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13.0 CONCLUSIONS

The Springpole Gold Project (Project) provides an important major development opportunity for an underserviced region of northwestern Ontario. The Project has the ability to deliver new infrastructure, training and skills development, new high-paying jobs, sustainable development, critical mineral potential, economic diversification and uplift to the region and beyond. First Mining Gold Corp. (FMG) is committed to developing the Project in a responsible manner that contributes to a healthy environment, prosperous economy and supports the well-being and goals of local and Indigenous communities.

FMG has developed this final Environmental Impact Statement / Environmental Assessment (EIS/EA) to meet the regulatory requirements under the *Canadian Environmental Assessment Act, 2012* (S.C. 2012, c. 19, s. 52) and the Ontario *Environmental Assessment Act* (R.S.O. 1990, c. E.18) to develop, operate and eventually decommission the Project. In doing so, the assessment aims to reflect the input provided by local and Indigenous communities, provincial and federal governments, stakeholders and the public.

The environmental assessment (EA) process is a planning tool to demonstrate that the Project is considered in a careful and precautionary manner that avoids or mitigates potential environmental effects and considers the benefits and opportunities from the Project. A key part of the EA planning process initiated by FMG is the early and transparent sharing of Project information at key milestones and providing meaningful consultation opportunities on all aspects of the Project for Indigenous communities, government agencies, and public stakeholders.

Consultation and engagement over the course of 36 months on the EIS/EA was an integral part of the overall EA and Project planning process. Consultation input has been considered throughout the final EIS/EA including on the extensive baseline data collection, alternatives assessment, Project design advancements, potential Project effects and proposed mitigation measures to eliminate or reduce those effects, and monitoring. This final EIS/EA describes the Project and the existing environmental conditions and assesses the potential effects of the Project on the biophysical and human environments, considering the mitigation that would be in place. It also includes an assessment of potential cumulative effects of the Project in combination with other previous, existing and future developments.

Twenty-three valued components were identified as relevant and important to the EA process based on regulatory requirements and the results of consultation:

- Air quality;
- Noise and vibration;
- Greenhouse gas emissions;
- Groundwater;
- Birch Lake system;
- Springpole Lake, north basin;
- Springpole Lake, southeast arm;
- Local inland waterbodies;
- Fish and fish habitat;
- Vegetation communities and wetlands

- Wildlife and wildlife habitat;
- Boreal Caribou;
- Wolverine;
- Bats;
- Species at risk birds;
- Commercial land and resource use;
- Outdoor recreation;
- Local and regional economy;
- Local and regional, infrastructure and services;
- Traditional land and resource use;
- Archaeology;
- Built heritage resources and cultural heritage landscapes; and
- Human and ecological health.

A variety of environmental protection, mitigation and management measures have been incorporated into planning, design, construction, operation and ultimate closure of the Project. The engineering design of the Project incorporates climate change considerations, and Project components and infrastructure are being designed to manage variable weather events. Key Project design and mitigation measures include:

- Minimizing the Project footprint (at 867 hectares [ha] the Project represents one of the smallest footprint open pit mining projects in the gold sector for a mine of its class in Canada);
- Implementation of an integrated site water management and treatment system using best available technology economically achievable;
- Discharge of treated site water to the southeast arm of Springpole Lake, which provides for enhanced mixing and the best assimilative capacity available locally;
- Production of two types of tailings: a thickened, non-acid generating tailings (80 percent [%] by mass) and a conventional slurry potentially acid generating tailings (20% by mass), to best manage mine rock and tailings;
- Optimized management concept for mine rock and tailings to promote a smaller carbon footprint and more effective encapsulation of mine rock by producing thickened non-acid generating tailings that will be hydraulically transported via pipeline to the north cell of the co-disposal facility;
- Co-locating infrastructure (i.e., mine access road, airstrip, and transmission line) within a single corridor to reduce surface disturbance, linear corridor requirements and associated effects;
- Optimized transmission line route based on feedback from Indigenous communities and government;
- Provision of compensation and offsetting for effects related to fish habitat, with the creation of targeted fish habitat features resulting in 3.5% of additional habitat compared to baseline;
- Achieving offsetting measures to provide an overall benefit to Boreal Caribou;

- Construction and operation of a transmission line to connect the site to the provincial electrical grid to minimize requirements for diesel power generation and reduce greenhouse gas emissions; and
- Optimized location of dikes to limit the portion of the mining area to 6% of Springpole Lake, while maintaining the ability based on design to re-connect a larger and productive aquatic area after closure.

In addition to the key design and mitigation measures, an Independent Geotechnical and Tailings Review Board (IGTRB) has been established for the Project to provide independent oversight on the design planning and construction, operation, performance and closure planning, with the objective of long-term safety and environmental protection. The IGTRB was established early during the EA process, in advance of construction, to support the planning process and provide review and study advice from the early design stage through to closure. The IGTRB's reviews are supportive of the work undertaken to date and next steps for detailed engineering.

FMG is also committed to supporting the federal and provincial target of net-zero through the development and implementation of a Net-Zero Strategy. The Net-Zero Strategy details FMG's plan for a net-zero Project and to embed a climate positive approach to all aspects of the Project.

Development of the Project will increase local and regional revenue, as well as business opportunities from which investments can be made in health and social services, community infrastructure, business development, training and employment. The Project will also increase the labour force capacity after operations cease to support future opportunities in the region and will result in the following infrastructure enhancements, including potentially after the Project closes if they are retained:

- Extension of the Wenasaga Road closer to the Cat Lake First Nation Reserve lands potentially facilitating Cat Lake's future connection to Sioux Lookout;
- Establishment of a new transmission line has the potential to provide business opportunities and other long-term regional renewable energy initiatives for Indigenous communities;
- Provides the potential impetus for regional infrastructure upgrades including the Vermillion Road;
- Creation a total of 43,880 person-years of employment (including direct, indirect and induced) in Canada; and
- Provincial government tax will increase by approximately $8 million annually.

The development of the draft Employee Health & Wellness Strategy is another key component of the Project planning in following up on the feedback received by local and Indigenous communities. Working with local and Indigenous communities, governments, service providers and experts in the field, FMG's proactive approach contained in the Employee Health & Wellness Strategy is based on emerging practices and will continue to be informed by those who are proximate to the Project to secure and support a local and Indigenous focused workforce for the Project.

Considering the precautionary approach and using conservative assumptions, there is a high level of confidence that the effects on valued components have not been underestimated. The follow-up and monitoring program will be implemented to verify predicted effects, evaluate the effectiveness of mitigation and measure compliance with future permit and authorization conditions. Modifications to follow-up and monitoring programs may occur as a result of applying an adaptive management approach over all phases of the Project (i.e., construction, operations, and decommissioning and closure). Adaptive management is a planned and systematic approach to improving knowledge over time through an iterative process that

provides the information required to increase confidence to make decisions that reduce uncertainty and improve risk management outcomes. Environment committee(s) are proposed to be established where there is interest from local Indigenous communities to facilitate information sharing and adaptive management for the Project.

Considering the Project designs and mitigation measures, no significant adverse environmental effects were predicted for the Project or for the Project in combination with other projects. This demonstrates that the Project will be developed, operated and decommissioned in a sustainable manner that is protective and respectful of the environment and people. The environmental information and dataset compiled to date for the Project region in combination with ongoing and future studies will provide an invaluable dataset supporting long-term environmental management for all aspects of the ecosystem at a scale broader than the Project. The Project represents a substantial and consistent resource for meeting growing global demand and is aligned with provincial and federal environmental obligations and commitments with respect to climate change. The Project also has important critical mineral potential, hosting considerable tellurium which will be further evaluated during life of mine. In addition to being consistent with national environmental objectives and commitments, the proposed Project will generate socioeconomic benefits and opportunities for local and Indigenous communities, Ontario and Canada, including increased direct, indirect and induced employment, tax and royalty revenue.