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May 7, 2025

**Sent by email**

Steve Lines  
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First Mining Gold Corp.  
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Steve Lines:

**Subject: Springpole Gold Project –Technical Review of the  
Environmental Impact Statement – Addendum to  
Information Requirements**

This letter is further to Impact Assessment Agency of Canada's (IAAC) letter of February 10, 2025, on the technical review of the Environmental Impact Statement (EIS) for the proposed Springpole Gold Project (the Project) proposed by First Mining Gold Corp. (the Proponent). This letter, informed by comments submitted by the Northwestern Ontario Métis Community, Cat Lake First Nation and Lac Seul First Nation, and Slate Falls Nation, and by meetings with Wabauskang First Nation and Mishkeegogamang Ojibway First Nation, includes an addendum to the Information Requirements (IRs) provided to the Proponent on February 10, 2025. Responses to these IRs are required to complete the environmental assessment (EA) under the *Canadian Environmental Assessment Act, 2012* (CEAA 2012).

The addendum identifies areas for which insufficient information is available to IAAC to complete its assessment of environmental effects, as defined in section 5 of CEAA 2012, particularly with respect to effects to Indigenous Peoples resulting from changes to the environment, defined in paragraph 5(1)(c) of CEAA 2012, or its assessment of impacts on the exercise of Aboriginal and/or treaty rights as recognized and affirmed by section 35 of the *Constitution Act, 1982*.

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As noted in IAAC's letter of February 10, 2025, the Proponent's responses may be in a format of your choice; however, the format must be such that the responses to individual rows can be easily identified. Your responses will be made public on the on the Canadian Impact Assessment Registry (the Registry),<sup>1</sup>

As you are aware, the federal timeline within which the Minister of Environment and Climate Change must make a decision, under section 27 of CEAA 2012, was suspended as of February 11, 2025. As per IAAC's *Operational Policy Statement: Information Requests and Timelines* (dated February 2016),<sup>2</sup> the federal EA timeline will not recommence until IAAC completes the conformity review of the formal submission of all responses and is satisfied that robust responses to the comments and questions have been received.

Please note that the addendum does not address all comments raised by Indigenous communities. Indigenous community comments that are not reflected in the addendum, but that relate to the environment effects or to impacts on the exercise of rights, will inform IAAC's advice to the Minister of the Environment and Climate Change. The comments from the Indigenous communities are published on the Registry, and as IAAC understands, have been shared with the Proponent. IAAC recommends that the Proponent provide responses to comments directly to the relevant Indigenous community or communities, including those comments pertinent to the provincial Individual Environmental Assessment process, or—should the Project be allowed to proceed—subsequent regulatory processes, or to any bilateral agreement with the respective Indigenous community.

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<sup>1</sup> <https://iaac-aeic.gc.ca/050/evaluations/proj/80149>

<sup>2</sup> <https://www.canada.ca/en/impact-assessment-agency/services/policy-guidance/information-requests-timelines.html>

### **Engagement between the Proponent and Indigenous communities**

Where engagement between the Proponent and relevant Indigenous communities would assist the Proponent in developing responses to the addendum, IAAC is available to support these meetings, such as assisting in the scheduling of meetings and the development of detailed agenda to guide conversations. In particular, IAAC strongly recommends technical meetings with Indigenous communities to discuss areas of diverging views, including:

- potential changes to the environment due to seepage from the co-disposal facility and any resulting environmental effects under paragraph 5(1)(c) of CEAA 2012;
- potential impacts to the exercise of Aboriginal and/or treaty rights, and how they would be mitigated or accommodated; and
- the overprinting of Waabizheshi Agaasademon Onigam (the Marten Portage), the acceptability of the alternative portage route as a mitigation measure, and the value of the re-established portage.

To note, IAAC met with Cat Lake First Nation and Lac Seul First Nation, and with Slate Falls Nation during its preparation of this addendum to receive feedback on its approach to resolving technical issues of concern. IAAC emphasizes that these Nations have all expressed strong interest in participating in the technical meetings recommended by IAAC above.

Please note that potentially impacted Indigenous communities and technical experts from Environment and Climate Change Canada provided comments and advice to IAAC regarding boreal caribou.<sup>3</sup> IAAC understands that expectations on the Proponent regarding the potential effects of the Project on boreal caribou would be overseen by the Ontario Ministry of the Environment, Conservation and Parks. IAAC will consider potential impacts to caribou in order to inform its assessment of effects to Indigenous Peoples' current use of caribou for traditional purposes, physical and cultural heritage, and exercise of Aboriginal and/or treaty rights.

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<sup>3</sup> <https://iaac-aeic.gc.ca/050/evaluations/proj/80149/contributions/id/62498>

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Please confirm receipt of this message and contact me directly at [springpolegoldmine-minedorsspringpole@iaac-aeic.gc.ca](mailto:springpolegoldmine-minedorsspringpole@iaac-aeic.gc.ca) or 226-749-1214, if you have any questions, or to move forward with scheduling meetings.

Sincerely,

Tara Bailey  
Project Manager, Ontario Region

Enclosure: Springpole Gold Project – Information Requirements for the Environmental Impact Statement, Addendum

c.c.: Meghan Bertenshaw, First Mining Gold Corp.  
Shane Hayes, First Mining Gold Corp.  
Jenny Archibald, Ministry of Environment Conservation and Parks