRFN rights in respect of fishing practices.

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			<p>a. A <b>comprehensive monitoring plan</b> will be developed as part of the application for the MOECC Environmental Compliance Approvals and the federal EEM program. [Commitments Table – ID# GRFN-29 &amp; MFN-10]</p> <p>b. Prodigy's <b>Environmental Monitoring Plan</b> will include an Adaptive Management Plan for Surface Water as well as an associated monitoring program, once finalized. [Commitments Table – ID# GRFN-34 &amp; MFN-15]</p> <p>c. The Aboriginal groups will participate in the development of the company's <b>surface water and ground water monitoring program</b>. [Commitments Table – ID# GRFN-26 &amp; MFN-7] The groundwater monitoring plan will be finalized at the Licensing stage in discussion with the MOECC and aboriginal communities. [Commitments Table – ID# FFH(1)-02]</p> <p style="padding-left: 40px;">i. Site <b>surface runoff water</b> will be collected and diverted to the WQCP prior to seasonal discharge [Commitments Table – ID# GRFN-34]</p> <p style="padding-left: 40px;">ii. Ground water quality discharge from the pit lake will meet the receiving water quality objectives (see TSD 7 Table 5-4: 'Results of Preliminary Pit Water Mass Balance Calculations'). If not, treatment will be required. [Commitments Table – ID# GRFN-5]</p> <p>d. Prodigy Gold commits to further engagement with Aboriginal groups on <b>sampling methods</b> and efforts that are used to inform the description of each waterbody. [Commitments Table – ID# MNO 4.3.2]</p> <p><u>Fisheries Working Group</u> Prodigy has committed to the Department of Fisheries and Oceans Canada (DFO) to establish a <b>Fisheries Working Group</b> in January of 2018 in order to serve two main purposes:</p> <p style="padding-left: 40px;">a. 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.</p> <p style="padding-left: 40px;">b. Provide a regular venue for Aboriginal groups to participate in the development of the fisheries offsetting, compensation and subsequent monitoring plans that will be required prior to construction. [Commitments Table – ID# FFH(1)-01; FFH (1)-06a; FFH (1)-30; AP-3]</p> <p><u>Ongoing Engagement</u> 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) (source: extract from Table 7-241, p. 7.509 of June 2017 EIS "Project Interactions with Land Use and Tourism"). [Commitment from IR-1 Appendix C – various IRs]</p> <p><b>4. Other Mitigation</b></p>		

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			<p><u>Project Design</u></p> <p>The selection of the TMF location was selected based on the outcomes of engagement with Aboriginal groups on the location of the TMF footprint so as to contain the Project footprint within the historic mine footprint and to minimize potential impacts to Aboriginal fishing activities and other traditional uses.</p>		
	LSA/RSA	GRFN's K&U study identified sites for catching pickerel, pike, speckled trout, and lake trout	Same as for PSA above	<p>Residual effects to fishing in the LSA are described in EIS Section 7.7.2.7 'Residual Effects on Traditional Use of Lands and Resources' (p. 7.404):</p> <ul style="list-style-type: none"> <li>• The public recreation/access points at Goudreau Lake will be lost.</li> <li>• The Project will have some adverse effects on fish/fish habitat or surface water quality or quantity at Otto, Herman, and Goudreau lakes within the LSA. With respect to effects to Goudreau Lake, Section 7.7.2.7 of the EIS states that these effects are not considered to be significant themselves and are therefore not expected to affect the fishing experience of traditional users, although Goudreau and other lakes near the Project will be affected by noise or visibility of the Project.</li> <li>• Depending on the location in the LSA, users involved in traditional uses such as fishing may experience some noise, vibration, light (sky glow, light trespass), or visual effects.</li> </ul> <p>Depending on the location in the RSA, users involved in traditional uses such as fishing may experience some noise, vibration, light (sky glow, light trespass), or visual effects.</p>	No significant adverse effects to GRFN fishing practices; no impacts after mitigation to GRFN rights in respect of fishing practices.



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				<p>There are no other residual effects to fishing in the RSA; see EIS Section 7.7.2.7 'Residual Effects on Traditional Use of Lands and Resources' (p. 7.404).</p> <p>Refer to the response to IE(1)-B10 (<i>Indigenous Fishing at Dreany/ Mountain Lakes</i>) for further clarification.</p> <ul style="list-style-type: none"> <li>•</li> </ul>	
<b>GRFN Trapping</b>	PSA	No GRFN trapping identified	N/A	N/A	N/A
<b>Overview:</b> <ul style="list-style-type: none"> <li>• PSA: no trapping</li> <li>• LSA: no trapping</li> <li>• RSA: no trapping</li> </ul>	LSA/RSA	No GRFN trapping identified	N/A	N/A	N/A
<b>GRFN Gathering</b>	PSA	No GRFN gathering identified	N/A	N/A	N/A
<b>Overview:</b> <ul style="list-style-type: none"> <li>• PSA: no gathering</li> <li>• LSA: no gathering</li> <li>• RSA: no gathering</li> </ul>	LSA/RSA	No GRFN gathering identified	N/A	N/A	N/A
<b>GRFN Cultural Activities and Special Places</b>	PSA	No GRFN cultural activities or special places identified	N/A	N/A	N/A
<b>Overview:</b> <ul style="list-style-type: none"> <li>• PSA: no sites/practices</li> <li>• LSA/RSA: 3 sites/practices (but not mapped)</li> <li>•</li> </ul>	LSA/RSA	GRFN's K&U study identified a camp and cabin used for hunting and fishing, and a route used to access the camp and Dubreuilville when travelling from Garden River	<p><b>1. Environmental Management System</b></p> <p><u>Historic Resources Management Plan</u></p> <p>Prodigy will prepare a Historic Resources Management Plan to identify and manage any objects or artifacts found during project development. All Aboriginal 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"> <li>• Identify and manage the treatment any objects or artifacts found during project development;</li> <li>• Be prepared in advance of construction;</li> <li>• Be available for review by all Aboriginal communities; and</li> <li>• Will list who should be contacted in the event of an archaeological find. [Commitments Table – ID# MFN-8; BFN 7-1, 7-28; GRFN-27]</li> </ul> <p><b>2. Follow-up and Monitoring</b></p> <p>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:</p>	Depending on a location in the LSA, users involved in traditional uses such as hunting, fishing and gathering may experience some noise, vibration, light (sky glow, light trespass), or visual effects i.e., subtle change on the horizon at some locations on Trout and Wabatongushi lakes) that may result in minor visual degradation of scenic quality (see EIS, Sec. 7.7.3.7). Generally speaking, these will decrease with distance from the Project, but be influenced by topography.	No significant adverse effects to GRFN cultural activities and special places; no impact after mitigation to GRFN rights in respect of physical or cultural heritage values.

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			<ul style="list-style-type: none"> <li>a. Ongoing engagement with identified land users;</li> <li>b. Aboriginal groups' participation in the Environmental Monitoring Committee;</li> <li>c. Adaptive management plans, and</li> <li>d. Consideration as part of the planning process for the final Closure Plan. [Commitments Tables – ID# GRFN-39]</li> </ul>		