

ECCC Comments on the draft Springpole Gold Project EA Report March 30, 2026

Comment ID	EA Report Reference	Current wording in the draft EA report	Proposed changes to the Draft EA report	ECCC Scientific Rationale, Input and/or Questions
ECCC#1	<p>Draft EA report, Section 3.1.1 Loss or alteration of fish habitat;</p> <p>Subheading - Loss of fish habitat in dewatered area of Springpole Lake, pg. 22</p>	<p>The draft EA report currently states</p> <p><i>“Environment and Climate Change Canada (ECCC) advised that the time required to reconnect the reflooded basin to Springpole Lake may be underestimated. Re-flooding the basin and filling the open pit will require water-taking from Springpole Lake, at rates that are protective of fish and fish habitat in the lake. The proponent predicted that, considering these controlled filling rates, and accounting for time required for the reflooded basin water to meet water quality criteria established through future permitting, reconnection of the reflooded basin to Springpole Lake would occur within five years from the start of filling, resulting in the minimum 18-year period of disconnection.”</i></p>	<p>ECCC recommends that this paragraph be changed (as indicated in bold) to more accurately reflect the scientific information and knowledge that was provided to IAAC.</p> <p><i>“Environment and Climate Change Canada (ECCC) advised that the time required to reconnect the reflooded basin to Springpole Lake may be underestimated given the uncertainty surrounding the water-taking rates assumed to be protective of fish and fish habitat. ECCC also recommended implementing robust monitoring in Springpole Lake to address this uncertainty. Re-flooding the basin and filling the open pit will require water-taking from Springpole Lake, at rates that are protective of fish and fish habitat in the lake. The proponent predicted that, considering these controlled filling rates, and accounting for time required for the reflooded basin water to meet water quality criteria established</i></p>	<p>At the request of IAAC and DFO, ECCC reviewed the proposed water-taking rates from Springpole Lake and identified uncertainty that they would be protective of fish and fish habitat. Water-taking rates to support basin reflooding and pit filling are assumed to be 10% of Springpole Lake inflows estimated at the outlet of Cromarty Lake (Southeast Arm), which is located downstream and separated from Springpole Lake (North Basin), where the pit is located, by a connecting channel.</p> <p>A dynamic wave routing model was used to assess changes in water levels in Springpole Lake and flow and velocity in the connecting channel. However, the model does not appear to account for the cumulative effects of multiyear water-taking or the reduction in available water volume caused by ice formation. The total water-taking volume required for basin reflooding and pit filling (approximately 173Mm³) is comparable to volume of Springpole Lake itself (estimated at 117Mm³ for the North Basin and 73 Mm³ for the Southeast Arm). Much of this storage is near the surface and may be unavailable during winter due to ice accumulation. In addition, inflows to Springpole Lake are estimated using long-term hydrometric data from a distant watershed, with limited on-site flow measurements, particularly in winter, limiting confidence in the timing and magnitude of estimated inflows to Springpole Lake.</p> <p>As a result, substantial uncertainty remains regarding potential impacts on surface water</p>

			<p><i>through future permitting, reconnection of the reflooded basin to Springpole Lake would occur within five years from the start of filling, resulting in the minimum 18-year period of disconnection.”</i></p>	<p>quantity, water quality recovery, and fish habitat conditions in Springpole Lake.</p> <p>ECCC previously recommended continued water level monitoring in Springpole Lake throughout the life of the project (this is also supported by DFO in their EIS review submission FH-05) as it will improve understanding of inflows to Springpole Lake and inform adaptive mitigation measures and help reduce uncertainty.</p> <p>This analysis and recommendation were provided to both IAAC and DFO. It is ECCC’s understanding that DFO is also supportive of this recommendation.</p>
ECCC #2	<p>Draft EA report, Section 3.1.1 - Loss or alteration of fish habitat</p> <p>Subheading - Loss of fish habitat in small inland waterbodies and tributary watercourses, pg. 23</p>	<p>The draft EA report currently states</p> <p><i>“ECCC identified uncertainties in the water quantity modelling for small inland waterbodies east of the stockpiles, which could translate to uncertainties in effects to fish habitat. The proponent will clarify assumptions in its modelling and refine predictions to inform the conditions of the Fisheries Act authorization.”</i></p>	<p>ECCC recommends that this paragraph be changed (as indicated in bold) to more accurately reflect the scientific information and knowledge that was provided to IAAC.</p> <p><i>“ECCC identified uncertainties in the water quantity modelling for small inland waterbodies east of the stockpiles and tributary watercourses, which could translate to uncertainties in effects to fish habitat. The proponent will clarify assumptions in its modelling, consider the effects of groundwater drawdown and other water-taking needs and refine water quantity predictions to inform the conditions of the Fisheries Act authorization.”</i></p>	<p>At the request of IAAC and DFO, ECCC reviewed the robustness of the water quantity models. As identified during ECCC’s review of the proponent’s EIS, uncertainty was noted as the model did not address the small-scale areas of concern related to fish and fish habitat in local inland waterbodies. These models were developed for larger-scale systems, i.e., lakes with controlled inlets and outlets, and their application to all smaller, more sensitive areas, regardless of their location, remains uncertain.</p> <p>To reduce uncertainty in water quantity predictions, ECCC recommended that the effect of potential changes to groundwater drawdown or other water-taking needs, managed under the Ontario Water Resources Act, in water quantity predictions are considered, when these predictions are refined to inform the conditions of the Fisheries Act authorization.</p>

				This analysis and recommendation were provided to both IAAC and DFO. It is ECCC’s understanding that DFO is also supportive of this recommendation.
ECCC #3	Draft EA report, Section 3.1.2 Fish health and mortality Subheading Uncontrolled effluent in Birch Lake and Springpole Lake, pg. 27	The draft EA report currently states <i>“ECCC noted that the proponent’s assessment did not substantiate predicted changes of certain metal concentrations at the seepage face, where seepage has not fully mixed with surface waters, and where effects to fish health are most likely to occur....”</i>	ECCC recommends that this paragraph be changed (changes in bold) to more accurately reflect the scientific information and knowledge that was provided to IAAC. “ECCC noted that the proponent’s assessment did not substantiate predicted effects of certain metal concentrations at the seepage face, where seepage has not fully mixed with surface waters, and where effects to fish health are most likely to occur...”	As previously conveyed to IAAC (Dec. 13, 2025), the inclusion of the word “changes” is problematic. It is unclear what the intent of this means as it is inaccurate to indicate that the metals will change. ECCC suggests that it would be more accurate to state the “predicted effects ”.
ECCC # 4	Draft EA Report, Section 3.1.3 – Effects from malfunctions and accidents; pg.30	The draft EA report states <i>“Other accidents that could impact fish include the possible malfunction of the water management system during extreme weather which could discharge untreated contact water into Birch Lake and Springpole Lake; the accidental detonation of explosives, which could cause underwater vibration resulting in disturbance or injury to fish; and <u>vehicular accidents or equipment malfunction that could lead to spills of materials</u> that could impact water quality if they were to reach nearby waterbodies,</i>	ECCC recommends that this be changed to the following to more correctly reflect the expert information and knowledge that was provided (Changes in bold text): <i>“Other accidents that could impact fish include the possible malfunction of the water management system during extreme weather which could discharge untreated contact water into Birch Lake and Springpole Lake; the accidental detonation of explosives, which could cause underwater vibration resulting in disturbance or injury to fish;</i>	ECCC made a similar suggested revision when reviewing an early draft of the EA report but appears to have been only partially implemented. The revised wording is still recommended because: <ul style="list-style-type: none"> • It includes the word “leaks”, which adds clarity to the potential accident and malfunctions that could occur (because spills typically refer to sudden releases of larger quantities, while leaks typically refer to slower, continuous releases). • It explicitly includes storage tanks, which could be a major source of potential leaks and spills. It refers to leaks and spills from vehicles more generally. Leaks and spills from vehicles do not solely result from accidents, but could also result from poor maintenance (e.g., leaking fuel, oil, or hydraulic lines).

		<i>including along the mine access road....”</i>	<i>and leaks or spills of fuels or other hazardous substances from storage tanks, vehicles, or equipment that could impact water quality if they were to reach nearby waterbodies, including along the mine access road..”</i>	
ECCC # 5	Draft EA Report, Section 3.1.3 – Effects from malfunctions and accidents; pg.30	The draft EA report states <i>“Specific mitigation measures recommended by IAAC, in relation to malfunctions and accidents, are highlighted in the paragraphs above and included in Table 3-1. In addition, IAAC recommends that an accidents and malfunctions prevention and response plan be developed and implemented, in consultation with Indigenous communities, ECCC, and other relevant authorities, for each phase of the project. While residual adverse effects to fish and fish habitat due to malfunctions and accidents could be possible, IAAC is of the view that such effects have a low probability of occurrence and would be managed by proposed mitigation measures.”</i>	ECCC recommends that this be changed to the following to more correctly reflect the expert information and knowledge that was provided (Changes in bold text): <i>“Specific mitigation measures recommended by IAAC, in relation to malfunctions and accidents, are highlighted in the paragraphs above and included in Table 3-1. In addition, IAAC recommends that an accidents and malfunctions prevention and response plan be developed and implemented, in consultation with Indigenous communities, ECCC, and other relevant authorities, for each phase of the project. The plan should include mitigation measures to reduce the likelihood of spills including, the presence of appropriately stocked spill kits, using biodegradable oils (e.g., hydraulic oil) for equipment near water, using secondary containment systems,</i>	ECCC recommends moving the suggested text from section 4.1.4 (Effects to migratory birds / Effects from malfunctions and accidents) to section 3.1.3 (Effects to fish and fish habitat / Effects from malfunctions and accidents). This is the first instance where reference to an accidents and malfunctions prevention and response plan is made, thus its inclusion in section 3.1.3 (earlier in the report) is more appropriate.

			<p>regularly inspecting any equipment that transports, stores, or uses hazardous substances, and applying fuel storage, transfer, and dispensing best practices including maintaining appropriate setback distances from water bodies. While residual adverse effects to fish and fish habitat due to malfunctions and accidents could be possible, IAAC is of the view that such effects have a low probability of occurrence and would be managed by proposed mitigation measures.”</p>	
ECCC # 6	Draft EA Report, Section 4.1.4 – Effects from malfunctions and accidents, pg. 38	<p>The draft EA report states</p> <p><i>“Spills of hazardous materials during transportation and storage, such as liquid cyanide or hydrocarbon materials, could enter the natural environment and increase the risk of mortality to migratory birds. Based on advice from ECCC, IAAC recommends that an accidents and malfunctions prevention and response plan be developed and implemented in relation to each phase of the project, taking into consideration ECCC’s Guidelines for Wildlife Response Plans. It should include measures for the protection of migratory birds from spills including, stationing appropriately stocked spill kits, using</i></p>	<p>ECCC recommends that this be changed to the following to more correctly reflect the expert information and knowledge that was provided (Changes in bold text):</p> <p><i>“Spills of hazardous materials during transportation, use, and storage, such as liquid cyanide or hydrocarbon materials, could enter the natural environment and increase the risk of mortality to migratory birds. Based on advice from ECCC, IAAC recommends that an accidents and malfunctions prevention and response plan be developed and implemented in relation to each phase of the project, taking into</i></p>	<p>The inclusion of the word “use” is recommended because spills of hazardous materials can also occur during their use, not only storage and transportation.</p> <p>It is recommended that the details regarding the measures to be included in the plan be moved up to section 3.1.3 (Effects to fish and fish habitat / Effects from malfunctions and accidents), as that is the first instance where the accidents and malfunctions prevention and response plan is mentioned (per previous comment).</p>

		<i>biodegradable oils (e.g., hydraulic oil) for equipment near water, using secondary containment systems, regularly inspecting the storage and dispensing systems, and applying fuel transfer and dispensing best practices.”</i>	<i>consideration ECCC’s Guidelines for Wildlife Response Plans. # should include measures for the protection of migratory birds from spills including, stationing appropriately stocked spill kits, using biodegradable oils (e.g., hydraulic oil) for equipment near water, using secondary containment systems, regularly inspecting the storage and dispensing systems, and applying fuel transfer and dispensing best practices. The plan should include measures for the protection of migratory birds from spills.”</i>	
ECCC #7	Draft EA report, Section 3.3, Table 3-1: Summary of IAAC’s recommended mitigation measures and follow-up program measures pertaining to fish and fish habitat. Pg. 31.	The draft EA report currently states in the Mitigation Measures (4 th row): <i>“Manage potential mine effluents in compliance with the pollution prevention provisions of the Fisheries Act and its regulations including the Metal and Diamond Mining Effluent Regulations.”</i>	ECCC requests that this sentence in row 4 be removed.	Stating this as a "recommended" measure undermines the legal requirements that apply according to the conditions in the regulations. In addition, the <i>Fisheries Act</i> is applicable to everyone.
ECCC #8	Draft EA report, Section 5 - Effects to the environment on federal lands, pgs. 42 to 45	The draft EA report states in Section 5 <i>“The project is likely to cause residual adverse effects to the environment on federal lands through changes to the atmospheric environment,</i>	ECCC recommends that the effects to the environment on federal lands chapter of the EA report include details on the amount of each habitat type that is proposed to be directly and/or indirectly impacted by this project. A list of species at	ECCC could not locate any data within this section on effects to the environment on federal lands (in regards to the construction, operation and potential decommissioning of the transmission line). The section only speaks to broad ecosystem classifications and not specific amounts of habitat loss either permanently or temporarily as a result of this project.

		<p><i>vegetation communities, and wildlife and wildlife habitat. With the implementation of the mitigation measures identified by the proponent, IAAC is of the view that the project is not likely to cause significant adverse effects to the environment on federal lands. Cumulative effects are not likely to occur.</i></p> <p><i>This section focuses on effects of the project to the environment on Slate Falls Nation Reserve. No other federal lands were predicted to be affected by the project.” (pg. 42)</i></p> <p>...</p> <p><i>“ IAAC considered changes to the environment in the portion of the PDA (i.e., the transmission line with a 60-metre buffer) where it intersects with the Slate Falls Nation Reserve; the LSA (i.e., an area that extends two kilometres from the centreline of the transmission line, where it intersects with the Slate Falls Nation Reserve); and the RSA (i.e., an area that fully encompasses the Slate Falls Nation Reserve). IAAC assessed the effects of project activities on the atmospheric environment, vegetation communities and wetlands, and wildlife and wildlife habitat (bolding added for emphasis). IAAC’s assessment of effects to migratory birds (Section</i></p>	<p>risk that may be present on the federal (reserve) land should also be included.</p> <p>ECCC also recommends that specific mitigation measures proposed for the construction, operation and potential decommissioning of the transmission line on Slate Falls Nation Reserve be included in this chapter of the EA report as this information will be required for a potential <i>Species at Risk Act</i> (SARA) permit.</p> <p>Lastly, ECCC recommends that all Indigenous Nations input and consultation received on the impacts to the Slate Falls Nation Reserve be included in this chapter of the EA report.</p> <p>ECCC could not provide any input into this part of the assessment as the proponent did not provide any information on potential environmental impacts to federal (reserve) lands.</p>	<p>To ECCC’s knowledge, no commitment has been made to remove the proposed transmission line during the decommissioning of this project and therefore would result in a permanent loss of habitat. ECCC is also unaware of any mitigation measures or commitments made specific to the environmental impacts due to the proposed works located on federal (reserve) lands. The statement made in Section 5.1.2 suggesting that vegetation would be allowed to regrow naturally under the transmission line is unlikely as any habitat allowed to grow in this area would need to be continually maintained to reduce the risk of fire and allow for any maintenance to occur. As a result, existing habitat (including habitat for boreal caribou) will be permanently removed in these areas.</p> <p>ECCC is uncertain how IAAC has reached a conclusion that the project is not likely to cause significant adverse effects to the environment on federal lands, as noted above, the proponent did not provide any information on potential environmental impacts from the proposed transmission line on Slate Falls Nation Reserve to the Federal Authorities.</p> <p>ECCC made repeated requests for this information to support its regulatory role; however, that information was not submitted. As a result, ECCC was unable to complete its analysis on potential impacts to terrestrial species at risk and migratory birds.</p> <p>As indicated previously, ECCC requires detailed information on the potential effects of the Project, including locations and/or occurrences of species at risk, their use of habitat and critical habitat within the Project area, and specific effects on federal</p>
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		<p><i>continuing until the transmission line is decommissioned and the vegetation regrows during the abandonment phase. The effects to the terrestrial environment would be partially reversible, as natural revegetation within transmission line corridor would not fully restore the terrestrial environment to pre-project conditions.</i></p> <p><i>With the implementation of recommended mitigation measures, IAAC concludes that the project is not likely to cause significant adverse effects to the environment on federal lands. IAAC does not recommend any further mitigation measures or follow-up monitoring.” (pg.44)</i></p> <p>Section 5.3 Cumulative effects <i>“IAAC considered whether residual effects from the project would interact with other activities to cause cumulative effects to the environment on federal lands. The E1C transmission line corridor abuts the project’s transmission line corridor on the Slate Falls Nation Reserve. The E1C transmission line is an operational line, and may require periodic maintenance, which may involve the use of heavy machinery.”</i></p> <p>....</p>		
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ECCC #9	<p>Draft EA report, Section 7 – Health Conditions</p> <p>Subheading – Air Contaminants</p>	<p>The draft EA report (pg. 53) currently states</p> <p><i>“Air quality impacts from peak emissions during each project phase were compared to the relevant AAQCs and CAAQS, including baseline</i></p>	<p>ECCC recommends the inclusion of the <u>following</u> in Table 7-1 and that the EA condition be revised (changes in bold) to include the NO₂ parameter as follows: Table 7-1, Follow-up programs:</p>	<p>The draft Environmental Assessment Report (Section 7, pg. 53) acknowledges that NO₂ was predicted to exceed its respective 1-hour CAAQS during all phases of the project. It also notes that the proponent has committed to implementing an air quality monitoring program, which includes monitoring of NO₂ during construction and operations at locations determined in accordance with the MECP</p>

<p>including benzo(a)pyrene, Pg.53</p> <p>Subheading – Particulate matter Pg. 54</p> <p>Table 7-1, Summary of IAAC’s recommended mitigation measures and follow-up program measures pertaining to changes to the health and socio-economic conditions of Indigenous Peoples, (section Follow-up programs) pg.64</p> <p>Draft Conditions Section 5 Health and socio-economic conditions of Indigenous peoples, Condition 5.2.1 Pg. 12</p>	<p><i>and project-related emissions. Concentrations of CO, NO2, and SO2 were all predicted to be below their respective AAQCs and CAAQS, with the exception of NO2 which was predicted to exceed its respective 1-hour CAAQS during all phases of the project.” (Pg. 53)</i></p> <p>The draft EA report also states</p> <p><i>“The proponent has committed to implementing an air quality monitoring program, which would monitor concentrations of PM10, PM2.5, and metals during construction, operations, and decommissioning. Monitoring of NO2 would also be undertaken during construction and operations at locations determined in accordance with the MECP” (Pg. 54)</i></p> <p><i>“IAAC recognizes that exposure levels are within federal and provincial limits, apart from NO2, which would be managed by proponent mitigation and monitoring. IAAC is of the view that, with the implementation of the</i></p>	<p>(bullet 4) Identify, prior to construction, contaminants of potential concern to be monitored, including total suspended particulates, PM₁₀, PM_{2.5}, and NO₂ and the locations where these contaminants of concern shall be monitored;</p> <p>Proposed additional parameter to the existing EA condition:</p> <p>5.2.1 Identify, prior to construction, contaminants of potential concern to be monitored, including total suspended particulates, PM₁₀, PM_{2.5}, and NO₂ and the locations where these contaminants of concern shall be monitored; and</p>	<p>Operations manual for air quality monitoring in Ontario. IAAC also recognizes that exposure levels are within federal and provincial limits, apart from NO₂, which would be managed by proponent mitigation and monitoring. Finally, IAAC is of the view that, with the implementation of the mitigation measures, the project is likely to result in residual adverse effects to Indigenous health conditions as a result of changes to air quality.</p> <p>Table 7-1 (Follow-up programs, pg. 64) contains the monitoring programs related to “Health and socio-economic conditions of Indigenous peoples” but it does not include any of the air quality parameters that are captured in Condition 5.2.1 including the absence of NO₂.</p> <p>To further reduce combustion-related air emissions and potential impacts to Indigenous health, the Proponent prioritizes, where feasible, the monitoring of NO₂. ECCC recommends that the monitoring of NO₂ be, added to Table 7-1 and as a condition.</p>
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ECCC #10	<p>Draft EA report, Section 7 – Health Conditions</p> <p>Subheading – Air Contaminants including benzo(a)pyrene, Pg.53</p>	<p>The draft EA report states <i>“The proponent also indicated the preferred use of emulsion explosives, which typically generates reduced ammonia residuals compared with conventional ammonium nitrate fuel oil explosives. To manage tailpipe emissions, heavy equipment would be maintained</i></p>	<p>ECCC recommends the following inclusion (addition in bold) to Table 7-1</p> <p>Mitigation Measures</p> <p>(bullet 5) Ensure off-road equipment operating on diesel or low-carbon diesel for the Project include engines that</p>	<p>The draft Environmental Assessment Report (pg. 53) notes the proponent’s commitment to managing tailpipe emissions by ensuring that the heavy equipment would be maintained to meet ECCC’s Tier 4 emission standards.</p> <p>However, in Table 7-1 (pg. 62) which contains the mitigation measures that are captured as related to “Health and socio-economic conditions of</p>

	<p>Table 7-1, Summary of IAAC's recommended mitigation measures and follow-up program measures pertaining to changes to the health and socio-economic conditions of Indigenous Peoples, (section Mitigation Measures) pg.62</p> <p>Draft Conditions Section 5 Health and socio-economic conditions of Indigenous peoples, Condition 5.2.1 pg. 12</p>	<p><i>to meet ECCC's Tier 4 emission standards."</i> (pg. 53)</p> <p>Table 7-1 in the draft EA report states <i>"Implement measures to mitigate fugitive dust emissions attributable to the project, including dust associated with vehicles on project roads and the handling and storage of granular materials that could become sources of fugitive dust taking into account Environment and Climate Change Canada's Best Practices for the Reduction of Air Emissions from Construction and Demolition Activities (2005). (4 bullets) "</i> (pg. 62)</p>	<p>meet Tier 4 emissions standards and are manufactured in accordance with the Off-Road Compression-Ignition Engine Emission Regulations where technically and economically feasible</p> <p>ECCC recommends the inclusion (addition in bold) of a new condition 5.1.5:</p> <p>5.1.5 ensure off-road equipment operating on diesel or low-carbon diesel for the Project include engines that meet Tier 4 emissions standards and are manufactured in accordance with the Off-Road Compression-Ignition Engine Emission Regulations where technically and economically feasible</p>	<p>Indigenous peoples" (conditions 5.1.1 to 5.1.4) it does not include use of tier 4 engines.</p> <p>To further reduce combustion-related air emissions and potential impacts to Indigenous health, the Proponent prioritized (where feasible) the use of lower-emission construction equipment (e.g., Tier 4). ECCC recommends that this mitigation measure be added to Table 7-1 and as a condition.</p>
ECCC # 11	<p>Draft EA report, Section 7.1.1 Health Conditions</p> <p>Subsection - Drinking Water, Pg. 56</p>	<p>The draft EA report currently states (3rd paragraph) <i>"Treated effluent from the water treatment plant will also be monitored to comply with the Metal and Diamond Mining Effluent Regulations"</i>.</p>	<p>ECCC requests that this sentence be removed.</p>	<p>The Metal and Diamond Mining Effluent Regulations are not related to drinking water quality and do not apply to the treated effluent from the water treatment plant.</p>

ECCC # 12	Draft EA Report, Section 7.1.3 – Effects from malfunctions and accidents, pg. 60	The draft EA report states “Accidental detonation of explosives would affect the acoustic environment and increase exposure of land users to noise and vibration. Potential spills of hazardous materials during transportation or storage would cause contamination of the nearby environment, potentially affecting the quality of country foods. A breach of the dykes would result in a reduction in water quality due to erosion of lake sediments, affecting drinking water.”	ECCC recommends that this be changed to the following to more correctly reflect the expert information and knowledge that was provided (Changes in bold text): “Accidental detonation of explosives would affect the acoustic environment and increase exposure of land users to noise and vibration. Potential spills of hazardous materials during transportation, use , or storage would cause contamination of the nearby environment, potentially affecting the quality of country foods. A breach of the dykes would result in a reduction in water quality due to erosion of lake sediments, affecting drinking water.”	ECCC recommends the inclusion of the word “use” because spills of hazardous materials can also occur during their use, not only storage and transportation.
ECCC # 13	Draft EA Report, Section 9.1.1 - Changes to the quality and availability of resources Subheading – Project Changes – Local Caribou Distribution During Harvest Seasons. pg. 76.	The draft EA report states “ECCC noted that <i>mapping the zone of influence from noise would have helped refine effect predictions.</i> ”	ECCC recommends that this be changed to the following to more correctly reflect the scientific information and knowledge that was provided (Changes in bold text): “ECCC noted that mapping the using a zone of influence approach (for example, considering-from noise) would have helped refine effect predictions for indirect habitat loss. ”	ECCC provided the following expert information and knowledge in February 2025 (IR Number ECCC-36) regarding using the zone of influence to assess indirect habitat loss, where noise was one example of a local / project-level mechanism: <ul style="list-style-type: none"> • “To assess indirect habitat loss, using the "Zone of Influence" is a better approach to assess if the Project could result in population level effects due to effects on individuals because it considers the mechanism that is happening at the local scale. For example, the Proponent found that noise levels (40 dBA) extend beyond the 500-meter buffer around the mine site, reaching distances of 1 to 2 kilometers (p.6.13-49).”

				<p>ECCC provided the following recommendation related to the zone of influence:</p> <ul style="list-style-type: none"> • “Provide updated amounts for indirect habitat loss, using the Zone of Influence approach supported by scientific studies.” <p>ECCC continues to recommend a zone of influence approach be used to calculate and monitor effects of indirect habitat loss due to the Springpole project, including but not limited to, noise effects, and supported by scientific studies.</p>
ECCC #14	<p>Draft EA Report, Section 9.1.1 - Project Changes</p> <p>Subheading - Regional Population Page pg. 77</p>	<p>The draft EA report states</p> <p><i>“ECCC noted the numbers in the EIS suggest the Churchill range local population is currently declining at a rate of roughly five percent per year. Any drop in growth rate in an already declining population presents a risk to the population and should not be discounted (see section 9.3 on Cumulative Effects). The project could accelerate the current decline in the Churchill local population and contribute to further decline in the Berens and Kinloch local populations. ECCC also noted areas where modelling predictions could have been improved with longer datasets, clearer assumptions, and communication of uncertainty. IAAC and ECCC acknowledge that high-use</i></p>	<p>ECCC recommends that this be changed to the following to more correctly reflect the expert information and knowledge that was provided (Changes in bold text):</p> <p><i>“ECCC noted the numbers in the EIS suggest the Churchill range’s local population is currently declining at an estimated rate of roughly five percent per year, and that the project could potentially accelerate this rate of decline. Although the estimated increase in the rate of decline is relatively small, ECCC emphasizes that any drop in growth rate in an already declining population presents an exacerbated risk to the</i></p>	<p>ECCC recommends that the specialist and expert information and knowledge that has been summarized into a single paragraph in the draft EA report be instead broken into two paragraphs.</p> <p>In terms of the first paragraph, ECCC's expert information and knowledge to IAAC stated that the loss of caribou habitat in the northern part of the Churchill Range could contribute to a total loss of caribou availability for traditional use in the Churchill Range, and a decrease in caribou availability in the Kinloch and Berens ranges. Specifically, ECCC advised that the Project is likely to increase the speed at which caribou will be extirpated from the Churchill Range, and that under a worst-case scenario, the combined population across all three ranges could decline to less than 12 percent remaining within 10 years.</p> <p>ECCC understands that IAAC's intent in revising this text is to ensure the draft EA report is accurate and not alarmist. The current draft acknowledges declining trends and the potential for accelerated population decline; however, it does not fully</p>

		<p><i>nursery habitat near the project could be an important contributor to population recovery in the Churchill range, and that there are other high-use nursery habitat areas in the northern part of the range.”</i></p>	<p><i>population and should not be discounted (see section 9.3 on Cumulative Effects). The project could accelerate the current decline in the Churchill local population and contribute to further decline in the Berens and Kinloch local-regional population (i.e. encompassing populations Churchill, Berens, Kinloch ranges). ECCC also noted areas where modelling predictions could have been improved with longer datasets, clearer assumptions, and communication of uncertainty. IAAC and ECCC acknowledge that high-use nursery habitat near the project could be an important contributor to population recovery in the Churchill range, and that there are other high-use nursery habitat areas in the northern part of the range.”</i></p>	<p>reflect the substance of ECCC's approved expert information and knowledge. Most notably, it omits the finding that under a worst-case scenario, the combined regional population across the Churchill, Berens and Kinloch ranges could decline to less than 12 percent remaining within 10 years. This trajectory is projected based on current conditions, before accounting for any additional impact from the Project.</p> <p>This conclusion was an explicit and intentional component of ECCC's expert information and knowledge.</p> <p>The current draft EA report has revised ECCC's expert information and knowledge in a manner that makes the Project's impacts appear less severe than the available information indicates. ECCC recommends that additional context be added to the EA report to help readers interpret the findings accurately. ECCC therefore recommends that the draft EA report be revised to:</p> <ol style="list-style-type: none"> 1. Accurately reflect ECCC's approved expert information and knowledge, including the finding that the combined regional population across the Churchill, Berens and Kinloch ranges could decline to less than 12 percent remaining within 10 years under a worst-case scenario; 2. Clarify that this worst-case trajectory is projected based on current population dynamics, before accounting for any additional impact from the Project; 3. Clarify that this estimate reflects the low end of the confidence interval and represents the worst-case scenario; and
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				<p>4. Clearly state that the Project could further accelerate an already projected rapid decline, potentially increasing the speed at which caribou will be extirpated from the Churchill Range.</p>
ECCC #15	<p>Draft EA Report, Section 9.1.1 - Project Changes</p> <p>Subheading – Regional Population, pg. 77</p>	<p>The draft EA report states</p> <p><i>“ECCC noted the numbers in the EIS suggest the Churchill range local population is currently declining at a rate of roughly five percent per year. Any drop in growth rate in an already declining population presents a risk to the population and should not be discounted (see section 9.3 on Cumulative Effects). The project could accelerate the current decline in the Churchill local population and contribute to further decline in the Berens and Kinloch local populations. ECCC also noted areas where modelling predictions could have been improved with longer datasets, clearer assumptions, and communication of uncertainty IAAC and ECCC acknowledge that high-use nursery habitat near the project could be an important contributor to population recovery in the Churchill range, and that there are other high-use</i></p>	<p>ECCC recommends that this be changed to the following to more correctly reflect the expert information and knowledge that was provided (Changes in bold text):</p> <p><i>“ECCC noted the numbers in the EIS suggest the Churchill range local population is currently declining at a rate of roughly five percent per year. Any drop in growth rate in an already declining population presents a risk to the population and should not be discounted (see section 9.3 on Cumulative Effects). The project could accelerate the current decline in the Churchill local population and contribute to further decline in the Berens and Kinloch local populations.</i></p> <p><i>ECCC also noted areas where that modelling predictions would could have been improved more accurate with</i></p>	<p>As stated above in ECCC#13, ECCC recommends that the advice that has been summarized into a single paragraph in the draft EA report be instead broken into two paragraphs.</p> <p>ECCC advises that the current draft does not fully reflect ECCC's comment regarding deficiencies in the proponent's analysis. ECCC recommends revising this sentence to state that modelling predictions would be more accurate with longer datasets, clearer acknowledgement of assumptions and explicit communication of uncertainty and its implications for projecting population trajectory. ECCC further emphasized that demographic variation and uncertainty could increase the risk to the population beyond what the modelling predicts.</p>

		<i>nursery habitat areas in the northern part of the range.”</i>	<i>longer datasets, clearer acknowledgement of assumptions, and explicit communication of uncertainty and its implications for projecting population trajectories. ECCC further emphasized that demographic variation and uncertainty could further increase the risk to the regional population. IAAC and ECCC acknowledge that high-use nursery habitat near the project could be an important contributor to population recovery in the Churchill range, and that there are other high-use nursery habitat areas in the northern part of the range.”</i>	
ECCC #16	Draft EA Report, Section 9.1.1 - Changes to the quality and availability of resources Subheading – Caribou Management Strategies, pg. 79	The draft EA report states “Offsetting for high use caribou habitat can also be challenging. ECCC noted that while high use habitat may be irreplaceable in function, and increased predation risk cannot be offset with habitat measures, offsets within the Churchill range could reduce the local adverse effects. ECCC recommended offsetting ratios for the habitat losses.”	ECCC recommends that this be changed to the following to more correctly reflect the scientific information and knowledge that was provided (Changes in bold text): “ECCC noted that while high use habitat may be irreplaceable in function, and increased predation risk cannot be offset with habitat measures, offsets within the Churchill range could reduce the local adverse effects, even with offset measures, impacts	ECCC provided the following expert information and knowledge in February 2025 (IR Number ECCC-60, ECCC-35): <ul style="list-style-type: none"> • “Even with offset measures, impacts on these areas might still prevent the recovery goals from being met. However, offsets within the Churchill Range could help reduce the negative effects on critical habitat. • ECCC recommends that the Proponent provide: <ul style="list-style-type: none"> ○ A Caribou Habitat Offsetting Plan, including details on each potential opportunity being advanced, with timelines and expected outcomes. • It is also recommended that offsets and offset plans be developed in consultation with the

			<p><i>on these areas might still prevent the recovery goals from being met. However, offsets within the Churchill Range could help reduce the negative effects on critical habitat. ECCC recommended offsetting ratios for the habitat losses, and the development of a Caribou Habitat Offsetting Plan, with information about how to develop effective offsets and offset plans in consultation with the appropriate regulatory authorities and Indigenous Nations.”</i></p>	<p>appropriate regulatory authorities and Indigenous Nations.”</p> <p>ECCC also provided expert information and knowledge on how to develop effective offsets and offset plans that can be acknowledged as a resource for the proponent as they develop their mitigation and monitoring plans.</p>
ECCC # 17	Draft EA Report, Section 9.1.4 – Effects from malfunctions and accidents, pg. 90	<p>The draft EA report states</p> <p>“Accidental detonation of explosives would affect the acoustic environment and increase exposure of land users to noise and vibration. Potential spills of hazardous materials during <u>transportation and storage</u> would cause contamination of the nearby environment, affecting hunting and fishing. Potential breach of the dykes would result in a reduction in water quantity in Springpole Lake as well as a reduction in water quality due to erosion of lake sediments, impacting use of water for fishing and navigation. Potential breach of the CDF dams could cause the</p>	<p>ECCC recommends that this be changed to the following to more correctly reflect the expert information and knowledge that was provided (Changes in bold text):</p> <p>“Accidental detonation of explosives would affect the acoustic environment and increase exposure of land users to noise and vibration. Potential spills of hazardous materials during transportation, use, and storage would cause contamination of the nearby environment, affecting hunting and fishing. Potential breach of the dykes would result in a</p>	<p>ECCC recommends the inclusion of the word “use” because spills of hazardous materials can also occur during their use, not only storage and transportation.</p>

		release of tailings, pond water, and mine rock into the surrounding environment, with potential migration into Birch Lake or Springpole Lake, which could impact the availability and quality of water for drinking, ceremony, and fishing.”	reduction in water quantity in Springpole Lake as well as a reduction in water quality due to erosion of lake sediments, impacting use of water for fishing and navigation. Potential breach of the CDF dams could cause the release of tailings, pond water, and mine rock into the surrounding environment, with potential migration into Birch Lake or Springpole Lake, which could impact the availability and quality of water for drinking, ceremony, and fishing.”	
ECCC #18	Draft EA Report, Section 9.2 – Significance of Residual effects, pg. 91; Section 9.3 – Cumulative Effects, pg. 92	The draft EA report states <i>“IAAC recommends a follow-up program be developed to monitor caribou harvesting in a way that informs Ontario’s long-term management strategies such as forest management planning.”</i> (pg. 91) <i>“IAAC recommends a follow-up program to monitor changes to local caribou harvest success and the potential causes of those changes, to generate information to support ongoing landscape-level management decisions such as forest management planning.”</i> (pg. 92)	N/A	The text on pages 90 and 91 recommends a follow-up program focused on monitoring caribou harvest success. If ECCC's recommendation for an alternative or additional condition suggesting an indicator focused on caribou habitat use and demographic response is accepted, ECCC recommends that this text be revised to reflect that this should be considered as a complementary indicator of caribou availability for traditional use. Monitoring this indicator at a relevant biological scale would provide a line of evidence that is within the Proponent's control and that captures effects at the scale at which impacts are predicted to occur, independent of harvest data. See condition (ECCC # 6con) in the conditions table for the proposed additional follow-up measure.
ECCC #19	Draft EA Report, Section 9.3 -	The draft EA report states	N/A	It is unclear what “protection” entails in this context. ECCC recommends that the report define for the

	Cumulative Effects, pgs. 92-93	<i>“The cumulative effects may extend into the RSA at a low magnitude because while forestry will influence landscape-level caribou patterns, forest management objectives are supportive of caribou and high-use calving areas would receive protection.”</i>		reader, or provide a reference, what type of protection the high-use calving areas would receive (e.g., would these areas be protected from any type of habitat alteration such as destruction or degradation?)
ECCC #20	Draft EA Repot, Section 11.5 - Issues to be addressed during the regulatory approval phase, pg. 108	The draft EA report states <i>“Should the project proceed, federal authorities with a regulatory role will continue consultation with Indigenous communities after the EA decision is issued. Specifically, relevant federal authorities may consult with Indigenous communities prior to making decisions related to Fisheries Act authorizations, including an amendment to Schedule 2 of the Metal and Diamond Mining Effluent Regulations, and Canadian Navigable Waters Act approval(s), as appropriate. Comments from Indigenous communities received during the EA have been shared directly with federal authorities to inform their decision-making. As applicable, the decisions by federal authorities would take into account the outcomes of ongoing consultation with Indigenous communities and the consultation record resulting from the EA.”</i>	ECCC recommends that the <i>Species at Risk Act</i> (SARA) be included in this list (see addition recommended in bolded text) to support our regulatory role for this project. <i>“Should the project proceed, federal authorities with a regulatory role will continue consultation with Indigenous communities after the EA decision is issued. Specifically, relevant federal authorities may consult with Indigenous communities prior to making decisions related to Fisheries Act authorizations, including an amendment to Schedule 2 of the Metal and Diamond Mining Effluent Regulations, Species at Risk Act and Canadian Navigable Waters Act approval(s), as appropriate. Comments from Indigenous communities received during the EA have been shared directly with federal authorities</i>	ECCC notes that potential for ECCC to consult on SARA permitting is missing from the list of relevant federal authorities that may consult with Indigenous communities prior to making decision. Under section 73(5) of SARA, if the species is found in a reserve or any other lands that are set apart for the use and benefit of a band under the <i>Indian Act</i> , the competent minister must consult the band before entering into an agreement or issuing a permit concerning that species in that reserve or those other lands. As the proposed transmission line for this project will be crossing Slate Falls Nation Reserve, consultation will be required before a permit could be issued.

			to inform their decision-making. As applicable, the decisions by federal authorities would take into account the outcomes of ongoing consultation with Indigenous communities and the consultation record resulting from the EA.”	

**ECCC Comments on the draft Springpole Gold Project Conditions
March 27, 2026**

Comment ID	Draft Conditions reference	Current wording for condition	Proposed changes to the condition	ECCC Scientific Rationale, Input and/or Questions
ECCC #1con	Draft Conditions, Section 3 – Fish and fish habitat; condition 3.5. pg. 9	Draft condition 3.5 currently states <i>“The Proponent shall collect contact water from the Designated Project area, including the Co-disposal Facility, surficial soil stockpile, ore stockpiles and open pit during all phases of the Designated Project and treat, as necessary, before it is deposited into the receiving environment in accordance with the pollution prevention provisions of the Fisheries Act and its regulations including the Metal and Diamond Mining Effluent Regulations.”</i>	ECCC requests that this sentence be changed to: <i>“The Proponent shall collect contact water from the Designated Project area, including the Co-disposal Facility, surficial soil stockpile, ore stockpiles and open pit during all phases of the Designated Project and treat, as necessary, before it is deposited into the receiving environment in accordance with the pollution prevention provisions of the Fisheries Act and its regulations including the Metal and Diamond Mining Effluent Regulations.”</i>	The current language suggests that the MDMER requires sample collection from several locations from which contact water may be sourced, but this is not true. The MDMER also does not include any requirement for treatment of effluent. The condition must be dissociated from the MDMER if details inconsistent with the MDMER are to remain as a condition. Additionally, compliance with the Fisheries Act and MDMER is required despite any EA conditions.

ECCC # 2con	Draft Conditions, Section 6 - Current use of lands and resources for traditional purposes, pg. 13	<p>The Draft conditions currently states</p> <p><i>“6.1 The Proponent shall conduct, in consultation with Indigenous groups, progressive reclamation of areas disturbed by the Designated Project.... In doing so, the Proponent shall:</i></p> <p><i>6.1.1 identify plant species native to the region and that support habitat restoration for species used for traditional purposes;</i></p> <p><i>6.1.2 invite Indigenous groups to participate in the planting or reclamation activities.”</i></p>	<p>ECCC recommends additional text to be included as another sub-bullet after 6.1.2:</p> <p><i>“6.1.3 take into account Ontario’s Best Management Practices for Mineral Exploration and Development Activities and Woodland Caribou in Ontario; and/or updated guidance provided by the province.”</i></p>	<p>Ontario has developed a series of Best Management Practices to help avoid or mitigate adverse effects and reduce threats to caribou when planning or undertaking development activities. For mining, these include general guidelines for rehabilitation, and infrastructure and site reclamation which should be included in any progressive reclamation plan.</p> <p>“Ontario’s Best Management Practices for Mineral Exploration and Development Activities and Woodland Caribou in Ontario” guidance document was previously referred to in several of ECCC’s IRs related to the Proponent’s EIS (January 2025). It is also referenced in the Proponent’s formalized commitments with respect to mitigations, beneficial actions and monitoring were addressed by the “SGP Boreal Caribou Mitigation and Offsetting Commitments” technical memorandum Feb 23rd 2026”</p>
ECCC # 3con	Draft Conditions, Section 6 - Current use of lands and resources for traditional purposes, pgs.13-14	<p>Draft condition 6.3 currently states</p> <p><i>“The Proponent shall develop, prior to construction, and in consultation with Indigenous groups, Environment and Climate Change Canada, and the Ontario Ministry of Natural Resources, and implement during all phases of the Designated Project, habitat offsetting measures to mitigate adverse effects from the Designated Project on woodland caribou (Rangifer tarandus caribou).”</i></p>	<p>ECCC recommends additional text (in bold) to be included in Condition 6.3:</p> <p><i>“ The Proponent shall develop, prior to construction, and in consultation with Indigenous groups, Environment and Climate Change Canada, and the Ontario Ministry of Natural Resources, and implement during all phases of the Designated Project, habitat offsetting measures to mitigate adverse effects from the Designated Project on woodland caribou (Rangifer tarandus caribou). These</i></p>	<p>The inclusion of habitat offsetting measures should also be part of a comprehensive follow up plan to monitor mitigation measures related to boreal caribou. Condition 6.6 allows for the development of a full follow-up program developed prior to construction in consultation with Indigenous groups, Ontario and ECCC.</p>

			offsetting measures should also be considered within the follow-up program developed in Condition 6.6.”	
ECCC # 4con	Draft Conditions, Section 6 - Current use of lands and resources for traditional purposes, pg. 14	Draft condition 6.5 currently states <i>“The Proponent shall undertake construction activities, including vegetation clearing, outside the woodland caribou (Rangifer tarandus caribou) calving and nursery period (May 1 to June 30), in calving and nursery areas identified in figure 6.13-7 of the Environmental Impact Statement, unless otherwise authorized by relevant authorities.”</i>	ECCC recommends additional text (in bold) to be included in Condition 6.5: <i>“ The Proponent shall undertake construction activities, including vegetation clearing, outside the woodland caribou (Rangifer tarandus caribou) calving and nursery period (May 1 to June 30 July 14, and July 15 to September 15), in calving and nursery areas identified in figure 6.13-7 of the Environmental Impact Statement, unless otherwise authorized by relevant authorities.”</i>	ECCC notes that the timing window in Ontario where caribou are most sensitive (very low tolerance) to disturbance in High use Nursery areas is from May 1 to July 14. This follows provincial guidance: General habitat description for the Forest-dwelling Woodland Caribou ontario.ca (accessed March 6, 2026): The sensitive period for Development or recreational activities that result in sensory disturbance within 10 km of High Use Areas (Category 1), potentially displacing caribou during sensitive periods: Nursery Areas (May 1 to July 14 - very low tolerance, July 15 to September 15 - low tolerance).
ECCC # 5con	Draft Conditions, Section - Current use of lands and resources for traditional purposes, pg. 14	As part of the follow-up program, Draft condition 6.6.1 currently states the Proponent shall: <i>“monitor, during construction and operation, the quantity and quality of woodland caribou (Rangifer tarandus caribou) obtained through harvesting and hunting activities for traditional purposes, based on information provided by Indigenous groups;”</i>	ECCC recommends additional text (in bold) to be included in Condition 6.6.1: <i>“monitor, during construction and operation, the quantity and quality of woodland caribou (Rangifer tarandus caribou) obtained through harvesting and hunting activities for traditional purposes, at a scale defined in consultation with impacted communities;”</i>	ECCC notes that even with a focus on current use of lands and resources for traditional purposes, it will still be important to monitor changes to caribou availability at a scale larger than the Project footprint. ECCC recommends that condition 6.6.1 be revised to reflect that monitoring should consider an appropriate biological scale relative to predicted effects.

ECCC # 6con	Draft Conditions - Section- Current use of lands and resources for traditional purposes, pg. 14	As part of the follow-up program, Draft condition 6.6.1 currently states the Proponent shall: <i>" monitor, during construction and operation, the quantity and quality of woodland caribou (Rangifer tarandus caribou) obtained through harvesting and hunting activities for traditional purposes, based on information provided by Indigenous groups;"</i>	ECCC recommends the following sub-condition be added to Condition 6.6.1: 6.6.1a monitor, during construction and operation, caribou habitat use and demographic response as a proxy indicator of caribou availability for traditional use by Indigenous groups, at a biological scale defined in consultation with impacted Indigenous communities and the responsible regulatory authority'.	ECCC recommends an additional follow-up condition to monitor caribou habitat use and demographic response as a proxy indicator of caribou availability for traditional use (currently 6.6.1 in the draft EA report). Harvest and hunting data provided by Indigenous groups is valuable; however, it is dependent on the willingness and capacity of those groups to participate and share information. Caribou habitat use and demographic response is an indicator that is more within the Proponent's control to monitor, and provides a complementary line of evidence for assessing caribou availability for traditional use. Monitoring both indicators at a relevant biological scale is important to capture effects on caribou at a scale larger than the Project footprint and consistent with the scale at which impacts are predicted to occur. Note: Accepting ECCC's recommendation will require changes to the draft EA report (page 90 paragraph 4 and page 91 paragraph 3; see comment ECCC #18).
ECCC # 7con Please see air quality comment on draft EA report ECCC # 9				
ECCC # 8con Please see air quality comment on draft EA report ECCC # 10				
ECCC # 9con	Draft Conditions - Condition 11.2, pg. 17	As part of the Accidents and Malfunctions, Draft condition 11.2 currently states the Proponent shall:	ECCC recommends additional text (in bold) to be included in Condition 11.2: <i>"The Proponent shall develop, prior to construction and in</i>	It is recommended to include "prevention" to align the condition with the text in the draft EA report, which requires the proponent to "Develop, prior to construction and in consultation with Indigenous communities and relevant authorities, and implement and maintain, a <u>"malfunctions and</u>

		<i>“The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, and implement an accidents and malfunctions response plan in relation to each phase of the Designated Project. The accidents and malfunctions response plan shall include:”</i>	<i>consultation with Indigenous groups and relevant authorities, and implement an accidents and malfunctions prevention and response plan in relation to each phase of the Designated Project. The accidents and malfunctions prevention and response plan shall include:”</i>	accidents prevention and response plan” for each phase of the project...” (Draft EA Report, table 3-1, page 32). *If this recommendation is implemented, the name of the plan will also need to be updated in other conditions. Namely within conditions 11.3 and 11.4.3.6 which currently refer to the accidents and malfunctions response plan.
ECCC # 10con	Draft Conditions - Condition 11.2, pg. 17	[Suggestion for new condition - Recommended to add suggested condition between 11.2.1 and 11.2.2]	ECCC recommends the following sub-condition be added to Condition 11.2: - <i>“the measures to be implemented to prevent accidents and malfunctions referred to in condition 11.2.1”</i>	This condition is recommended for inclusion because: <ul style="list-style-type: none"> • Condition 11.1 requires the proponent to “...take all reasonable measures to prevent accidents and malfunctions that may result in adverse environmental effects and mitigate any adverse environmental effects from accidents and malfunctions that occur”. • The draft EA report requires the proponent to develop a “malfunctions and accidents <u>prevention</u> and response plan”. • As currently written, the conditions do not require the proponent to document the measures that they will implement to prevent accidents and malfunctions. *If this recommendation is implemented, it is recommended that condition 11.2.3 be updated to include the proposed condition as well as 11.2.2 (currently included).
ECCC # 11con	Draft Conditions - Condition 11.2.1, pg. 17	As part of the Accidents and Malfunctions, Draft condition 11.2.1 currently states the Proponent shall:	ECCC recommends additional text (in bold) to be included in Condition 11.2.1: <i>“a description of the types of accidents and malfunctions</i>	These edits are suggested because: <ul style="list-style-type: none"> • Re-ordering the sentence to place “that may cause adverse environmental effects during any phase of the Designated Project” earlier improves clarity and helps support emphasis on environmental effects.

		<p><i>“a description of the types of accidents and malfunctions, including accidents and malfunctions as a result of a dyke failure, breach of co-disposal facility dams, malfunction of the water management system, accidental detonation of explosives, spills and wildlife emergencies involving migratory birds, that may cause adverse environmental effects during any phase of the Designated Project;”</i></p>	<p>that may cause adverse environmental effects during any phase of the Designated Project, including accidents and malfunctions as a result of a dyke failure, breach of co-disposal facility dams, malfunction of the water management system, accidental detonation of explosives, <i>leaks or spills of fuels and hazardous substances, and accidents and malfunctions that result in wildlife emergencies involving migratory birds;</i>”</p>	<ul style="list-style-type: none"> • Inclusion of “leaks” adds clarity to the scenarios being requested (because spills typically refer to sudden releases of larger quantities, while leaks typically refer to slower, continuous releases). • Inclusion of “fuels and hazardous substances” adds clarity to the types of leaks or spills that would need to be described. <p>Adding “accidents and malfunctions that result in wildlife emergencies” adds a link that was missing in the sentence between accidents and malfunctions and wildlife emergencies (wildlife emergencies are not an accident or malfunction event, but they can be caused by accidents and malfunctions).</p>
ECCC # 12con	Draft Conditions - Condition 11.2, pg. 17	[Suggestion for new condition - Recommended to add suggested condition after 11.2.3]	<p>ECCC recommends the following sub-condition be added to Condition 11.2:</p> <p><i>“a description of the spill response training and exercises to be implemented for each type of accident and malfunction referred to in condition 11.2.1, and a description of the Proponent’s process to document and address any deficiency observed during training or exercises and update the accidents and malfunctions response plan to address these deficiencies. Training and exercises shall include opportunities for participation by Indigenous groups and</i></p>	<p>ECCC notes that training and exercising is important for accident and malfunction preparedness and response, and requirements for detailing training and exercise requirements are often included in conditions for projects. There is currently no consideration of training and exercising for accidents and malfunctions in the draft conditions.</p> <p>*Note that “accidents and malfunctions response plan” should be changed to “accidents and malfunctions preparedness and response plan” if comment ECCC # A is implemented.</p>

			<i>relevant authorities as applicable.”</i>	