

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

May 7, 2025

Further to the Impact Assessment Agency of Canada's (IAAC) correspondence 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), IAAC provides this addendum to the February 10, 2025, Information Requirements (IRs).

Following receipt of the EIS, IAAC met with Cat Lake First Nation and Lac Seul First Nation, Mishkeegogamang Ojibway First Nation, the Northwestern Ontario Métis Community, Slate Falls Nation, and Wabauskang First Nation to discuss and receive comments on the EIS. IAAC received written comments from and met with the Northwestern Ontario Métis Community ([December 20, 2024](#)), Cat Lake First Nation and Lac Seul First Nation ([January 31, 2025](#), and [February 10, 2025](#)), and Slate Falls Nation ([February 28, 2025](#)), and also met with Mishkeegogamang Ojibway First Nation and Wabauskang First Nation. This addendum was informed by these discussions and comments. Where relevant, IAAC included references to examples of comments submitted by Indigenous communities in the table and summarized key concerns to support the Proponent in understanding the context of IAAC's IRs.

IAAC also notes that following the receipt of comments from the Northwestern Ontario Métis Community, IAAC received two letters of support ([February 20, 2025](#) and [February 21, 2025](#)) for the Project that “*acknowledges that any potential effects of the Project on Métis Section 35 Rights have been sufficiently accommodated by [the Proponent]*”. IAAC notes that this table only reflects areas for which additional information would be required for IAAC to provide advice to the Minister of the Environment and Climate Change with respect to the environmental effects of the Project, as defined in section 5 of the *Canadian Environmental Assessment Act, 2012*, or with respect to impacts on the exercise of Aboriginal and/or treaty rights.

All comments and letters are posted to the Canadian Impact Assessment Registry at <https://iaac-aeic.gc.ca/050/evaluations/proj/80149/contributions/id/62626>. Indigenous community comments that are not reflected in this table, but that relate to these environmental effects or impacts on the exercise of rights, will inform IAAC's advice to the Minister. Comments that are not related to the areas noted above should be addressed by the Proponent, either as part of the provincial Individual Environmental Assessment process, or—should the Project be allowed to proceed—subsequent regulatory processes, or through bilateral agreement with the respective Indigenous community.

Information Requirements

Ref. #	Link to CEAA 2012	Topic	Reference to EIS Guidelines	Reference to EIS	Comments from Indigenous Communities	Context and Rationale	Information Request
IP-03	5(1)(c)(i) Indigenous Peoples: health and socioeconomic conditions 5(1)(c)(ii) Indigenous Peoples: physical and cultural heritage 5(1)(c)(iii) Indigenous Peoples: current use of lands and resources for traditional purposes	Groundwater and Surface Water Quality	3.2.1 Factors to be Considered; Changes to the Environment 7.1.5 Groundwater and Surface Water 7.1. 11 Current Use of Lands and Resources; Other Changes to the Environment 7.2.2 Predicted Changes to the Physical Environment; Changes to Groundwater	Appendix E (Revised Mine Waste Management Alternatives) Appendix K-1.1 (Static Testing Baseline Report 2021) Appendix K-1.2 (Tailings ML/ARD Assessment – Static Testing Results) Appendix K-1.3 (Kinetic Geochemistry Report) Appendix K-1.4 (Overburden Fish Habitat Area Geochemistry Memo)	IAAC received comments from Cat Lake First Nation and Lac Seul First Nation (sufficiency comments 10b, 20, 26, 29 and technical comments 40, 52) and Slate Falls Nation (section 1, comment 3; section 6.18, comment 8; section 6.21, comment 38; section 6.26, comment 11) expressing concerns that uncaptured seepage from the co-disposal facility (CDF), as modelled by the Proponent, would affect two major waterbodies of importance to these communities: Springpole Lake and Birch Lake. Cat Lake First Nation and Lac Seul First Nation noted that access to clean drinking water is both a right and a practice that is integral to and inseparable from spending time on the land, and that clean water is important for the preparation of traditional medicines. Further, the Nations noted that impacts to surface water bodies would affect their way of life and affect socioeconomic and harvesting practices. The Nations noted concern about the lack of consideration of impacts on drinking water, including a spring water site identified in their land use studies, and subsequent effects to current use of lands and resources and exercise of rights, in the Proponent's analysis.	IAAC understands that the real or perceived contamination of Birch Lake and Springpole Lake (including the fear of contamination due to accidents) may lead to effects to Indigenous Peoples, such as: <ul style="list-style-type: none"> • effects on Indigenous Peoples' biophysical and mental health, including due to fears of contamination and alienation from places of importance; • effects on Indigenous communities' commercial and recreational tourism businesses; • effects on Indigenous communities' current use of lands and resources, including willingness to use nearby waterbodies for drinking, ceremony, and cultural and spiritual use; and, • impacts to the exercise of rights related to the use of nearby waterbodies, given that <i>nibi</i> (water) is a value of spiritual and cultural importance to nearby communities. IAAC and Indigenous communities reviewed the EIS and given the potential volume of uncaptured seepage, have identified the following areas for which greater confidence is required to validate the assessment of	Following the ongoing technical discussions with the Province of Ontario about water quality modelling to satisfy the requirements of WQI-01, and any associated changes made to the supporting assessments, provide updated information on: <ul style="list-style-type: none"> • monitoring or follow-up measures to verify the accuracy of the assessment of effects on drinking water used by Indigenous Peoples, including the spring water collection site identified by Lac Seul First Nation; • any communication plans for notifying Indigenous land users of potential health risks associated with drinking water; and, • whether and how the Proponent accounted for potential diminished use of nearby waterbodies by Indigenous Peoples due to real or perceived contamination in its assessment of effects to Indigenous (mental) health and socioeconomic conditions, current use of lands and resources for traditional purposes, and exercise of rights.

Ref. #	Link to CEEA 2012	Topic	Reference to EIS Guidelines	Reference to EIS	Comments from Indigenous Communities	Context and Rationale	Information Request
			and Surface Water	Appendix K-2 (Mine Site Water Quality Modelling) Appendix L-2 (Hydrogeological Modelling Report) Appendix N-1 (Surface Water Quality Baseline) Appendix N-2 (Surface Water Quality Modelling Report) Appendix V-1 (CDF PFS Design Report Update)	Slate Falls Nation noted that changes to surface water quality not only impacts fishing opportunities, but the health of Slate Falls Nations members, as they rely on water for drinking, to harvest wildlife, plants, and medicines, and to support tourism activities and outdoor recreation. Slate Falls Nation noted that water is connected to all parts of the ecosystem and that clean and plentiful water is vital to community health, so water contamination over time is of particular concern.	potential effects to Indigenous Peoples related to water quality: <ul style="list-style-type: none"> • changes to drinking water collected within the Project Development Area (PDA) (including surface water and the site identified by Cat Lake First Nation), and within the Local Study Area (LSA) (including surface water and the spring water collection site identified by Lac Seul First Nation); and • changes to the quality of aquatic country foods due to contamination, including fish species of importance such as lake trout, walleye, northern pike, sturgeon, yellow perch, etc., and resultant effects to Indigenous Peoples' health, current use of lands and resources, and impacts to the exercise of rights.¹ IAAC acknowledges that impacts to aquatic country foods could be managed through the country foods monitoring program that the Proponent described in its response to HH-01. IAAC understands that the groundwater source within the PDA will not be accessible during life of mine and therefore is not a risk to human health but understands that the loss of the site for drinking water is an effect on current use of lands and resources. IAAC previously issued WQI-01, which outlines several areas where further information is required to build confidence in the assessment of potential impacts to water quality, and requested a technical discussion between IAAC, the Proponent, and the Ontario Ministry of the Environment, Conservation and Parks, which is the competent ministry for surface water and groundwater management and related provincial permitting. IAAC understands that the Proponent is planning to host technical meetings with interested Indigenous communities to discuss	

¹ All references to rights in this document refer to Aboriginal and/or treaty rights as recognized and affirmed by section 35 of the *Constitution Act, 1982*.

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						the CDF. IAAC is available to support these meetings.	
IP-04	<p>5(1)(c)(i) Indigenous Peoples: health and socioeconomic conditions</p> <p>5(1)(c)(ii) Indigenous Peoples: physical and cultural heritage</p> <p>5(1)(c)(iii) Indigenous Peoples: current use of lands and resources for traditional purposes</p>	<p>Air Quality</p> <p>Surface Water Quality</p>	<p>7.2.1 Predicted Changes to the Physical Environment; Changes to the Atmospheric Environment</p> <p>7.1.5 Effects Assessment; Groundwater and Surface Water</p> <p>7.2.2 Predicted Changes to the Physical Environment; Changes to Groundwater and Surface Water</p>	Section 6.24	<p>IAAC received comments from Cat Lake First Nation and Lac Seul First Nation (sufficiency comments 10, 10a, 34) and Slate Falls Nation (section 6.24, comments 3 and 4) about the geographic extent of effects of the Project and sensory disturbance that could affect land users.</p> <p>Cat Lake First Nation and Lac Seul First Nation noted that the area affected by the Project holds profound importance for community members and that the Project threatens to disrupt the harvesting and cultural rights of community members in a preferred harvesting area. The Nations noted that the EIS fails to capture the geographic scale and magnitude of impacts on land users' values and experience of the lands. In particular, land users often camp overnight in the area, and the Nations noted that any sensory disturbance would affect community members' ability and willingness to continue this tradition, as well as their quiet enjoyment of the land.</p> <p>Slate Falls Nation noted concerns about potential contamination of air and water on Indigenous land users, as well as impacts to land users' behaviour, health, and wellbeing due to perception or fear of contamination.</p>	<p>IAAC requested the Proponent provide maps showing the extent of effects related to the Project, during a meeting on October 8, 2024, and again by email on November 13, 2024. The Proponent provided updated figures in the final EIS; however, these figures did not fully show the geographic area where effects are anticipated to occur. This information is required to support discussions with Indigenous communities and IAAC's analysis of impacts to Indigenous Peoples.</p> <ul style="list-style-type: none"> • Air quality. The EIS notes that Indigenous land users will be active within the Proponent's property boundary; however, the figures illustrating air quality (Figures 6.2-1, 6.2-2, and 5-1 to 5-11) do not show isopleths within this property boundary. Given the small number of receptors, and the fact that land users are expected to be mobile on waterbodies inside the property boundary, air quality contour plots that include a range of concentrations, including, the relevant Ambient Air Quality Criteria are required to understand impacts to the current use of lands and resources for traditional purposes, as land users may avoid areas due to potential air quality concerns. IAAC raised concerns in HH-03 about potential effects on the health of Indigenous land users due to air quality. In its response, the Proponent indicated that the health effects to Indigenous Peoples due to changes in air quality are expected to be limited, as land users would not be subject to prolonged exposure of airborne contaminants; isopleth plots are required for IAAC to validate the Proponent's assertion with Indigenous communities. • Surface water quality. Indigenous communities noted that EIS does not take into account the spiritual and cultural importance of nearby waterbodies in its analysis of surface water quality nor 	<ol style="list-style-type: none"> 1) Provide figures identifying the geographic extent of changes to the environment beyond the PDA related to the following valued components (VC): <ol style="list-style-type: none"> a) air quality; and, b) surface water quality. 2) Should there be elevated concentrations above the criteria selected by the Proponent for each VC beyond the PDA, provide information regarding the duration and frequency of the elevated levels to support the assessment of potential changes to Indigenous Peoples' health conditions.

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						<p>recognize that any exceedances in water quality parameters could impact current use of lands and resources for traditional purposes, including harvesting, ceremony, and drinking, and the exercise of rights. A map showing these contours is required to understand impacts to current use of lands and resources and Indigenous health.</p>	
IP-05	<p>5(1)(c)(i) Indigenous Peoples: health and socioeconomic conditions</p> <p>5(1)(c)(iii) Indigenous Peoples: current use of lands and resources for traditional purposes</p>	<p>Indigenous Peoples – Current Use of Lands and Resources for Traditional Purposes</p> <p>Indigenous Peoples - Health and Socioeconomic Conditions</p>	<p>3.2.2 Valued Components to be Examined</p> <p>4.2.2 Community Knowledge & Indigenous Knowledge</p> <p>7.2 Predicted changes to the Physical Environment</p> <p>7.1.9 Indigenous Peoples; Current Use of Lands and Resources for Traditional Purposes</p>	<p>Section 2</p> <p>Section 6</p>	<p>IAAC received comments from Cat Lake First Nation and Lac Seul First Nation (sufficiency comments 4, 10b, 13, 21, 25) and Slate Falls Nation (section 6.21, comments 21, 26, 50) expressing concern that the effects assessment presented in the EIS either did not consider or did not accurately represent the traditional knowledge studies or information that they provided to the Proponent, and that there were not opportunities for them to validate the Proponent’s assessment. For instance, Indigenous communities noted concerns about the location of the proposed project components, including the fact that the CDF is in close proximity to Birch Lake and Springpole Lake, which are both of spiritual and cultural importance to surrounding Indigenous communities. The area at large is a preferred harvesting and fishing site on which communities rely. As such, Indigenous communities noted doubt that the EIS fully or accurately explains effects of the Project on the environment, including to areas listed in section 5 of CEAA 2012.</p> <p>In particular, IAAC received many comments from Indigenous communities articulating concerns about the Proponent’s alternatives assessment, stating that the Proponent did not adequately consult them on the location of the proposed project components. Indigenous communities noted that the Proponent did not appear to consider Indigenous values in its determination of the preferred location for the co-disposal facility.</p> <p>Slate Falls Nation noted concern that information from their Health, Socioeconomic,</p>	<p>IAAC notes that the EIS does not detail divergences in views between the Proponent and Indigenous communities, how these differences were addressed, and specific steps that were taken to validate the effects assessment and significance criteria with communities, apart from providing the draft EIS for public review.</p> <p>IAAC previously requested a meeting in fall 2023 to discuss how the Proponent would be integrating supplemental information and comments provided by Indigenous communities following the Proponent's engagement on the draft EIS. In this meeting, held on April 25, 2024, the Proponent did not explain how it intended to validate the integration of Indigenous knowledge in the EIS with Indigenous communities. Further, in a meeting with the Proponent on March 25, 2025, IAAC requested further information about the methods used by the Proponent to validate the information in the EIS with Indigenous communities, including the integration of community-led studies, residual effects, and significance ratings. The Proponent confirmed that traditional knowledge studies provided by Indigenous communities were integrated into the final EIS, but that Indigenous communities were not given the opportunity to validate how the information had been integrated.</p> <p>When the assessment of impacts to Indigenous peoples integrates Indigenous traditional knowledge and socioeconomic studies—including in the identification of valued components of interest to Indigenous communities, in the assessment of potential</p>	<ol style="list-style-type: none"> 1) Clarify how Indigenous knowledge was integrated into the project design choices and specify if there was Indigenous knowledge that was provided that could not be integrated into design decisions due to the location of the ore, engineering safety of the project design, or other reasons. 2) Where Indigenous knowledge was not able to be incorporated, provide clarification on the potential impacts to Indigenous Peoples’ health and socioeconomic conditions and current use of lands and resources; and, as applicable, efforts that have been made to either mitigate or accommodate for those impacts. 3) Clarify the Proponent’s intent to incorporate information provided by Indigenous communities into its proposed follow-up and monitoring programs and provide details on opportunities for Indigenous communities to participate in the development of these programs and validate how their knowledge was incorporated into program design.

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					<p>Indigenous Knowledge, and Land Use Baseline Report was not meaningfully integrated into the effects assessment. In particular, Slate Falls Nation noted that their perspectives were not included when determining alternatives for the Project, and that the effects assessment does not include their risk acceptance criteria. Slate Falls Nation expressed low confidence overall in the effects assessment and significance ratings and noted that they were unable to meaningfully engage with the Proponent to discuss technical issues of importance prior to the submission of the EIS to IAAC.</p>	<p>effects, the identification of mitigation measures, and the determination of significance of any residual effects—the integration of the traditional knowledge should be validated with Indigenous communities to ensure that the Proponent has accurately represented the communities' knowledge and views.</p> <p>IAAC strongly recommends that the Proponent schedule technical meetings with interested Indigenous communities to discuss the integration of Indigenous knowledge in the Proponent's pathways of effects, validation of proposed mitigation, and significance ratings. IAAC is available to support these meetings.</p>	
IP-06	5(1)(c)(iii) Indigenous Peoples: current use of lands and resources for traditional purposes	<p>Indigenous Peoples – Current Use of Lands and Resources for Traditional Purposes</p> <p>Indigenous Peoples – Exercise of Rights</p>	<p>7.1.9 Indigenous Peoples; Current Use of Lands and Resources for Traditional Purposes</p> <p>7.3.5 Predicted Effects on Valued Components; Current Use of Lands and Resources for Traditional Purposes</p>	<p>Section 6.21</p> <p>Section 6.26</p>	<p>IAAC received comments from Cat Lake First Nation and Lac Seul First Nation (sufficiency comment 13) and Slate Falls Nation (section 6.21, comments 21, 26, 50) about the Proponent's assessment of impacts on Indigenous communities' exercise of rights.</p> <p>Cat Lake First Nation and Lac Seul First Nation noted that the Proponent does not consider any semi-tangible or intangible aspects of culture, such as language, intergenerational knowledge transfer, and sense of place, in its assessment of impacts on the exercise of rights, despite the Nations providing information to the Proponent directly through their community-led studies.</p> <p>Slate Falls Nation noted concern that information from their Health, Socioeconomic, Indigenous Knowledge, and Land Use Baseline Report was not meaningfully integrated into the assessment of impacts on the exercise of rights. Slate Falls Nation noted that they were not meaningfully engaged to discuss the indicators or methods used in the assessment and expressed low confidence in the appropriateness or accuracy of the Proponent's analysis.</p>	<p>As outlined in the EIS Guidelines, the Proponent is required to document potential adverse impacts of the Project on the exercise of rights for each Indigenous community. The Proponent highlights values of importance identified in each community's traditional knowledge study and provides brief context on Aboriginal and treaty rights, but there is no detailed discussion of how the Project will impact the exercise of rights or how these effects will be managed.</p> <p>In a meeting with the Proponent on March 25, 2025, IAAC requested clarification on the scope of the Proponent's analysis of impacts to the exercise of rights, and the Proponent confirmed that its assessment of potential impacts to the exercise of rights is presented in Sections 6.21 and 6.26. However, these sections do not provide sufficient information about each community's exercise of rights, the specific impacts to each community, and how these will be accommodated and mitigated. Indigenous communities raised concerns about this lack of information. Similarly, IAAC requires further information about the specific mitigation and accommodation measures that will be employed by the Proponent to manage impacts to rights in order to support its assessment and advice to the Minister; without this information, IAAC must assume that the impacts to rights identified by</p>	<p>Provide an analysis of anticipated impacts to each Indigenous community's exercise of rights, the measures proposed to mitigate or accommodate these impacts, and information about impacts that have not been fully mitigated or accommodated as part of the EA. The analysis should include a summary of any discrepancies in the views of the Proponent and each Indigenous community and rationales for the Proponent's conclusions.</p>

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						<p>Indigenous communities would not be managed.</p> <p>IAAC and Indigenous communities reviewed the EIS closely, including the sections highlighted by the Proponent, and have identified the following areas for which greater confidence is required to validate the assessment of potential impacts to Indigenous Peoples' exercise of rights:</p> <ul style="list-style-type: none"> • how Indigenous Peoples' perspectives on anticipated impacts to their rights were integrated into the Proponent's analysis and effects assessment; • how the Project will affect the values of importance highlighted by the Proponent in Section 6.21 but not included in the effects assessment, including water (nibi), cultural continuity, language, etc.; • the severity of residual effects on the exercise of rights; and, • mitigation or accommodation measures proposed by the Proponent to manage impacts to rights, and Indigenous communities' perspectives on the effectiveness of these measures. <p>IAAC strongly recommends that the Proponent schedule meetings with interested Indigenous communities to discuss specific rights practices such as connection to water (nibi); fishing, hunting, and trapping; food, plants, and medicines; and cultural continuity, how these would be affected by the Project, and how they would be mitigated or accommodated. IAAC is available to support these meetings.</p>	
IP-07	5(1)(c)(ii) Indigenous Peoples: physical and cultural heritage 5(1)(c)(iv) Indigenous Peoples: any	Indigenous Peoples – Physical and Cultural Heritage Indigenous Peoples – Sites of Significance	7.1.9 Indigenous Peoples; Current Use of Lands and Resources for Traditional Purposes 7.3. 5	Section 6.22 Section 6.23	IAAC received comments from Cat Lake First Nation and Lac Seul First Nation (sufficiency comment 12; technical comments 48 and 49) about the Proponent's assessment of impacts to Waabizheshi Agaasademon Onigam (the Marten Portage). Cat Lake First Nation and Lac Seul First Nation have raised concerns about the CDF overprinting Waabizheshi Agaasademon	The Proponent notes that it will establish an alternative portage route and re-establish Waabizheshi Agaasademon Onigam following the decommissioning and abandonment of the Project. In a meeting with the Proponent on March 25, 2025, IAAC requested clarification on whether the Proponent had validated the acceptability of this mitigation with Cat Lake First Nation and Lac Seul First Nation. The Proponent confirmed that it had discussed this	In the light of the diverging views between the Proponent and the Indigenous communities, indicate any additional measures to mitigate or accommodate the potential impact to physical and cultural heritage associated with the overprinting of Waabizheshi Agaasademon Onigam. Should measures be proposed, describe the steps that the Proponent took to build consensus on these

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	structure, site or thing that is of historical, archaeological, paleontological or architectural significance		Predicted Effects on Valued Components; Current Use of Lands and Resources for Traditional Purposes		<p>Onigam (the Marten Portage), which is a critical part of their cultural landscape. Cat Lake First Nation and Lac Seul First Nation expressed that not only is Waabizheshi Agaasademon Onigam a significant area of cultural heritage, but the portage facilitates continued use of their traditional territory and exercise of rights by providing access to critical harvesting areas and locations of importance.</p> <p>Cat Lake First Nation and Lac Seul First Nation have requested that a Heritage Impact Assessment (HIA) be undertaken by the Proponent in order to understand the full scope of potential impacts to Waabizheshi Agaasademon Onigam.</p>	<p>with proximate land users and a trapline license holder but had not discussed this mitigation with leadership for either Nation. To this point, Cat Lake First Nation and Lac Seul First Nation have noted that this strategy has not been validated with their communities and state that the destruction of Waabizheshi Agaasademon Onigam could be irreversible, as the re-established portage would not have the same spiritual significance.</p> <p>Given these comments, it is unclear whether the proposed mitigation is acceptable to Indigenous communities, which reduces confidence in the assessment of residual effects and significance rating provided by the Proponent.</p> <p>IAAC strongly recommends that the Proponent schedule meetings with interested Indigenous communities to discuss the overprinting of Waabizheshi Agaasademon Onigam, the acceptability of an alternative portage route as a mitigation measure, and the value of the re-established portage. IAAC is available to support these meetings.</p> <p>In relation to the HIA, the Ontario Ministry of Citizenship and Multiculturalism also recommended that it be prepared as part of the EA in order to inform understanding of project effects and detailed design.</p>	<p>measures with impacted Indigenous communities.</p> <p>Further, describe the Proponent's commitments regarding a potential Heritage Impact Assessment (HIA), including:</p> <ul style="list-style-type: none"> the timeline for completion of the study how Indigenous knowledge would be integrated to inform the assessment; opportunities for Indigenous communities' participation in the HIA; and, methods for validating and sharing the results of the HIA with Indigenous communities, including any relevant commitments from the Proponent.
IP-08	5(1)(c)(iii) Indigenous Peoples: current use of lands and resources for traditional purposes	<p>Indigenous Peoples – Current Use of Lands and Resources for Traditional Purposes</p> <p>Indigenous Peoples – Exercise of Rights</p>	<p>4.5 Summary of environmental impact statement</p> <p>3.2.2 Project Activities; Decommissioning and Abandonment</p> <p>9. Follow-up and</p>	Section 6	IAAC received comments from Cat Lake First Nation and Lac Seul First Nation (technical comment 13) and Slate Falls Nation (section 6.21, comment 21) about the role of Indigenous communities in Project-related follow up, including opportunities for participation in monitoring activities and financial supports.	<p>The EIS refers to Environment Committee(s) as a key mitigation measure and opportunity for Indigenous communities to be involved in Project-related follow-up and monitoring. The stated purposes are as follows:</p> <ul style="list-style-type: none"> <i>Facilitate on-going [sic] communications and meaningful engagement during construction, operation and closure of the Project;</i> <i>Facilitate the sharing and integration of Traditional knowledge in Project-related activities during construction, operation and closure of the Project; and,</i> 	<ol style="list-style-type: none"> Provide details on how the Environment Committee(s) would be structured and operated, including mandate, function, and decision-making authorities, as applicable. Provide details on opportunities for the participation of Indigenous communities in the development of the Environment Committee(s).

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			Monitoring Programs			<ul style="list-style-type: none"> Share and evaluate environmental information, review Project approvals and environmental management and monitoring plans, participate in adaptive management and identify mitigation measures, address emerging issues and areas of interest identified by communities (page 6.26-39). <p>Further, the EIS states that the Proponent will “continue to participate in the Environment Committee(s) at a rate commensurate with activity in the project development area” (6.21-33). It is unclear how the Committee(s) would function to assess and mitigate potential effects and concerns identified by Indigenous communities, and for how long the Committee(s) would be active. Further information is required to assess the effectiveness of mitigation and monitoring.</p>	
IP-09	5(1)(c)(iii) Indigenous Peoples: current use of lands and resources for traditional purposes	Indigenous Peoples – Current Use of Lands and Resources for Traditional Purposes Indigenous Peoples – Exercise of Rights	3.1 Designated Project (All season access road) 2.2 Alternative means of carrying out the project; Access to the project site 3.2.1 Site Preparation and Construction (Construction of access road) 7.1.9 Indigenous Peoples; Current Use of Land and	Section 6.26	IAAC received comments from Cat Lake First Nation and Lac Seul First Nation (technical comment 114) and Slate Falls Nation (section 6.21, comment 20) about Indigenous community involvement in the development of the access management strategy and the conditions under which the Proponent will communicate with local land users about potential health risks related to the Project, such as maintenance activities, vegetation clearing, and any response plans for potential accidents or malfunctions. Indigenous communities also raised concerns about increased public access into the region, which could lead to long-lasting social and economic effects for surrounding Indigenous communities, including social pressures, increased availability of substances, and competition for land users.	The EIS refers to the access management strategy as a key mitigation measure to address Indigenous communities' concerns regarding public access to the local area, with the plan providing for "appropriate signage to advise the public of the road's intended use, safety communication protocol for traditional land users, a gatehouse / checkpoint towards the end of the Wenesaga to ensure unauthorized use does not occur, and potential inspection schedule" (6.21.1.2). Further information about the access management strategy is required to support IAAC's understanding of impacts to the current use of lands and resources and to support issues resolution for other community concerns.	<ol style="list-style-type: none"> Provide details on opportunities for the participation of Indigenous communities in the development of the access management strategy. Provide timelines for the establishment of the access management strategy and indicate the conditions under which it would no longer be required. Provide a description of the strategy for communicating with land users, including the expected methods of communication, and circumstances under which the Proponent will communicate with land users.

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			Resources for Traditional Purposes				
IP-10	5(1)(c)(iii) Indigenous Peoples: current use of lands and resources for traditional purposes	Indigenous Peoples – Current Use of Lands and Resources for Traditional Purposes Indigenous Peoples – Exercise of Rights	7.1.9 Indigenous Peoples; Current Use of Lands and Resources for Traditional Purposes 7.3.5 Predicted Effects on Valued Components; Current Use of Lands and Resources for Traditional Purposes	Section 6.21	IAAC received comments from Slate Falls Nation (section 6.17, comment 5) about impacts to traplines and trapline holders.	The EIS states that the Project would impact eight traplines that intersect the mine access road or transmission line corridor, including SL 186, 191, 192, 193, 194, 196, 197, and 200. Section 6.21 notes that traplines SL 197 and 200 are held by members of Cat Lake First Nation and proposes communication with those trapline holders to facilitate land use activities as a mitigation measure. Further information is required regarding the other traplines that would be affected by the Project to support IAAC's understanding of impacts to Indigenous socioeconomic conditions and current use of lands and resources. IAAC understands from the EIS that the Proponent would also work with the Province of Ontario and trapline license holders to determine alternative options for trapline losses.	Provide further information on the potential effects on Indigenous Peoples' socioeconomic conditions and current use of lands and resources for traditional purposes related to the use of traplines SL 186, 191, 192, 193, 194, and 196, in the case that license for these traplines are held by members of Indigenous communities.
AM-01	5(1)(c)(i) Indigenous Peoples: health and socioeconomic conditions 5(1)(c)(ii) Indigenous Peoples: physical and cultural heritage 5(1)(c)(iii) Indigenous Peoples: current use of lands and resources for traditional purposes	Accidents and Malfunctions Indigenous Peoples – Current Use of Lands and Resources for Traditional Purposes Indigenous Peoples – Exercise of Rights	3.2.1 Factors to be Considered; Changes to the Environment 7.6.1. Effects of potential accidents or malfunctions	Section 9	IAAC received comments from Cat Lake First Nation and Lac Seul First Nation (sufficiency comment 17 and technical comment 29) and Slate Falls Nation (section 8.2.3, comment 4, section 8.6.2 comment, 17; section 9, comment 2) expressing concerns about catastrophic accidents and malfunctions in the case of the failure of the water management system in the co-disposal facility (CDF) and potential impacts to communities, land users, and their exercise of rights. Indigenous communities noted that the areas surrounding the Project are of great spiritual and cultural significance to their communities and used for harvesting and fishing, and that these could be destroyed by a potential catastrophic accident or malfunction.	The final EIS states that the CDF is designed to meet all relevant requirements of the Canadian Dam Association, Dam Safety Guidelines (CDA 2013, 2019), as well as all provincial requirements under the provincial <i>Lakes and Rivers Improvement Act</i> (RSO 1990, c. L.3). At a meeting on February 25, 2025, with IAAC, and provincial and federal technical review teams, the Proponent noted that the <i>Lakes and Rivers Improvement Act</i> would not apply to the CDF dams as these are “offline” dams that are not constructed within a naturally occurring lake or river. At the meeting, the Proponent indicated that the dams would be built to meet the Global Industry Standard on Tailings Management, and that these standards may be incorporated into provincial permitting requirements.	Clarify the applicable regulatory requirements and industry standards related to the safety of the CDF dams. Indicate the ways in which these measures would reduce the risk of accidents and malfunctions that may lead to adverse effects on Indigenous Peoples' health and socioeconomic conditions, current use of lands and resources for traditional purposes, physical and cultural heritage, sites of significance, and exercise of rights. Indicate any measures that the Proponent would implement to communicate dam safety to potentially impacted Indigenous communities (such as the sharing of inspection or maintenance reports). <i>IAAC notes that it has already provided advice² to the Proponent regarding the potential requirement to develop, prior to construction, and in consultation with Indigenous communities, ECCC, and other</i>

² <https://iaac-aeic.gc.ca/050/documents/p80149/161074E.pdf>

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

May 7, 2025

Ref. #	Link to CEEA 2012	Topic	Reference to EIS Guidelines	Reference to EIS	Comments from Indigenous Communities	Context and Rationale	Information Request
	5(1)(c)(iv) Indigenous Peoples: any structure, site or thing that is of historical, archaeological, paleontological or architectural significance						<i>relevant authorities, and implement, an accidents and malfunctions response plan in relation to each phase of the Project, and to develop, in consultation with Indigenous communities, a communication plan for accidents and malfunctions in relation to the Project.</i>