



March 13, 2026,

IAAC reference number: 80149

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Subject: NRCan Input – Springpole Gold Project – Request for review – Draft EA Report and Conditions

On February 27, 2026, the Impact Assessment Agency of Canada (the Agency) requested Natural Resources Canada (NRCan) to review the Draft EA Report and Conditions for the Springpole Gold Project.

NRCan is participating in the impact assessment process pursuant to the *Canadian Environmental Assessment Act, 2012*, as a department in possession of specialist or expert information or knowledge related to the project.

NRCan's experts have reviewed the draft report and conditions with a focus on ensuring accurate characterization of potential effects as they relate to our mandate, and verifying the validity of proposed mitigation measures, monitoring and follow-up programs.

From an NRCan perspective on groundwater quantity, there is nothing to identify as a "red flag" issue and NRCan is satisfied with the proponents preliminary Follow-Up and Monitoring Framework (EIS section 12.1.2), Adaptive Management (EIS section 12.1.3) and Environmental Management Plans (EIS section 12.1.5) as they pertain to groundwater (EIS section 12.5).

With respect to mine waste and site water management, NRCan is generally satisfied with the characterization of potential effects of the project, however we have provided several minor technical comments, noting some inconsistencies and referring to best practice in **Table 1** below.

For additional information, please contact Colter Kelly (colter.kelly@nrca-rncan.gc.ca) or Natalie Robinson (Natalie.Robinson@nrca-rncan.gc.ca)

Sincerely,
Colter Kelly
Sr. Impact Assessment officer, Impact Assessment Division
Natural Resources Canada



Table 1: Summary of issues – Springpole Gold Project – Draft EA Report and Conditions

Issue #	Location (EA/Conditions)	EA Wording (Excerpt)	Issue Type	Description of Concern	NRCan Recommendation
1	EA – Mine Waste and Site Water Management section	“Non-metal leaching and acid-generating mine rock would be used for construction...”	Technical inconsistency	This phrase is internally contradictory and could imply acid-generating material is suitable for construction.	Revise to: 'Non-metal-leaching and non -acid-generating mine rock would be used for construction...'
2	Both documents	ARD/ML or PAG/ML	Technical inconsistency	This phrase should always be metal leaching first because we can have metal leaching without PAG or ARD conditions.	Please revise to use 'metal leaching and acid rock drainage (ML/ARD)' consistently. 'Metal leaching' should always be listed first, even when referenced within the text.
3	Section 3.6.5	Cover all acid-generating, potentially acid-generating and potentially metal-leaching tailings and mine rock during operations, decommissioning and abandonment with an oxygen-limiting barrier in a manner determined by a qualified individual.	Technical	Directing the proponent to only cover the ML/ARD material is not considered best practice. The proponent could decide to backfill some of the material in the open mined-out pit. The Mine Environment Neutral Drainage (MEND) Manuals published by Natural Resources Canada (NRCan) has provided several examples of using open pits as disposal sites for ML/ARD material. Besides backfill and cover, the proponent has other means of mitigating ML/ARD risks, which includes	Backfill and/or cover all acid-generating, potentially acid-generating and potentially metal-leaching tailings and mine rock during operations, decommissioning and abandonment with an oxygen-limiting barrier in a manner determined by a qualified individual.

				blending and/or segregating waste.	
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