TECHNICAL MEMORANDUM

DATE 23 February 2026 **Project No.** CA0048147

TO Steve Lines, Vice President, Sustainability
First Mining Gold (FMG)

CC Meghan Bertenshaw (FMG), Shane Hayes (FMG), Al Arsenault (WSP), Derrick Moggy (WSP)

FROM WSP Canada Inc. **EMAIL** **megan.hazell@wsp.com**

SPRINGPOLE GOLD PROJECT - BOREAL CARIBOU MITIGATION AND OFFSETTING COMMITMENTS SUMMARY

1.0 PURPOSE AND CONTEXT

WSP Canada Inc. (WSP) prepared this technical memorandum to summarize the specific mitigation measures and commitments proposed for the Springpole Gold Project This memo summarizes the mitigation measures from), including relevant tables, figures from the Final Environmental Impact Statement / Environmental Assessment (EIS/EA), as well as additional details discussed with the Ministry of the Environment Conservation and Parks (MECP)'s Species at Risk Branch (SARB), and clarification of FMG's intent to follow provincial Best Management Practices (BMPs) wherever feasible for activities in Boreal Caribou habitat (Section 3.0).

As per MECP comments during the meeting on February 3rd, 2026, and MECP-SARB comments on the final EIS/EA (December 23rd, 2025) given the references to proposed mitigation measures, beneficial actions, and monitoring throughout the Final EIS/EA, MECP-SARB requested that these commitments be formalized as part of the Final EA approval**.** Therefore**,** additional details pertaining to mitigation, monitoring and offsetting conditions have been summarized. The mitigation measures presented in this memorandum incorporate the outcomes of multiple engagement cycles with MECP's SARB to ensure alignment with provincial policy direction, Boreal Caribou habitat management requirements and project mitigation best practices and commitments described in Sections 6.3.4 and 6.13.1.1 of the Final EIS/EA.

2.0 REGULATORY AND POLICY ALIGNMENT

The commitments compiled in Table A1 align with the federal and provincial frameworks governing Boreal Caribou habitat management in Canada and Ontario. These include legislated requirements, guidance documents, and the mitigation hierarchy applied throughout the Final EIS/EA.

2.1 Federal Policy Framework

Federal requirements under the *Species at Risk Act* (SARA) guide the management of Boreal Caribou habitat. Key federal instruments that apply to the Springpole Project include:

- The federal mitigation hierarchy (avoid, minimize, restore, offset), and
- The Federal Offsetting Policy for Biodiversity, which outlines conditions and expectations for the use of offsets where residual effects remain after mitigation.

FMG's mitigation approach applies this hierarchy as follows:

- Avoidance: Eliminating disturbance to critical habitat through project design, infrastructure siting, and seasonal timing restrictions.
- Minimization: Reducing the extent, duration, or intensity of disturbance where avoidance is not feasible.
- Restoration: Re-establishing habitat function on-site through progressive reclamation, revegetation, and application of best operational practices.
- Offsetting: Implementing off-site habitat restoration or averted-loss measures only when residual effects persist after all reasonable avoidance, minimization, and restoration efforts have been exhausted.

This sequencing is consistent with federal guidance and acknowledges the higher uncertainty associated with terrestrial restoration compared to avoidance and minimization.

2.2 Provincial Policy Framework

Relevant provincial guidance includes:

- MECP (2020) Best Management Practices (BMPs) for Mineral Exploration and Development Activities and Woodland Caribou in Ontario[1],
- MECP (2020) General Habitat Description for Boreal Caribou[2], and
- Applicable range-management policies referenced in Section 6.13 of the Final EIS/EA[3].

MECP (2020) BMPs outline expectations for planning, development, operations, and rehabilitation activities within Boreal Caribou range. Specifically, proponents are expected to:

- Minimize the disturbance footprint and the Project's contribution to cumulative disturbance and habitat loss at the range scale.
- Minimize habitat changes and fragmentation to maintain the function and connectivity of sub-range habitat features.
- Minimize the density of linear features to avoid increases in predator efficiency and access.
- Reduce habitat and sensory disturbance near High Use Areas, including calving, nursery, and seasonal concentration areas.
- Avoid activities that increase caribou mortality risk, including vehicle collisions and opportunities for hunting.

FMG's commitment framework aligns with these provincial BMP principles. Where project-specific mitigation measures provide an equal or higher level of environmental protection than the recommended BMPs, FMG will apply those measures and document their functional equivalency in Environmental Management Plans. Equivalency will be demonstrated by describing how the Project-specific mitigation achieves the underlying intent of the relevant BMP (e.g., minimizing disturbance, maintaining connectivity, reducing sensory effects, or avoiding sensitive seasonal periods).

3.0 RESTORATION, OFFSETTING, AND RESIDUAL EFFECTS LINKAGE

Mitigating measures have been proposed to offset direct and indirect adverse effects to Boreal Caribou and their habitat. FMG and the provincial and federal government agencies recognize the need to verify that

[1] Ministry of the Environment, Conservation and Parks (MECP). 2020. Best Management Practices for Mineral Exploration and Development Activities and Woodland Boreal Caribou in Ontario. https://www.ontario.ca/page/best-management-practices-mineral-exploration-and-development-activities-and-woodland-Caribou.

[2] Ministry of the Environment, Conservation and Parks (MECP). 2020. General habitat description for the Forest-dwelling Woodland Caribou. Updated: July 09, 2021. Accessed from: https://www.ontario.ca/page/general-habitat-description-forest-dwelling-woodland-caribou.

[3] WSP Canada Inc. (WSP). 2023. Springpole Gold Project – Environmental Impact Statement / Environmental Assessment: Section 6 – Effects Assessment and Mitigation. Report prepared for First Mining Gold Corp., Toronto, Ontario.

proposed mitigative measures are effective, and for FMG to be able to take actions based on monitoring results, to verify conclusions and commitments in the Final EIS/EA throughout the life of the Project.

The principal mitigation measures to limit adverse effects to Boreal Caribou populations and Boreal Caribou habitat are to develop as small an overall project footprint as practicable, and to limit indirect effects to the extent reasonably practicable. Where adverse effects cannot reasonably be prevented, such as for overprinting habitat due to infrastructure requirements, habitat compensation or offsetting of habitat is proposed.

As outlined in Section 6.13 the Final EIS/EA, the Project incorporates progressive, enhanced on-site restoration designed to re-establish mature coniferous refuge habitat and avoid vegetation types that could locally increase Moose presence and predation risk to Boreal Caribou from shared predators (Wolf, Bear) that could periodically or seasonally occur and use current or future refuge habitat. Restoration planning is informed by pre-mine ecosite conditions and post-mining landform constraints.

Residual effects that cannot be fully avoided or minimized will be addressed through off-site restoration and/or development deferrals, consistent with federal and provincial habitat-restoration frameworks. A proposed calving-island measure in Springpole Lake is integrated with closure-stage aquatic habitat development to enhance ecological function and monitoring efficiency. Additional opportunities to create habitat for Caribou will continue to be explored through the closure planning process.

FMG is working to identify suitable development deferral and habitat offsetting focus areas with priority preference for areas closer to the Springpole project area and situated on current or future Category 1 habitat types. In addition, FMG is actively looking for opportunities for linear disturbance restoration projects that offer potential habitat compensation opportunities; the priority is for areas closer to the project in preferred Boreal Caribou habitat types. Further, and importantly, FMG is committed to working with Forest Resource License Holders and MNR during the forest management planning process to ensure the Springpole Project is included in future forest allocations to align forest harvest and renewal activities and Trout Lake forest management plan/schedules with the Springpole Project schedule, with an overall objective to facilitate overall benefit to Boreal Caribou habitat supply and connectivity.

The Offsite Restoration and Compensation Plan will be prepared by a Qualified Professional and include details related to the restoration of disturbed habitat and/or forestry or mining deferrals to meet regulatory requirements.

4.0 MONITORING, VERIFICATION, AND ADAPTIVE MANAGEMENT

Monitoring programs will be implemented to verify the accuracy of the predicted effects, assess the effectiveness of the implemented mitigation and offsetting compensation measures, and may be further optimized in response to monitoring data. The monitoring of the rehabilitation measures for onsite mine components or offsite road restoration Projects will provide feedback on the effectiveness of these measures in restoring habitat function and use for Boreal Caribou

The follow-up and monitoring framework supports the overall environmental management for the Project. The follow-up program is implemented as part of the framework to verify predicted effects, evaluate the effectiveness of mitigation, and to measure compliance with permit conditions and statutory requirements. Monitoring is used to address uncertainties associated with effects predictions, identify any unanticipated effects, and provide input into corrective actions or adaptive management to limit those effects. Collectively, these actions improve the overall environmental performance of the Project. The objectives of the follow-up and monitoring framework are to:

- Verify the accuracy of the effects assessment;

- Confirm the effectiveness of the measures implemented to mitigate adverse effects of the Project and inform adaptive management needs;
- Confirm compliance with commitments made during the EA process; and
- Confirm compliance with regulatory conditions of approval.

Monitoring will include structured surveys, vegetation and lichen establishment assessments, and evaluation of habitat and landscape connectivity indicators.

The Final EIS/EA effects analysis provides for four main potential effect categories:

- **Habitat effects:** Direct habitat loss due to the removal of features supporting Boreal Caribou habitat, and/or the indirect habitat loss as a result of sensory disturbances (increased light and noise) and barrier/movement effects. This effect is assessed for a potential change in Boreal Caribou distribution in seasonal ranges used for overwintering, nursery or calving areas.
- **Population effects:** Changes in demography from altered mortality risk, changes in population state (abundance and distribution), and/or altered vital rates (lambda, adult female survival and calf recruitment).
- **Community effects:** Changes in predator-prey dynamics are assessed due to increased mobility and hunting efficiency by predators due to the creation or widening of linear corridors, and/or increases in Moose abundance due to availability of early successional habitats resulting from Project development activities.
- **Range effects:** Altered range condition considering cumulative effects of habitat disturbance at a range scale or the incremental addition of the Project footprint at local scale or altered range connectivity.

Based on these four categories, the objectives of the follow-up monitoring is to determine / confirm:

- Direct and indirect habitat losses associated with site preparation activities during the Construction and Operations Phase in the mine site area, and along the access road and transmission line, including indirect alterations due to edge effects and potential sensory disturbance;
- Indirect habitat losses associated with the mine Operations Phase for the mine site area as well as the mine access road for the indirect alteration due to potential sensory disturbance;
- Whether or not there has been a change in Boreal Caribou population dynamics;
- Whether the change in range scale habitat condition is within EIS prediction; and

Whether or not compensatory measures are performing effectively and the need for adaptive management. In general, methods for measuring effects to Boreal Caribou will mirror those used to collect baseline data, with some adjustments for monitoring locations and frequencies including aerial surveys and satellite telemetry. Habitat restoration trajectories will be measured using vegetation and soil plots as well as satellite imagery. Genetic mark-recapture will also be considered in consultation with MECP and Indigenous partners to further support population monitoring. The proposed monitoring methods are outlined in Section 12.10.2 of the Final EIS/EA.

FMG will work with Environment Committee(s) made up of members of local Indigenous communities. The Environment Committee(s) provides a non-exclusive pathway for continued and constructive, transparent dialogue, interaction and information-sharing between FMG and the leadership and members of local Indigenous communities. The mandate of the Environment Committee(s) is to provide a forum for:

- Timely review and consultation/comment on applicable Project Approvals and environmental monitoring plans;
- Sharing and evaluating environmental information;
- Identifying mitigation measures, if required through adaptive management; and
- Assisting in the development and implementation of environmental monitoring plans.

In addition, community environmental monitors will be invited to participate in data collection, and Indigenous community input will be considered in the development and implementation of environmental monitoring plans.

Adaptive management is a planned and systematic process for continuously improving environmental knowledge over time and adjusting management practices and approaches as needed by learning from the outcomes. Adaptive management provides a structured approach where FMG will implement follow-up monitoring to verify:

- The accuracy of predicted effects,
- The effectiveness of mitigation, restoration, and offsetting measures, and
- Habitat performance (supply and function) in the context of landscape disturbance within the Churchill Range, and in particular with respect to mitigations, restoration activities and offsetting measures at local and landscape scales will be measured and monitored as per Project commitments MECP manages habitat at the range scale for Boreal Caribou. FMG will continue to work closely with MECP to improve and increase the overall amount of Boreal Caribou habitat in the Churchill Range through restoration and offsetting measures.

FMG will apply adaptive management where monitoring identifies the need to improve performance, to guide decision making and allow for flexibility to accommodate new circumstances. FMG will adjust monitoring, implement new mitigation or modify existing mitigation measures during the life span of the Project as needed. If monitoring detects environmental changes that are different from predicted changes, adaptive management would be implemented to determine if and what actions are needed to meet the underlying objectives of minimizing adverse effects and reducing uncertainty. Actions stemming from adaptive management may include more intensive or focused monitoring, specific studies to better understand a particular change in measurement indicators and associated environmental effects, improved or modified Project design, experimental treatments at small scales prior to fullscale implementation, or additional mitigation measures. For example, FMG will analyse predator-prey dynamics and assess the extent to which predators use the linear corridors within the study area. If the monitoring results indicate that predators are using the linear corridors and/or increases in Boreal Caribou mortality rates are associated with the linear corridors, additional mitigation will be determined in consultation with MECP and may include additional installation of vegetation management areas to block sight lines.

5.0 CONSOLIDATED COMMITMENTS

Attachment A, Table A1 provides the comprehensive list of all Boreal Caribou measures and commitments in the Final EIS/EA including specific measures grouped into the following categories:

- Avoidance and project design
- Vegetation clearing and timing windows
- Access and traffic management
- Transmission line vegetation management
- Barrier-reduction and movement considerations
- Wildlife site-wide practices
- Dust, noise, and lighting controls
- Onsite Restoration
- Offsite Restoration, compensatory actions and offsetting measures
- Monitoring and adaptive management

The mitigation measures presented in this memorandum incorporate the outcomes of multiple engagement cycles with MECP's SARB. Their input, provided across several rounds of technical comments and meetings, has already been integrated into the Final EIS/EA and Project to ensure alignment with provincial policy direction, Boreal Caribou habitat management requirements and project mitigation best practices commitments described in sections 6.3.4 and 6.13.1.1 of the Final EIS/EA.

6.0 CLOSING

This memorandum provides government with a clear, consolidated summary of all Boreal Caribou-specific mitigation, monitoring, restoration, and offsetting commitments associated with the Springpole Gold Project. It is intended to support the preparation of MECP and IAAC reports.

WSP Canada Inc.

Al Arsenault
Principal Wildlife Biologist

Megan Hazell
Principal Wildlife Biologist

Original signed

Distribution: Steve Lines (Steve@firstmininggold.com), Meghan Bertenshaw (Meghan@firstmininggold.com), Shane (Shane@firstmininggold.com), Al Arsenault (al.arsenault@wsp.com), Derrick Moggy (derrick.moggy@wsp.com)

Attachments Table A1: Consolidated Boreal Caribou Commitments

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Table A1: Consolidated Boreal Caribou Commitments

Category	Commitment	Phase	Location / Applicability	Source	Federal Mitigation Hierarchy	MECP BMP (2020) Alignment
Avoidance and project design	Development of a compact mine site to limit the area extent of disturbance.	Con / Op / Cl	Mine site (general)	EIS/EA: Section 6.13.4; Table 6.13-17	Avoiding and Minimizing	Consistent with BMP Principles
	During construction, co-locate the transmission line, airstrip and mine access road within a shared infrastructure corridor, where feasible.	Con / Op / Cl	Linear corridors	EIS/EA: Section 6.13.4; Table 6.13-17	Avoiding and Minimizing	Consistent with BMP Principles
	Align the new transmission line route adjacent to the existing E1C transmission line corridor, to the extent possible, to reduce the creation of new linear corridors.	Con / Op / Cl	Transmission line	EIS/EA: Section 6.13.4; Table 6.13-17	Avoiding and Minimizing	Consistent with BMP Principles
Avoidance and Project Design	Ensure adequate water movement where an all-weather road crosses wetland complexes by using appropriate crossings, half-culverts on pilings, or other drainage techniques. Apply construction methods that reduce soil and peat compaction.	Con	Mine access road	MECP (2020) Best Management Practices (BMPs)	Avoiding and Minimizing	Consistent with BMP Principles
Vegetation clearing and timing windows	During construction of the Project, minimize the disturbance in Category 1 and 2 Boreal Caribou habitats by using existing trails and roads for travel.	Con / Op / Cl	Access/Construction travel	EIS/EA: Section 6.13.4; Table 6.13-17	Avoiding and minimizing	Consistent with BMP Principles
	Avoid clearing and construction activities in Category 1 Boreal Caribou nursery habitat during the calving and nursery period (May 1 to September 15).	Con	Category 1 nursery habitat	EIS/EA: Section 6.13.4; Table 6.13-17	Avoiding and minimizing	Consistent with BMP Principles
	During construction and operation of the airstrip, avoid construction and overflights of Category 1 nursery habitats during the nursery period (May 1 to September 15).	Con / Op	Category 1 nursery habitat	EIS/EA: Section 6.13.4; Table 6.13-17	Avoiding and minimizing	Consistent with BMP Principles
	Minimize the area cleared with heavy machinery in Category 1 Boreal Caribou habitat recognizing the need for clear sightlines for safety along the mine access road.	Con	Mine site/ Mine access road and transmission line	EIS/EA: Section 6.13.4; Table 6.13-17	Avoiding and minimizing	Consistent with BMP Principles
Access and traffic management	Reduce Project-related traffic speed to 30 km/hr along the mine access road in sections traversing Category 1 habitat.	Op	Mine access road	EIS/EA: Section 6.13.4; Table 6.13-17	Minimizing	Consistent with BMP Principles
	Project-related vehicles travelling on the mine access road must come to a stop if Boreal Caribou are encountered and provide them with the	Op	Mine access road	EIS/EA: Section 6.13.4; Table 6.13-17	Minimizing	Consistent with BMP Principles

Category	Commitment	Phase	Location / Applicability	Source	Federal Mitigation Hierarchy	MECP BMP (2020) Alignment
	right-of-way and time to safely cross the roadway and into native cover without undue sensory disturbance.					
	A controlled access gatehouse/checkpoint and signage are proposed to control unauthorized use of the 18-km mine access road leading to the mine site. An access management strategy will be developed with local Indigenous communities and Ministry of Natural Resources (MNR) to provide access for traditional land and resource use activity along this newly accessible area.	Op	Mine access road	EIS/EA: Section 6.13.4; Table 6.13-17	Minimizing	Consistent with BMP Principles
	Efforts will be made to re-supply the mine with bulk of deliveries outside the nursery period from May 1 to September 15th Traffic and delivery rates will be monitored monthly and included in the annual monitoring report.	Con / Op	Logistics (site-wide)	EIS/EA: Section 6.13.4; Table 6.13-17	Minimizing	Consistent with BMP Principles
	Limit snow plowing of access and maintenance roads to those necessary for current operations, maintenance, and emergency access only. Wing snowbanks to reduce height and minimize predator travel corridors.	Con / Op	Mine access road	MECP (2020) BMPs	Minimizing	Consistent with BMP Principles
Transmission line habitat management and movement barrier reduction	Reduce predator sight lines by minimizing the removal of woody vegetation along the transmission line in areas known to be used by Boreal Caribou for crossing the existing transmission line as well as adjacent to Category 1 habitat (overwintering and nursery areas) by limiting removal to hazard trees and only clearing for safe access and infrastructure needs.	Con / Op / Cl	Transmission line	EIS/EA: Section 6.13.4; Table 6.13-17	Minimizing	Consistent with BMP Principles
	Create vegetation management areas, where vegetation is left along the transmission line corridor to facilitate safe Boreal Caribou crossing of the linear feature and prevent predator lines of sight. These vegetation management crossing areas will be installed every 500 m to 1 km along the transmission line.	Op	Transmission line	EIS/EA: Section 6.13.4; Table 6.13-17	Minimizing	Consistent with BMP Principles
	Use appropriate vegetation control measures to prevent the growth of deciduous shrubs and trees within the right-of-way, reducing browse availability for moose/deer and subsequently lowering predator attraction.	Con / Op / Cl	Rights-of-Way	MECP (2020) BMPs	Minimizing	Consistent with BMP Principles
	In areas where Boreal Caribou have been recorded crossing the existing transmission line, retain vegetation and undertake strategic vegetation treatments to reduce the potential for barriers to movement.	Op	Transmission line (crossings)	EIS/EA: Section 6.13.4; Table 6.13-17	Minimizing	Consistent with BMP Principles

Category	Commitment	Phase	Location / Applicability	Source	Federal Mitigation Hierarchy	MECP BMP (2020) Alignment
	If Boreal Caribou are found to be crossing linear features created by the Project in new areas (outside of the currently identified cluster of movement locations), implement vegetation treatments to mitigate potential barrier effects in these new locations.	Op	Any new crossing locations	EIS/EA: Section 6.13.4; Table 6.13-17	Minimizing	Consistent with BMP Principles
	First Mining Gold (FMG) will design linear features to maintain connectivity across the Project footprint by incorporating breaks in long windrows (e.g., slash, rock, or snow berms) and ensuring unobstructed access routes across rights-of-way. These measures reduce potential barrier effects and support Boreal Caribou movement.	Con / Op	Project Development Area (PDA)	MECP (2020) BMPs	Minimizing	Consistent with BMP Principles
Onsite	During all phases, prohibit hunting and trapping by employees and contractors within the PDA and while working on site.	Con / Op / Cl	PDA & while on duty	EIS/EA: Section 6.13.4; Table 6.13-17	Avoiding	Consistent with BMP Principles
	Properly secure, store, and dispose of all domestic solid waste products and similar materials at an offsite licensed facility, particularly anything that is an attractant for scavenging wildlife. All domestic solid waste products will be transported to a landfill off-site and therefore mitigating the habitat sink effect of increased predator densities that can be created due to access to landfill sites.	Con / Op / Cl	Site-wide	EIS/EA: Section 6.13.4; Table 6.13-17	Avoiding and minimizing	Consistent with BMP Principles
	To prevent accidental wildlife entry and reduce the risk of injury or mortality to Boreal Caribou, install fencing of an appropriate height around specific high-risk features such as open pits, mine shafts, tailings ponds, settling ponds, and other deep or unstable excavations. Fencing will be applied where the physical characteristics of the feature create a clear hazard, and only during the periods when the hazard is present (e.g., active construction, active operation, or until closure stabilization). This targeted approach ensures fencing is used strictly as a safety measure rather than broadly across the site.	Con / Op / Cl	PDA	MECP (2020) BMPs	Avoiding and minimizing	Consistent with BMP Principles
Dust, noise and lighting controls	During construction, operation and closure phases of the Project, implement relevant mitigation measures for dust from EIS/EA Section 6.2, including: During operation, the process plant emission sources will be enclosed where possible and be designed to allow good atmospheric dispersion. To reduce emissions, dust control equipment and best practices will be used, where necessary, as described below:	Con / Op / Cl	Site-wide (plant, roads, stockpiles)	EIS/EA: Section 6.13.4; Table 6.13-17	Minimizing	Consistent with BMP Principles

Category	Commitment	Phase	Location / Applicability	Source	Federal Mitigation Hierarchy	MECP BMP (2020) Alignment
	▪ Conveyor transfer (drop) points will be controlled via enclosure or water spray; ▪ Crushed ore stockpile susceptible to dust generation will be enclosed, and emissions controlled by a baghouse; ▪ A wet scrubber or equivalent will be used to control emissions in grinding (baghouse controlled); ▪ Truck unloading at the primary crusher will be enclosed and emissions controlled by a baghouse; ▪ Drill rigs will be equipped with a dust shroud on the drill and a wet suppression (spray) system will be used; ▪ Truck placement of mine rock onto the Co-Disposal Facility (CDF) will be controlled using water sprays and surface wetting as needed; ▪ Travel surfaces will be maintained to minimize silt (fine material); ▪ Crushing of ore materials and reclaim at stockpiles will be controlled by baghouses; ▪ The vents from the lime silo will be controlled by a dust collector; ▪ Areas for ore mixing and handling will be controlled by dust collectors; and ▪ A regular maintenance schedule will be followed to ensure baghouses and dust collectors are functioning properly.					
	▪ During construction, operations and active closure, a dust management plan will be implemented to identify potential sources of fugitive dusts, outline mitigation measures that will be employed to control dust generation and detail the inspection and record keeping required to demonstrate that fugitive dusts are being effectively managed; ▪ Dust emissions from roads and mineral stockpiles will be controlled through the application of water spray and supplemented by dust suppressants, if required;	Con / Op / Cl	Site-wide	EIS/EA: Section 6.13.4; Table 6.13-17	Minimizing	Consistent with BMP Principles

Category	Commitment	Phase	Location / Applicability	Source	Federal Mitigation Hierarchy	MECP BMP (2020) Alignment
	▪ Site roads will be maintained in good condition, with regular inspections and timely maintenance completed to minimize the silt loading on the roads; and, ▪ Vehicle speeds will be limited.					
	During construction, operation and closure phases, implement relevant mitigation measures for noise from Final EIS/EA Section 6.3, including: ▪ Motorized equipment will be selected or designed with mufflers/silencers to limit noise emissions; ▪ Reversing alarms should be dimmable with white noise and/or strobe light but in accordance with the applicable health and safety regulations; ▪ Check that equipment and machinery used on site is maintained in good working conditions through regular maintenance and inspection; ▪ Prohibit the use of engine brakes and require the engines to be stopped for vehicles on standby, depending on seasons and weather; ▪ Operate vehicles and equipment such that impulsive noise is minimized, where possible; and, ▪ For helicopter use during transmission line construction, maintain minimum flight altitudes unless engaged in construction tasks, landing or departure.	Con / Op / Cl	Site-wide / Helicopter ops	EIS/EA: Section 6.13.4; Table 6.13-17	Minimizing	Consistent with BMP Principles
	During construction, operation and closure phases of the Project, implement mitigation for lighting to minimize sensory disturbance, including: ▪ To prevent a direct line-of-sight from light, maintain light sources below natural barriers such as tree lines or artificial barriers such as berms; and, ▪ Minimize light spill and glare using shielding on stationary light sources and direct lighting downwards unless needed for safety.	Con / Op / Cl	Site-wide lighting	EIS/EA: Section 6.13.4; Table 6.13-17	Minimizing	Consistent with BMP Principles

Category	Commitment	Phase	Location / Applicability	Source	Federal Mitigation Hierarchy	MECP BMP (2020) Alignment
On-Site Restoration	In collaboration with Indigenous communities and MECP, FMG will design and implement a habitat restoration program for Boreal Caribou. FMG will have a Qualified Professional prepare a Caribou Habitat Restoration Plan ("the Onsite Restoration Plan") and submit this plan to MECP, within 2 years of the initiation of construction. This timeline allows for consultation and input from Indigenous partners to determine the appropriate end land use concept and targets to re-establish pre-mine ecosites to the extent possible given that the post-closure landscape will include permanent topographical alterations and ecotypes that are not currently present in the local area. The development of mature coniferous and refuge forest types preferred by Boreal Caribou will be the target restoration goal. The plan will also focus on avoiding the creation of vegetation types such as mixed or deciduous forest ecosystems that could attract Moose thereby potentially increasing a predation risk for Boreal Caribou. The Onsite Restoration Plan may include: ▪ Targeted objectives to achieve a contiguous landscape of dense mature coniferous forest and refuge habitat for Boreal Caribou on the mine footprint, mine access road and along the transmission line. ▪ The progressive restoration of the PDA footprint with areas suitable for enhanced Boreal Caribou habitat restoration. ▪ Stockpiles shall be processed and removed before final closure of the Mine and the remaining footprint of these areas will be fully covered and revegetated to ensure the restoration of mature coniferous habitat for Boreal Caribou. ▪ Any plateaus or ramps in the Mine footprint shall receive a full re-vegetation treatment focused on ensuring restoration of mature coniferous and refuge functions for Boreal Caribou. ▪ The shorelines of any created waterbodies that are more than 1 metre in depth with a shoreline that is more than 1 metre in height shall be re-sloped to a grade of 4:1 at 200 metre intervals, to allow for egress of Boreal Caribou entering or leaving the water. ▪ Stocking densities at minimum will be planting of Jack Pine or Black Spruce at a minimum density of 1000 stems per hectare and/or	Con / Op / Cl	PDA	EIS/EA: Section 6.13.4; Table 6.13-17 MECP (2020) BMPs, MECP-SARB request for more detail to support approvals in review of Final EA/EIS.	Restoring	Consistent with BMP Principles

Category	Commitment	Phase	Location / Applicability	Source	Federal Mitigation Hierarchy	MECP BMP (2020) Alignment
	aerial seeding of Jack Pine and Black Spruce at 20,000 viable seeds per hectare. Lichen restoration or enhancement treatments will be undertaken in areas that will not support growth of Jack Pine or Black Spruce trees. ▪ Progressive and enhanced onsite restoration of its Project footprint will be undertaken on a minimum of 10 ha/year throughout the life of the Mine so that Boreal Caribou habitat restoration is effectively accelerated at closure. ▪ Remove infrastructure and other assets that are no longer required for development, operations, or maintenance to reduce long-term disturbance, prevent the establishment of deciduous browse species, and avoid creating additional predator travel corridors. Demolish and remove buildings and associated structures and dispose of demolition materials at approved facilities. ▪ Restrict vehicular access on roads and trails that are no longer required for development, operations, or maintenance (e.g., using berms or removal of water crossings). Scarify the road or trail surface to alleviate soil or gravel compaction and support natural vegetative regeneration, reducing long-term habitat disturbance, fragmentation, and predator travel efficiency. ▪ The creation of suitable Boreal Caribou calving habitat through the establishment of a small island in the open pit basin of Springpole Lake and revegetate the island with mature coniferous forest. Including preliminary design of this created habitat feature. **Deliverable**: Onsite Boreal Caribou Habitat Restoration Plan (integrated with the Closure Plan), draft for review to be submitted to MECP within 2 years of the initiation of construction.					
OFF-SITE RESTORATION AND HABITAT OFFSETTING	Offsite habitat offsetting is the intentional creation of measurable benefits to compensate for biological losses (i.e., habitat destruction, habitat damage, population loss) from the residual effects of human development that remain after all reasonable steps have been taken to avoid or minimize losses. Measures to offset must be specifically intended to deliver gains beyond those that would otherwise be achieved by planned or ongoing activities required for the implementation of the work, undertaking or activity, including post-Project remediation or rehabilitation. Offset measures may include	Program (post-mitigation)	Off-site	EIS/EA: Section 6.13.4; Table 6.13-17 MECP (2020) BMPs MECP-SARB request for more detail to support approvals in review of Final EA/EIS.	Restoration and Offsetting	Not addressed in BMP's

Category	Commitment	Phase	Location / Applicability	Source	Federal Mitigation Hierarchy	MECP BMP (2020) Alignment
	positive management actions to improve ecological conditions (such as ecosite restoration via enhanced silviculture, stand treatment, stand improvement, natural seed supplementation, or other measures) or measures to avert losses by preserving existing ecological conditions (such as development deferrals or creation of protected areas). Offset measures include: ▪ Positive management actions (physical interventions) to improve ecological conditions (e.g. ecosite restoration via enhanced silviculture, stand treatment, stand improvement, natural seed supplementation, or other measures). ▪ Averted losses (legal or other measures) to preserve existing ecological conditions (e.g. development deferrals or creation of protected areas). ▪ To meet regulatory requirements, FMG is advancing various potential offsetting opportunities including: ▪ Opportunities to undertake enhanced restoration of lands subject to recent forest fires. ▪ Opportunities to undertake enhanced restoration on lands subject to forestry activities through partnership with the forestry industry. ▪ Opportunities identified by Ontario pursuant to the provincial Woodland Caribou Recovery Strategy. For example, potential habitat restoration in the vicinity of the abandoned South Bay mine. ▪ Partnership deferrals in other parts of the Churchill Range (deferral of forestry and mineral exploration lands) FMG will coordinate with Forest Resource Licence Holders and MNR during the forest management planning process to ensure the Springpole Project is reflected in future forest harvest allocations. The Trout Forest Management Plan begins renewal in 2028, which aligns with the Project schedule and will allow the Springpole footprint to be incorporated into the next Forest Management Plan (FMP) allocation cycle. FMG will also participate in Annual Work Schedule reviews to confirm that forestry activities in the Trout Forest align with the 2031–2041 Forest Management Plan and account for the Springpole Project.					

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	Within 2 years of the initiation of construction, FMG will prepare and implement an Offsite Restoration Plan. FMG will submit this plan to MECP prior to commencing implementation of the Offsite Restoration Plan, and update the plan where needed under consultation with Indigenous partners and MECP. All Restoration actions in the Offsite Restoration Plan shall be completed within five (5) years of the Offsite Restoration Plan being approved by MECP. The Offsite Restoration and Compensation Plan will be prepared by a Qualified Professional and include details related to the restoration of disturbed habitat and/or forestry or mining deferrals to regulatory requirements. Offsite restoration activities will include limiting access to newly restored or deferred sites by: ▪ Limiting vehicular traffic to the extent possible using physical access controls at linear disturbance access points and along portions of the linear disturbance to prevent or impede access by ATV/UTV, snowmobile, or other vehicles. Installation of signage and gates, for the purpose of eliminating sensory disturbance from human access and accelerating vegetation growth. ▪ Implementing measures to reduce predator efficiency and access, such as ditches, berms, slash piles, or other actions that are likely to impede predator use and line of sight on roads. Installation of one or more trench barricades and rip-plow scarification where necessary to prevent or impede human and predator access, create microclimates that encourage diverse vegetation and promote growth with structural complexity equivalent to or greater than adjacent cover, and reduce soil compaction to accelerate vegetation growth. ▪ Strategic planting of conifer seedlings at locations that will eventually reduce predator line-of-sight to less than 100 m. Restoration of habitat in 200-300 m segments to optimize local site conditions to ensure success. Mounding and planting at strategic locations for the purpose of creating microsites of seed and seedling habitat, impairing predator and human movement efficiency, and accelerating the re-establishment of natural					

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	vegetation. Stem bending and tree falling to impede predator and human travel efficiency and reduce lines of sight. Slash rollback and coarse woody debris to impede wolf travel efficiency, ▪ Discourage public access, create microclimates to increase vegetation diversity and accelerate vegetation growth; conifer planting, using Boreal Caribou preferred native species suited to local ecosites to reduce predator line-of-sight, discourage browsing and mast production by overtopping deciduous species; cause soil acidification to discourage deciduous species; and establish conifer dominant upland communities of desired species composition; deciduous shrub and mast management to discourage preferential browsing by alternative prey (e.g., Moose, Beaver) and reduce predator occurrence (i.e., Black Bears foraging for mast; Wolf predation risk relative to prey abundance); seedling stocking at a density of at least 1,000 stems/ha or site preparation and aerial seeding of jack pine at 20,000 viable seeds per hectare; removal of culverts, bridges and roadbed segments. **Deliverable**: Offsite Boreal Caribou Habitat Restoration and Compensation Plan (draft for review) to be submitted to MECP within 2 years of the initiation of construction.					
Monitoring and Adaptive Management	In collaboration with Indigenous communities and MECP, FMG will have a Qualified Professional prepare a Boreal Caribou Monitoring Plan and submit this plan to MECP within 12 months of the initiation of construction. The Monitoring Plan will determine / confirm: ▪ Direct and indirect habitat losses associated with site preparation activities during the Construction Phase in the mine site area, and along the access road and transmission line, including indirect alterations due to edge effects and sensory disturbance from noise, light and dust; ▪ Indirect habitat losses associated with the mine Operations Phase for the mine site area as well as the mine access road for the indirect alteration due to sensory disturbance from noise, light and dust;	Con / Op / Cl	On-site & off-site	EIS/EA: Section 6.13.4	Monitoring	Consistent with BMP Principles

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	▪ Whether or not there has been a change in Boreal Caribou population dynamics; ▪ Whether the change in range scale habitat condition is within EIS prediction; and ▪ Whether or not offsite habitat restoration and/or compensatory measures), are performing effectively. In general, methods for measuring effects to Boreal Caribou will mirror those used to collect baseline data, with some adjustments for monitoring locations and frequencies including aerial surveys and satellite telemetry, vegetation and soil plots as well as satellite imagery to measure habitat restoration trajectories. Genetic mark-recapture will also be considered in consultation with MECP and Indigenous partners to further support population monitoring for Boreal Caribou. This Monitoring Plan will be updated within 12 months of the following habitat restoration plans approvals: ▪ Onsite Boreal Caribou Habitat Restoration Plan; ▪ Offsite Boreal Caribou Habitat Restoration and Compensation Plan. The Monitoring Plan will include measure the success of onsite and offsite habitat restoration and compensatory actions including the following: ▪ An outline of the frequency and duration of monitoring required to determine the effectiveness of habitat restoration and/or compensatory criteria for the selection of treatment and reference sites, as determined to be appropriate by the Qualified Professional. ▪ Direct comparisons of selected parameters of the biota and abiotic environment of the treatment sites to the reference sites. ▪ Assessment of ongoing habitat suitability for Boreal Caribou using measures derived from field-based vegetation metrics such as canopy species composition, tree height, forest age, lichen cover or abundance, and shrub or understory cover, to define and demonstrate establishment of a restoration trajectory in the reference sites. This will include a trajectory analysis of trends from					

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	collected data to monitor progress towards the desired or target objectives for restoration or habitat deferrals as well as the assessment of the use of these areas by Boreal Caribou over time. ▪ Monitoring will also measure Boreal Caribou responses to mine activities. Range wide aerial surveys of Churchill, Berens and Kinloch ranges will be undertaken every 3 years between February 1 to March 15th through construction and operations and 10 years following active mine closure. Each range survey shall include sufficient transects flown at a 3 km spacing covering range boundaries. Winter aerial surveys shall be directed at determining and documenting the presence of Boreal Caribou, alternate prey (i.e., Moose), and predators (i.e., Wolves and Wolverine) within the range(s). Where Boreal Caribou are observed, group structure including age and sex of each Boreal Caribou will be measured enabling multi-year calf recruitment information. Sight ability correction factor enabling estimates of population size as well as identification and delineation of winter activity areas consisting of heavy tracks, slushing and/or cratering will also be recorded. FMG will analyse predator-prey dynamics and assess the extent to which predators use the linear corridors within the study area. If the monitoring and research results indicate that predators are using the linear corridors and/or increases in Boreal Caribou mortality rates are associated with the linear corridors, additional mitigation will be determined in consultation with MECP. Beginning in the first winter following the initiation of full construction, FMG will implement a telemetry program, collaring a minimum of 50 Boreal Caribou. every 6 years, until 10 years following the Active Mine Closure, undertaken by Qualified Professional(s). The telemetry program shall be conducted to evaluate; ▪ Boreal Caribou responses to mine activities, ▪ Levels of site fidelity of confirmed seasonal ranges such as calving and over wintering areas that may be affected by mining activities as well as determining the level of spatial and temporal variation in the use of calving and over wintering areas, and whether there is					

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	evidence of strong site fidelity to these annual and seasonal home ranges from year to year. ▪ Collar mortality signal investigations to determine the source, season and location of any mortality events experienced by collared animals. Seasonal and spatial patterns in mortality rates relative to predator activity will also be quantified to determine whether mine activities have resulted in increased mortality rates. ▪ Changes in calf recruitment and group structure in the study area over time will also be quantified. **Deliverable**: Boreal Caribou Monitoring Plan to be submitted to MECP within 2 years of the initiation of construction.					

Notes: Con = construction; Op = operation; Cl = closure