

First Mining Gold (FMG) Response to the Impact Assessment Agency of Canada Addendum of Information Requirements on the Springpole Gold Project Final Environmental Impact Statement/ Environmental Assessment Received on May 7, 2025

#	Link to CEAA 2012	Reference to EIS Guidelines	Reference to EIS	Comments from Indigenous Communities	Context and Rationale	Information Request	FMG Response
IP-03	5(1)(c)(i) Indigenous Peoples: health and socioeconomic conditions 5(1)(c)(ii) Indigenous Peoples: physical and cultural heritage 5(1)(c)(iii) Indigenous Peoples: current use of lands and resources for traditional purposes	3.2.1 Factors to be Considered; Changes to the Environment 7.1.5 Groundwater and Surface Water 7.1. 11 Current Use of Lands and Resources; Other Changes to the Environment 7.2.2 Predicted Changes to the Physical Environment; Changes to Groundwater	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) Appendix N-1 (Surface Water Quality Baseline)	IAAC received comments from Cat Lake First Nation and Lac Seul First Nation (sufficiency comments 10b, 20, 26, 29 and technical comments 40, 52) and Slate Falls Nation (section 1, comment 3; section 6.18, comment 8; section 6.21, comment 38; section 6.26, comment 11) expressing concerns that uncaptured seepage from the co-disposal facility (CDF), as modelled by the Proponent, would affect two major waterbodies of importance to these communities: Springpole Lake and Birch Lake. Cat Lake First Nation and Lac Seul First Nation noted that access to clean drinking water is both a right and a practice that is integral to and inseparable from spending time on the land, and that clean water is important for the preparation of traditional medicines. Further, the Nations noted that impacts to surface water bodies would affect their way	IAAC understands that the real or perceived contamination of Birch Lake and Springpole Lake (including the fear of contamination due to accidents) may lead to effects to Indigenous Peoples, such as: <ul style="list-style-type: none"> • effects on Indigenous Peoples' biophysical and mental health, including due to fears of contamination and alienation from places of importance; • effects on Indigenous communities' commercial and recreational tourism businesses; • effects on Indigenous communities' current use of lands and resources, including willingness to use nearby waterbodies for drinking, ceremony, and cultural and spiritual use; and, • impacts to the exercise of rights related to the use of nearby waterbodies, given that nibi (water) is a value of spiritual and cultural importance to nearby communities. IAAC and Indigenous communities reviewed the EIS 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 Indigenous Peoples related to water quality:	Following the ongoing technical discussions with the Province of Ontario about water quality modelling to satisfy the requirements of WQI-01, and any associated changes made to the supporting assessments, provide updated information on: <ul style="list-style-type: none"> • monitoring or follow-up measures to verify the accuracy of the assessment of effects on drinking water used by Indigenous Peoples, including the spring water collection site identified by Lac Seul First Nation; • any communication plans for notifying Indigenous land users of potential health risks associated with drinking water; and, • whether and how the Proponent accounted for potential diminished use of nearby waterbodies by Indigenous Peoples due to real or perceived contamination in its assessment of effects to Indigenous (mental) health 	On August 13, 2025, the province of Ontario confirmed that it was satisfied that FMG has addressed its comments on surface water for the Final EIS/EA. Surface water quality in the receiving environment adjacent to the CDF is demonstrated to meet water quality guidelines for the protection of aquatic life which are more stringent than drinking water criteria. Contact water will be collected and treated prior to release and will be subject to effluent quality discharge limits established by the provincial Ministry of the Environment, Conservation and Parks (MECP) during permitting which will ensure protection levels are met. The proposed follow-up monitoring programs are described in Section 12 of the Final EIS/EA, including a program for water quality, which is intended to build on the extensive baseline monitoring program already in place. Please see Attachment IAAC-IP-03a for a figure depicting the comprehensive water monitoring program with 35 monitoring locations, and extending 75 km downstream all the way to Slate Falls Nation. As noted, the follow-up program is generally very consistent with the baseline program with the 35 locations covering all reasonable monitoring locations and

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			<p>Appendix N-2 (Surface Water Quality Modelling Report)</p> <p>Appendix V-1 (CDF PFS Design Report Update)</p>	<p>of life and affect socioeconomic and harvesting practices. The Nations noted concern about the lack of consideration of impacts on drinking water, including a spring water site identified in their land use studies, and subsequent effects to current use of lands and resources and exercise of rights, in the Proponent's analysis.</p> <p>Slate Falls Nation noted that changes to surface water quality not only impacts fishing opportunities, but the health of Slate Falls Nations members, as they rely on water for drinking, to harvest wildlife, plants, and medicines, and to support tourism activities and outdoor recreation. Slate Falls Nation noted that water is connected to all parts of the ecosystem and that clean and plentiful water is vital to community health, so water contamination over time is of particular concern.</p>	<ul style="list-style-type: none"> changes to drinking water collected within the Project Development Area (PDA) (including surface water and the site identified by Cat Lake First Nation), and within the Local Study Area (LSA) (including surface water and the spring water collection site identified by Lac Seul First Nation); and changes to the quality of aquatic country foods due to contamination, including fish species of importance such as lake trout, walleye, northern pike, sturgeon, yellow perch, etc., and resultant effects to Indigenous Peoples' health, current use of lands and resources, and impacts to the exercise of rights.¹ <p>IAAC acknowledges that impacts to aquatic country foods could be managed through the country foods monitoring program that the Proponent described in its response to HH-01. IAAC understands that the groundwater source within the PDA will not be accessible during life of mine and therefore is not a risk to human health but understands that the loss of the site for drinking water is an effect on current use of lands and resources.</p> <p>IAAC previously issued WQI-01, which outlines several areas where further information is required to build confidence in the assessment of</p>	<p>and socioeconomic conditions, current use of lands and resources for traditional purposes, and exercise of rights.</p>	<p>was set up with both baseline and follow-up monitoring in mind. This program will be further refined and updated as needed during permitting based on provincial permitting requirements, and additional consultation opportunities during permitting.</p> <p>FMG is committed to providing additional meaningful opportunities in working collaboratively with the Shared Territory Protocol Nations (STPN) through all phases of the Project. Community-based monitoring is also proposed for the STPN communities to supplement the regulatory follow-up monitoring. For example, communities may wish to monitor additional waterbodies and drinking water locations upstream that are not required for regulatory or Project-related effects monitoring.</p> <p>Receiving water quality will be compared to federal and provincial protection of aquatic life criteria which are more stringent than drinking water quality standards. While the aquatic protection guidelines that FMG is monitoring water quality are more protective than human drinking water criteria, FMG will compare water monitoring results to both aquatic protection and drinking water criteria for transparency and ease of understanding. While not predicted to</p>

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					<p>potential impacts to water quality, and requested a technical discussion between IAAC, the Proponent, and the Ontario Ministry of the Environment, Conservation and Parks, which is the competent ministry for surface water and groundwater management and related provincial permitting</p> <p>IAAC understands that the Proponent is planning to host technical meetings with interested Indigenous communities to discuss the CDF. IAAC is available to support these meetings.</p>		<p>occur, any exceedances will be reported to MECP and shared with the STPN, discussed in reporting, investigated and addressed through adaptive management; please see Attachment IAAC-IP-03b for the Environmental Management, Monitoring and Adaptive Management Framework.</p> <p>The Environment Committee(s) is expected to provide a forum for the local First Nations for the timely review and consultation/ comment on environmental monitoring plans and data sharing and adaptive management through life of the Project. FMG is also providing the opportunity for the STPN to appoint an environmental monitor to work in the mine's environment department to implement the follow-up monitoring collaboratively with FMG. These opportunities including an Environment Committee and environmental monitoring role have already been confirmed to date with Mishkeegogamang First Nation. The STPN communities have the option to work jointly with Mishkeegogamang or independently and also independently of each other if they wish. FMG will maintain flexibility to establish Environment Committees that fit how the communities may choose to work together or not.</p>

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							<p>The Environment Committee(s) and First Nation Environmental Monitors/ Technicians are proposed to help facilitate communication with their respective communities in addition to FMG’s direct outreach communications. FMG will also communicate water quality updates, and other information, directly via the Project webpage, regular newsletters, community meetings, leadership meetings, and other opportunities for information sharing.</p> <p>The Final EIS/EA includes comprehensive mitigation measures related to water quality, quantity, as well as Traditional Land and Resource Use. As noted in Section 6.21.2.3, the spring water location is not known to be within the mine site area. FMG sought clarification on this point and received the following reply from the Nations on August 14, 2025:</p> <p><i>“The level of detail sought by FMG about the location of culturally important sites cannot be provided from the studies because the data is buffered and randomized to protect the intellectual property of the Nations. The Nations do not share raw mapped data, for the same reason. Their Indigenous Knowledge have been improperly accessed and used on too many occasions and protocols are now in place to prevent that. That said, we</i></p>

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							<p><i>strongly encourage FMG to take a precautionary approach and assume that the noted value and other values are in proximity to the currently proposed effluent discharge location and identify (under a scenario where that is the final discharge point; see further discussion in relation to your Item C below) what impacts the effluent discharge is likely to have on the value, and present that information to the Nations for review. We also recommend that effluent discharge near a culturally traditional source of drinking water is not a good decision by FMG”.</i></p> <p>FMG will continue to offer dialogue with Lac Seul First Nation regarding traditional land use and surface water. We acknowledge that in May 2025, Cat Lake First Nation and Lac Seul First Nation requested that the proposed treated effluent discharge location in the southeast arm of Springpole Lake be relocated to be closer to the mine site with treated discharge to Birch Lake. FMG supports this request and has followed up with MECP to confirm its viability from a regulatory perspective. Accordingly, FMG is committed to optimizing the discharge location per the Cat Lake and Lac Seul First Nation request during the permitting process.</p>

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							<p>FMG will make monitoring reports available to Indigenous communities upon request, and would notify community leadership directly if any potential health risks were identified. However, no health effects are predicted from the Project and a country foods monitoring program is proposed to be developed with the STPN communities to monitor country foods during the life of mine.</p> <p>The assessment of potential effects on Indigenous peoples in Section 6.26 acknowledges that there may be changes in the experience of Indigenous peoples in conducting traditional practices through negative perceptions. However, with the establishment of a collaborative Environment Committee(s) and community-based monitoring initiative and ongoing communication with community members these perceptions can be addressed.</p> <p>While the Final EIS/EA addresses closure strategy for the Project, closure planning will be an ongoing key focus of permitting and consultation during all phases of the Project. An updated conceptual closure vision figure has been produced (Attachment IAAC-IP-03c) to reflect feedback to date, particularly for the CDF closure concept and fish habitat, and building on the objective of restoring the Project</p>

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							<p>site to as stable and productive landscape capable of supporting land uses and minimizing visual disturbance by creating natural looking features at the CDF for closure design. Again, this concept will be modified where feasible based on additional consultation during permitting and life of mine and will consider advancements that may be made with closure methods at other similar sites. Revegetation trials will be undertaken during the mine life in collaboration with the local First Nations to test and optimize plant suitability.</p> <p>A closure alternative opportunity that can be considered in the future during life of mine, if there is interest from the local First Nations, is to establish a renewable energy project at the reclaimed mine site to generate electricity which can be sold into the Ontario grid given the Project's transmission line connection. This can potentially be First Nation owned. However, the base case at this time remains to close and reclaim the site per the concepts described here and in the Final EIS/EA.</p> <p>FMG will offer to engage with the STPN communities on the development of the Certified Closure Plan that will be filed under the Mining Act prior to construction. The Mine Closure Plan is a legally required</p>

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							document under Part VII of the Mining Act and Ontario Regulation 240/00 (Mine Development and Closure) that must be filed before construction begins. The Closure Plan in permitting specifies the amount of Financial Assurance required to guarantee completion of the closure work. The Financial Assurance is submitted with the filing of the closure plan and held by the Ministry.
IP-04	<p>5(1)(c)(i) Indigenous Peoples: health and socioeconomic conditions</p> <p>5(1)(c)(ii) Indigenous Peoples: physical and cultural heritage</p> <p>5(1)(c)(iii) Indigenous Peoples: current use of lands and resources for traditional purposes</p>	<p>7.2.1 Predicted Changes to the Physical Environment; Changes to the Atmospheric Environment</p> <p>7.1.5 Effects Assessment; Groundwater and Surface Water</p> <p>7.2.2 Predicted Changes to the Physical Environment; Changes to Groundwater and Surface Water</p>	Section 6.24	<p>IAAC received comments from Cat Lake First Nation and Lac Seul First Nation (sufficiency comments 10, 10a, 34) and Slate Falls Nation (section 6.24, comments 3 and 4) about the geographic extent of effects of the Project and sensory disturbance that could affect land users.</p> <p>Cat Lake First Nation and Lac Seul First Nation noted that the area affected by the Project holds profound importance for community members and that the Project threatens to disrupt the harvesting and cultural rights of community members in a preferred harvesting area. The Nations noted that the EIS fails to capture the geographic scale and</p>	<p>IAAC requested the Proponent provide maps showing the extent of effects related to the Project, during a meeting on October 8, 2024, and again by email on November 13, 2024.</p> <p>The Proponent provided updated figures in the final EIS; however, these figures did not fully show the geographic area where effects are anticipated to occur. This information is required to support discussions with Indigenous communities and IAAC's analysis of impacts to Indigenous Peoples.</p> <p>• Air quality. The EIS notes that Indigenous land users will be active within the Proponent's property boundary; however, the figures illustrating air quality (Figures 6.2-1, 6.2-2, and 5-1 to 5-11) do not show isopleths within this property boundary. Given the small number</p>	<ol style="list-style-type: none"> 1. Provide figures identifying the geographic extent of changes to the environment beyond the PDA related to the following valued components (VC): <ol style="list-style-type: none"> a) air quality; and, b) surface water quality. 2. Should there be elevated concentrations above the criteria selected by the Proponent for each VC beyond the PDA, provide information regarding the duration and frequency of the elevated levels to support the assessment of potential changes to Indigenous Peoples' health conditions. 	<ol style="list-style-type: none"> 1. Please see Attachment IAAC-IP-04 for figures identifying the graphic extent of changes to the environment relate to air quality and surface water quality. All locations are in compliance with stringent environmental protection criteria demonstrating the effectiveness of the Project's design and environmental protection measures. The figures demonstrate the effectiveness of project planning, overall design and mitigation measures. Follow up programs will be implemented along with adaptive management where required. Please see Attachment IAAC-IP-03b for the Environmental Management, Monitoring and Adaptive Management Framework.. 2. For air quality, FMG has conducted supplemental model runs on additional receptors with the

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				<p>magnitude of impacts on land users' values and experience of the lands. In particular, land users often camp overnight in the area, and the Nations noted that any sensory disturbance would affect community members' ability and willingness to continue this tradition, as well as their quiet enjoyment of the land.</p> <p>Slate Falls Nation noted concerns about potential contamination of air and water on Indigenous land users, as well as impacts to land users' behaviour, health, and wellbeing due to perception or fear of contamination.</p>	<p>of receptors, and the fact that land users are expected to be mobile on waterbodies inside the property boundary, air quality contour plots that include a range of concentrations, including, the relevant Ambient Air Quality Criteria are required to understand impacts to the current use of lands and resources for traditional purposes, as land users may avoid areas due to potential air quality concerns. IAAC raised concerns in HH-03 about potential effects on the health of Indigenous land users due to air quality. In its response, the Proponent indicated that the health effects to Indigenous Peoples due to changes in air quality are expected to be limited, as land users would not be subject to prolonged exposure of airborne contaminants; isopleth plots are required for IAAC to validate the Proponent's assertion with Indigenous communities.</p> <ul style="list-style-type: none"> • Surface water quality. Indigenous communities noted that EIS does not take into account the spiritual and cultural importance of nearby waterbodies in its analysis of surface water quality nor recognize that any exceedances in water quality parameters could impact current use of lands and resources for traditional purposes, including 		<p>intention of further defining the potential air quality effects within the property boundary; even within the PDA. The parameters considered as well as the methodology follow the same modelling as the Springpole air quality technical support document (TSD) included as Appendix G-2 of the Final EIS/EA; however, eight new points of reception (POR) were chosen as supplemental representative points of potential activity within the leased claims boundary of the Project. The results show that for all parameters, predicted concentrations are below the respective AAQC, for all averaging times, even with consideration of project emissions and the existing overestimated baseline concentrations.</p> <p>The only exception was benzo(a)pyrene, as a result of its high conservative baseline concentrations, as was also noted in the Final EIS/EA. This finding is typical of air quality assessments in Ontario where baseline b(a)p concentrations, attributed to a variety of sources including industry and transportation, are high at baseline relative to the stringent criteria.</p>

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					<p>harvesting, ceremony, and drinking, and the exercise of rights. A map showing these contours is required to understand impacts to current use of lands and resources and Indigenous health.</p>		<p>For water quality, the modelling presented in support of the Final EIS/EA demonstrates that predicted water quality in the receiving environment, Birch Lake and Springpole Lake, has been conservatively estimated using standard, defensible methods consistent with regulatory expectations in Ontario including in other mining EAs.</p> <p>With seepage mitigation, the modelling further shows the incremental changes in water quality from limited bypass seepage are indistinguishable from natural variability. As such, modelling demonstrates that water quality remains below (better than) applicable Water Quality Guidelines for the Protection of Aquatic Life (WQG PAL).</p> <p>Site-specific monitoring programs, including adaptive management thresholds and response actions, will be implemented for the Project.</p> <p>Collectively, these findings confirm that the modelling approach is robust and precautionary, and that the Project will maintain compliance and achieve environmental protection standards throughout its life cycle. FMG has addressed MECP's comments on the Final EIS/EA with respect to</p>

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							surface water and air quality and MECP has confirmed its satisfaction.
IP-05	5(1)(c)(i) Indigenous Peoples: health and socioeconomic conditions 5(1)(c)(iii) Indigenous Peoples: current use of lands and resources for traditional purposes	3.2.2 Valued Components to be Examined 4.2.2 Community Knowledge & Indigenous Knowledge 7.2 Predicted changes to the Physical Environment 7.1.9 Indigenous Peoples; Current Use of Lands and Resources for Traditional Purposes	Section 2 Section 6	IAAC received comments from Cat Lake First Nation and Lac Seul First Nation (sufficiency comments 4, 10b, 13, 21, 25) and Slate Falls Nation (section 6.21, comments 21, 26, 50) expressing concern that the effects assessment presented in the EIS either did not consider or did not accurately represent the traditional knowledge studies or information that they provided to the Proponent, and that there were not opportunities for them to validate the Proponent's assessment. For instance, Indigenous communities noted concerns about the location of the proposed project components, including the fact that the CDF is in close proximity to Birch Lake and Springpole Lake, which are both of spiritual and cultural importance to surrounding Indigenous communities. The area at large is a preferred harvesting and fishing site on	IAAC notes that the EIS does not detail divergences in views between the Proponent and Indigenous communities, how these differences were addressed, and specific steps that were taken to validate the effects assessment and significance criteria with communities, apart from providing the draft EIS for public review. IAAC previously requested a meeting in fall 2023 to discuss how the Proponent would be integrating supplemental information and comments provided by Indigenous communities following the Proponent's engagement on the draft EIS. In this meeting, held on April 25, 2024, the Proponent did not explain how it intended to validate the integration of Indigenous knowledge in the EIS with Indigenous communities. Further, in a meeting with the Proponent on March 25, 2025, IAAC requested further information about the methods used by the Proponent to validate the information in the EIS with Indigenous communities, including the integration of community-led studies, residual effects, and significance ratings. The	1. Clarify how Indigenous knowledge was integrated into the project design choices and specify if there was Indigenous knowledge that was provided that could not be integrated into design decisions due to the location of the ore, engineering safety of the project design, or other reasons. 2. Where Indigenous knowledge was not able to be incorporated, provide clarification on the potential impacts to Indigenous Peoples' health and socioeconomic conditions and current use of lands and resources; and, as applicable, efforts that have been made to either mitigate or accommodate for those impacts. 3. Clarify the Proponent's intent to incorporate information provided by Indigenous communities	1. Section 5.3 (Project Description) of the Final EIS/EA explains how Indigenous knowledge information was considered in the design presented in the Final EIS/EA. For example, Indigenous knowledge was considered in the following: <ul style="list-style-type: none"> • Routing of the transmission line whereby 57km of the transmission line was relocated; • Development of the water management and treatment system including perimeter contact water and seepage collection ditching, containment ponds and water treatment technology effective for removal of metals and other parameters at a scale suitable for the Project. • Co-located the mine access road with the transmission line to reduce linear corridors. • Solid waste will be transported off site for disposal rather than landfilled on site to eliminate the long-term storage need for solid waste; • Understanding the concern for public access along the mine access road, the development of an access management strategy to address Indigenous concerns regarding public access to TLRU area is

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				<p>which communities rely. As such, Indigenous communities noted doubt that the EIS fully or accurately explains effects of the Project on the environment, including to areas listed in section 5 of CEAA 2012.</p> <p>In particular, IAAC received many comments from Indigenous communities articulating concerns about the Proponent’s alternatives assessment, stating that the Proponent did not adequately consult them on the location of the proposed project components. Indigenous communities noted that the Proponent did not appear to consider Indigenous values in its determination of the preferred location for the co-disposal facility.</p> <p>Slate Falls Nation noted concern that information from their Health, Socioeconomic, Indigenous Knowledge, and Land Use Baseline Report was not meaningfully integrated into the effects assessment. In particular, Slate Falls Nation noted</p>	<p>Proponent confirmed that traditional knowledge studies provided by Indigenous communities were integrated into the final EIS, but that Indigenous communities were not given the opportunity to validate how the information had been integrated.</p> <p>When the assessment of impacts to Indigenous peoples integrates Indigenous traditional knowledge and socioeconomic studies—including in the identification of valued components of interest to Indigenous communities, in the assessment of potential effects, the identification of mitigation measures, and the determination of significance of any residual effects—the integration of the traditional knowledge should be validated with Indigenous communities to ensure that the Proponent has accurately represented the communities’ knowledge and views.</p> <p>IAAC strongly recommends that the Proponent schedule technical meetings with interested Indigenous communities to discuss the integration of Indigenous knowledge in the Proponent’s pathways of effects, validation of proposed mitigation, and significance ratings. IAAC is available to support these meetings.</p>	<p>into its proposed follow-up and monitoring programs and provide details on opportunities for Indigenous communities to participate in the development of these programs and validate how their knowledge was incorporated into program design.</p>	<p>planned (e.g., locating the gate house/checkpoint towards the end of Wenasaga Road to prevent unauthorized use of the area), the use of signage along the Wenasaga Road advising of the road ahead being closed to public use, and coordination with the provincial Ministry of Natural Resources (MNR) on other potential measures would be considered along with recommendations from the local First Nations; and</p> <ul style="list-style-type: none"> • Development of the draft Employee Health and Wellness Strategy was advanced for the Final EIS/EA to frame the Project’s approach to supporting Project readiness and the retention of employees. The strategy identified how FMG will collaborate with the local First Nations, municipalities, and service providers to promote health and wellness at the Project and in the region. <p>In addition, the overall design of a small project footprint is consistent with feedback received throughout the EA process regarding the importance of minimizing effects and extent of disturbance. The small footprint reduces effects by reducing the extent and distribution of disturbance and limits the extent of effects from potential dust, emissions, and noise and by extension limits effects on</p>

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				<p>that their perspectives were not included when determining alternatives for the Project, and that the effects assessment does not include their risk acceptance criteria. Slate Falls Nation expressed low confidence overall in the effects assessment and significance ratings and noted that they were unable to meaningfully engage with the Proponent to discuss technical issues of importance prior to the submission of the EIS to IAAC.</p>			<p>traditional land use activities. The location of the two dikes also helps minimize the extent of effects on Springpole Lake and fish and fish habitat. The design of the CDF effectively manages mine rock and tailings geochemistry and mitigates effects on water quality which was noted by Indigenous communities as being important to protect.</p> <p>Additional Project designs and mitigation measures that limit dust and noise have also been influenced by Indigenous communities, as have the design concepts for closure and restoration of the open pit basin and CDF. Again, this will be further refined through consultation opportunities with the STPN communities during permitting and the life of the Project.</p> <p>In addition, based on review of the Final EIS/EA, FMG has received a request from Cat Lake and Lac Seul First Nations regarding the effluent discharge location. FMG is supportive and committed to optimize the treated effluent discharge location during detailed design and permitting such that it is not discharging directly to the southeast arm of Springpole Lake and is relocated closer to the mine site with treated discharge to Birch</p>

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							<p>Lake. This would eliminate the need for approximately 8 km of pipeline infrastructure.</p> <p>2. FMG was unable to incorporate the design recommendation to construct an underground mine instead of an open pit mine. This was not possible because the ore body is near surface and hosted within less competent rock type making underground mining too dangerous, and the ore is distributed in bulk across the deposit at around 1g/t which is not amenable to underground mining methods.</p> <p>A historical portage, referred to as the Marten Portage based on TKLU work is located within the mine site area of the PDA and specifically within the open pit footprint. The portage was overgrown and has been recently maintained by FMG to support alternate access between Springpole Lake and Birch Lake instead of using the exploration camp route. Avoidance of the portage is not possible as it is partially within the open pit. As the portage will be largely overprinted by the mining operation an alternate historical portage route located between Birch Lake and Springpole Lake's north basin has</p>

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							<p>been identified as a potential and viable alternate portage to be re-established and maintained starting from Project construction through active closure to provide on-going portage access. Following active closure, the Marten portage will be re-established in collaboration with local First Nations. In addition, it is proposed that the historic aspect of the portage that will be overprinted during mine operations would also be fully documented and commemorated prior to construction. This would be done and led by local First Nations and help inform the design planning for the re-establishment work for the portage during active closure. The design of the alternate portage used during construction and operation would also be undertaken by the local First Nations as would the design of re-establishing the existing portage in the Project closure phase.</p> <p>FMG had discussions with Cat Lake and Lac Seul First Nations regarding the portage through this summer and discussions remain ongoing regarding the required next steps and mitigation measures associated with the Portage. Through the discussions, FMG appreciates that while the access component of portage can be</p>

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							<p>mitigated through the establishment of an alternate route, the historical component is more challenging to address and requires thorough documentation of the portage prior to construction. FMG is committed to working with the STPN communities on the approach and welcomes their ideas and leadership and supportive of additional dialogue. In their letter of August 14, 2025, Cat Lake and Lac Seul requested additional structured meetings on this topic occur, and progress can be made between the parties on required next steps and appropriate mitigation and accommodation measures. FMG is supportive of additional meetings and understand that IAAC has made efforts to coordinate such meetings with the Nations which we would be pleased to join.</p> <p>Finally, in the Final EIS/EA the alternatives assessment evaluated different locations for the CDF including options further away from waterbodies. As noted in the alternatives assessment, locating the CDF further afield presents several challenges with potential greater impacts and the preferred location selected in the Final EIS/EA provides for highly favorable geotechnical and</p>

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							<p>hydrogeological foundation conditions. FMG continues to work with Slate Falls Nation who has requested additional consideration on this topic and related technical discussions.</p> <p>3. As described in Section 12.1.4 of the Final EIS/EA, FMG will work with Environment Committee(s). The Environment Committee(s) provides a structured pathway for continued and constructive, transparent dialogue, interaction and information-sharing between FMG and the leadership and members of local Indigenous communities. Reasonable capacity will be provided by FMG for the Environment Committee(s). The mandate of the Environment Committee(s) is to provide a forum for:</p> <ul style="list-style-type: none"> • The review, collaboration, and consultation/comment on applicable post-EA Project approvals and environmental monitoring plans; • Sharing and evaluating environmental information; • Identifying mitigation measures, if required through adaptive management;

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							<ul style="list-style-type: none"> • Assisting in the development and implementation of environmental monitoring plans; and • Ongoing life of mine sharing of TK and TLRU information, community perspectives, and collaboration on continual improvement initiatives <p>In addition, community environmental monitors will be invited to participate in data collection, and Indigenous community input through life of mine will be considered in the refinement of environmental monitoring and adaptive management plans.</p> <p>FMG acknowledges that some individuals may be reluctant to use areas adjacent to the mine due to concerns for country food health and other reasons. To address this, it is proposed that the Nations and FMG collaborate on monitoring:</p> <ul style="list-style-type: none"> • Water quality monitoring during all phases of the Project. • A country foods monitoring program for the Project area. • The STPN will also be able to do their own monitoring at areas of importance to the Nations, and share their own results and views. • The STPN will have the opportunity to have environmental monitors

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							<p>working on site to see how the Project is being constructed and operated and to implement the monitoring plans.</p> <ul style="list-style-type: none"> The STPN will be able to visit the site and tour the mine and ask questions and provide feedback.
IP-06	5(1)(c)(iii) Indigenous Peoples: current use of lands and resources for traditional purposes	<p>7.1.9 Indigenous Peoples; Current Use of Lands and Resources for Traditional Purposes</p> <p>7.3.5 Predicted Effects on Valued Components; Current Use of Lands and Resources for Traditional Purposes</p>	<p>Section 6.21</p> <p>Section 6.26</p>	<p>IAAC received comments from Cat Lake First Nation and Lac Seul First Nation (sufficiency comment 13) and Slate Falls Nation (section 6.21, comments 21, 26, 50) about the Proponent's assessment of impacts on Indigenous communities' exercise of rights.</p> <p>Cat Lake First Nation and Lac Seul First Nation noted that the Proponent does not consider any semi-tangible or intangible aspects of culture, such as language, intergenerational knowledge transfer, and sense of place, in its assessment of impacts on the exercise of rights, despite the Nations providing information to the Proponent directly through their community-led studies.</p> <p>Slate Falls Nation noted concern that information from their Health, Socioeconomic, Indigenous Knowledge, and</p>	<p>As outlined in the EIS Guidelines, the Proponent is required to document potential adverse impacts of the Project on the exercise of rights for each Indigenous community. The Proponent highlights values of importance identified in each community's traditional knowledge study and provides brief context on Aboriginal and treaty rights, but there is no detailed discussion of how the Project will impact the exercise of rights or how these effects will be managed.</p> <p>In a meeting with the Proponent on March 25, 2025, IAAC requested clarification on the scope of the Proponent's analysis of impacts to the exercise of rights, and the Proponent confirmed that its assessment of potential impacts to the exercise of rights is presented in Sections 6.21 and 6.26. However, these sections do not provide sufficient information about each community's exercise of rights, the specific impacts to each community, and how these will be accommodated and mitigated.</p>	<p>Provide an analysis of anticipated impacts to each Indigenous community's exercise of rights, the measures proposed to mitigate or accommodate these impacts, and information about impacts that have not been fully mitigated or accommodated as part of the EA. The analysis should include a summary of any discrepancies in the views of the Proponent and each Indigenous community and rationales for the Proponent's conclusions.</p>	<p>FMG acknowledges that the ability of community members to exercise rights and interests within the mine footprint area will be affected during mine construction, operations and active closure due to mining activities and safety requirements. Mitigation measures identified throughout the Final EIS/EA and commitments are made to minimize effects outside of the mine footprint. The attached table (Attachment IAAC-IP-06) provides an analysis of anticipated impacts to the local First Nation ability to exercise rights and the measures proposed to mitigate or accommodate these impacts. The closure planning strategies identified in the Final EIS/EA will ensure that the Project site is restored to a functional and productive state with substantial enhancements to fish and fish habitat in particular. Other measures include to removal of mining infrastructure and the reclamation of the CDF to as natural a feature as feasible (see Attachment IAAC-IP-03c for an updated conceptual closure vision drawing).</p>

#	Link to CEAA 2012	Reference to EIS Guidelines	Reference to EIS	Comments from Indigenous Communities	Context and Rationale	Information Request	FMG Response
				<p>Land Use Baseline Report was not meaningfully integrated into the assessment of impacts on the exercise of rights. Slate Falls Nation noted that they were not meaningfully engaged to discuss the indicators or methods used in the assessment and expressed low confidence in the appropriateness or accuracy of the Proponent's analysis.</p>	<p>Indigenous communities raised concerns about this lack of information. Similarly, IAAC requires further information about the specific mitigation and accommodation measures that will be employed by the Proponent to manage impacts to rights in order to support its assessment and advice to the Minister; without this information, IAAC must assume that the impacts to rights identified by Indigenous communities would not be managed.</p> <p>IAAC and Indigenous communities reviewed the EIS closely, including the sections highlighted by the Proponent, and have identified the following areas for which greater confidence is required to validate the assessment of potential impacts to Indigenous Peoples' exercise of rights:</p> <ul style="list-style-type: none"> • how Indigenous Peoples' perspectives on anticipated impacts to their rights were integrated into the Proponent's analysis and effects assessment; • how the Project will affect the values of importance highlighted by the Proponent in Section 6.21 but not included in the effects assessment, including water (nibi), cultural continuity, language, etc.; • the severity of residual effects on the exercise of rights; and, 		

#	Link to CEAA 2012	Reference to EIS Guidelines	Reference to EIS	Comments from Indigenous Communities	Context and Rationale	Information Request	FMG Response
					<ul style="list-style-type: none"> mitigation or accommodation measures proposed by the Proponent to manage impacts to rights, and Indigenous communities' perspectives on the effectiveness of these measures. <p>IAAC strongly recommends that the Proponent schedule meetings with interested Indigenous communities to discuss specific rights practices such as connection to water (nibi); fishing, hunting, and trapping; food, plants, and medicines; and cultural continuity, how these would be affected by the Project, and how they would be mitigated or accommodated. IAAC is available to support these meetings.</p>		
IP-07	<p>5(1)(c)(ii) Indigenous Peoples: physical and cultural heritage</p> <p>5(1)(c)(iv) Indigenous Peoples: any structure, site or thing that is of historical, archaeological, paleontological or architectural significance</p>	<p>7.1.9 Indigenous Peoples; Current Use of Lands and Resources for Traditional Purposes</p> <p>7.3. 5 Predicted Effects on Valued Components; Current Use of Lands and Resources for Traditional Purposes</p>	<p>Section 6.22 Section 6.23</p>	<p>IAAC received comments from Cat Lake First Nation and Lac Seul First Nation (sufficiency comment 12; technical comments 48 and 49) about the Proponent's assessment of impacts to Waabizheshi Agaasademon Onigam (the Marten Portage).</p> <p>Cat Lake First Nation and Lac Seul First Nation have raised concerns about the CDF overprinting Waabizheshi Agaasademon Onigam (the Marten Portage), which is a critical part of their cultural landscape. Cat Lake First</p>	<p>The Proponent notes that it will establish an alternative portage route and re-establish Waabizheshi Agaasademon Onigam following the decommissioning and abandonment of the Project. In a meeting with the Proponent on March 25, 2025, IAAC requested clarification on whether the Proponent had validated the acceptability of this mitigation with Cat Lake First Nation and Lac Seul First Nation. The Proponent confirmed that it had discussed this with proximate land users and a trapline license holder but had not discussed this mitigation with leadership for either Nation. To this point, Cat Lake First Nation and Lac Seul First Nation have</p>	<p>In the light of the diverging views between the Proponent and the Indigenous communities, indicate any additional measures to mitigate or accommodate the potential impact to physical and cultural heritage associated with the overprinting of Waabizheshi Agaasademon Onigam. Should measures be proposed, describe the steps that the Proponent took to build consensus on these measures with impacted Indigenous communities.</p>	<p>FMG is continuing dialogue with Cat Lake First Nation and Lac Seul First Nation, and this process will continue through life of mine.</p> <p>Continuing dialogue is also offered to Slate Falls Nation. FMG sought clarification on whether the Marten Portage (Waabizheshi Agaasademon Onigam) is referring to as the same portage adjacent to the FMG exploration camp as there was no reference to a portage near the Project site in the version of the Indigenous Knowledge and Use studies provided to FMG. The current exploration camp serves as the main portage at present; however, FMG also began maintaining a historical portage route adjacent the</p>

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				<p>Nation and Lac Seul First Nation expressed that not only is Waabizheshi Agaasademon Onigam a significant area of cultural heritage, but the portage facilitates continued use of their traditional territory and exercise of rights by providing access to critical harvesting areas and locations of importance.</p> <p>Cat Lake First Nation and Lac Seul First Nation have requested that a Heritage Impact Assessment (HIA) be undertaken by the Proponent in order to understand the full scope of potential impacts to Waabizheshi Agaasademon Onigam.</p>	<p>noted that this strategy has not been validated with their communities and state that the destruction of Waabizheshi Agaasademon Onigam could be irreversible, as the re-established portage would not have the same spiritual significance.</p> <p>Given these comments, it is unclear whether the proposed mitigation is acceptable to Indigenous communities, which reduces confidence in the assessment of residual effects and significance rating provided by the Proponent.</p> <p>IAAC strongly recommends that the Proponent schedule meetings with interested Indigenous communities to discuss the overprinting of Waabizheshi Agaasademon Onigam, the acceptability of an alternative portage route as a mitigation measure, and the value of the re-established portage. IAAC is available to support these meetings.</p> <p>In relation to the HIA, the Ontario Ministry of Citizenship and Multiculturalism also recommended that it be prepared as part of the EA in order to inform understanding of project effects and detailed design.</p>	<p>Further, describe the Proponent's commitments regarding a potential Heritage Impact Assessment (HIA), including:</p> <ul style="list-style-type: none"> • the timeline for completion of the study • how Indigenous knowledge would be integrated to inform the assessment; • opportunities for Indigenous communities' participation in the HIA; and, • methods for validating and sharing the results of the HIA with Indigenous communities, including any relevant commitments from the Proponent. 	<p>exploration camp in 2023 to provide alternate access from Springpole Lake's north basin to Birch Lake, without having to pass through the exploration camp. From productive meetings with Cat Lake and Lac Seul in Thunder Bay at the end of May 2025, FMG now understands and appreciates that the Marten Portage refers to the same historical portage that FMG began to maintain in 2023. Given the overprinting of the portage by the ore body, and based on discussions with Cat Lake and Lac Seul, FMG has proposed that the Nations could lead the following (we hope that SFN would also participate): the development and implementation of the documentation and commemoration plan for the Marten Portage, the design planning for the alternate portage route planned for the mine's construction and operation phases, and the design plan for the re-establishment of the Marten Portage during the mine closure phase. We also understand that Cat Lake and Lac Seul would like to see additional work undertaken to further document the portage beyond the Stage 2 archaeology work and heritage evaluation work completed for the Final EIS/EA, and FMG would be pleased to collaborate with the Nations. FMG is committed to working with the Nations on these and other potential measures</p>

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							<p>that may be brought forward by the Nations. We are also committed to work with Slate Falls Nation where there is an interest.</p> <p>In addition, as noted in the response to IP-05, FMG is committed to optimize the treated effluent discharge location during detailed design and permitting such that it is not discharging directly to the southeast arm of Springpole Lake and subsequently keeping a smaller footprint.</p> <p>Field work for the Portage has been completed and documented in the Final EIS/EA including both the Stage 2 archaeological assessment and heritage evaluation. The HIA is the regulatory documentation requirement in Ontario typically undertaken post EA that captures the outcomes of the EA process and is required in permitting under the provincial Heritage Act and will be completed prior to construction. It also should capture the proposed mitigation measures, and we await the feedback from Cat Lake and Lac Seul on the measures proposed and additional recommendations and guidance. FMG has and will continue to offer to engage with Cat Lake First Nation, Lac Seul First Nation, and Slate Falls Nation on the portage and the alternate routing prior to construction and during all phases of the Project.</p>

#	Link to CEAA 2012	Reference to EIS Guidelines	Reference to EIS	Comments from Indigenous Communities	Context and Rationale	Information Request	FMG Response
IP-08	5(1)(c)(iii) Indigenous Peoples: current use of lands and resources for traditional purposes	4.5 Summary of environmental impact statement 3.2.2 Project Activities; Decommissioning and Abandonment 9. Follow-up and	Section 6	IAAC received comments from Cat Lake First Nation and Lac Seul First Nation (technical comment 13) and Slate Falls Nation (section 6.21, comment 21) about the role of Indigenous communities in Project-related follow up, including opportunities for participation in monitoring activities and financial supports.	<p>The EIS refers to Environment Committee(s) as a key mitigation measure and opportunity for Indigenous communities to be involved in Project-related follow-up and monitoring. The stated purposes are as follows:</p> <ul style="list-style-type: none"> • Facilitate on-going [sic] communications and meaningful engagement during construction, operation and closure of the Project; • Facilitate the sharing and integration of Traditional knowledge in Project- related activities during construction, operation and closure of the Project; and, • Share and evaluate environmental information, review Project approvals and environmental management and monitoring plans, participate in adaptive management and identify mitigation measures, address emerging issues and areas of interest identified by communities (page 6.26- 39). <p>Further, the EIS states that the Proponent will “continue to participate in the Environment Committee(s) at a rate commensurate with activity in the project development area” (6.21- 33). It is unclear how the Committee(s) would function to assess and mitigate potential effects and concerns identified by Indigenous communities,</p>	<p>Provide details on how the Environment Committee(s) would be structured and operated, including mandate, function, and decision-making authorities, as applicable.</p> <p>Provide details on opportunities for the participation of Indigenous communities in the development of the Environment Committee(s).</p>	<p>FMG will work with Environment Committee(s) made up of members of local Indigenous communities including Cat Lake First Nation, Lac Seul First Nation, Mishkeegogamang First Nation, and Slate Falls Nation. The communities may choose to work together through one committee or not in which case more than one committee will be formed. The Environment Committee(s) provides a structured pathway for continued and constructive, transparent dialogue, interaction and information-sharing between FMG and the leadership and members of local Indigenous communities. With reasonable capacity support from FMG, the mandate of the Environment Committee(s) is to provide a forum for:</p> <ul style="list-style-type: none"> • The review, collaboration, and consultation/comment on applicable post-EA 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. • Ongoing life of mine sharing of TK and TLRU information, community

#	Link to CEAA 2012	Reference to EIS Guidelines	Reference to EIS	Comments from Indigenous Communities	Context and Rationale	Information Request	FMG Response
					and for how long the Committee(s) would be active. Further information is required to assess the effectiveness of mitigation and monitoring.		perspectives, and collaboration on continual improvement initiatives 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 and adaptive management plans
IP-09	5(1)(c)(iii) Indigenous Peoples: current use of lands and resources for traditional purposes	3.1 Designated Project (All season access road) 2.2 Alternative means of carrying out the project; Access to the project site 3.2.1 Site Preparation and Construction (Construction of access road) 7.1.9 Indigenous Peoples; Current Use of Land and Resources for Traditional Purposes	Section 6.26	IAAC received comments from Cat Lake First Nation and Lac Seul First Nation (technical comment 114) and Slate Falls Nation (section 6.21, comment 20) about Indigenous community involvement in the development of the access management strategy and the conditions under which the Proponent will communicate with local land users about potential health risks related to the Project, such as maintenance activities, vegetation clearing, and any response plans for potential accidents or malfunctions. Indigenous communities also raised concerns about increased public access into the region, which could lead to long-lasting social and economic effects for	The EIS refers to the access management strategy as a key mitigation measure to address Indigenous communities' concerns regarding public access to the local area, with the plan providing for "appropriate signage to advise the public of the road's intended use, safety communication protocol for traditional land users, a gatehouse / checkpoint towards the end of the Wenasaga to ensure unauthorized use does not occur, and potential inspection schedule" (6.21.1.2). Further information about the access management strategy is required to support IAAC's understanding of impacts to the current use of lands and resources and to support issues resolution for other community concerns.	<ol style="list-style-type: none"> 1. Provide details on opportunities for the participation of Indigenous communities in the development of the access management strategy. 2. Provide timelines for the establishment of the access management strategy and indicate the conditions under which it would no longer be required. 3. Provide a description of the strategy for communicating with land users, including the expected methods of communication, and circumstances under which the Proponent will communicate with land users. 	<ol style="list-style-type: none"> 1. As part of the access management strategy, a controlled access gate or check point/gate house is proposed to control and monitor unauthorized use of the mine access road, at a location towards the end of the Wenasaga road to be determined in consultation with CLFN, LSFN, SFN, MNR and the forestry road owner. The strategy will also include signage advising of public use restrictions associated with the mine access road. Such signage implemented by MNR already exists along the Wenasaga road limiting public access to certain other lakes in the region. Opportunities for participation in the development of the plan details can occur through the Environment Committee(s). 2. The access management strategy would be in place prior to the operation of the mine access road. It would no longer be warranted if the Nations confirm that it is not

#	Link to CEAA 2012	Reference to EIS Guidelines	Reference to EIS	Comments from Indigenous Communities	Context and Rationale	Information Request	FMG Response
				surrounding Indigenous communities, including social pressures, increased availability of substances, and competition for land users.			<p>required as this was primarily a Cat Lake First Nation concern which we believe is supported by Lac Seul and Slate Falls.</p> <p>3. FMG will work with the communities and MNR to support information sharing on the access management plan implementation with Indigenous community members and the public. Signage will be posted along the Wenasaga road to advise of the restricted access point well in advance (e.g. "Restricted Road Access Ahead in 10 km"). Road access information will also be posted to the FMG website and shared in FMG regular newsletters and bulletins provided to communities. Concerns or complaints can be provided to FMG via the planned web-based public feedback mechanism for the mine and through MNR, and through the community representatives on the Environment Committee(s).</p>
IP-10	5(1)(c)(iii) Indigenous Peoples: current use of lands and resources for traditional purposes	7.1.9 Indigenous Peoples; Current Use of Lands and Resources for Traditional Purposes 7.3.5 Predicted Effects on Valued Components;	Section 6.21	IAAC received comments from Slate Falls Nation (section 6.17, comment 5) about impacts to traplines and trapline holders.	<p>The EIS states that the Project would impact eight traplines that intersect the mine access road or transmission line corridor, including SL 186, 191, 192, 193, 194, 196, 197, and 200.</p> <p>Section 6.21 notes that traplines SL 197 and 200 are held by members of Cat Lake First Nation and proposes</p>	Provide further information on the potential effects on Indigenous Peoples' socioeconomic conditions and current use of lands and resources for traditional purposes related to the use of traplines SL 186, 191, 192, 193, 194, and 196, in the	As per information provided by MNR regarding Trapline Owners, traplines SL192, SL194 and SL196 are vacant, FMG had engaged with Trapline Holder SL191; however, the transmission line no longer passes through this area in the Final EIS/EA and eliminates the need to create 33 kms of new linear

#	Link to CEAA 2012	Reference to EIS Guidelines	Reference to EIS	Comments from Indigenous Communities	Context and Rationale	Information Request	FMG Response
		Current Use of Lands and Resources for Traditional Purposes			<p>communication with those trapline holders to facilitate land use activities as a mitigation measure. Further information is required regarding the other traplines that would be affected by the Project to support IAAC's understanding of impacts to Indigenous socioeconomic conditions and current use of lands and resources.</p> <p>IAAC understands from the EIS that the Proponent would also work with the Province of Ontario and trapline license holders to determine alternative options for trapline losses.</p>	<p>case that license for these traplines are held by members of Indigenous communities.</p>	<p>corridor through SL191 and avoids SL186 entirely.</p> <p>Traplines SL 191, 192, 193, 194, and 196 have less than 1% of their area overlapping with the Project Development Area (PDA). In addition, the PDA includes the planned footprint of the Project plus a buffer; which results in a conservative overestimation of interaction with the traplines. This very limited change in the trapline area will not change the ability to access or use the traplines.</p> <p>In addition, FMG has provided multiple letters/notices to all trapline license holders in the broad RSA regarding the Project and invited input on the EIS/EA, as described in Section 2.6.4 of the Final EIS/EA. No concerns have been raised through the EA process. FMG has committed to notifying land users including trapline holders of the commencement of Project activities to minimize disruption during construction.</p>
AM-01	<p>5(1)(c)(i) Indigenous Peoples: health and socioeconomic conditions</p> <p>5(1)(c)(ii) Indigenous Peoples: physical</p>	<p>3.2.1 Factors to be Considered; Changes to the Environment</p> <p>7.6.1. Effects of potential accidents or malfunctions</p>	Section 9	<p>IAAC received comments from Cat Lake First Nation and Lac Seul First Nation (sufficiency comment 17 and technical comment 29) and Slate Falls Nation (section 8.2.3, comment 4, section 8.6.2 comment, 17; section 9, comment 2) expressing concerns about catastrophic</p>	<p>The final EIS states that the CDF is designed to meet all relevant requirements of the Canadian Dam Association, Dam Safety Guidelines (CDA 2013, 2019), as well as all provincial requirements under the provincial <i>Lakes and Rivers Improvement Act</i> (RSO 1990, c. L.3).</p>	<p>Clarify the applicable regulatory requirements and industry standards related to the safety of the CDF dams. Indicate the ways in which these measures would reduce the risk of accidents and malfunctions that may lead to adverse effects on Indigenous Peoples' health</p>	<p>The following regulations, guidelines, and standards have been adopted for the CDF design and analyses:</p> <ul style="list-style-type: none"> • Dam Safety Guidelines 2007 (2013 Edition). Canadian Dam Association (CDA 2013); • Technical Bulletin: Application of Dam Safety Guidelines to Mining Dams (CDA 2019); and

#	Link to CEAA 2012	Reference to EIS Guidelines	Reference to EIS	Comments from Indigenous Communities	Context and Rationale	Information Request	FMG Response
	<p>and cultural heritage</p> <p>5(1)(c)(iii) Indigenous Peoples: current use of lands and resources for traditional purposes</p> <p>5(1)(c)(iv) Indigenous Peoples: any structure, site or thing that is of historical, archaeological, paleontological or architectural significance</p>			<p>accidents and malfunctions in the case of the failure of the water management system in the co-disposal facility (CDF) and potential impacts to communities, land users, and their exercise of rights. Indigenous communities noted that the areas surrounding the Project are of great spiritual and cultural significance to their communities and used for harvesting and fishing, and that these could be destroyed by a potential catastrophic accident or malfunction.</p>	<p>At a meeting on February 25, 2025, with IAAC, and provincial and federal technical review teams, the Proponent noted that the <i>Lakes and Rivers Improvement Act</i> would not apply to the CDF dams as these are “offline” dams that are not constructed within a naturally occurring lake or river. At the meeting, the Proponent indicated that the dams would be built to meet the Global Industry Standard on Tailings Management, and that these standards may be incorporated into provincial permitting requirements.</p>	<p>and socioeconomic conditions, current use of lands and resources for traditional purposes, physical and cultural heritage, sites of significance, and exercise of rights.</p> <p>Indicate any measures that the Proponent would implement to communicate dam safety to potentially impacted Indigenous communities (such as the sharing of inspection or maintenance reports).</p> <p><i>IAAC notes that it has already provided advice² to the Proponent regarding the potential requirement to develop, prior to construction, and in consultation with Indigenous communities, ECCC, and other relevant authorities, and implement, an accidents and malfunctions response plan in relation to each phase of the Project, and to develop, in consultation with Indigenous communities, a communication plan for accidents and</i></p>	<ul style="list-style-type: none"> • Technical Bulletins, Ontario Environment and Energy, Dam Management (Lakes and Rivers Improvement Act). <p>Applicable requirements from these guidelines have been adopted as the minimum design requirements. Design requirements of the Global Industry Standard on Tailings Management, being the global technical standard, has also been considered in developing the design criteria.</p> <p>In addition, the CDF conservatively applies the highest hazard classification design criteria with a design earthquake of 1 in 10,000-year event and IDF of Probable Maximum Precipitation (PMP). The CDF exceeds the minimum required factors of safety specified in the guidelines.</p> <p>The CDF is designed to meet the factors of safety required for long-term, static loading conditions, as well as pseudo-static loading conditions and will be constructed in stages with early construction and placement of material focused on the south cell of the CDF. By using robust mine rock to construct the CDF dams on bedrock, the overall stability of the facility is not affected by the strength of the thickened and slurry tailings which effectively mitigates dam failure. These features make rock fill dams very safe and reliable structures for mining projects. In addition, FMG</p>

#	Link to CEAA 2012	Reference to EIS Guidelines	Reference to EIS	Comments from Indigenous Communities	Context and Rationale	Information Request	FMG Response
						<p><i>malfunctions in relation to the Project.</i></p>	<p>will have a qualified geotechnical engineer dedicated to the safe design, construction and operation of the CDF.</p> <p>The Mining Association of Canada's Towards Sustainable Mining (TSM) program predominantly focusses on management systems versus engineering design criteria and requires site level reporting with external verification. This is an internationally recognized program with adoption by eight international mining industry associations. TSM is supported by the Tailings Management Protocol which in turn is supported by the Tailings Guide. The Tailings Guide provides guidance on responsible tailings management. The Tailings Management Protocol provides tools to measure tailings management performance, and has five performance indicators focused on:</p> <ul style="list-style-type: none"> • Developing a corporate tailings management policy and commitment • Assigning accountability and responsibility for tailings management • Developing and implementing site-specific tailings management systems and emergency preparedness measures • Developing and implementing site-specific Operations, Maintenance and Surveillance (OMS) manuals

#	Link to CEAA 2012	Reference to EIS Guidelines	Reference to EIS	Comments from Indigenous Communities	Context and Rationale	Information Request	FMG Response
							<ul style="list-style-type: none"> • Conducting annual tailings management reviews <p>FMG will follow the Tailings Management Protocol for the Springpole CDF.</p> <p>The use of international standards and guides reduces accidents and malfunctions by providing guidance, promoting best practices, and offering resources to dam owners and operators. For example, CDA provides technical guidance on requirements for dam safety reviews, emergency preparedness plans, and emergency response plans.</p> <p>An Independent Geotechnical and Tailings Review Board (IGTRB) conducted a thorough review of the Pre-Feasibility Study and design updates for the CDF (see Appendix V-1 CDF PFS Design Update). The IGTRB is a group of world-class independent experts who provide oversight and advice on the design, construction, operation, and closure of tailings management facilities and related infrastructure. The IGTRB for the Project includes recognized experts with over 40 years of experience each in geotechnical engineering and tailings management.</p> <p>The IGTRB's findings were positive, noting strong geotechnical conditions at the site and endorsing the design</p>



#	Link to CEAA 2012	Reference to EIS Guidelines	Reference to EIS	Comments from Indigenous Communities	Context and Rationale	Information Request	FMG Response
							<p>improvements made. The IGTRB highlighted that the work completed to date meets their expectations and supports the Project's advancement. They emphasized the favorable foundation conditions at the CDF location and provided valuable feedback to enhance operational and environmental performance, which is being implemented.</p>



ATTACHMENT IAAC-IP-03a

Water Quality Monitoring Figure

SPRINGPOLE GOLD PROJECT

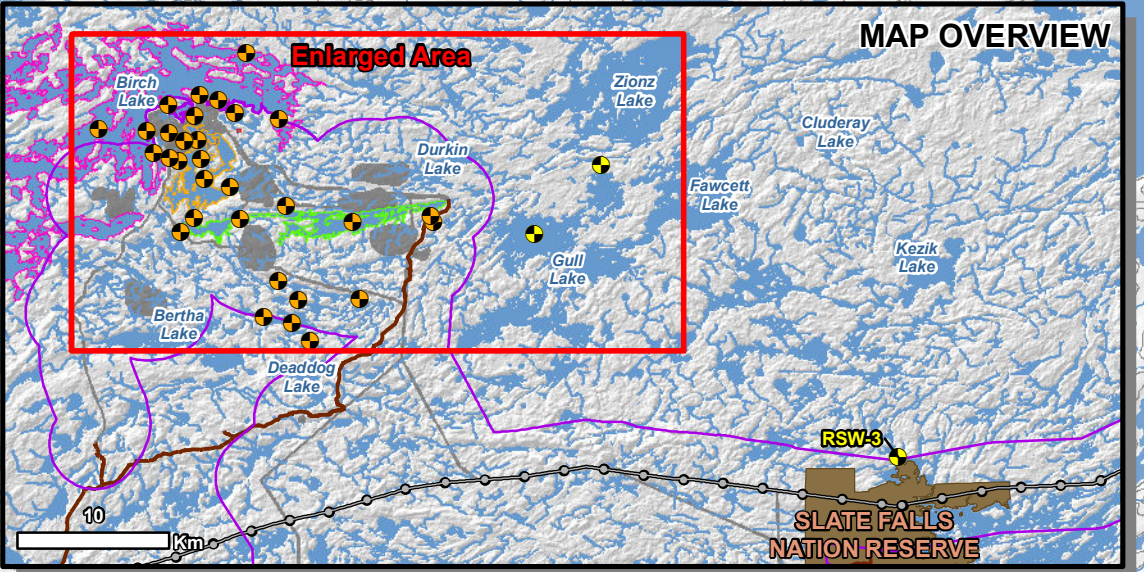
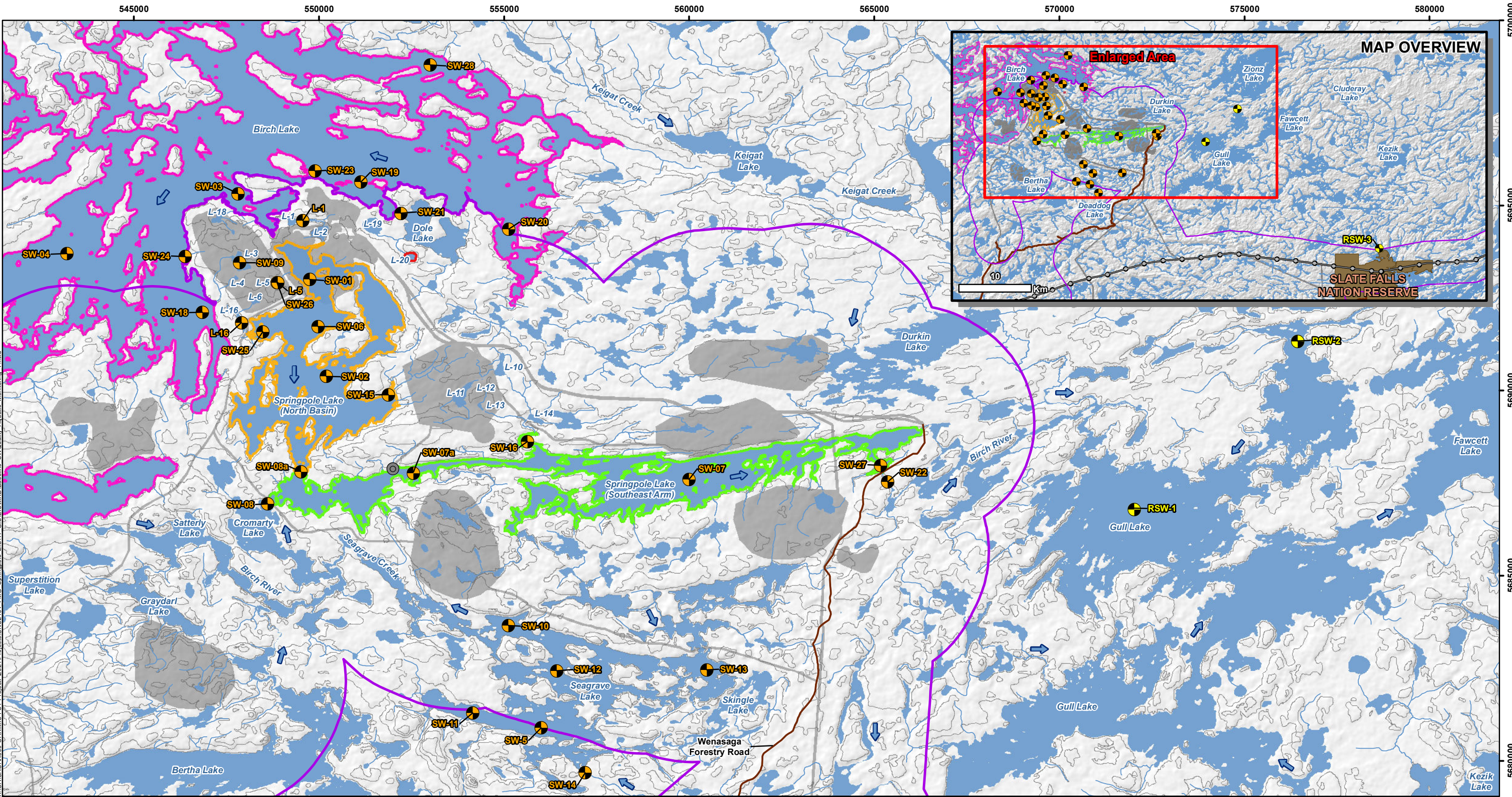
FIRST MINING GOLD CORP.

PROJECT NO.: ONS2104

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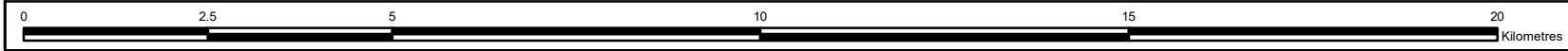
LEGEND

Baseline Water Quality Monitoring Stations (Labelled with ID)	Existing Road	Existing Watercourse
Regional Baseline Water Quality Monitoring Stations (Labelled with ID)	Existing Transmission Line	Existing Waterbody
Proposed Mine Features and Project Component Alternatives	Contour (10 m intervals)	Birch Lake
Proposed Effluent Discharge Location	Flow Direction	Springpole Lake (North Basin)
Baseline Investigation Area		Springpole Lake (Southeast Arm)
First Nation Reserve		Small Inland Waterbodies

NOTES:
 - Topographic information extracted from LIO, MNRF.
 - Proposed site plan provided by Ausenco, drawing number 104496-GX-03000-31344-003, Rev 1. 26 June 2023 and modified by WSP July 2023.

Datum: NAD83
 Projection: UTM Zone 15N

SPRINGPOLE GOLD PROJECT	
Surface Water Quality and Aquatic Resource Monitoring Locations	
PROJECT N°: ONS2104	FIGURE: 12.6-2
SCALE: 1:97,500	DATE: August 2024



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ATTACHMENT IAAC-IP-03b

Environmental Management, Monitoring
and Adaptive Management Framework

SPRINGPOLE GOLD PROJECT

FIRST MINING GOLD CORP.

PROJECT NO.: ONS2104

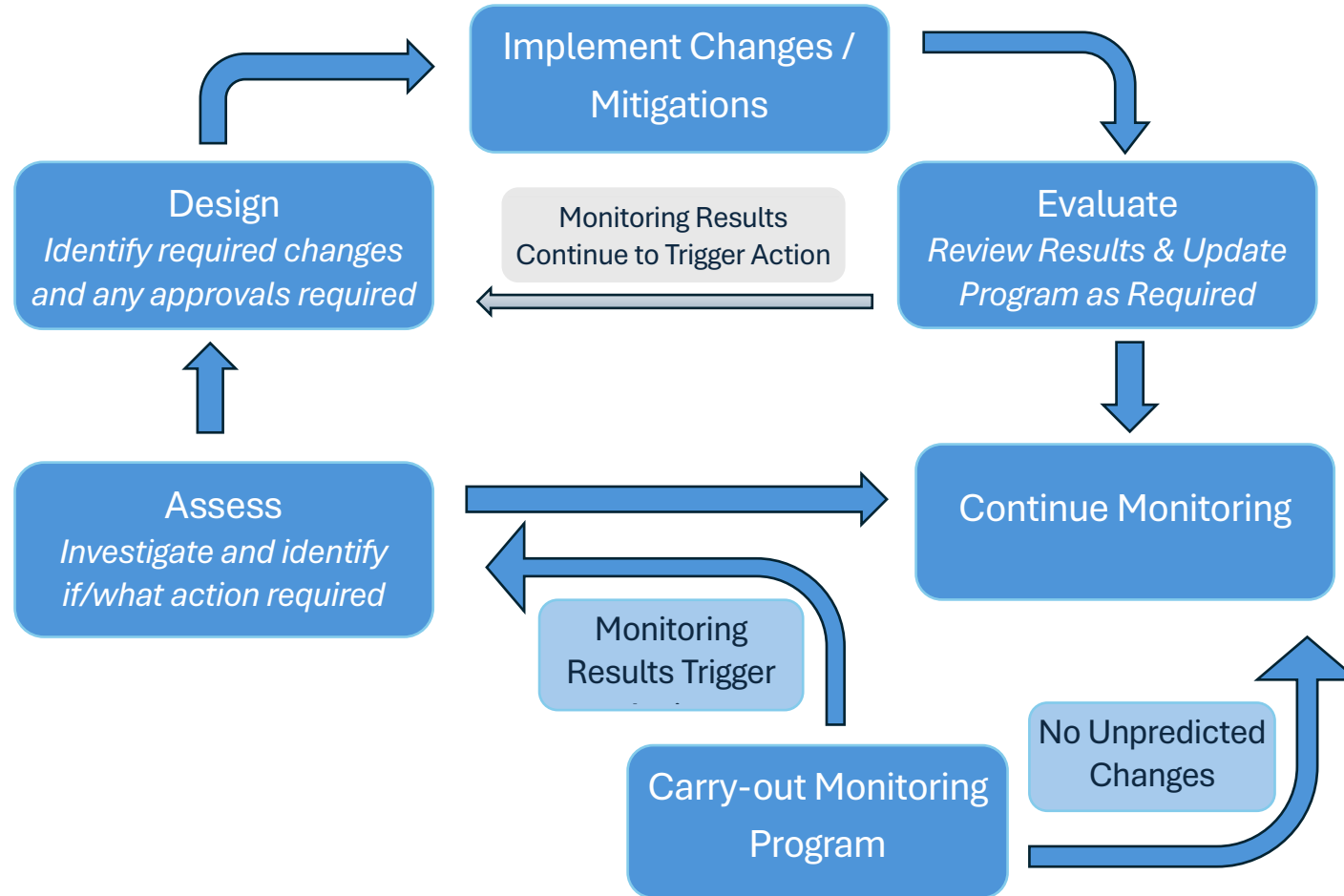
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WSP.com

Environmental Management, Monitoring, and Adaptive Management Framework

A Collaborative Approach with local First Nation Environment Committee(s) and Environmental Monitors





ATTACHMENT IAAC-IP-03c

Closure Vision Figure

SPRINGPOLE GOLD PROJECT

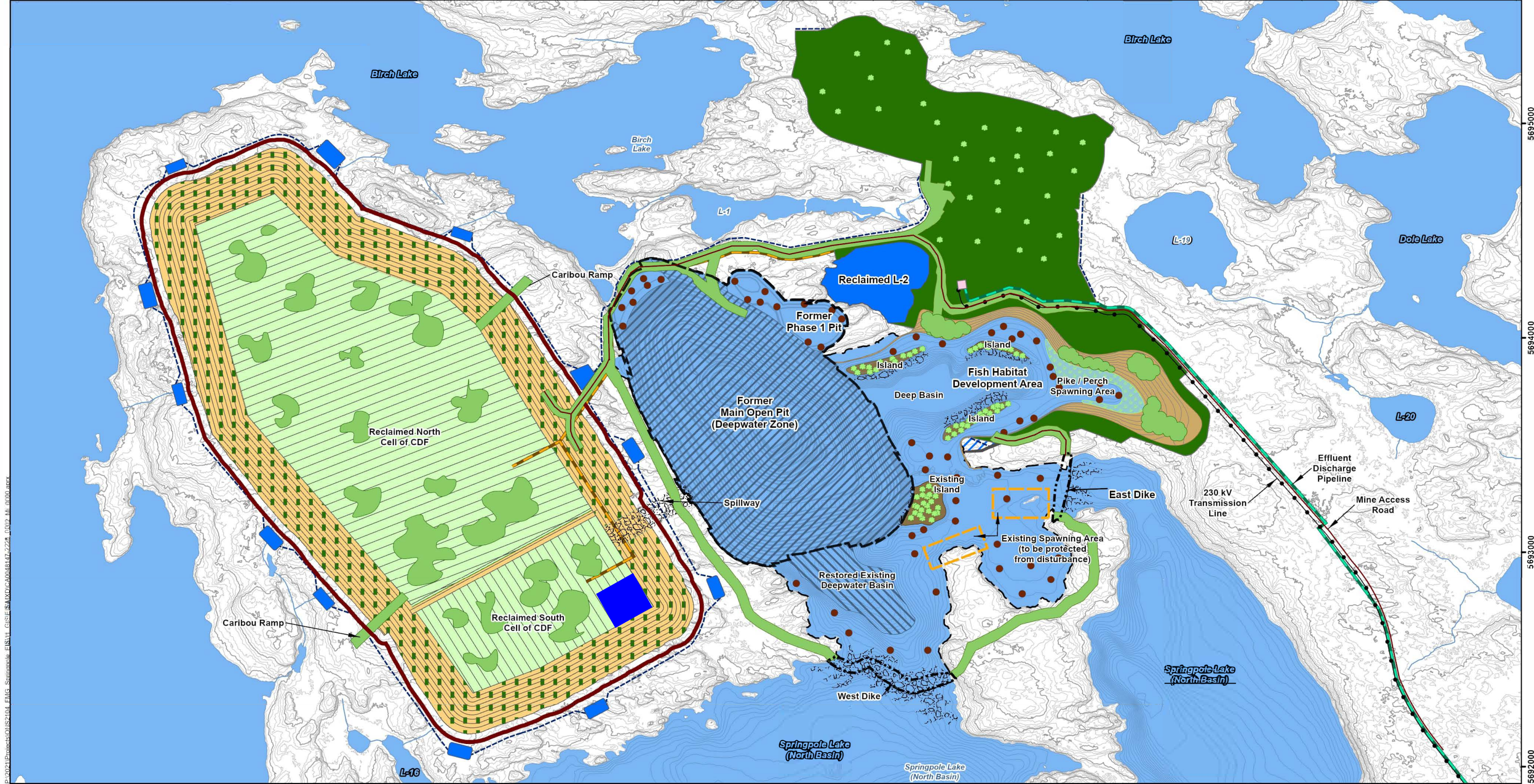
FIRST MINING GOLD CORP.

PROJECT NO.: ONS2104

WSP Canada Inc.
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LEGEND	
Watercourse	Mine Access Road
Waterbody	230 kV Transmission Line
Major Contours (5 m interval)	Effluent Discharge Pipeline
Minor Contours (1 m interval)	Tailings Pipeline Corridor
Pond	Existing Spawning Area
Effluent Treatment Plant	Filled Open Pit
Open Pit Basin	Dike (Removed at Closure)
Reclaimed CDF Area	Revegetated Slope with Lichen Patch
Aquatic Plants	Aquatic Plants
Tree	Aquatic Plants
Tree / Rock Pile	Tree
Treed Area	Tree
	New Shoal Area
	Former Open Pit Deepwater Zone
	Restored Existing Deepwater Basin
	Island
	Regraded Bank
	Vegetated Area

NOTES:
 - Contours extracted from 2020 LIDAR survey.
 - Proposed site plan provided by Ausenco, drawing number 104496-GX-03000-31344-003, Rev 1, 26 June 2023 and modified by WSP July 2023.
 - 230 kV transmission line provided by First Mining Gold, April 2024.
 - Ditching and sums current as of October 2024.

	FIRST MINING GOLD	
SPRINGPOLE GOLD PROJECT		
Active Closure Concept Vision		

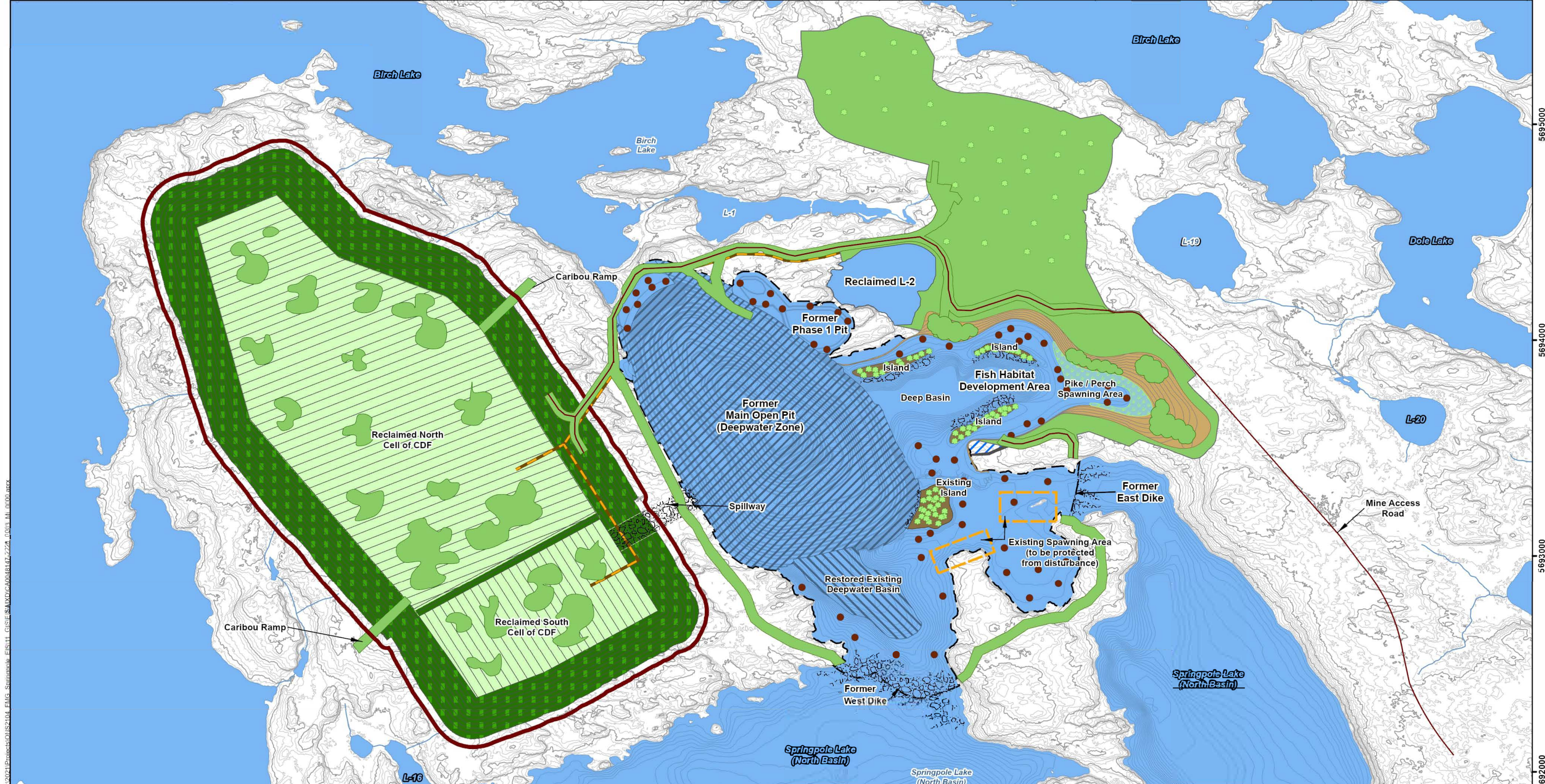


Datum: NAD83
 Projection: UTM Zone 15N

PROJECT N°: CA0048147	FIGURE: 1
SCALE: 1:17,000	DATE: August 2025

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LEGEND

Watercourse	Mine Access Road	Existing Spawning Area	Revegetated Slope with Lichen Patch	New Shoal Area
Waterbody	Reclaimed CDF Area	Tailings Pipeline Corridor	Aquatic Plants	Former Open Pit Deepwater Zone
Major Contours (5 m interval)			Aquatic Plants	Restored Existing Deepwater Basin
Minor Contours (1 m interval)			Tree	Island
			Tree / Rock Pile	Regraded Bank
			Treed Area	Vegetated Area

NOTES:
 - Contours extracted from 2020 LIDAR survey.
 - Proposed site plan provided by Ausenco, drawing number 104496-GX-03000-31344-003, Rev 1, 26 June 2023 and modified by WSP July 2023.
 - 230 kV transmission line provided by First Mining Gold, April 2024.
 - Ditching and sums current as of October 2024.

Datum: NAD83
 Projection: UTM Zone 15N

SPRINGPOLE GOLD PROJECT	
Final Closure Concept Vision	
PROJECT N°: CA0048147	FIGURE: 2
SCALE: 1:17,000	DATE: August 2025

0 0.5 1 2 3 4 5 Kilometres



ATTACHMENT IAAC-IP-04

Figures identifying changes to the environment related to air quality and surface water quality

SPRINGPOLE GOLD PROJECT

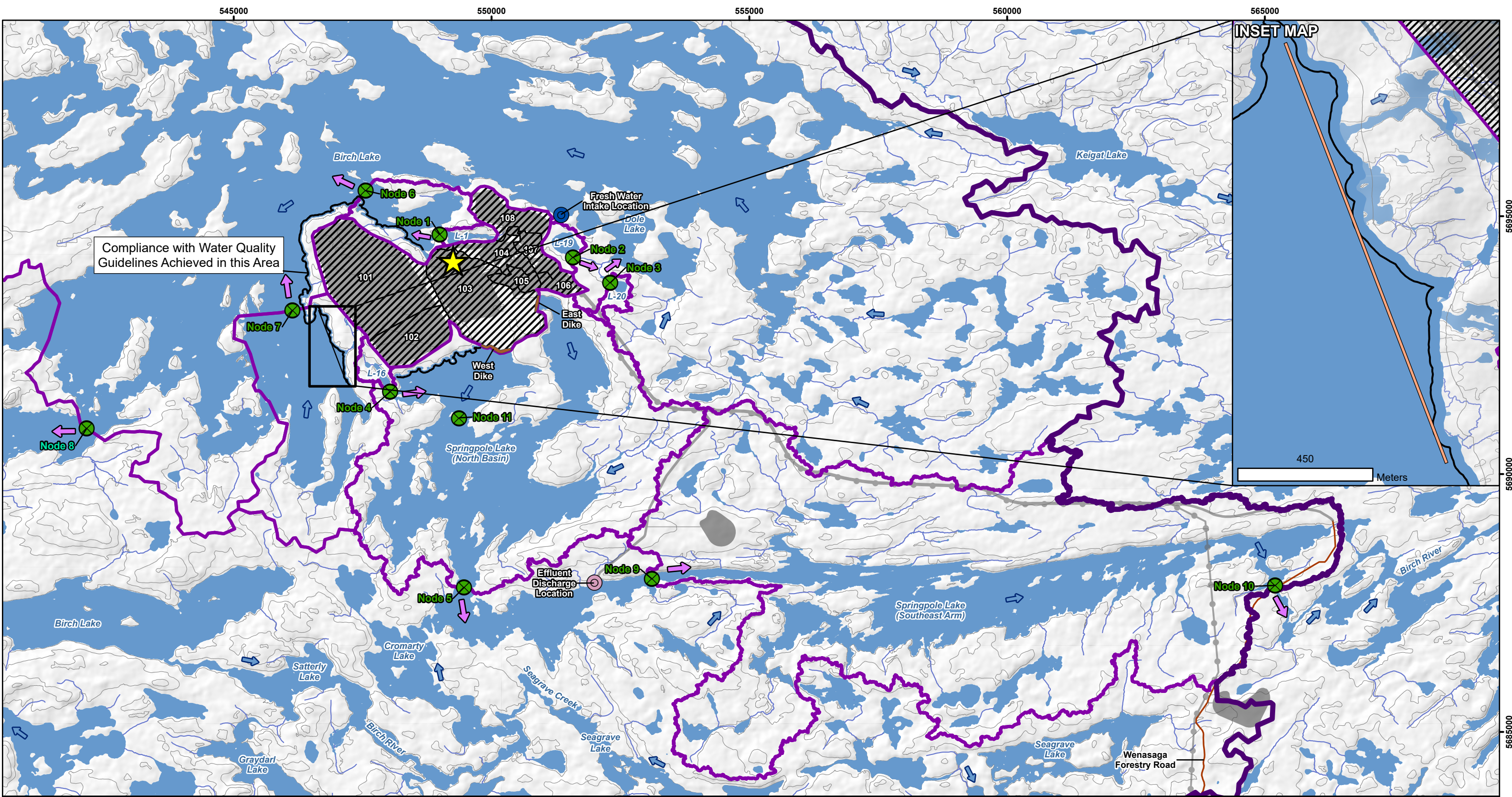
FIRST MINING GOLD CORP.

PROJECT NO.: ONS2104

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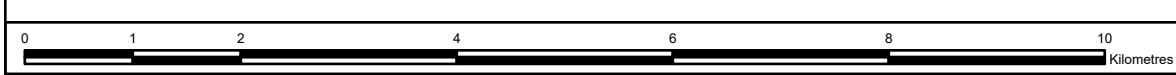
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WSP.com



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- LEGEND**
- ★ PROJECT LOCATION
 - FRESH WATER INTAKE LOCATION
 - ⊙ EFFLUENT DISCHARGE LOCATION
 - PROPOSED MINE FEATURE
 - REPRESENTATIVE AREA USED IN MODEL
 - COMPLIANCE WITH WATER QUALITY GUIDELINES ACHIEVED IN THIS AREA
 - EXISTING ROAD
 - CONTOUR (10 M INTERVALS)
 - WATERCOURSE
 - WATERBODY
 - ➔ FLOW DIRECTION
 - ➔ WATERSHED OUTLET FLOW DIRECTION
 - ⊗ MODEL NODES (LABELLED WITH ID)
 - WATERSHED TO SPRINGPOLE LAKE OULET (NODE 10)*
 - SUBWATERSHED*
 - ▨ PROJECT WATERSHEDS (LABELLED WITH ID)
 - DIKE



NOTES:
 - Topographic information extracted from LIO, MNRF.
 - Watershed delineations based on data provided by Aquasphera, data obtained through the Ontario Flow Assessment Tool (OFAT) and LIDAR provided by First Mining Gold, 2020.
 - Proposed site plan provided by Ausenco, drawing number 104496-GX-03000-31344-003, Rev 1. 26 June 2023 and modified by WSP July 2023.
 - 230 kV transmission line provided by First Mining Gold, April 2024.
 * Natural/undisturbed watershed areas, excluding the Project footprint

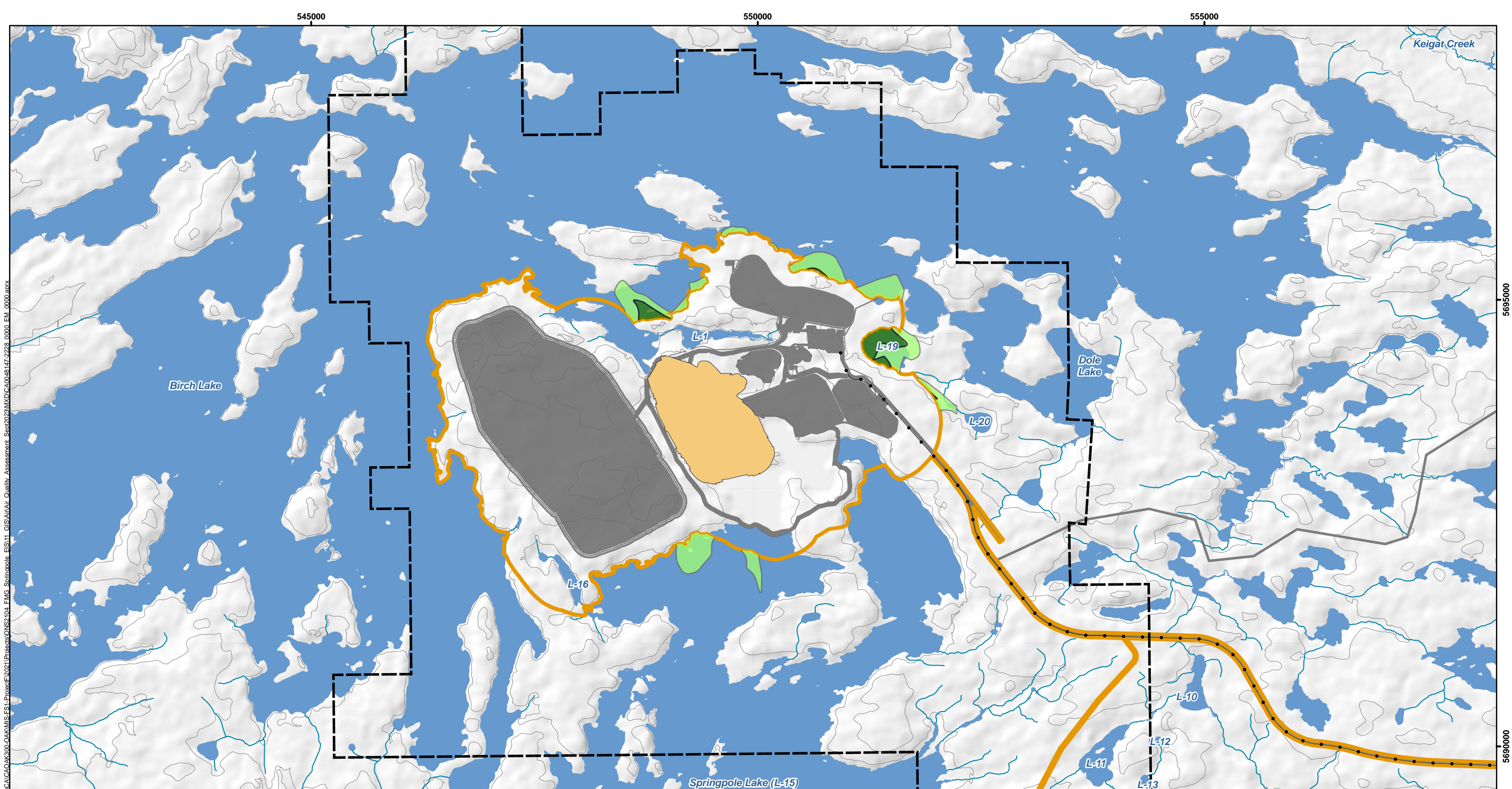
Datum: NAD83
 Projection: UTM Zone 15N



SPRINGPOLE GOLD PROJECT

Bypass Seepage Mixing Model

PROJECT N^o: ONS2104 **FIGURE: 1**
 SCALE: 1:70,000 DATE: June 2025



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- LEGEND**
- PROJECT DEVELOPMENT AREA
 - AIR QUALITY MODELLING BOUNDARY
 - PROPOSED OPEN PIT
 - OTHER PROPOSED MINE FEATURE
 - PROPOSED 230 KV TRANSMISSION LINE
 - WATERBODY
 - EXISTING ROAD
 - WATERCOURSE
 - CONTOUR (10 M INTERVALS)
 - PM10 CONCENTRATION ISOPLETH (24-HOUR)
 - PROJECT AND BASELINE EFFECT
 - PROJECT EFFECT

Disclaimers:

- Predicted concentrations should be considered in the context of the conservative nature of the emission rate estimates (all sources active at maximum all the time, activity levels for all years at the maximum year of operations) and the conservative modelling (worst-case meteorological condition over five years of meteorological data).
- Isopleths map out the maximum concentration predicted for each averaging time at each receptor, and therefore present the worst-case scenario. The isopleths are not adjusted in the same manner that the maximum POI concentrations (tabular results) are because the anomalies do not affect all receptors. The isopleths shown may suggest an exceedance which is the result of these meteorological anomalies, but which cannot be removed from the concentration plot; concentrations in the tables rather than the concentration plots should be taken as the absolute value of each maximum predicted concentration.
- Concentrations exceeding MECP criteria are predicted to be infrequent and to primarily occur during the winter periods (December to February).

NOTES:

- Topographic information extracted from LIO, MNR.
- Receptor locations provided by First Mining Gold, July 2021.
- Proposed site plan provided by Ausenco, drawing number 104496-GX-03000-31344-003, Rev 1, 26 June 2023 and modified by WSP July 2023.
- 230 kV transmission line provided by First Mining Gold, April 2024.



SPRINGPOLE GOLD PROJECT

PM10 Concentration isopleth (24-hour Averaging Time)

Datum: NAD83
Projection: UTM Zone 15N

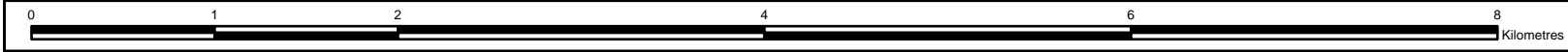


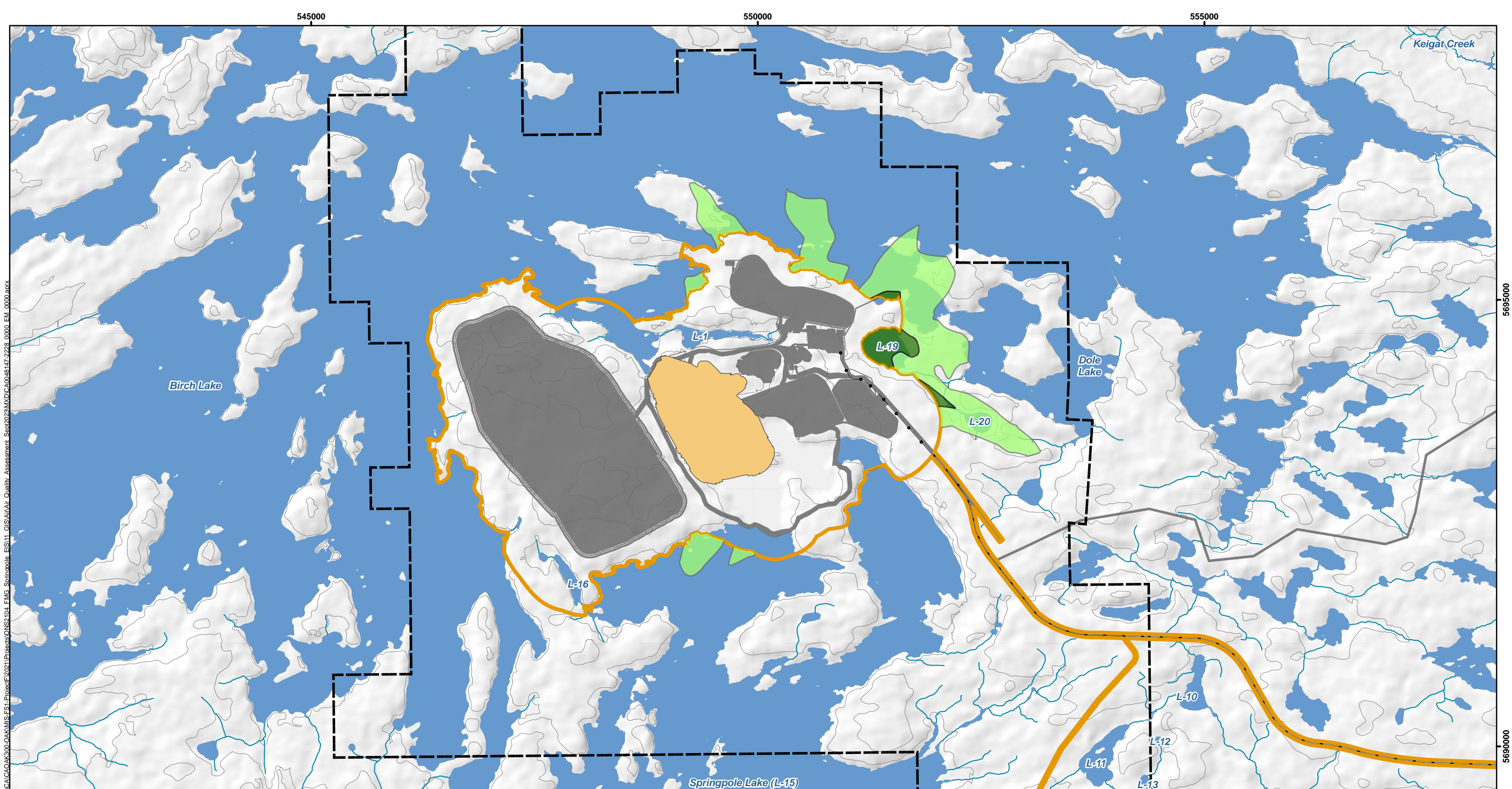
PROJECT N^o: ONS2104

FIGURE: B-1

SCALE: 1:40,000

DATE: 2025-08-22





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- LEGEND**
- PROJECT DEVELOPMENT AREA
 - AIR QUALITY MODELLING BOUNDARY
 - PROPOSED OPEN PIT
 - OTHER PROPOSED MINE FEATURE
 - PROPOSED 230 KV TRANSMISSION LINE
 - WATERBODY
 - EXISTING ROAD
 - WATERCOURSE
 - CONTOUR (10 M INTERVALS)

- PM2.5 CONCENTRATION ISOPLETH (24-HOUR)**
- PROJECT AND BASELINE EFFECT
 - PROJECT EFFECT

Disclaimers:

- Predicted concentrations should be considered in the context of the conservative nature of the emission rate estimates (all sources active at maximum all the time, activity levels for all years at the maximum year of operations) and the conservative modelling (worst-case meteorological condition over five years of meteorological data).
- Isoleths map out the maximum concentration predicted for each averaging time at each receptor, and therefore present the worst-case scenario. The isopleths are not adjusted in the same manner that the maximum POI concentrations (tabular results) are because the anomalies do not affect all receptors. The isopleths shown may suggest an exceedance which is the result of these meteorological anomalies, but which cannot be removed from the concentration plot; concentrations in the tables rather than the concentration plots should be taken as the absolute value of each maximum predicted concentration.
- Concentrations exceeding MECP criteria are predicted to be infrequent and to primarily occur during the winter periods (December to February).

NOTES:

- Topographic information extracted from LIO, MNR.
- Receptor locations provided by First Mining Gold, July 2021.
- Proposed site plan provided by Ausenco, drawing number 104496-GX-03000-31344-003, Rev 1, 26 June 2023 and modified by WSP July 2023.
- 230 kV transmission line provided by First Mining Gold, April 2024.



SPRINGPOLE GOLD PROJECT

PM2.5 Concentration isopleth (24-hour Averaging Time)

Datum: NAD83
Projection: UTM Zone 15N

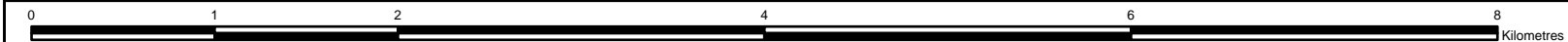


PROJECT N^o: ONS2104

FIGURE: B-2

SCALE: 1:40,000

DATE: 2025-08-22



ATTACHMENT IAAC-IP-06

SPRINGPOLE GOLD PROJECT

FIRST MINING GOLD CORP.

Potential Impacts to Local First Nations Ability to Exercise of Rights & Measures Proposed to Mitigate/ Accommodate

Exercise of Rights	Potential Impacts	Mitigation	Key Communities
Hunting	The mine footprint will be inaccessible during construction, operation and active closure. Potential sensory disturbance due to change in noise and viewscape.	<ul style="list-style-type: none"> • Minimize mine site footprint. • Prior to construction, develop an access management strategy with local Indigenous communities to manage access along the mine access road, during construction, operation and closure phases of the Project, with the purpose of supporting TLRU access and minimizing new public access. • During all phases of the Project, where practical, avoid sensitive wildlife habitat by implementing buffers. • In collaboration with Indigenous communities and MECP, design and implement a habitat restoration program for Boreal Caribou • Implement the mitigation measures related to air quality, including dust, and noise. • Facilitate the development and implementation of a community-based monitoring program to supplement (not duplicate) regulatory monitoring requirements. • Support reasonable requests and work schedule flexibility for Indigenous employees for time off to pursue traditional land use activities, during construction, operation and closure phases • Support community land-based cultural activities, during construction, operation and closure of the Project . • FMG will file a Mine Closure Plan under Part VII of the Mining Act and Ontario Regulation 240/00 (Mine Development and Closure) before construction begins and aims to provide for the restoration of the Project site including addressing viewscape to the extent feasible at closure. • A country foods monitoring program is proposed to be developed with local First Nations to monitor country foods during the life of mine. 	CLFN, SFN, LSFN

Exercise of Rights	Potential Impacts	Mitigation	Key Communities
		<ul style="list-style-type: none"> • Optimize location of the treated effluent discharge infrastructure during detailed engineering and permitting to relocate closer to the mine site at Birch Lake (CLFN, LSFN). 	
Trapping	The mine footprint will be inaccessible during construction, operation and active closure. Potential sensory disturbance due to change in noise and viewscape.	<ul style="list-style-type: none"> • Minimize mine site footprint. • Implement the mitigation measures related to air quality, including dust, and noise. • Facilitate the development and implementation of a community-based monitoring program to supplement (not duplicate) regulatory monitoring requirements. • Support reasonable requests and work schedule flexibility for Indigenous employees for time off to pursue traditional land use activities, during construction, operation and closure phases • Support community land-based cultural activities, during construction, operation and closure of the Project. • Maintain regular communication with trapline holders SL197 and SL 200 regarding activities and opportunities to facilitate their land use activities. • Work with MNR and trapline licence holders to maintain communication throughout all phases of the Project. • FMG will file a Mine Closure Plan under Part VII of the Mining Act and Ontario Regulation 240/00 (Mine Development and Closure) before construction begins and aims to provide for the restoration of the Project site including addressing viewscape to the extent feasible at closure. • Optimize location of the treated effluent discharge infrastructure during detailed engineering and permitting to relocate closer to the mine site at Birch Lake (CLFN, LSFN). 	CLFN, SFN, LSFN
Fishing	The open pit basin will be inaccessible during	<ul style="list-style-type: none"> • Minimize footprint with the placement of the east and west dikes in proximity to the mine. • Create fish habitat on the downstream side of the dikes. 	CLFN, SFN, LSFN

Exercise of Rights	Potential Impacts	Mitigation	Key Communities
	<p>construction, operation and active closure. Potential sensory disturbance due to change in noise and viewscape.</p>	<ul style="list-style-type: none"> • Develop a detailed blasting management plan for areas adjacent to fish habitat that meets DFO criteria. • Closure planning with enhanced fish habitat area to increase productivity and area for fishing. • Achieve fish habitat offsetting objectives (Appendix F), including measures implemented during operations. • Prior to closure, where there is interest, develop and implement a Lake Sturgeon reintroduction and restoration program harmonizing with the interest of local Indigenous communities and MNR. • Prior to construction, establish the alternate navigation route identified to maintain access between Springpole Lake and Birch Lake, and maintain the alternate route until post closure when the existing portage has been re-established. • The effluent treatment plant will be designed and operated to produce an effluent quality appropriate for discharge to the environment in accordance with applicable regulatory requirements, including the MDMER. • Optimize location of the treated effluent discharge infrastructure during detailed engineering and permitting to relocate closer to the mine site at Birch Lake (CLFN, LSFN). • Facilitate the development and implementation of a community-based monitoring program to supplement (not duplicate) regulatory monitoring requirements. • Support reasonable requests and work schedule flexibility for Indigenous employees for time off to pursue traditional land use activities, during construction, operation and closure phases. • Support community land-based cultural activities, during construction, operation and closure of the Project. • A country foods monitoring program is proposed to be developed with local First Nations to monitor country foods during the life of mine. 	

Exercise of Rights	Potential Impacts	Mitigation	Key Communities
		<ul style="list-style-type: none"> • FMG will file a Mine Closure Plan under Part VII of the Mining Act and Ontario Regulation 240/00 (Mine Development and Closure) before construction begins and aims to provide for the restoration of the Project site including addressing viewscape to the extent feasible at closure. 	
<p>Plant Gathering (including food and medicines)</p>	<p>The mine footprint will be inaccessible during construction, operation and active closure. Potential sensory disturbance due to change in noise and viewscape.</p>	<ul style="list-style-type: none"> • Minimize mine site footprint. • Where there is interest, provide opportunities to local Indigenous communities and traditional land users to harvest plants and aquatic resources within the PDA prior to construction. • Implement the mitigation measures related to air quality, including dust, and noise. • Facilitate the development and implementation of a community-based monitoring program to supplement (not duplicate) regulatory monitoring requirements. • Support reasonable requests and work schedule flexibility for Indigenous employees for time off to pursue traditional land use activities, during construction, operation and closure phases • Support community land-based cultural activities, during construction, operation and closure of the Project. • Undertake revegetation trials with opportunities for community involvement during mining operations to optimize closure strategy. • During the operation and closure of the Project, undertake revegetation in the mine site area, where practical, and include input from Indigenous communities and TLRU planning documents. • A country foods monitoring program is proposed to be developed with local First Nations to monitor country foods during the life of mine. • FMG will file a Mine Closure Plan under Part VII of the Mining Act and Ontario Regulation 240/00 (Mine Development and Closure) before construction begins and aims to provide for the restoration of the Project site including addressing viewscape to the extent feasible at closure. 	<p>CLFN, SFN, LSFN</p>

Exercise of Rights	Potential Impacts	Mitigation	Key Communities
Water (nibi) Use	The open pit basin will be inaccessible during construction, operation and active closure.	<ul style="list-style-type: none"> • An integrated water management system will collect and control all contact water from the stockpiles, CDF and plant site areas. • The effluent treatment plant will be designed and operated to produce an effluent quality appropriate for discharge to the environment in accordance with applicable regulatory requirements, including the MDMER. • Optimize location of the treated effluent discharge infrastructure during detailed engineering and permitting to relocate closer to the mine site at Birch Lake (CLFN, LSFN). • Support the development and delivery of Indigenous led ceremonies on site to pay respect to the land air, and water prior to construction and at other key Project milestones. • Implement the mitigation measures related to air quality, including dust. • Implement the mitigation measures related to surface water quality. • FMG will carry out a surface water quality monitoring program through construction, operation and active closure, including stations extending approximately 75 km downstream to Slate Falls Nation. • Facilitate the development and implementation of a community-based monitoring program to supplement (not duplicate) regulatory monitoring requirements. • Support reasonable requests and work schedule flexibility for Indigenous employees for time off to pursue traditional land use activities, during construction, operation and closure phases. • Prior to construction, establish the alternate navigation route identified to maintain access between Springpole Lake and Birch Lake, and maintain the alternate route until post closure when the existing portage has been re-established. • Support community land-based cultural activities, during construction, operation and closure of the Project. 	CLFN, SFN, LSFN

Exercise of Rights	Potential Impacts	Mitigation	Key Communities
		<ul style="list-style-type: none"> • Receiving water quality will be compared to federal and provincial protection of aquatic life criteria which are more stringent than drinking water quality standards. While the aquatic protection guidelines that FMG is monitoring water quality are more protective than human drinking water criteria, FMG will compare water monitoring results to both aquatic protection and drinking water criteria for transparency and ease of understanding. Any exceedances will be reported to MECP and shared with the communities and discussed in reporting. 	
<p>Traditional Land and Resource Use Experience (Cultural continuity)</p>	<p>The mine footprint will be inaccessible during construction, operation and active closure. Potential sensory disturbance due to change in noise and viewscape.</p>	<ul style="list-style-type: none"> • Support the development and delivery of Indigenous led ceremonies on site to pay respect to the land air, and water prior to construction and at other key Project milestones. • Prior to construction, establish Environment Committee(s) with interested local Indigenous communities to: <ul style="list-style-type: none"> ○ Facilitate on-going communications and meaningful engagement during construction, operation and closure of the Project; ○ Facilitate the sharing and integration of Traditional knowledge in Project-related activities during construction, operation and closure of the Project; and, ○ Share and evaluate environmental information, review Project approvals and environmental management and monitoring plans, participate in adaptive management and identify mitigation measures, address emerging issues and areas of interest identified by communities. • During construction, operation and closure phases, engage Indigenous environmental monitors from local communities in the implementation of mitigation and monitoring measures. • Optimize location of the treated effluent discharge infrastructure during detailed engineering and permitting to relocate closer to the mine site at Birch Lake (CLFN, LSFN). 	<p>CLFN, SFN, LSFN</p>

Exercise of Rights	Potential Impacts	Mitigation	Key Communities
		<ul style="list-style-type: none"> • Where there is interest, provide opportunities to local Indigenous communities and traditional land users to harvest plants and aquatic resources within the PDA prior to construction. • Facilitate the development and implementation of a community-based monitoring program to supplement (not duplicate) regulatory monitoring requirements. • Support reasonable requests and work schedule flexibility for Indigenous employees for time off to pursue traditional land use activities, during construction, operation and closure phases • Support community land-based cultural activities, during construction, operation and closure of the Project. • The following mitigation for the portage which will be undertaken in collaboration with interested local Indigenous communities: <ul style="list-style-type: none"> ○ Develop and implement a documentation and commemoration plan for the historical portage. This will serve to inform the re-establishment of the portage during the mine closure phase; ○ Design and establish an alternate portage route within the north basin of Springpole Lake by rehabilitating the other known historical portage just to the west; and ○ Develop the design for the re-establishment of the existing portage during the mine closure phase. • Prior to construction, establish the alternate navigation route identified to maintain access between Springpole Lake and Birch Lake, and maintain the alternate route until post closure when the existing portage has been re-established. • Preserve a tree line as a buffer around the mine site to diminish the amount of the mine site that can be seen. • If chance finds or deeply buried archaeological resources (including paleontological resources in organic deposits beneath lakes, marshes and 	

Exercise of Rights	Potential Impacts	Mitigation	Key Communities
		<p>peat) are encountered during the construction phase, a Chance Find Procedure will be implemented and the site secured. Local Indigenous communities will be notified and all activities impacting the affected archaeological resources will cease immediately.</p> <ul style="list-style-type: none"> • Prior to construction, develop an access management strategy with local Indigenous communities to manage access along the mine access road, during construction, operation and closure phases of the Project, with the purpose of supporting TLRU access and minimizing new public access. • FMG will file a Mine Closure Plan under Part VII of the Mining Act and Ontario Regulation 240/00 (Mine Development and Closure) before construction begins and aims to provide for the restoration of the Project site including addressing viewscape to the extent feasible at closure. 	