



Fisheries and Oceans
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March 13, 2026

Your file *Votre référence*

Our file *Notre référence*
18-HCAA-00211

Amy Sen
Springpole Gold Project
c/o Impact Assessment Agency of Canada

Subject: Springpole Gold Project – DFO final comments/edits requested on draft EA Report and draft EA conditions.

Dear Amy Sen:

Thank you for your letter dated February 27, 2026, requesting Fisheries and Oceans Canada (DFO) provide our final comments on the draft Environmental Assessment Report and draft potential conditions for the proposed Springpole Gold Project (the Project).

The enclosed table includes our views and advice on draft Condition 3.7. Beyond this, it is our opinion that the Agency has accurately and adequately characterized the potential environmental effects, recommended mitigation measures, monitoring and follow-up programs as it relates to DFO's mandate; and, accurately and adequately summarized the comments and views of DFO.

Should the Project be approved, DFO will continue to work collaboratively with the proponent through the regulatory process to ensure that all sources of uncertainty are clearly identified, transparently characterized, and appropriately addressed. This includes working to refine project information, assess potential risks to fish and fish habitat, and ensure that mitigation, offsetting, and monitoring measures are robust and proportionate to the level of uncertainty.

Should there be any questions or concerns regarding this submission, please contact Brittany Schmidt (Brittany.Schmidt@dfo-mpo.gc.ca) and Clayton James (Clayton.James@dfo-mpo.gc.ca).

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Yours sincerely,

Brandi Mogge
Team Leader – Mining, Oil & Gas
Fish and Fish Habitat Protection Program
Ontario and Prairie Region
Fisheries and Oceans Canada

Attachment: Table 1 – DFO Comments on Draft EA Conditions



Table 1 – DFO Comments on Draft EA Conditions

ID	Reference	Context	Advice
DFO-01	Springpole EA Draft Condition 3.7	<p>The EA must include a follow-up program to verify the accuracy of the environmental assessment and determine the effectiveness of mitigation measures.</p> <p>While the EA report does not include changes to water quantity in Springpole Lake as a key effect of the project, the Proponent completed modelling and predictions regarding water taking from Springpole Lake during pit re-filling. ECCC had previously recommended that enhanced monitoring include inflow rates and lake levels for Springpole Lake as part of a monitoring program to verify predictions and allow for implementation of additional mitigation measures. This will be important if predictions are exceeded and there is the potential for effects to fish habitat to occur as a result. DFO supports this recommendation, and has proposed changes to the condition in the following column to address it.</p> <p>DFO also offers that should the Project be approved, DFO’s regulatory process will require the Proponent to further refine impact quantification and monitoring requirements to verify the effectiveness of mitigation. As part of a <i>Fisheries Act</i> Authorization, DFO could require lake level monitoring to ensure mitigation is effective and/or work with Ontario to understand and incorporate fish habitat considerations into their hydrology monitoring requirements, if possible.</p>	<p>Proposed changes to draft condition 3.7 are highlighted in red.</p> <p>3.7 The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, and implement, during all phases of the Designated Project, a follow-up program to verify the accuracy of the environmental assessment and determine the effectiveness of mitigation measures with respect to adverse environmental effects from the Designated Project on fish and fish habitat resulting from changes to surface water quantity and quality. As part of the follow-up program, the Proponent shall:</p> <p>3.7.1 monitor surface water quality for contaminants of potential concern, including aluminum, antimony, arsenic, cadmium, cobalt, mercury, selenium, silver, uranium and zinc at the seepage face in Birch Lake, Lake 16 and Springpole Lake;</p> <p>3.7.2 if the results of monitoring referred to in condition 3.7.1 indicate that contaminants of potential concern exceed thresholds of the Canadian Council of Ministers of the Environment’s <i>Canadian Water Quality Guidelines of the Protection for Aquatic Life</i>, implement modified or additional mitigation measures pursuant to condition 2.7.4, such as pump back wells. The Proponent shall submit these measures to the Agency before implementing them;</p> <p>3.7.3 monitor surface water quantity in Springpole Lake; and</p> <p>3.7.4 if the results of monitoring referred to in condition 3.7.3 indicate that the changes to water quantity exceed established thresholds potentially affecting fish habitat, implement modified or additional mitigation measures pursuant to condition 2.7.4. The Proponent shall submit these measures to the Agency before implementing them.</p>