



Impact Assessment  
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Agence d'évaluation  
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February 10, 2025

**Sent by email**

Steve Lines  
Vice President, Sustainability  
First Mining Gold Corp.  
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steve@firstmininggold.com

Steve Lines:

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

The Impact Assessment Agency of Canada (IAAC) is conducting a technical review of the Environmental Impact Statement (EIS) for the proposed Springpole Gold Project (the Project). IAAC has determined that information is required to complete the environmental assessment (EA) under the *Canadian Environmental Assessment Act, 2012* (CEAA 2012).

Enclosure 1 includes Information Requirements (IRs) developed by IAAC and based on input provided by Environment and Climate Change Canada, Fisheries and Oceans Canada, Health Canada, Indigenous Services Canada, Natural Resources Canada, and Transport Canada.

The IRs include areas of insufficient information in the assessment of effects to fish and fish habitat, migratory birds, and effects of changes to the environment on Indigenous Peoples.

Federal advice to First Mining Gold Corp. (the Proponent) to inform other regulatory requirements, such as permits or authorizations, or to support responses to the IRs, will follow.

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With the issuance of these IRs, the federal timeline within which the Minister of Environment and Climate Change must make a decision, under section 27 of CEAA 2012, is suspended as of February 11, 2025. As per IAAC's *Operational Policy Statement: Information Requests and Timelines* (dated February 2016),<sup>1</sup> the federal EA timeline will not recommence until IAAC completes the conformity review of the formal submission of responses to these IRs, and any additional IRs issued as noted below, and is satisfied that robust responses to the comments and questions have been received.

Please note that IAAC has not yet received input for some valued components within the scope of the federal assessment. In particular, technical discussion continues between Environment and Climate Change Canada and the Ontario Ministry of the Environment, Conservation and Parks on the topic of caribou. Further, IAAC has not yet received comments from all participating Indigenous communities, nor has it received input from some provincial ministries. IAAC may issue an addendum to this IR package after receiving and reviewing these comments.

Should you choose to review materials that may inform the addendum to this letter, you may review the submissions of Grand Council Treaty #3, Northwestern Ontario Métis Community, the Ontario Ministry of Citizenship and Multiculturalism, and Wildlife Conservation Society Canada, which are available on the Canadian Impact Assessment Registry at <https://iaac-aeic.gc.ca/050/evaluations/proj/80149>.

IAAC is also in receipt of comments submitted via letters, dated January 31, 2025, and February 10, 2025, provided by Cat Lake First Nation and Lac Seul First Nation. These letters were directed to the Proponent along with IAAC and will be posted to the Registry shortly.

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<sup>1</sup> [https://www.canada.ca/content/dam/iaac-acei/documents/ops/ops-information\\_requests\\_and\\_timelines.pdf](https://www.canada.ca/content/dam/iaac-acei/documents/ops/ops-information_requests_and_timelines.pdf)

As noted in the first IR about fish and fish habitat, in relation to the co-disposal facility, IAAC understands the Proponent has discussions underway with the Ontario Ministry of the Environment, Conservation and Parks (MECP) regarding surface water and groundwater management and related provincial permitting. IAAC also understands that a technical memo with updated information related to seepage predictions is pending. IAAC has several detailed questions about groundwater and surface water management, in relation to effects on fish, that it will reconsider and provide once informed by these updates. IAAC has requested a technical discussion with the Proponent and the province on this topic.

The responses to IRs may be in a format of your choice; however, the format must be such that the responses to individual IRs can be easily identified. The IRs and your responses will be made public on the Canadian Impact Assessment Registry page linked above.

As a reminder, as per the time limit extension granted on August 19, 2022, the deadline to submit the required information or studies described in the Final Environmental Impact Statement Guidelines, as amended in March 2022, is December 31, 2025.

You may wish to discuss certain IRs with IAAC or other government experts, as necessary, to obtain clarification or additional information, prior to submission of the responses. Working directly with government experts in this manner will help to ensure that IRs are responded to satisfactorily. IAAC can assist in arranging meetings with government experts, at your request.

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Please confirm receipt of this message and contact me directly at *springpolegoldmine-minedorsspringpole@iaac-aeic.gc.ca* or 226-749-1214, if you have any further questions, or to request a meeting.

Sincerely,

Tara Bailey  
Project Manager, Ontario Region

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

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