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**From:** [Georgi Doundarov](#)

**Sent:** November 8, 2019 10:52:06 AM

**To:** Du, Sherry (IAAC/AEIC)

**Cc:** Jagdish Parekh

**Subject:** Ambershaw Metallics Inc. Final Response to IAAC

**Sensitivity:** Normal

**Attachments:**

[2019-10-21 ATTACHMENT 1 - IAAC to AMI - Summary Table of PP2 Comments - FINAL.docx](#) ;

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Dear Sherry,

Please find attached Abershaw's final response to the Letter from IAAC with a deadline November 8, 2019.

Thanks a lot and thanks for guiding us during the process answering those questions.

Georgi

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**ATTACHMENT 2:****Summary Table of Comments from Comment Period on the draft Environmental Impact Statement (EIS) Guidelines (August 21 – September 20, 2019)**Bending Lake Iron Project: Federal Assessment under the *Canadian Environmental Assessment Act, 2012*

<b>Group</b>	<b>Theme</b>	<b>Summary of Comment(s) and Agency Responses where applicable<sup>1</sup></b>	<b>Proponent Response</b>
Environment and Climate Change Canada	Atmospheric Emissions	Requested that the EIS Guidelines include additional details about atmospheric emissions during all phases of the Project.  <i>The Agency incorporated the recommended details in Part 2, section 7.2.1.</i>	Acknowledged and AMI will comply.
Nigigoonsiminikaaning First Nation	Health and Socio-Economic Conditions	Commented about impacts to air quality resulting from smoke stacks.	AMI will consider human health in a risk assessment associated with air emissions modeling. AMI will complete a study for air and noise emissions for life of mine as part of the EIS.
Naotkamegwanning First Nation	Fish and Fish Habitat	Commented that the proposed waste rock storage area would lie over several existing lakes, and asked what the proponent plans to do with those lakes.	Once the tailings alternatives assessment has been completed AMI can complete the boundaries for the waste rock storage assessment and it will then be possible to determine how many waterbodies may be affected and what can be done to mitigate the impacts to the waterbodies. There will likely be a Fisheries Act authorization or MDMER Schedule 2 amendment required, which will require an approved plan to offset loss of fish habitat. Indigenous peoples as well as the relevant government agencies will be consulted in making this determination. Baseline environmental, Traditional Knowledge and Land Use studies will be

<sup>1</sup>Agency responses have been included where comments led to changes in the Environmental Impact Statement (EIS) Guidelines. Editorial comments and factual errors have been addressed in the EIS Guidelines and are not included in the table.

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			utilized to determine waste rock placement strategies which minimize negative impacts on the environment and socio-economic values.
Fisheries and Oceans Canada	Fish and Fish Habitat	<p>Clarified information that is required for the assessment of effects on fish and fish habitat resulting from the Project, including changes to fish habitat and effects from the offsetting plan, and provided wording from the new <i>Fisheries Act</i>.</p> <p><i>The Agency incorporated the recommended changes in Part 2, section 7.3.1.</i></p>	Acknowledged and AMI will comply.
Ontario Ministry of Natural Resources and Forestry	Fish and Fish Habitat	<p>Requested that project components and activities listed in the EIS Guidelines (Part 2, sections 3.1 and 3.2) include river diversions and channelization.</p> <p><i>The Agency included the recommended additions as part of the proponent's alternatives assessment in Part 2, section 2.2, and as part of the description of project activities during construction in Part 2, section 3.2.1.</i></p>	Acknowledged and AMI will comply.
Ontario Ministry of Environment, Conservation and Parks	Water Quality	<p>Advised that the proponent should assess impacts on water quality for each phase of the Project, including impacts on Turtle River White Otter Provincial Park and impacts on Turtle River downstream of the mine site.</p> <p>Commented that the proponent's analysis of potential impacts of Turtle River White Otter Lake Provincial Park must occur at a scale that is meaningful and acknowledges the interconnectedness of systems across the regulated boundary.</p>	Acknowledged and AMI will comply.

Group	Theme	Summary of Comment(s) and Agency Responses where applicable <sup>1</sup>	Proponent Response
		<p><i>The Agency notes that the proponent would be required to assess effects to water quality during all phases of the Project.</i></p>	
Natural Resources Canada	Water Quality	<p>Recommended that the EIS Guidelines require additional information on groundwater and surface water, including pit water quality and the final hydrological regime established in the Bending Lake watershed during the abandonment phase (i.e. post-closure period).</p> <p><i>The Agency incorporated the recommended additions in Part 2, sections 7.1.5 and 7.2.2.</i></p>	Acknowledged and AMI will comply.
Environment and Climate Change Canada	Water Quality/Quantity	<p>Advised that the project activities listed in the EIS Guidelines (Part 2, section 3.2) should include more information on water management and hazardous materials, including:</p> <ul style="list-style-type: none"> <li>• water withdrawal points</li> <li>• effluent management and treatment during the construction phase</li> <li>• management of water on the project site during the decommissioning or abandonment phases, and</li> <li>• storage, handling, transportation and management of hazardous materials, fuels, residues or wastes (other than mine waste) during all phases of the Project.</li> </ul> <p><i>The Agency incorporated the recommended additions in Part 2, section 3.2.</i></p>	Acknowledged and AMI will comply.

Group	Theme	Summary of Comment(s) and Agency Responses where applicable <sup>1</sup>	Proponent Response
Environment and Climate Change Canada; Natural Resources Canada	Water Quality/Quantity	<p>Advised that modelling should inform the characterization of groundwater flow in the project area and the predicted changes in water quality resulting from the Project.</p> <p><i>The Agency included these details in Part 2, sections 7.1.5 and 7.2.2.</i></p>	Acknowledged and AMI will comply.
Mitaanjigamiing First Nation; Wabigoon Lake Ojibway Nation	Water Quality/Health Conditions	<p>Inquired about the depth of the groundwater table at the project site, potential impacts on groundwater arising from the Project, including impacts to drinking water sources and natural hot springs, and the proponent's plans to mitigate impacts.</p> <p><i>The Agency notes that the proponent would be required to determine baseline information on and impacts to groundwater, including potable water sources, in Part 2, sections 7.1.5 and 7.2.2.</i></p>	Acknowledged and AMI will comply.

Group	Theme	Summary of Comment(s) and Agency Responses where applicable <sup>1</sup>	Proponent Response
Environment and Climate Change Canada; Ontario Ministry of Natural Resources and Forestry	Riparian, wetland, and terrestrial environments	<p>Environment and Climate Change Canada advised that species composition of plant and animal communities that rely on wetlands for part of their life cycle or on a seasonal or opportunistic basis should be assessed. Also advised that wetlands with higher potential to be impacted (e.g., those that are closer to the project area) may require additional information to assess the baseline status and predicted environmental effects.</p> <p>Ontario Ministry of Natural Resources and Forestry advised that impacted wetlands should be evaluated for significance using the Ontario Wetland Evaluation System – Northern Manual by a qualified wetland evaluator.</p> <p><i>The Agency incorporated the recommended details in Part 2, section 7.1.4.</i></p>	Acknowledged. AMI will use this information to help define the required baseline studies.
Ontario Ministry of Natural Resources and Forestry	Riparian, wetland, and terrestrial environments	<p>Recommended that wildlife mortality resulting from the construction of infrastructure corridors and increased traffic on existing corridors should be assessed, with a particular focus on ungulates.</p> <p><i>The Agency included a requirement to assess mortality of species in Part 2, section 7.1.4.</i></p>	Acknowledged and AMI will collect and assess this information.
Ontario Ministry of Natural Resources and Forestry	Riparian, wetland, and terrestrial environments	<p>Requested that the EIS Guidelines include natural heritage features and provincially significant values.</p> <p><i>The Agency included the requirement to assess natural heritage sites in Part 1, section 1.3. The Agency is of the view</i></p>	Acknowledged and AMI will comply. AMI will also fund Traditional Ecological Knowledge and Traditional Land Use studies with potentially impacted Aboriginal communities.

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		<i>that provincially significant values, such as provincial parks and wetlands, would be assessed where they would contribute to effects on valued components as part of the federal assessment.</i>	
Ontario Ministry of Natural Resources and Forestry	Riparian, wetland, and terrestrial environments	<p>Requested the EIS Guidelines include mitigation measures for species besides those listed under the <i>Species at Risk Act</i>.</p> <p><i>The Agency notes that the proponent would need to develop mitigation measures to reduce project effects on species listed under the Species at Risk Act, those designated by COSEWIC and those harvested by Indigenous groups in Part 2, section 7.4.</i></p>	Acknowledged and AMI will include the requested mitigation measures. AMI will look to the related operational guidelines to inform or guide management plans for AMI patent lands and will manage the patent land forests in a manner which is consistent with the Wabigoon Sustainable Forest License.
Nigigoonsiminikaaning First Nation; Environment and Climate Change Canada	Effects of the Environment on the Project	<p>Commented that it is important for the proponent to investigate the effects of climate change on project components, including the waste rock storage area and tailings management area.</p> <p>Environment and Climate Change Canada advised that climate change may limit the effectiveness of project mitigation measures.</p> <p><i>The Agency included additional requirements related to climate change in Part 2, section 7.6.2.</i></p>	Acknowledged and AMI will comply.
Wabigoon Lake Ojibway Nation; Nigigoonsiminikaaning First Nation	Cumulative Effects	Commented on the potential for cumulative effects in the area given the possibility of a nuclear waste disposal facility near Ignace, Ontario, and the legacy of the Steep Rock mine near Atikokan, Ontario.	AMI will conduct a cumulative effects assessment as part of the EIS. AMI will design, build, operate and close out operations in a manner which reflects industry standard best practices. AMI proposes and is committed to delivering this project in a manner which provides significant net overall benefit to the region

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			and area residents in a manner which protects the natural environment.
Métis Nation of Ontario	Cumulative Effects	<p>Requested that the EIS Guidelines, including the cumulative effects assessment, should include changes to Métis-specific valued components and that the spatial and temporal boundaries of the cumulative effects assessment be established in consultation with Indigenous groups.</p> <p><i>The Agency incorporated the recommended change in Part 2, section 7.6.3, requiring the proponent establish the spatial and temporal boundaries for cumulative effects assessment in consultation with Indigenous groups. The Agency also notes that the proponent will be expected to engage with potentially impacted Indigenous groups, including the Métis Nation of Ontario, in the development of the EIS (Part 1, section 4.2.2), which includes identifying valued components of importance to Indigenous groups.</i></p>	AMI remains committed to advance engagement and consultation with Indigenous groups and all other interested groups to inform project design, construction, operation, closure and post closure.
Métis Nation of Ontario; Wabigoon Lake Ojibway Nation; Environment and Climate Change Canada	Alternative means of carrying out the Project	<p>Stressed the importance of the assessment of alternative means of carrying out the Project. Indicated that the alternative means analysis should include alternative methods of extracting ore (i.e. open pit versus underground), alternative methods of ore beneficiation and processing methods/technologies, and alternative methods of transporting ore, intermediate, and final product.</p> <p><i>The Agency incorporated the recommended changes in Part 2, section 2.2.</i></p>	Acknowledged and AMI will incorporate an alternative methods analysis into the EIS.



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Health Canada	Health and Socio-Economic Conditions	<p>Recommended that the EIS Guidelines require the proponent to consider polycyclic aromatic hydrocarbons when assessing the effects of diesel particulate matter on human health.</p> <p><i>The Agency included the recommended addition in Part 2, sections 7.1.1 and 7.2.1.</i></p>	PAHs will be considered in the air quality assessment. AMI will utilize and assess the collective information gathered via Air and Noise Emissions study testing to inform project design, construction, operation and close out in a manner which best satisfies the concerns of all comments received as part of the EIS consultation process.
Health Canada	Health and Socio-Economic Conditions	<p>Advised that data collection for the baseline survey of ambient air quality should occur at the project site, since reference sites (e.g. in Thunder Bay) may not be representative of baseline conditions in the project area due to different characteristics (e.g. development, topography, wind patterns).</p> <p><i>The Agency incorporated this recommendation in Part 2, section 7.1.1.</i></p>	Acknowledged. AMI will establish a weather station to collect data related to air quality at the site.
Health Canada	Health and Socio-Economic Conditions	<p>Recommended that the EIS Guidelines require the proponent to provide a description of mitigation or adaptive management measures that could be implemented should a monitoring program indicate that concentrations of contaminants of potential concern approach or exceed a defined set of trigger values.</p> <p><i>The Agency included the recommended addition in Part 2, section 9.2.</i></p>	Acknowledged and AMI will comply.
Nigigoonsiminikaaning First Nation; Naotkamegwanning First Nation; Seine River First Nation	Health and Socio-Economic Conditions	<p>Commented about water quality degradation, including impacts to human health, due to the possibility of seepage or discharge from project components (tailings storage facility, waste rock storage area, and overburden stockpile).</p>	Acknowledged. These components will be addressed in the EIS.

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		<p><i>The Agency notes that the proponent would be required to assess seepage from project components in Part 2, section 7.2.2, and impacts of water quality on the health of Indigenous peoples in Part 2, section 7.3.4.</i></p>	
Natural Resources Canada		<p>Recommended that the EIS Guidelines require the proponent to characterize the abundance of sulfide, carbonate, and amphibole minerals in the ore, waste rock, tailings, and final pit walls, and to propose measures to mitigate dust and potential respiratory hazards from amphibole minerals, as appropriate.</p> <p><i>The Agency included the recommended additions in Part 2, section 7.1.2.</i></p>	Acknowledged and AMI will comply.
Health Canada	Health and Socio-Economic Conditions	<p>Recommended that the proponent's assessment of effects on air, water, and country food quality include detailed geographic information on permanent, seasonal and temporary residences and any potential drinking water sources in the project area.</p> <p><i>The Agency incorporated requirements for the proponent to determine effects at key receptor points and priority areas in Part 2, section 7.1.1, and to provide a map of these areas in Part 2, section 7.3.4.</i></p>	This information will be part of the data collection program associated with the EIS.
Nigigoonsiminikaaning First Nation; Couchiching First Nation	Health and Socio-Economic Conditions	Commented that the groups engage in guiding and forestry operations in the project area which have socio-economic benefits.	Crown lands adjacent to AMI's private lands will be documented and analyzed in the EIS. AMI's patent lands are currently not available for access, travel or use by any persons without advance and written consent of AMI. AMI will communicate with these Indigenous groups to clarify the groups' uses in the project area.

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			AMI may also consider permitting active forest management and resource use activities, provided those activities can be carried out in a manner which supports AMI's requirements for on-site operational safety and environmental protections required of AMI by regulatory requirements.
Métis Nation of Ontario; Transport Canada	Health and Socio-Economic Conditions	<p>Requested that socio-economic effects resulting from changes to the physical environment, including changes to navigable waters and water used for transport by Indigenous peoples, be considered by the proponent in the development of the EIS.</p> <p><i>The Agency included recommendations from Transport Canada to clarify information that is required in relation to waterbodies used for navigation in Part 2, section 7.1.9, and to require an assessment by the proponent of current, past and potential future use of navigable waters including water used for Indigenous transport in Part 2, sections 7.1.10 and 7.3.4.</i></p>	AMI will consider all comments, socio-economic and otherwise, in the planning, development, operation and closure and post closure of the site. AMI will help inform the planning, develop, operation, closure and post-closure of the project in order to minimize potential effects related to the project.

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Nigigoonsiminikaaning First Nation; Couchiching First Nation	Health and Socio-Economic Conditions	<p>Commented about the potential health and social effects of the Project on Indigenous populations, including increased drug availability, drug use, addiction, prostitution, and human trafficking. Stated that these impacts can disproportionately affect women and youth in the community.</p> <p><i>The Agency notes that the proponent would be required to consider the effects to mental and social well-being of Indigenous peoples, including how these effects may be disproportionately experienced by diverse subgroups within an Indigenous group, in Part 2, section 7.3.4.</i></p>	This will be part of the socio-economic analysis carried out as part of the EIS. AMI will consider all comments, socio-economic and otherwise, in the planning, development, operation and closure and post-closure of the site.
Environment and Climate Change Canada; Health Canada	Health and Socio-Economic Conditions/Accidents and Malfunctions	<p>Recommended that the EIS Guidelines require the proponent to discuss potential spills of hazardous substances and tailings-related accidents and malfunctions, and provide relevant risk management and mitigation measures to reduce the risk of accidents and address community concerns, if applicable.</p> <p><i>The Agency incorporated the recommended addition in Part 2, section 7.6.1.</i></p>	Acknowledged and AMI will incorporate this into the EIS.
Wabigoon Lake Ojibway Nation	Physical and Cultural Heritage	Commented that the project area is a culturally important gathering site.	AMI will reach out to the First Nation to identify the spatial boundaries and other considerations. AMI looks forward to learning of and incorporating Traditional Ecological Knowledge and Traditional Land Use attributes of the project area. AMI looks forward to working with Indigenous knowledge keepers as we design the project area on AMI patent

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			lands and adjacent Crown lands in a respectful and balanced manner.
Nigigoonsiminikaaning First Nation	Physical and Cultural Heritage	Identified heritage resources within the project area, including travel routes with important linkages to social and traditional activities such as hunting and wild rice gathering.	AMI will reach out to the First Nation and incorporate this information into the EIS. AMI looks forward to learning of and incorporating Traditional Ecological Knowledge and Traditional Land Use attributes of the project area. AMI looks forward to working with Indigenous knowledge keepers as we design the project area on AMI patent lands and adjacent Crown lands in a respectful and balanced manner.
Ontario Ministry of Tourism, Culture and Sport (MTCS)	Physical and Cultural Heritage	<p>Indicated that MTCS has received a Stage 1 archaeological assessment report for the Project, which recommended additional archaeological assessments for specific areas that may be impacted to determine archaeological potential. MTCS advised that the proponent make a commitment to following the recommendations outlined in the archeological assessment reports.</p> <p>MTCS indicated that they have requested the proponent to complete additional screening steps for determining the existence of built heritage resources and cultural heritage landscapes and to identify communities to consult.</p> <p><i>The Agency incorporated a requirement for the proponent to consider archeological assessment reports and their recommendations in the baseline assessment of Indigenous peoples' physical and cultural heritage in Part 2, section 7.1.9.</i></p>	Acknowledged and AMI will comply. AMI will incorporate the recommendations of MTCS to perform additional archaeological assessments and heritage study in areas AMI proposes for development.

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Ontario Ministry of Tourism, Culture and Sport	Physical and Cultural Heritage	<p>Recommended that the EIS Guidelines discuss the alignment of federal and provincial processes for identifying and conserving cultural heritage resources to avoid duplication.</p> <p><i>The Agency notes that it endeavours to coordinate with federal and provincial regulatory bodies, where possible, throughout the assessment process.</i></p>	AMI acknowledges and agrees.
Lac Seul First Nation	Current Use of Lands and Resources for Traditional Purposes	Commented that the infrastructure corridor of the Project will potentially impact the community's traditional territory.	AMI will take this into consideration during the development of the EIS. AMI recognizes the watershed defined boundary of Lac Seul's traditional territory and will engage with Lac Seul on all proposed activities with the potential to impact or affect Lac Seul First Nation's Treaty and / or Indigenous rights.
Nigigoonsiminikaaning First Nation	Current Use of Lands and Resources for Traditional Purposes	Commented that the Project is within the community's homeland.	AMI recognizes the watershed defined boundary of Nigigoonsiminikaaning homeland and will engage with the community on all proposed activities with the potential to impact or affect the community member's Treaty and / or Indigenous rights.
Lac Seul First Nation	Current Use of Lands and Resources for Traditional Purposes	Commented that dewatering the west arm of Bending Lake would impact the community's relationship to the land and ability to protect the health of water.	AMI will engage with Lac Seul on all proposed activities with the potential to impact or affect Lac Seul First Nation's Treaty and / or Indigenous rights. AMI will work with the community through the EIS process to try and address their concerns.
Nigigoonsiminikaaning First Nation	Current Use of Lands and Resources for Traditional Purposes	Commented that the moose population in the project area has declined due to climate change, industrial development, and changes in deer population.	AMI will draw upon the collective observations of Indigenous community members, Ministry of Natural Resources and Forestry featured species management guidelines and the wildlife management guidelines of the

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			surrounding Wabigoon Sustainable Forest Management Plan in support of those featured species. This approach will support naturally occurring populations of ungulates. AMI will work tirelessly to not contribute to the further decline in population with respect to their activities.
Couchiching First Nation; Seine River First Nation	Current Use of Lands and Resources for Traditional Purposes	Indicated that community members use the project area for hunting, fishing, gathering (including medicine and wild rice), and berry picking, and commented that it is important to preserve access to these valued components for the community's way of life.	AMI acknowledges and agrees
Seine River First Nation; Nigigoonsiminikaaning First Nation; Wabigoon Lake Ojibway Nation	Current Use of Lands and Resources for Traditional Purposes	Commented that there are traplines held and utilized by Indigenous peoples in the project area.	There are no traplines located on or overlapping with AMI's patent land. AMI is aware of traplines in the area surrounding its patent lands and will work through the MNRF to engage with all trapline holders who express an interest in AMI's proposed developments. The identity and contact information of these license holders is kept in confidence by the MNRF, placing the onus of two way contact with the license holders in their unilateral control and discretion.
Naotkamegwanning First Nation	Current Use of Lands and Resources for Traditional Purposes	Inquired about the inclusion of migratory patterns of wildlife in the proponent's baseline studies.  <i>The Agency incorporated requirements for the proponent to consider migration patterns for species important to current use in Part 2, sections 7.1.4 and 7.2.3.</i>	Acknowledged. AMI will consider the patterns of migratory wildlife and take this into consideration during the design and location of project components.

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Seine River First Nation	Aboriginal and Treaty Rights	<p>Inquired whether the assessment of impacts on Aboriginal and Treaty Rights has already been completed and whether conversations about the assessment of impacts to Aboriginal and Treaty Rights should occur with the Agency or with the proponent.</p> <p><i>The Agency notes that the assessment of potential impacts on rights continues throughout the environmental assessment process as per Part 2, section 6 of the EIS Guidelines, and will be updated based on information provided by Indigenous groups to the Agency and to the proponent.</i></p>	<p>AMI confirms that the assessment of potential impacts on rights continues throughout the environmental assessment process as per Part 2, section 6 of the EIS Guidelines, and will be updated based on information provided by Indigenous groups to the Agency and to the proponent.</p>
Seine River First Nation	Aboriginal and Treaty Rights	<p>Commented that the exercise of Aboriginal and Treaty rights by Indigenous groups does not require a commercial license.</p>	<p>This is understood and has not intentionally been suggested.</p> <p>AMI has been made aware of commercial fishing licenses held by Naotkamegwanning First Nation on Stormy Lake and Wabigoon Lake in the Wabigoon watershed.</p>
Métis Nation of Ontario; Wabigoon Lake Ojibway Nation; Naotkamegwanning First Nation	Indigenous Knowledge	<p>Indicated that traditional knowledge and land use studies are scoped based on available funding. Inquired whether the Agency will provide funding for traditional knowledge and land use studies, and expressed interest in applying for funding.</p> <p>Métis Nation of Ontario indicated that since it is not able to capture information from all regional land users or traditional knowledge holders, such studies do not provide a comprehensive understanding of baseline information, which should be taken into consideration when assessing information provided by groups.</p>	<p>AMI is committed to interest based engagement and consultation. We strongly encourage all those with an interest in AMI's proposed developments to express questions, concerns and comments to inform and improve our planning and implementation of all activities and designs on site. Unexpressed comments or issues cannot be addressed.</p>



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Métis Nation of Ontario	Indigenous Knowledge	<p>Requested that the proponent share with Indigenous groups how Indigenous knowledge was incorporated into the Project and what, if any, changes were made to the Project after consideration of Indigenous knowledge.</p> <p><i>The Agency incorporated these recommendations in Part 2, section 4.2.2.</i></p>	<p>AMI agrees with the Metis Nation of Ontario's request. Indigenous knowledge will contribute to decision-making regarding the various project components in an assessment of alternatives. This information will be documented in the EIS and shared with all Indigenous groups at various stages of EIS completion.</p>
Ontario Ministry of Environment, Conservation, and Parks	Human Environment	<p>Recommended that the EIS Guidelines require the proponent to assess impacts on Turtle River White Otter Lake Provincial Park during all phases of the Project, including:</p> <ul style="list-style-type: none"> <li>• increased park use</li> <li>• noise and visual impact to paddlers and boaters navigating Turtle River via Bending Lake</li> <li>• creation of new access to areas of the park via infrastructure corridors</li> <li>• impacts from potential work camps, and</li> <li>• effects on wilderness canoe routes and motorboat or canoe-based camping experiences.</li> </ul> <p><i>The Agency incorporated a requirement for the proponent to consider current use of lands in the study area, including within the Turtle River White Otter Provincial Park, in Part 2, section 7.1.10. The Agency notes that changes in noise and vibration levels and visual aesthetics are addressed in Part 2, sections 7.2.1 and 7.3.5, and workforce accommodation camps are included in Part 1, section 3.1.</i></p>	<p>Acknowledged and this information will be part of the EIS.</p>

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Transport Canada	Human Environment	<p>Advised that the EIS Guidelines should include information related to navigation use and changes to waterways, including current, past and potential future use of all waterways and waterbodies for recreation or navigation by non-Indigenous peoples that will be directly affected by the Project. Further recommended that information is required in relation to any activities and construction methodologies that require dewatering of waterbodies, or that involve throwing or depositing materials in water.</p> <p><i>The Agency clarified information that is required in relation to waterbodies used for navigation in Part 2, section 7.1.9 and that the current, past and potential future use of navigable waters in Part 2, section 7.1.10. The Agency is of the view that activities that require dewatering of waterbodies or that involve throwing or depositing materials in water will be described under Part 2, sections 7.1.11 and 7.3.5.</i></p>	Acknowledged and this information will be part of the EIS.
Métis Nation of Ontario	Environmental Assessment Process and Consultation	<p>Noted that Part 1, section 3.2 of the EIS Guidelines ("Factors to be considered") does not include impacts to Indigenous groups.</p> <p><i>The Agency notes that the referenced section of the EIS Guidelines is a mirror of section 19 of CEAA 2012. The requirement to assess impacts on Indigenous peoples is set out in section 5 of CEAA 2012 and is present in Part 2, section 7.3.4 of the EIS Guidelines.</i></p>	AMI acknowledges and agrees with the Agency that the requirement to assess impacts on Indigenous peoples is set out in section 5 of CEAA 2012 and is present in Part 2, section 7.3.4 of the EIS Guidelines.

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Ontario Ministry of Environment, Conservation, and Parks	Environmental Assessment Process and Consultation	<p>Advised that the EIS Guidelines should name the conservation reserves in the vicinity of Turtle River White Otter Provincial Park.</p> <p><i>The Agency incorporated the recommendation in Part 2, section 1.3.</i></p>	Acknowledged. This information will be part of the EIS.
Environment and Climate Change Canada	Environmental Assessment Process and Consultation	<p>Indicated that the tailings management area will be served by both a tailings pipeline and a water return pipeline, and requested that information on both pipelines be included in the EIS Guidelines.</p> <p><i>The Agency incorporated the recommended changes in Part 2, section 3.2.1.</i></p>	Acknowledged. This information will be included in the EIS.
Natural Resources Canada	Environmental Assessment Process and Consultation	<p>Indicated that the proponent will likely be required to manufacture explosives on-site. Recommended that the EIS Guidelines require the proponent to include information related to manufacture of explosives and to explain how, where and by whom (and under what licensing) the explosives that will be used at the project site are manufactured and/or prepared.</p> <p><i>The Agency incorporated the recommended changes in Part 1, section 3.1 and Part 2, sections 3.1, 3.2 and 7.1.11.</i></p>	No explosives will be manufactured on-site. Such materials will be shipped from outside

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Health Canada	Environmental Assessment Process and Consultation	<p>Commented that the key criteria used to characterize the significance of residual effects (i.e., magnitude, geographic extent, timing, frequency, and duration) are often defined by proponents based on project activities. Advised that these key criteria should instead be defined by the proponent based on the potential for effects due to the Project.</p> <p><i>The Agency notes that guidance for determining significance of residual effects is included in Part 2, section 7.5.</i></p>	Acknowledged.
Lac Seul First Nation	Environmental Assessment Process and Consultation	Commented that opportunities to review baseline studies have not been provided.	<p>Baseline Studies completed to date , largely in support of Mining Act. Ministry of Energy, Northern Development and Mines. defined Advanced Exploration activities have been shared in digital form with Lac Seul First Nation and all other Indigenous communities who AMI identified or those who self expressed an interest in AMI activities.</p> <p>Grand Council Treaty 3  Wabigoon Lake Ojibway Nation  Eagle Lake First Nation  Lac Seul First Nation  Lac des Mille Lacs First Nation  Naoakamegwaning First Nation  Nigigoonsiminikaaning First Nation  Seine River First Nation  Couchiching First Nation  Metis Nation of Ontario</p> <p>AMI will forward to those additional communities IAAC identified as potentially interested such as Naicatchewenin First Nation and or</p>

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			potentially impacted by AMI's proposed developments.  Mitaanjigamiing First Nation Lac La Croix First Nation
Wabigoon Lake Ojibway Nation	Environmental Assessment Process and Consultation	Inquired about the possibility of a third party reviewing the proponent's submissions.	AMI would support third party review of submissions to regulatory agencies.
Seine River First Nation	Environmental Assessment Process and Consultation	Inquired whether the group's draft consultation protocol can be implemented as part of the Agency's consultation plan.	AMI is committed to engaging with all interested Indigenous communities in a manner prescribed as most appropriate by those individual communities.
Nigigoonsiminikaaning First Nation; Naicatchewenin First Nation; Couchiching First Nation; Lac Seul First Nation	Environmental Assessment Process and Consultation	Inquired how many Indigenous groups are being consulted by the Agency on the Project, and asked about the Agency's process for determining which Indigenous groups should be consulted.	Comment acknowledged.
Ontario Ministry of Natural Resources and Forestry	Environmental Assessment Process and Consultation	Recommended that federal and provincial agencies discuss and coordinate the determination of which Indigenous groups to consult on the Project.	AMI agrees and requests that federal and provincial agencies discuss and coordinate the determination of which Indigenous groups to consult on the Project.
Nigigoonsiminikaaning First Nation	Environmental Assessment Process and Consultation	Commented that harmonization between federal and provincial regulatory bodies is poor, leading to a lack of agreement on Project mitigation measures.	AMI looks forward to helping federal and provincial regulatory agencies harmonize their activities in a way that promotes agreement on any project mitigation measures.
Lac Seul First Nation	Environmental Assessment Process and Consultation	Requested a presentation from the Agency to the Indigenous groups impacted by the Project on the federal assessment process and the potential impacts of iron ore mining.	AMI agrees with and supports this suggestion.
Couchiching First Nation; Naicatchewenin First Nation	Environmental Assessment Process and Consultation	Asked what is expected of Indigenous groups in the upcoming phases of the federal assessment, and whether there are additional opportunities to comment on the Project.	Comment acknowledged. AMI plans future consultation activities with Indigenous groups in this respect

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Naotkamegwaning First Nation; Wabigoon Lake Ojibway Nation	Environmental Assessment Process and Consultation	Requested clarification on the Agency's expectations of the proponent's engagement activities with Indigenous groups.  <i>The Agency notes that these details are in Part 1, section 4.2.2 of the EIS Guidelines.</i>	Comment acknowledged.
Naotkamegwaning First Nation; Couchiching First Nation; Wabigoon Lake Ojibway Nation	Environmental Assessment Process and Consultation	Inquired about the availability of participant funding for Indigenous groups in the federal assessment process.	Comment acknowledged.
Wabigoon Lake Ojibway Nation; Mitaanjigamiing First Nation; Métis Nation of Ontario	Environmental Assessment Process and Consultation	Commented that Bending Lake Iron Project should be assessed under the <i>Impact Assessment Act</i> .	Project was issued EIS Guidelines under CEAA 2012 and much of the additional information found in the new Act has been incorporated into the Guidelines for this project.
Naicatchewenin First Nation; Mitaanjigamiing First Nation; Couchiching First Nation; Naotkamegwaning First Nation	Environmental Assessment Process and Consultation	Inquired about the length of the federal assessment process and the project timeline.	Comment acknowledged.
Wabigoon Lake Ojibway Nation	Other Comments	Concerned that the proponent is carrying out exploration activities in the project area while the federal assessment process is ongoing.	AMI advises, that exploration activities have been reviewed by Ontario Ministry of Energy, Northern Development and Mines. AMI will continue its exploration and deposit assessment activities on its patent lands and mineral claims on crown lands. These activities are conducted to better understand the location, extent, concentration, geochemical properties, potential mining methodology and the economic feasibility of developing the project. These activities are essential to minimize the environmental impact of commercial mining activities.

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Ontario Ministry of Natural Resources and Forestry	Other Comments	Requested that the proponent contact the Ontario Ministry of Natural Resources and Forestry prior to completing any baseline data collection, commencing timber harvesting, or completing any work on Crown land, including shore lands, waterbodies and watercourses.	Acknowledged and AMI will comply.
Mitaanjigamiing First Nation	Other Comments	Inquired whether the proposed dams on the west arm of Bending Lake are a new addition to the Project.	AMI notes that predecessors had proposed coffering the west arm, of Bending Lake in the previous IAAC submission of Bending Lake Iron Group. While AMI originally believed it could design and deliver an economically feasible mine without coffering the west arm of Bending Lake, the company's assessment of the ore body location and concentration in June 2019 supported the view that the coffering of a portion of the west arm of Bending Lake would be required to meet the threshold of economic feasibility. This will be further assessed during the EIS.
Wabigoon Lake Ojibway Nation	Other Comments	Indicated to the Agency that the proponent had previously committed to Wabigoon Lake Ojibway Nation that the Project would not dewater or build dams on the west arm of Bending Lake. However, the project plan changed to include the damming and dewatering of the west arm of Bending Lake. Commented that this alteration to the project plan was not discussed with Wabigoon Lake Ojibway Nation.	AMI notes that predecessors had proposed coffering the west arm, of Bending Lake in the previous IAAC submission of Bending Lake Iron Group. While AMI originally believed it could design and deliver an economically feasible mine without coffering the west arm of Bending Lake, the company's assessment of the ore body location and concentration in June 2019 supported the view that the coffering of a portion of the west arm of Bending Lake would be required to meet the threshold of economic feasibility. This will be further assessed during the EIS.

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			This AMI management decision was made in June 2019, but it could not be communicated with Wabigoon Lake Ojibway Nation at that time. The minerals and mining representative has requested a full project update by AMI to new Chief and Council. AMI will be pleased to provide this update at the community's earliest convenience.
Nigigoonsiminikaaning First Nation; Seine River First Nation; Métis Nation of Ontario	Other Comments	<p>Inquired about the requirements for the establishment of an environmental monitoring program or committee by the proponent in conjunction with Indigenous groups.</p> <p>Inquired whether the Agency monitors proponents' compliance with memoranda of understanding or impact benefit agreements.</p> <p><i>The Agency clarified that the proponent is expected to engage with Indigenous groups in developing the environmental monitoring program (Part 2, section 9.2).</i></p>	AMI will engage with Indigenous groups in developing the environmental monitoring program (Part 2, section 9.2).
Couchiching First Nation	Other Comments	Inquired about the potential for employment opportunities arising from the Bending Lake Iron Project.	AMI will engage with all Indigenous groups in developing employment and business supply agreements arising from the Bending Lake Iron Project.
Lac Seul First Nation	Other Comments	Concerned about the overall impacts of iron ore mining, stating that the impacts of iron ore mining can be greater than the impacts of gold mining.	AMI looks forward to learning of all questions or concerns regarding its proposed developments.
Naotkamegwaning First Nation	Other Comments	<p>Inquired about the boundary and size (i.e. footprint) of the Project, and for a comparison of its size to the Rainy River Mine.</p> <p><i>The Agency has requested the proponent via email to provide a map that identifies</i></p>	The footprint of the Project will be finalized during the EIS. At that time AMI will be able to provide a comparison with the Rainy River Mine.



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		<i>mineral claims and patent lands related to the Project.</i>	
Naicatchewenin First Nation; Nootkamegwanning First Nation; Wabigoon Lake Ojibway Nation	Other Comments	Requested clarification about project design and project components, including the size and location of the dams on the west arm of Bending Lake, the ore processing facility, waste rock storage area, tailings management area, and open pit.	AMI will be pleased to provide clarification to all Indigenous groups as the EIS is underway and will incorporate their comments into the assessment of alternatives.
Ontario Ministry of Natural Resources and Forestry	Other Comments	Advised that the overburden stockpile should be protected from erosion to enable its use during the decommissioning phase (i.e. mine closure) and rehabilitation. Suggested grass seeding to prevent erosion.  <i>The Agency incorporated this recommendation in Part 2, section 3.1.</i>	Acknowledged. The overburden stockpile will be protected from erosion.
Public Citizen	Other Comments	Commented that Legacy Hill Resources has a history of poor operational decisions on previous mining projects that have resulted in environmental impacts.	The public citizen has not provided specifics that AMI can respond to.

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Ontario Ministry of Natural Resources and Forestry	Other Comments	<p>Requested that the EIS Guidelines include information related to land ownership of the project area as well as provincial regulatory requirements and their impacts on Aboriginal and Treaty rights. Some of these provincial regulatory requirements include:</p> <ul style="list-style-type: none"> <li>• Licence to Collect Fish for Scientific Purposes;</li> <li>• Wildlife Scientific Collector's Authorization;</li> <li>• Licence for Forest Resources</li> <li>• Work Permits under the <i>Public Lands Act</i> and <i>Lakes and Rivers Improvement Act</i>;</li> <li>• Occupational Authority under the <i>Public Lands Act</i>;</li> <li>• Aggregate permit, pending locations; and</li> <li>• Class EA for Resource Stewardship and Facility Development, if applicable.</li> </ul> <p><i>The Agency included a requirement for the proponent to provide information about land ownership (e.g., patents, leases, tenures, etc.) in Part 2, section 1.3. The Agency notes that the proponent would be required to provide information on regulatory approvals that are applicable to the Project at the federal, provincial, regional and municipal levels, as noted in Part 2, section 1.4.</i></p>	Acknowledged. Permits required during the EIS process will be applied for in advance from the MNRF. Prior to construction, additional permits will be required as outlined in the EIS. AMI anticipates that a MNRF Class EA may be required and will be undertaken concurrently with the EIS after confirmation and discussion with the MNRF.