

The Impact Assessment Agency of Canada (IAAC) is conducting its technical review of the Environmental Impact Statement (EIS) and associated EIS Summary for the proposed Springpole Gold Project (the Project). IAAC’s review is supported by submissions from government experts, Indigenous communities and the public. IAAC has determined that information is required, as presented in the table below.

Information Requirements

IR Number	Link to CEAA 2012	Topic	Reference to EIS Guidelines	Reference to EIS	Context and Rationale	Information Request
Fish and Fish Habitat (FH)						
<i>Includes changes to the environment¹ (Water Quality (WQI)) that may have pathways of effects to fish and fish habitat</i>						
WQI-01	5(1)(a)(i) Fish and Fish Habitat	Groundwater and Surface Water Quality	Section 3.2 - Project Activities Section 7.1.2 - Geology and Geochemistry Section 7.1.4 - Riparian, Wetland and Terrestrial Environments Section 7.1.5 - Groundwater and Surface Water Section 7.2 - Predicted Changes to the Physical Environment Section 7.3 - Predicted Effects on Valued Components Section 7.4 - Mitigation Measures	Appendix E (Revised Mine Waste Management Alternatives) Appendix K-1.1 (Static Testing Baseline Report 2021) Appendix K-1.2 (Tailings ML/ARD Assessment – Static Testing Results) Appendix K-1.3 (Kinetic Geochemistry Report) Appendix K-1.4 (Overburden Fish Habitat Area Geochemistry Memo) Appendix K-2 (Mine Site Water Quality Modelling) Appendix L-2 (Hydrogeological Modelling Report)	IAAC acknowledges that the Proponent has selected the proposed co-disposal facility (CDF) location and design to take advantage of hard bedrock and minimize the project footprint, while considering its close proximity to Springpole Lake and Birch Lake. IAAC and Federal Authorities have remaining concerns that, due to its location, the CDF may result in noncompliance with the <i>Fisheries Act</i> from uncaptured seepage and may present a risk of toxicity to aquatic life in the surrounding water bodies. IAAC understands that once the Project has been constructed and materials are deposited to the CDF, there are limited options to adapt the management of seepage to achieve compliance. IAAC would like to better understand the Proponent’s strategies and modelling assumptions in this regard. Concerns around seepage at the CDF location were raised during the review of the draft EIS (November 2022). ² Design changes were brought forward to IAAC and federal authorities in July 2023. In an August 2023 meeting, federal authorities raised several questions which the Proponent noted would be addressed in the final EIS. IAAC requested the Proponent’s assistance to locate certain missing information in the final EIS by email on December 12, 2024. The Proponent provided additional information on January 17, 2025, noting that additional memos were being drafted to provide updated information on the CDF. IAAC and Federal Authorities reviewed the EIS closely and, given the potential volume of uncaptured seepage, have identified the following areas for which greater confidence is required to validate the assessment of potential effects to fish and fish habitat related to surface water quality: <ul style="list-style-type: none"> • hydrogeological modelling, including the assumptions made within the hydrogeology model; • the potential for the proposed CDF quarry to affect the modelled hydrogeological regime; • predicted volume and rate of seepage bypass; and opportunities to further reduce bypass (such as deeper ditches); • predicted changes to surface water quality and the potential for acute fish toxicity where seepage will enter surrounding water bodies (meaning, closer to the seepage face than current assessment nodes); 	IAAC requests a technical discussion between the Proponent, the Province of Ontario, and relevant federal authorities to better understand from the Proponent: <ul style="list-style-type: none"> • how the Project will be designed to ensure compliance with the Fisheries Act; • how the Proponent intends to meet any permitting standards to be set out by the province for groundwater and surface water quality (at a high-level, recognizing permitting-level design detail may not be available); and • potential impacts to fish and fish habitat in relation to surface water quality. Following technical discussions with the Province of Ontario, and any associated changes made to the supporting assessments, provide an update on the potential adverse effects on fish and fish habitat as a result of seepage bypass.

¹ IAAC is providing these IRs as they relate to changes to the environment with pathways of effects to fish and fish habitat and, potentially, to the health of Indigenous Peoples. IAAC notes that water quality and quantity receive provincial oversight under the *Ontario Water Resources Act* and some elements of mine design and operations receive oversight under the *Mining Act*.

² HH-05, WQI-05,06,10,11,12,15,16

IR Number	Link to CEAA 2012	Topic	Reference to EIS Guidelines	Reference to EIS	Context and Rationale	Information Request
				<p>Appendix N-1 (Surface Water Quality Baseline)</p> <p>Appendix N-2 (Surface Water Quality Modelling Report)</p> <p>Appendix V-1 (CDF PFS Design Report Update)</p>	<ul style="list-style-type: none"> assumptions made within the site water quality model; site geochemical characterization program and the geochemical source terms used in models; selenium in the NAG tailings used to manage PAG mine rock; and the site water balance and feasibility of maintaining saturated conditions in the CDF south cell during prolonged periods of dry weather conditions. <p>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. The outcomes of these discussions are of particular interest to IAAC, ECCC and DFO due to potential pathways of effects to fish and fish habitat, an area of federal responsibility. IAAC has identified several detailed information requirements about groundwater and surface water management, in relation to fish, that it will reconsider and provide once informed by the pending technical memo and updates from the Proponent's discussions with MECP. The intention is to not confuse things or hinder progress underway to resolve water-related issues.</p> <p>IAAC has requested a technical discussion with the Proponent and the province on this topic.</p>	
FH-01	5(1)(a)(i) Fish and Fish Habitat	Fish and Fish Habitat - General	Sections 7.3.1; 7.4	Appendix F	<p><u>Offsetting – General</u></p> <p>Although the Proponent has presented a list of potential options to offset the impacts to fish and fish habitat, the projects accounting for the greatest proportion of the total offset area (see FH-03 and FH-04) are those that DFO would not accept due to their uncertainty in terms of success, inaccurate accounting, and long time frames to completion. Furthermore, they do not meet the EIS guidelines (Section 7.4): 'Measures will be specific, achievable, measurable and verifiable, and described in a manner that avoids ambiguity in intent or commitment, interpretation and implementation.'</p> <p>To provide impact assessment advice to decision-makers about the residual effects on fish, IAAC must be confident that the offsetting concepts are feasible and agreeable, with consideration of the <i>Fisheries Act</i> authorization as a means for refining details.</p> <p>Other potential offsetting options that are in line with DFO's offsetting policy require greater confidence in the feasibility of the works (South Bay Mine rehabilitation project (FH-02, Coarse Wood Structure Shoreline Enhancement, and Spawning Shoals) to be accepted by DFO as sufficient offsetting measures.</p>	<ol style="list-style-type: none"> Remove the projects listed in FH-03 and FH-04 from the accounting of offset habitat in future revisions of the Fish Habitat Offset Compensation Plan (FHOCP). Revisit the FHOCP and ensure that the remaining projects (e.g., South Bay Mine rehabilitation project [see FH-02], Coarse Wood Structure Shoreline Enhancement, and Spawning Shoals) have sufficient detail (as described in Section 7.4 of the EIS guidelines) including project execution, timelines, success criteria and monitoring/ contingency to meet the terms of the EIS guidelines and offset for the impact of the time lag associated with the Project. If insufficient, the Proponent should provide additional alternative offsetting projects (preferably multiple options) that could meet DFO's policy with future refinement.

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					With the options and level of detail presented to date, DFO does not have confidence that the impacts to fish habitat could be offset.	
FH-02	5(1)(a)(i) Fish and Fish Habitat	Fish and Fish Habitat - General	Sections 7.3.1; 7.4	Appendix F, Section 8, Pages 8-1 to 8-10	<p><u>Offsetting - South Bay Mine rehabilitation project</u></p> <p>The proposed rehabilitation of the South Bay Mine, in partnership with the Ontario Ministry of Mines (MINES), is in line with DFO's 'Policy for applying measures to offset adverse effects on fish and fish habitat' and would be a high priority for DFO in the list of proposed offsets. However, DFO requires greater confidence in the feasibility of the works and further detail of any arrangements made with MINES in order to meet the requirements in the EIS guidelines.</p> <p>As described in the Fish Habitat Offset Compensation Plan, DFO understands the works involve isolating the tailings area, but objectives with respect to benefiting fish and fish habitat are not clear. Appendix F, page 8-7 references a Memorandum of Understanding (MOU) between the Proponent and MINES; however, this document has not been included.</p>	<ol style="list-style-type: none"> 1) Provide more detailed information on the proposed reclamation works at South Bay Mine, including the works required to reach the end goal of restored fish communities in Boomerang, Amanda and Mud Lakes. 2) Clarify the objectives of the South Bay Mine reclamation efforts with respect to benefiting fish and fish habitat. 3) Provide detailed information regarding the arrangements made with MINES for the South Bay Mine reclamation, discussing the proportion and types of works the Proponent will be contributing to, and the timeline and monitoring planned for the area. 4) Provide the MOU between the Proponent and MINES that is referenced in Appendix F, page 8-7, if not confidential.
FH-03	5(1)(a)(i) Fish and Fish Habitat	Fish and Fish Habitat - General	Sections 7.3.1; 7.4	Appendix F, Section 8, Pages 8-1 to 8-10	<p><u>Offsetting - Reclaimed open basin</u></p> <p>The EIS included the restored open pit basin (and therefore the existing fish habitat in NB-01 – the basin that will be dewatered) as habitat in the offsetting calculations.</p> <p>As previously discussed with the Proponent, the reclaimed open pit basin will not be considered surplus offsetting for this Project. NB-01 already supports a healthy lake trout population and the restoration of that habitat after the life of the mine is considered mitigation and not offsetting.</p> <p>If the open pit basin is reasonably restored to near NB-1's original capacity as proposed, then the Proponent would be responsible to offset for the amount of time the habitat is lost due to mining activities (including any potential mine expansions). This is assuming there are no long-term impacts on fish populations (specifically lake trout) in the remainder of Springpole lake, as predicted</p>	<ol style="list-style-type: none"> 1) Remove from the offset calculation any habitat that was already present in Springpole Lake (e.g., NB-01). This means remove the restored open pit basin. 2) In Section 6.10 of the EIS, the Proponent states that non-schooling fish tend to occupy depths of 18 to 25 m (defined as pelagic habitat). Provide the proportion of 18 to 25 m habitat within NB-01 compared to the remainder of 18 to 25 m habitat in Springpole Lake and provide the proportion of 18 to 25 m habitat that will be created after the pit has been restored compared to the remainder of 18 to 25 m habitat in Springpole Lake. If the quantity of 18 to 25 m habitat is higher after restoration, some credit may be considered offsetting for the surplus lake trout habitat, assuming the remainder of the pit is restored as currently proposed.
FH-04	5(1)(a)(i) Fish and Fish Habitat	Fish and Fish Habitat - General	Sections 7.3.1; 7.4	Appendix F	<p><u>Offsetting – LKST Restorative Stocking</u></p> <p>DFO supports the inclusion of the Stage 1 Research Program to investigate lake sturgeon presence and distribution in the Birch and Cat River systems as it meets the criteria set out in DFO's offsetting policy for complementary measures. However, DFO does not support the Stage 2 Population Support component of the FHOCP. Stage 2 relies on the findings in Stage 1 and has</p>	Remove Stage 2 of the lake sturgeon research program from the accounting of offset habitat in future revisions of the FHOCP.

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					<p>too high a level of uncertainty in terms of feasibility, success and the ability to monitor success. DFO cannot accept allocating any offsetting, especially a large proportion (200 ha) of offset habitat, to a potential future project with no understanding of its feasibility. Should the results of the complementary measures proposal indicate a path forward to recovery of lake sturgeon through restorative stocking, DFO may consider the offsetting viable for future project proposals.</p>	
FH-05	5(1)(a)(i) Fish and Fish Habitat	Fish and Fish Habitat - General	Sections 7.1.5, 7.3.1	<p>Section 2.2 - Ambient and Effluent Discharge Flow Rates. Pg. 2-2</p> <p>Table 3-1. Water Quality Model Nodes. Pg.3-13</p> <p>Figure 3-1. Water Quality Model Nodes. Pg. 3-22</p> <p>Section 5.0; Appendix F</p> <p>Appendix N-2 (Surface Water Quality Modelling Report)</p> <p>Attachment A - Treated Effluent Discharge Mixing Study</p>	<p><u>Pit refilling rates and timing of NB-1 habitat restoration (duration of effect of Springpole habitat loss on lake trout)</u></p> <p>The proposed de-watering of the open pit basin is summarized in Section 5.0 – Descriptions of Proposed Works, Undertaking or Activity Likely to Affect Fish and Fish Habitat of Appendix F, which includes an evaluation of indirect effects from potential changes in flow and surface water elevation. However, rewatering the open pit basin is not considered in the same section despite the amount of time required to re-fill the basin ranging from 2.9 to 6.3 years under different flow condition scenarios.</p> <p>The length of time required to re-water the open pit basin is an impact to fish and fish habitat in the form of a time lag and any predictions associated with flow changes during the re-filling phase of the Project need to be considered in the accounting of impacts to fish and fish habitat.</p> <p>IAAC has questions regarding assumptions and parameters used in the modelling of surface water flows under dry climate conditions and flows during pit refilling that could result in reduced volume in Springpole Lake. IAAC acknowledges that management of surface water quantity is within the jurisdiction of MECP and looks forward to working with the Province of Ontario and the Proponent to address these questions.</p> <p>A reduced volume in Springpole Lake during the decommissioning phase could lead to slower pit refilling and uncertainty in the time required to re-fill the basin. Additionally, changes to hydrology and the resultant impacts to water quality parameters could result in delays for reconnecting the open pit basin to Springpole Lake.</p> <p>In the EIS, dry climate conditions were evaluated during the operational phase by assuming one dry year (1:100 return period) followed by nine average years. ECCC noted there may be some uncertainty in the site water balance of relevance to fish and fish habitat and that evaluating the water balance under more extreme conditions (considering several years drier than average) may reduce uncertainty in the predicted time required to refill the open pit.</p> <p>Further, if water quality requirements cannot be met that would allow the open pit basin to be re-watered, the removal of the north basin would become a permanent impact to fish habitat that is not currently accounted for in the offset plan. This represents significant uncertainty in understanding</p>	<p>Provide a summary of the direct and indirect effects of refilling the open pit basin in Section 5.0 of the FHCOP. The following concerns should be addressed:</p> <ol style="list-style-type: none"> 1) Uncertainties in predictions for the length of time required to refill the pit and meet water quality requirements to reconnect the basin, specifically addressing assumptions in the surface water models related to dry climate conditions. 2) How water withdrawal (e.g., to maintain continuous water coverage in the CDF south cell) will affect the remainder of Springpole Lake and potentially affect time to rewater the open pit. 3) How any additional time lag will impact the ability of fish to access the restored basin and be accounted for in offsetting. An updated, conservative range of years to re-fill, and an approach to incorporating the time lag into the offsetting plan would be acceptable at this stage. For example, the proponent may consider proposing a range of offsetting ratios based on years of refilling and potential delays associated with meeting water quality requirements. 4) Uncertainties in achieving water quality standards (federally and provincially) in the refilled basin that may limit or negate the Proponent's ability to reconnect the open pit basin at all.

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					the extent of effects, and the ability of the Proponent to mitigate those effects.	
Migratory Birds (Bir)						
Bir-01	5(1)(a)(iii) Migratory Birds	Migratory Birds and their Habitat	Section 7.3.2- Migratory birds	Section 9.2.6 - Potential for Interactions between Wildlife and Water Management System. Pg 9-3	<p>IAAC requested clarification regarding the mitigation measures (e.g., features to prevent birds from using the water management facility) that would reduce the possibility of migratory birds, species at risk and other wildlife using any area where water quality is expected to exceed quality thresholds.</p> <p>In Appendix C-1, row IAAC-Ter-006, the Proponent notes, "a visual monitoring program will be implemented during operations and further adaptive management measures may be implemented if required, such as deterrents."</p> <p>Section 6.12.6.3, notes: "Bird deterrents (e.g., cannons, bangers) may be used around the ponds prior to nesting periods (zone C5: late April to late August) and during the northern and southern migration periods to deter bird nesting activity. Monitoring would occur regularly to evaluate the effectiveness of deterrents, and adaptive management would be applied as necessary."</p> <p>The EIS also states (Section 9.2.6) "The use of deterrents to minimize the potential for interactions between wildlife and birds with the water management treatment system [h]as been included in Section 9.10."; however there does not seem to be any information on deterrents and their use in section 9.10.</p> <p>IAAC considers the monitoring and, when necessary, mitigation through deterrence measures to be a key measure for managing potential effects to birds, including those birds of importance to Indigenous peoples. IAAC is seeking more certainty in proponent intentions to be confident in our advice to decision-makers about how the effects will be managed.</p>	<ol style="list-style-type: none"> 1) Confirm the intent to implement measures to prevent migratory birds from using or frequenting areas where water quality is expected to exceed thresholds, through monitoring of bird use and, when necessary, implementation of deterrent measures. 2) Confirm the intent to develop the water quality objectives using an ecological risk-based approach in consultation with Indigenous communities and relevant authorities.
Bir-02	5(1)(a)(iii) Migratory Birds	Migratory Birds and their Habitat	Section 7.3.2 - Migratory birds Section 7.3.3- Species at risk	Section 6.16.3 - Identification of Potential Effect Pathways. Pg. 6.16-18	<p>The EIS Guidelines (Section 7.3.2) states that the Proponent should characterize the Project effects and associated mitigation measures related to "collision risk of migratory birds with any project infrastructure and vehicles"</p> <p>The EIS states: "The operation and maintenance of the transmission line interacts with [species at risk (SAR)] birds, and results in a pathway to a potential effect due to vegetation management within the corridor to maintain operation. The assessment of potential effects on SAR birds includes the change in the habitat function, connectivity, and quality from this pathway."</p> <p>Scientific research has found that transmission lines are the highest industrial causes of mortality of Canadian birds due to human activities (Calvert et al. 2013). Best available data show that the most vulnerable bird groups to collision with transmission lines are (1) waterfowl, (2) grebes, (3)</p>	Identify the measures to reduce the collision risk of migratory birds with the transmission line, including measures to increase transmission line visibility (e.g., aerial marker spheres, spirals, and suspended devices, bird strike diverters).

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					<p>shorebirds, and (4) cranes (Rioux et al. 2013), and may yield population level effects for declining species, including shorebird species.</p> <p>The operation of the transmission line also presents a direct mortality risk (via collision). This should be accounted for in the pathways of effects and appropriate mitigation measures to minimize this risk should be implemented.</p> <p>Environment and Climate Change Canada (ECCC) does not currently have guidance specific to transmission lines. However, the Avian Powerline Interaction Committee has suggested practices posted to their website: https://www.aplic.org/</p> <p>There is also information available in the published literature:</p> <ul style="list-style-type: none"> • Bird collisions with power lines: State of the art and priority areas for research https://doi.org/10.1016/j.biocon.2018.02.029 • Mitigating avian collisions with power lines through illumination with ultraviolet light https://doi.org/10.5751/ACE-02217-170209 	
<p>Indigenous Peoples (IP) <i>Includes changes to the environment that may have pathways of effects to the health conditions of Indigenous peoples (HH)</i></p>						
HH-01	5(1)(c)(i) Aboriginal Health and Socioeconomic Conditions	Indigenous Peoples - Health and Socioeconomic Conditions	Part 2, Section 7.3.4 – Predicted effects on valued components, Indigenous peoples	Section 6.24	<p>Potential health risks of consumption of contaminated country foods have not been sufficiently assessed and corresponding communication plans have not been developed.</p> <p>Project-related changes to concentrations of contaminants in country foods could result in health impacts to Indigenous Peoples conducting traditional land resource use activities on Springpole Lake, Birch Lake, and surrounding lands. The Human and Ecological Health Risk Assessment (HEHRA) predicts total hazard quotients for arsenic, cobalt, and methylmercury that exceed threshold levels for the protection of human health, with country food items (e.g., fish) driving some of the Project-related incremental risk.</p> <p>The Proponent has not committed to develop and implement a country foods monitoring program, nor has rationale been provided to support the exclusion of a country foods monitoring program. Given the predicted elevated risks posed by arsenic, cobalt, and methylmercury during project operations and closure, and the Proponent's ongoing reliance in the HEHRA on country food data from Chan et al. (2014), which is reportedly representative of the Project area (Ecozone 1 Boreal Shield/Subarctic) but has not, to date, been validated through consultation with Indigenous communities, a monitoring program is required to validate assumptions. Country food species should be selected in collaboration with Indigenous communities associated with the Project in order to monitor contaminants of potential concern (COPCs) in species relevant for human consumers.</p> <p>Additionally, there is uncertainty as to how and/or when the Proponent intends to inform local Indigenous communities about observed changes in levels of potential COPCs in country foods and related impacts on human</p>	<p><i>Note: This requirement may be refined upon review of comments from Indigenous communities on the EIS, some of which are still to be received.</i></p> <p>Confirm the Proponent's intent to develop and implement a targeted country food monitoring and reporting program to address uncertainty around potential contamination of country foods.</p> <p>Such a program should be informed by consultation and engagement with Indigenous communities to understand which consumed species should be sampled and to identify preferred sampling methods. As a starting point, and subject to validation by Indigenous communities, IAAC would expect this to include large-bodied fish, such as lake trout, whitefish, lake sturgeon, northern pike, bass, and/or walleye.</p> <p>The program should also contemplate a communication plan, to be informed by consultation and engagement with potentially affected Indigenous communities, outlining how follow-up monitoring results and analyses regarding human health risks would be shared with these communities and how their feedback would be considered.</p>

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					<p>health. Developing a communication plan would strengthen transparency about the Project's impacts to the environment and human health and support effective and efficient communication between the Proponent and communities.</p> <p>Given the predicted influence of seepage and air emissions on waterbodies that support large-bodied fish consumption, a plan to manage any uncertainty about health risks may help build confidence for decision-makers.</p>	<p>Additionally, information should be included on the steps that would be taken in the event of an exceedance of established benchmarks and adaptive measures.</p>
HH-02	5(1)(c)(i) Aboriginal Health and Socio-Economic Conditions	<p>Indigenous Peoples – Current Use of Lands and Resources for Traditional Purposes</p> <p>Indigenous Peoples - Health and Socioeconomic Conditions</p>	Part 2, Section 7.3.4 – Predicted effects on valued components, Indigenous peoples	Appendix R - HEHRA Section 6.2 Section 6.21	<p>The human health risk (Appendix R, Figure 3-2,) and air quality assessments (Section 6.2.1.3) defined an air quality modelling property boundary that differs from the defined PDA.</p> <p>The human health risk (Appendix R, Figure 3-2) and air quality assessments (Section 6.2.1.3, Figure 6.2-2) also included three receptor locations (POR02, POR03, and POR05) within the property boundary that are identified as areas where traditional land and resource use is practiced (Appendix G-2, Table D-1).</p> <p>No receptor locations were chosen within the PDA, as access to the mine site area and country food harvesting within the PDA will be restricted during the active phases of the Project (i.e., construction, operations, and decommissioning (active closure)) (Appendix R, 3.5).</p> <p>How the Proponent intends to restrict access to the PDA is not specified, and access to areas within the property boundary but outside of the PDA may still occur in the absence of a physical barrier. Section 6.21 notes that prior to construction, the Proponent will develop an access management strategy with local Indigenous communities to manage access along the mine access road, throughout all phases of the Project, but it is not clear if and how people may be able to access areas within the property boundary without passing through the proposed gate on the access road.</p>	<p><i>Note: This requirement may be refined upon review of comments from Indigenous communities on the EIS, some of which are still to be received.</i></p> <ol style="list-style-type: none"> 1) Clarify which areas within the property boundary (as defined in Section 6.2.1.3 and presented in Appendix R, Figure 3-2), if any, will remain accessible to local Indigenous communities during each phase of the Project. 2) Provide further rationale on the selection of receptor locations within the property boundary and along the access corridor to confirm whether they represent a worst-case scenario. Provide information about likely exposure frequencies and durations informed by Indigenous engagement, taking into account accessibility. 3) In the human health risk assessment, consider whether the plan to carefully manage site access will require air quality modelling predictions at more locations than is required for the provincial Environmental Compliance Approval (e.g., the property boundary). <p>Ensure the assessment of effects on human health, and associated mitigation and follow-up programs, take into account Indigenous land use.</p>
IP-01	5(1)(c)(iii) Current Use of Lands and Resources for Traditional Purposes	Indigenous Peoples - Current use of Lands and Resources	Indigenous Peoples - Current Use of Lands and Resources for Traditional Purposes	Section 2 Section 6.21 Section 6.26	<p>The EIS does not sufficiently describe potential impacts to traditional navigation of waterbodies and waterways impacted by the Project. This information must be provided to understand effects to current use of lands and resources for traditional purposes and potential impacts to the exercise of Aboriginal and/or treaty rights by members of potentially impacted Indigenous communities.</p> <p>Regarding navigation specifically, IAAC understands that the Project will overprint a portage that currently crosses the existing exploration camp,</p>	<p><i>Note: This requirement may be refined upon review of comments from Indigenous communities on the EIS, some of which are still to be received.</i></p> <p>Provide further information about potentially navigable waterways, as follows:</p>

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					<p>which is used by Cat Lake First Nation and Slate Falls Nation. IAAC already understands that Indigenous communities also use Birch Lake, Springpole Lake, Kapikik Lake, Trout Lake, Kezik Lake, Fawcett Lake, Fry Lake, Bamaji Lake, Lake St. Joseph, Trout Lake, Little Vermillion Lake, and Richardson Lake for fishing, but potential impacts to the navigability of these waterways is not described in the EIS.</p> <p>The EIS notes that some water levels will be lowered, dammed, or overprinted, and further information is required to support IAAC's understanding of impacts to Indigenous navigation. Example questions to determine effects to navigable waterways may include:</p> <ul style="list-style-type: none"> • What are the physical characteristics (e.g. size and depth)? • Has the waterway been used in the past and is it likely to be used in the future? • Is there access by land and water? • How do Indigenous communities utilize these waterways, and how frequently? 	<ol style="list-style-type: none"> 1) Provide information about the physical characteristics of the waterbodies where navigability may be affected by the Project, particularly the area proposed to be dewatered, including size and depth. 2) Provide any information received from Indigenous communities about navigation of waters, including any relevant information on present or past use of waterbodies and waterways. This includes any relevant information provided by Indigenous communities from Traditional Knowledge and Land Use studies or comments from meetings or correspondence. 3) Explain how effects to navigable waterways were validated with Indigenous communities and any specific impacts on their exercise of Aboriginal and/or treaty rights. This includes any concerns raised about hazards being exposed that may affect safe passage, or changes to lake levels that may impact travel routes, as well as any responses to those concerns.
IP-02	5(1)(c)(i) Aboriginal Health and Socio-Economic Conditions	Indigenous Peoples - Health and Socioeconomic Conditions	7.1.9 Indigenous Peoples 7.4 Mitigation Measures	Section 6.21.2.1 Traditional and Resource Use Section 6.11.4 (Mitigation Measures)	<p>Additional information is required to understand potential effects to current use of lands and resources for traditional purposes, with regards to vegetation species of importance and related mitigation measures. The EIS does not provide detail about the species of plants and vegetation that will be cleared within the transmission line corridor. IAAC understands, based on the information in the EIS and input from Indigenous communities, that Indigenous land users use the transmission line corridor for traditional land use activities, including harvesting and gathering. Further information is required about the species that will be cleared within this corridor to support an assessment of effects to current use of lands and resources.</p> <p>Further, the EIS notes that mechanical vegetation removal will be used where possible, but that chemical removal could also be used. Mechanical vegetation removal is often preferred by Indigenous communities due to concern about potential contamination from herbicides or changes to perceptions of the land. The EIS does not define when chemical vegetation removal would be used or potential effects to land users.</p>	<p><i>Note: This requirement may be refined upon review of comments from Indigenous communities on the EIS, some of which are still to be received.</i></p> <ol style="list-style-type: none"> 1) Provide additional information on vegetation species impacted by the construction and operation of the transmission line and specifically quantify the loss of species identified as culturally important or harvested by Indigenous communities. 2) Clarify and provide rationale for the circumstances under which the Proponent would use chemical removal instead of mechanical removal. 3) Ensure that the updated analysis on anticipated loss of vegetation is included in the assessment of effects to Indigenous peoples' current use of lands and resources.