

APPENDIX C

EIS/EA CONCORDANCE WITH RESPONSES TO COMMENTS RECEIVED

(Provided digitally on USB flash drive with Volume 1 binder and on website address:
<https://www.firstmininggold.com/springpole-ea>)

- C-1 Federal Impact Assessment Agency of Canada and Environment and Climate Change Canada Comments on Baseline Study Reports and the Draft EIS/EA
- C-2 Ontario Ministry of the Environment, Conservation and Parks; Ministry of Northern Development and Mines; Ministry of Natural Resources and Forestry; Ministry of Mines, and Ministry of Tourism, Culture and Sport Comments on Baseline Study Reports and the Draft EIS/EA
- C-3 Shared Territory Protocol Nations Comments on Baseline Study Reports
- C-4 Cat Lake First Nation and Lac Seul First Nation Comments on the Draft EIS/EA
- C-5 Mishkeegogamang Ojibway Nation Comments on Baseline Study Reports and the Draft EIS/EA
- C-6 Slate Falls Nation Comments on Baseline Study Reports and the Draft EIS/EA
- C-7 Northwestern Ontario Métis Community Comments on the Draft EIS/EA**

Table C-7.1: First Mining Gold Response to the Northwestern Ontario Métis Community Comments on the Springpole Gold Project Draft Environmental Impact Statement/Environmental Assessment

ID	Specific Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Where Addressed
NWO MC-001	Section 0 Preface, Page i (PDF Page 1)	<p><i>"First Mining Gold believes that our projects can provide lasting benefits to the communities we operate near, as well as to our employees and shareholders. Our sustainability approach starts with efforts to build and maintain respectful relationships with the communities and governments that host our projects, as well as recognizing the importance of environmental protection. Understanding the vision and goals of local communities in order to create beneficial opportunities is an integral element of our development planning. We are committed to responsible environmental management of resources, as well as putting the health and safety of our people first."</i></p> <p>The Preface refers to "communities". It is unclear from the language used that it is inclusive of Indigenous Nations.</p>	<p>Please update the language within the Preface to include Indigenous nations such as the Northwestern Ontario Métis Community. Suggested text includes:</p> <p>First Mining Gold believes that our projects can provide lasting benefits to the communities we operate near or Indigenous Nations whose territories are Project is within, as well as to our employees and shareholders. Our sustainability approach starts with efforts to build and maintain respectful relationships with the communities, Indigenous Nations, and governments that host our projects, as well as recognizing the importance of environmental protection. Understanding the vision and goals of local communities and Indigenous Nations in order to create beneficial opportunities is an integral element of our development planning. We are committed to responsible environmental management of resources, as well as putting the health and safety of our people first. [emphasis added to proposed text].</p>	Throughout the draft EIS/EA when referring to communities, it is intended to include all local residents, including Indigenous communities.	ACTION(S): – Please advise whether the clarification within FMG's response will be integrated in the final EIS/EA to ensure clarity of use for the term 'communities'.	FMG's response will be included in the final EIS/EA.	Throughout the EIS
NWO MC-002	1.2 Project Planning and Management Strategies Pg 1-2 (PDF Page 3)	<p>"In this draft EIS/EA, FMG proposes to implement a variety of planning and management strategies that avoid or reduce the adverse environmental effects of the Project, including:</p> <ul style="list-style-type: none"> – Limiting the Project footprint, and designing for closure and end land use objectives; – Adherence to federal and provincial regulatory requirements, and meeting all applicable building, safety and industry codes and standards; and – Adopting guiding principles for design and implementation of the Project, including incorporation of economically feasible components, proven and applicable technologies" <p>There are no planning and management strategies listed which are related to the Northwestern Ontario Métis Community values or interests; which does not allow for the avoidance or reduction of adverse effects of the Projects on these values or interests.</p>	<p>Please update bullet #1 to include:</p> <p>Limiting the Project footprint, and designing for closure and end land use objectives, and continued exercise of indigenous rights. [emphasis added to proposed text]</p>	FMG invites further dialogue to enable us to consider further refinement of the closure end land use objectives as the Project progresses.	ACTION(S): – Please advise whether the suggested text edits to bullet #1 will be accepted and applied in the final EIS/EA as the current FMG response does not address this directly.	The text will be updated to state that the Project planning seeks to minimize disruptions on the continued exercise of Indigenous rights and interests.	EIS Section 1.
NWO MC-003	1.2 Project Planning and Management Strategies Pg 1-2 (PDF Page 3)	<p><i>"Project facilities have been located to avoid and reduce interactions with sensitive environmental features. Project facilities have been located to avoid and reduce interactions with sensitive environmental features."</i></p> <p>Formatting</p>	Delete repeated sentence.	Comment noted.	-	-	Not applicable

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NWO MC-004	1.3 Project Location Pg 1-3 (PDF Page 4)	There is no reference to the Regional structure of the Métis Nation of Ontario within the Project location section.	Update to include locations related to the Métis Nation of Ontario including the Northwestern Ontario Métis Community and Community Council locations.	The location of MNO Northwest Métis Council will be added to this Project location figure in the final EIS/EA.	-	-	EIS Figure 1-1
NWO MC-005	Figure 1.3-1, Page 1-4 (PDF Page 5)	This map displays First Nation reserve locations but does not identify Métis Nation of Ontario Northwestern Ontario Métis Community, the Traditional Harvesting Territory which the project is located within, or the community council locations.	Please update the map to include features specifically related to the Northwestern Ontario Métis Community.	This will be updated in the final EIS/EA with the information available.	-	-	EIS Figure 1-1
NWO MC-006	1.4 Purpose of the Project and Project Justification, Page 1-5 (PDF Page 9)	<p>"Additional potential benefits of the Project include:</p> <ul style="list-style-type: none"> – Offers opportunities to local communities of Ear Falls and Sioux Lookout as potential key service points for the Project; – Leverages and solidifies the existing forestry road infrastructure and secures its longer term use supporting access for local communities; – Establishes a 230 kilovolt transmission line with a life span far greater than life of mine that may support other long-term regional green energy generation initiatives; – Provides the impetus for the development and implementation of training initiatives to facilitate employment growth in the region and the acquisition of transferable skills for generations to come; – Diversifies the local economy which is currently heavily reliant on forestry and government; – Continues to support local initiatives currently in place including the Sioux Lookout Mining Centre for Excellence; – Supports and sponsors community-based land use, social and recreational activities to facilitate improvements in overall health and well-being of local communities; and – Provides environmental data (collected from environmental baseline investigations as well as from future environmental monitoring efforts) that will contribute significantly to the understanding of the local and regional area across many environmental disciplines, including Species at Risk, such as Caribou (Boreal population), and potential reintroduction of Lake Sturgeon to local waters." <p>The Project benefits, as described, do not specifically reference the Northwestern Ontario Métis Community. Additionally, the employment opportunities created during construction, operations, and decommissioning are not specifically targeted to Indigenous populations including the Northwestern Ontario Métis Community.</p> 	The Northwestern Ontario Métis Community requires further engagement with FMG in relation to Project benefits and how these may accrue to Northwestern Ontario Métis Community citizens.	FMG is open to further discussion and engagement on Project benefits.	<p>ACTION(S):</p> <ul style="list-style-type: none"> – Please advise on a next steps, outcomes, and a timeline for further discussion and engagement on Project benefits. 	FMG and MNO signed a workplan and budget for community benefits agreement negotiation in April 2023 which outlines expectations and timelines for next steps.	Not applicable

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NWO MC-007	1.5 Project Overview, Page 1-6 (PDF Page 7)	<p><i>"FMG intends to explore potential collaborations with Indigenous communities, that might have fish enhancement projects that are aligned with fishery offset and compensation plans, with a goal to enhance the productivity of recreational fisheries."</i></p> <p>The Northwestern Ontario Métis Community requires commitment from FMG that the Northwestern Ontario Métis Community will be involved in the fishery offset and compensation plan development in partnership with the DFO.</p> <p>This will ensure the Northwestern Ontario Métis Communities goal for 'net gain' can be incorporated in planning, that rights based fisheries can also be enhanced, and so there will be alignment with ongoing work between the DFO and the Northwestern Ontario Métis Community.</p>	<p>Please provided a specific commitment to work with the Northwestern Ontario Métis Community on fisheries offset and compensation plans and updated the language within this section as follows:</p> <p>FMG intends to explore potential collaborations with Indigenous communities, which might have fish enhancement projects that are aligned with fishery offset and compensation plans, with a goal to enhance the productivity of rights based and recreational fisheries. [emphasis added to proposed text]</p>	FMG looks forward to receiving comments on the draft fish offsetting/ compensation plan from MNO and remains interested in continuing to work with MNO as the plan is finalized.	<p>For clarity, does FMG's response whereby they look "...forward to receiving comments on the draft fish offsetting/compensation plan from MNO" constitute a commitment to working with the NWOMC on this plan? If yes, this language must be more precise in a further response.</p> <p>Additionally, please clarify whether the NWOMC suggested text edits will be accepted and applied in the Final EIS/EA.</p> <p>ACTION(S):</p> <ul style="list-style-type: none"> – Clarify FMG's commitment to working with the NWOMC on the Fish Offset and Compensation Plan. – Clarify whether suggested text edits are accepted and will be applied in the Final EIS/EA. 	<p>As discussed on May 29, 2023 FMG is committed to working with the NWOMC on the Fish Offset and Compensation plan and are looking to schedule a workshop and regular technical update meetings with NWOMC.</p> <p>The suggested text edits are accepted and will be applied in the final EIS/EA.</p>	Appendix F
NWO MC-008	1.6 Project Setting, Page 1-12 (PDF Page 13)	<p><i>"The region hosts remote tourism outposts and seasonal camps. There are no dedicated protected areas, conservation reserves or parks within 20 km of the Project site. The closest federal lands are associated with First Nation Reserve lands located approximately 40 to 45 km from the Project site."</i></p> <p>There is no reference to Métis Regions or Traditional Harvesting Territories within this section.</p>	<p>Please revise as follows:</p> <p>There are no dedicated protected areas, conservation reserves or parks within 20 km of the Project site. The closest federal lands are associated with First Nation Reserve lands located 40 to 45 km from the Project site. The Project site is within Métis Nation of Ontario Region 1 (the Northwestern Ontario Métis Community), as well as within the Lake of the Woods/Lac Seul Traditional Harvesting Territory. [emphasis added to proposed text]</p>	This information will be added to Section 3, Existing Environment, in the final EIS/EA.	-	-	EIS Section 3.2.2.

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NWO MC-009	1.7.1 Federal Environmental Assessment Requirements, Page 1-12 (PDF Page 13)	<p><i>"Based on these criteria, FMG submitted a Project Description to the Canadian Environmental Assessment Agency (CEA Agency), now the Impact Assessment Agency of Canada (IAAC) in February 2018. Based on the Project Description, the Canadian Environmental Assessment Agency determined that a federal EA was required and issued federal EIS Guidelines for the Project on June 19, 2018, as amended on March 11, 2022."</i></p> <p>It is unclear why, within the amended EIS Guidelines issued on March 11, 2022, aspects of the Impact Assessment Act, 2019 were not added. In particular, guidance around the assessment of potential impacts on the rights of Indigenous peoples as this aspect will assist the Crown in discharging its duty to consult.</p>	Please clarify, through ongoing engagement with the Northwestern Ontario Métis Community, why aspects of the Impact Assessment Act, 2019 were not added to the amended EIS guidelines on March 11, 2022.	The Project falls under CEAA 2012. Questions about the amended EIS guidelines should be directed to the IAAC.			Not applicable
NWO MC-010	1.7.2 Provincial Environmental Assessment Requirements, Page 1-13 (PDF Page 14)	<p><i>"The Individual EA process requires approval of a Terms of Reference (ToR) in prescribed format that will guide the content of the provincial EA. FMG prepared a draft ToR which was issued for regulatory, Indigenous and stakeholder comment in February 2020. The final ToR was approved by the Ontario Minister of MECP on November 8, 2021."</i></p> <p>As the Northwestern Ontario Métis Community was not added to the federal EIS Guidelines until March 11, 2022, input into the scoping of the individual EA (and more broadly the EIS), is limited.</p>	Please clarify, through ongoing engagement with the Northwestern Ontario Métis Community, how FMG will work to provide information to the IAAC which will assist in the discharge of this Crown bodies duty to consult and allow for the assessment of potential impacts on the rights of Indigenous peoples.	FMG invites MNO's input on the draft EIS/EA which will be considered in the preparation of final EIS/EA report. FMG remains interested in continuing to work with the MNO throughout all phases of the Project.	This comment is specifically related to the NWOMC's lack of input into Project scoping documents such as the federal EIS guidelines, which did not include the NWOMC until the March 11, 2022 version. As there was limited input and aspects of the Impact Assessment Act, 2019 are not included in the amended EIS guidelines, it is unclear whether FMG will collect the necessary information (e.g., Métis rights, context for those rights, existing conditions of the rights, and an effects assessment) related to potential impacts on the rights of Indigenous Peoples. While it is positive that FMG has interest in continuing work with the NWOMC, this comment requires greater clarity in FMG's response. Such as will FMG be assessing impacts to Indigenous rights?	The final EIS/EA will assess the potential impacts of the Project on Aboriginal and Treaty rights (including the Northwestern Ontario Métis Community), as described in section 6 of the EIS guidelines.	EIS Sections 6.26.2.8, 6.26.3, 6.26.4, 6.26.6, 6.26.7.

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NWO MC-011	Section 1.8.2 Indigenous Communities Page 1-14 (PDF Page 15)	<p><i>"FMG continues to share EA-related information with all of the communities and provide opportunities to share feedback. FMG has worked with the Shared Territory Protocol Nations including Cat Lake First Nation, Slate Falls Nation and Lac Seul First Nation to establish a joint environmental committee for the EA, referred to as the Springpole Environment Committee."</i></p> <p>Additional details are required in relation to the establishment of the joint environmental committee for the EA/EIS.</p>	Please clarify what capacity funding will be available to support ongoing the Northwestern Ontario Métis Community participation.	FMG encourages the ongoing participation of the Métis and aims to support that involvement in the EA process and beyond. We are pleased with the work to date with respect to traditional knowledge and land use, Valued Components workshop, terms of reference review and draft EA review. FMG intends to continue providing the Métis with reasonable support for consultation and review of EA related materials throughout the process. This is similar to the First Nations who established their joint Environment Committee.	-	-	Not applicable
NWO MC-012	1.9 Methodologies, Page 1-15 (PDF Page 16)	<p><i>"Methodologies used throughout this document have been utilized for a number of other mining projects which were subject to Canadian Environmental Assessment Act, 2012 and the Ontario Environmental Assessment Act, that were reviewed by government agencies, Indigenous communities and other stakeholders at the time."</i></p> <p>Reliance on methodologies used for previously completed mining projects subject to the Canadian Environmental Assessment Act, 2012 places this project at risk of not providing sufficient information to the Crown to allow the Crown to discharge its duty to consult.</p> <p>Current legislation, including the Impact Assessment Act, 2019 and the Fisheries Act, 2019 are explicit in their direction for inclusion of Indigenous knowledge and an assessment of potential impacts on the rights of Indigenous peoples.</p> <p>This cannot be satisfied through the current factors to be assessed under CEAA, 2012 as rights are not equated with Traditional Land and Resource use alone.</p>		<p>See the response to Comment #9.</p> <p>The Project team is aware of and has considered the amended 2019 Fisheries Act during the preparation of the draft EIS/EA and more specifically Appendix F the "Fisheries Offset and Compensation Plan" [the Plan]. As stated in Appendix F, the Plan is provided with the intent to be further reviewed and discussed with regulators, Indigenous communities and stakeholders to share ideas and consider feedback before finalization. The Project team looks forward to further considering both Traditional Knowledge and ideas from the MNO and other communities into revisions of the Plan as they are made available.</p>	<p>Please note, the language within the Fish Offset and Compensation Plan does not reflect a commitment by FMG to assess impacts on the rights of Indigenous Peoples. Additionally, the Fish Offset and Compensation Plan is only one aspect of the EIS/EA which requires consideration of the rights of Indigenous peoples.</p> <p>It is acknowledged that discussion is required with the Impact Assessment Agency of Canada. However, FMG must also consider data collection related to Métis rights (i.e., how this can be completed, integrated and assessed) as part of their final EIS/EA to ensure sufficient information is provided to the Crown to allow the Crown to discharge its duty to consult as data collection is not typically</p>	An assessment of the potential impacts on Aboriginal and Treaty rights (including the Northwestern Ontario Métis Community), due to the Project will be provided in final EIS/EA.	EIS Sections 6.26.2.8, 6.26.3, 6.26.4, 6.26.6, 6.26.7.

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					completed by the Crown itself in relation to Projects.		
NWO MC-013	1.9 Methodologies, Page 1-15 (PDF Page 16)	<p><i>"The methodology used to assess the alternatives has been developed to ensure a transparent conclusion as to the preferred alternative, as has been successfully used in previous EAs for Ontario mining projects."</i></p> <p>See Comment #12</p>	See Comment #12	See the response to Comment #12.	Please see Follow-up Comment #19 (formally Comment #12)	See the response to Comment #12.	EIS Sections 6.26.2.8, 6.26.3, 6.26.4, 6.26.6, 6.26.7.
NWO MC-014	2.2.1 Local Indigenous Communities, Page 2-4 (PDF Page 6)	<p><i>"The Project is located in the geographic area of the Shared Territory Protocol agreement between the First Nations of Cat Lake, Slate Falls and Lac Seul."</i></p> <p>There is no mention within this section of the Region, Traditional Harvesting Territory or community council locations of the Northwestern Ontario Métis Community.</p> <p>Indigenous rights are not hierarchical and the Northwestern Ontario Métis Community must be consulted/engaged equally to First Nations consulted/engaged on the Project.</p>	Please update this section to be reflective of the Northwestern Ontario Métis Community.	The Métis Nation of Ontario, Region 1 is listed as a bullet point in Section 2.2.1. The text will be updated to state that the Project is within Métis Nation of Ontario Region 1 (the Northwestern Ontario Métis Community) Traditional Harvesting Territory.	-	-	EIS Section 2.3.1.
NWO MC-015	2.4.1 Local Indigenous Communities, Page 2-7 (PDF 9)	<p><i>"Consultation with local Indigenous communities throughout the EA process is being conducted in an open and transparent manner. FMG's intent for consultation is to be proactive, flexible and based on a goal of continuous improvement, particularly as local Indigenous communities identify how they prefer to be involved and engaged throughout the Project."</i></p> <p>Consultation with Indigenous Nations such as the Northwestern Ontario Métis Community derives from a constitutional imperative to identify, understand, and assess the level of impact a Project may have on the rights of that Nation.</p> <p>Therefore, any consultation/engagement undertaken with the Northwestern Ontario Métis Community must strive to assess potential impacts on the rights of the Northwestern Ontario Métis Community and its citizens.</p>	There must be ongoing engagement with the Northwestern Ontario Métis Community to ensure there is a fulsome assessment of potential impacts on the rights of this Region and its citizens.	<p>FMG remains interested in continuing to work with the Northwestern Ontario Métis Community.</p> <p>MNO's traditional knowledge study was used to inform the draft EIS/EA and we remain open to consider supporting additional study.</p> <p>For further information on potential effects, please refer to Section 6 of the draft EIS/EA.</p>	<p>Please note, integration of the NWOMC's traditional knowledge study does not constitute an assessment of impacts to Métis rights. Currently, Section 6 lacks this analysis.</p> <p>ACTION(S):</p> <ul style="list-style-type: none"> – Please provide a timeline, outcomes, and next steps for continuing work between FMG and the NWOMC. 	An assessment of the potential impacts on Aboriginal and Treaty rights (including the Northwestern Ontario Métis Community), due to the Project will be provided in final EIS/EA. The assessment will be informed by ongoing engagement with NWOMC.	EIS Sections 6.26.2.8, 6.26.3, 6.26.4, 6.26.6, 6.26.7.

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NWO MC-016	Section 2.4.1 Local Indigenous Communities, Page 2-7 (PDF Page 9)	<p><i>"Shared Territory Protocol Nations (STPN) Springpole Environmental Committee"</i></p> <p>The references within the EA/EIS are not reflective of the Northwestern Ontario Métis Community involvement.</p>	<p>The Northwestern Ontario Métis Community requires further engagement in relation to the committee and/or working group to ensure discussion around TK / TLU, the environment, education, training, and other Northwestern Ontario Métis Community goals or visions can be discussed on an ongoing basis.</p> <p>Further, references to this committee must be updated to include the Northwestern Ontario Métis Community.</p>	<p>For clarification, the STPN Springpole Environment Committee was developed or conducted in coordination with the Shared Territory Protocol Nations communities and included members from Cat Lake First Nation, Slate Falls Nation and Lac Seul First Nation.</p> <p>FMG remains interested in continuing to work with the MNO on an ongoing basis.</p>	<p>As Indigenous rights are not hierarchical and the NWOMC citizens have Métis rights which are exercised in proximity to the Project. Please, through ongoing engagement with the NWOMC, describe how the NWOMC and FMG will continue to work together outside of the identified committee/working group.</p> <p>ACTION(S):</p> <ul style="list-style-type: none"> – Continue engagement with the NWOMC and identify how FMG and NWOMC will continue work outside of a committee/working group structure. 	<p>FMG will continue to engage with the NWOMC using the preferred methods and approaches identified by MNO. FMG understands it is preferred to continue to work directly with the MNO Lands, Resources and Consultations Branch, specifically the Mineral Development Advisor and assigned manager to coordinate document reviews, meetings and provision of TK/ TLU.</p>	Not applicable
NWO MC-017	2.5.1.1 General Project Information Sharing, Page 2-10 (PDF page 12)	<p><i>"FMG also supports and sponsors community-based initiatives relating to TLU and social and recreational activities to support the health and well-being of local communities."</i></p> <p>The characterization of data collection to support the EA/EIS as 'sponsorship' or a 'community based initiative' is not appropriate.</p> <p>In order for the EA/EIS to fulfill Section 5(1)(c) of CEAA, 2012 there is a requirement to understand effects occurring in relation to the current use of lands and resources for traditional purposes. Therefore, TLU related data collection is a necessary component of the assessment process; providing both baseline and assessment data.</p>	<p>Please amend this section and remove the reference to TLU.</p>	<p>To clarify, FMG has provided sponsorship for a number of local events in the Region, as well as continues to support the collection of TLU information. This sentence will be clarified in the final EIS/EA.</p>	-	-	EIS Section 2.7.1.
NWO MC-018	Section 2.6.1 Pre-Draft EIS/EA Submission, Page 2-10 (PDF Page 12)	See Comment #16	See Comment #16	See Response #16	Please see Follow-up Comment #23 (formally Comment #16)	Please see Follow-up Response #16	Not applicable

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NWO MC-019	2.6.1.2 Baseline Studies, Page 2-11 (PDF Page 13)	<i>"The MNO VC information is also helpful in informing field plans."</i>	Please clarify why the Northwestern Ontario Métis Community VC information was not used to expand the list of identified Valued Components to better reflect the values and interests of Northwestern Ontario Métis Community citizens and, instead, was used to inform field plans.	The preliminary Valued Components and associated indicators were provided in the draft Terms of Reference (ToR) for an individual provincial environmental assessment which was issued for comment. Input received from regulatory agencies, Indigenous communities and stakeholders during consultation on the draft ToR was fully considered in the selection of Valued Components for the draft EIS/EA. In addition, the TKLUS report and Valued Component Workshop report from MNO were also considered in the final selection of Valued Components and indicators for the draft EIS/EA (See Table 1, attached).	ACTION(S): – Please update the final EIS/EA to include Table 1 within Section 2.6.1.4 to provide greater explanation of the interrelation of NWOMC Valued Ecological Components, Valued Socio-Economic Components, and the Project's selected Valued Components.	A description of the input provided by NWOMC regarding the valued components will be included in the final EIS/EA.	EIS Section 2.7.1.7.
NWO MC-020	2.6.1.5 Community Meetings, Page 2-11 (PDF Page 13)	<i>"2.6.1.5 Community Meetings FMG continues to engage with local Indigenous communities to provide opportunities to visit the Project site and host in-person meetings."</i> This section only identified Community meetings, including site visits, with STPN. However, community meetings were undertaken with the Northwestern Ontario Métis Community. Site visits were not completed, however. This highlights a need for further engagement with the Northwestern Ontario Métis Community, and updates are required to the EA/EIS to reflect Northwestern Ontario Métis Community Meetings which have occurred (e.g., May 20, 2021)	The Northwestern Ontario Métis Community requires ongoing engagement which may include potential site visits, subject to discussion with the Northwestern Ontario Métis Community representatives and available capacity. Additionally, the EIS/EA must be updated to reflect completed activities with the Northwestern Ontario Métis Community.	FMG remains interested in continuing to work with the Northwestern Ontario Métis. We would be happy to consider a site visit if there is interest. The May meeting is referenced in Section 2.6.1.4	ACTION(S): – Please provide a timeline, outcomes, and next steps for continuing work between FMG and the NWOMC.	FMG will work with the Lands, Lands, Resources and Consultations Branch to organize a site visit in late summer/fall of 2023.	EIS Section 2.7.1.7.

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NWO MC-021	2.6.1.6 Capacity Building, Page 2-12 (PDF Page 14)	<i>"FMG encourages the involvement and participation of Indigenous community members as part of the Project. In 2021, FMG provided opportunities for CLFN, SFN, LSFN and MOFN to identify community environmental monitors to participate in Project field work. The intent is to provide the Environmental Monitors with the opportunity to learn about the environmental data collection methods and supports their ability to communicate environmental findings to their community leadership and membership. While not all communities identified environmental monitor candidates, FMG continues to discuss filling these roles for work in 2022. The Environmental Monitors have the opportunity to participate in a 6-week accredited training course through Northern College in 2022."</i>	Please clarify whether additional opportunities for the Northwestern Ontario Métis Community to identify community environmental monitors and/or participate in the 6-week accredited training course will be offered.	FMG is open to discussing the opportunity for MNO to identify a community environmental monitor should the Project proceed to construction. At this time Springpole is a remote site with limited access and much of the field work has been completed for the EA. FMG will provide for the necessary on-site training for the role including environmental monitoring/ technician training with available accreditation.	ACTION(S): – Please provide a timeline, outcomes, and next steps for continued work between FMG and the NWOMC in relation to a community environmental monitor.	FMG and MNO signed a workplan and budget for community benefits agreement negotiation in April 2023 which outlines expectations and timelines for next steps.	Not applicable
NWO MC-022	Section 2.9 Summary of Influence of Consultation on draft EIS/EA, Page 2-14 (PDF Page 16)	<i>"Baseline Studies: Opportunities have been provided to review baseline reports and work plans. To date, based on discussions resulting from these reviews, FMG received input on the scope, methodology and results of the baseline studies. Comments were considered and responded to and where appropriate, additional data collection has been undertaken or planned."</i>	Please provide disaggregated nation specific information that was provided in relation to review of baseline reports and indicate where it was incorporated in the EIS.	This information is available in Appendix C of the draft EIS/EA	Please note, Appendix C includes concordance tables of comments received during preparation from the Impact Assessment Agency of Canada, MECP and NDMNRF, Mishkeegogamang Ojibway Nation, and Shared Territory Protocol Nations. Due to a lack of engagement in early Project development, no input or comments were provided by the NWOMC.	The baseline reports are also included as appendices to the draft EIS/EA which have been reviewed as part of this comment response process and will be considered in Project development planning. The baseline reports were also provided to the NWOMC for review and input in May 2021; however, no feedback was received.	Throughout the EIS, as a subsection named Influence of Consultation
NWO MC-023	Table 2.9-2: Summary of Comments from Métis Nation of Ontario, Page 2-22 (PDF Page 24)	<i>"Requested further information on caribou aerial surveys and recommended consultation with trappers."</i> The Northwestern Ontario Métis Community provided a recommendation to undertake consultation with trappers to obtain further information on caribou. This recommendation was not addressed in the "How Comment was Considered in the draft EIS/EA" column. The Northwestern Ontario Métis Community trappers have first hand knowledge of caribou and caribou habitats in the Project area.	Please address the recommendation to conduct consultation about caribou with proximate trappers.	FMG remains interested in continuing to work with the Northwestern Ontario Métis Community. FMG invites all information that may be relevant to environmental assessment for the Springpole Gold Project as part of this draft EIS/EA review.	Please refer to Follow-up Comment #6 for details related to information sharing. ACTION(S): Please provide a timeline, outcomes, and next steps for continued work between FMG and the NWOMC.	As discussed on May 29, 2023 FMG is preparing to submit the final EIS/EA in the first half of 2024 and therefore invites all information that may be relevant to environmental assessment, including traditional knowledge and land use information, to be shared prior to the end of 2023. As discussed, FMG is open to regular technical meetings with NWOMC to continue the information sharing. NWOMC will be provided with another engagement opportunity in reviewing the final EIS/EA after its submission.	Not applicable

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NWO MC-024	3.1.1 Overview of Historical and Current Land Use, Page 3-1 (PDF Page 3)	<p><i>"There are no dedicated protected areas, conservation reserves or parks within 20 kilometres (km) of the Project. The closest federal lands are associated with First Nation Reserve lands, located approximately 40 to 45 km from the Project (Figure 3.1-1)."</i></p> <p>See Comment #4</p>	See Comment #4	See Response #4	-	-	EIS Section 3 Figure 3.2-2.
NWO MC-025	3.1.2 Indigenous Traditional Territories and Lands, Page 3-2 (PDF Page 4)	There is no reference within this section of the Métis Region, Traditional Harvesting Territory or other details which may contribute to the overall environmental setting.	Please, through engagement with the Northwestern Ontario Métis Community, update this section to be reflective of aspects of the Northwestern Ontario Métis Community.	FMG remains interested in continuing to work with the Northwestern Ontario Métis.	ACTION(S): – Please provide a timeline, outcomes, and next steps for continued work between FMG and the NWOMC.	<p>Please see Follow-up Response #23</p> <p>As discussed on May 29, 2023 FMG is preparing to submit the final EIS/EA in the first half of 2024 and therefore invites all information that may be relevant to environmental assessment, including traditional knowledge and land use information, to be shared prior to the end of 2023. As discussed, FMG is open to regular technical meetings with NWOMC to continue the information sharing. NWOMC will be provided with another engagement opportunity in reviewing the final EIS/EA after its submission.</p>	Not applicable
NWO MC-026	3.2.1 Background and Information Sources Pg 3-7 (PDF Page 9)	<p>While it is acknowledged that this project is subject to the Canadian Environmental Assessment Act, 2012 and the Ontario Environmental Assessment Act, this does not preclude FMG from assessment potential impacts to Indigenous rights which can be reflected through the Northwestern Ontario Métis Community values and interests.</p> <p>No baseline or supporting studies were completed to specifically address the contextualization and assessment of Indigenous rights which is foundational to the Impact Assessment Act, 2019.</p>	Additional engagement is required to ensure FMG understands the Northwestern Ontario Métis Communities' values and interests and can complete a fulsome assessment of those values and interests to ensure Métis rights are considered.	<p>FMG remains interested in continuing to work with the Northwestern Ontario Métis to gather further information that can be incorporated into the assessment of effects.</p> <p>MNO's traditional knowledge study was used to inform the draft EIS/EA and we remain open to consider supporting additional study.</p> <p>For further information on potential effects, please refer to Section 6 of the draft EIS/EA.</p>	ACTION(S): – Please provide a timeline, outcomes, and next steps for continued work between FMG and the NWOMC.	<p>Please see Follow-up Response #23</p> <p>As discussed on May 29, 2023 FMG is preparing to submit the final EIS/EA in the first half of 2024 and therefore invites all information that may be relevant to environmental assessment, including traditional knowledge and land use information, to be shared prior to the end of 2023. As discussed, FMG is open to regular technical meetings with NWOMC to continue the information sharing. NWOMC will be provided with another engagement opportunity in reviewing the final EIS/EA after its submission.</p>	Not applicable
NWO MC-027	Section 3.2.1 Background and Information Sources Environmental Setting, Page 3-7 (PDF Page 9)	<p><i>"FMG provided opportunities for Indigenous communities, regulators and other stakeholders to review the existing baseline studies and plans for additional fieldwork. A summary of key meetings with Indigenous communities can be found in Section 2. The work plans for environmental monitoring in 2022 are provided in Appendix W."</i></p> <p>The meetings summarized in Section 2 do not include the Northwestern Ontario Métis Community.</p>	Please update.	MNO meeting are referenced in sections specific to the meeting topics such as 2.6.1.2 (baseline) and 2.6.1.4 (Valued Components)	-	-	EIS Section 2.7.1.7.

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NWO MC-028	3.3.10.2 Overview of Results, Page 3-28 (PDF Page 30)	This section does not reference plants of importance to Indigenous groups, more specifically, plants of importance to Métis harvesters.	Please clarify whether plant species of importance to Indigenous groups, and specifically the Northwestern Ontario Métis Community, were surveyed and documented around the project site to supplement the overall assessment.	Plant surveys were conducted in 2011, 2012 and 2021, and the results are summarized in Appendix P-1 and P-3. The following species identified in the MNO TKLUS were found in the study area: blueberries, choke cherries, cranberries, fiddleheads, Labrador tea, raspberries, pin cherries, Saskatoon berries and plantain.	ACTION(S): – Please clarify whether this information will be included in the final EIS/EA to properly reflect Métis plant harvesting?	A description of the input provided by NWOMC regarding plant species of interest to Indigenous groups will be included in the final EIS/EA.	EIS Section 3.4.14.2.
NWO MC-029	3.3.12 Socioeconomics Page 3-35 (PDF Page 37)	<p><i>“The socioeconomic baseline study describes the current socioeconomic conditions in the area around the Project site that may be influenced by the Project. Socioeconomic conditions include: regional community population size and demographics, the economy, community services and infrastructure (such as education, health care, utilities, transportation systems). It also provides information regarding land and resource uses.”</i></p> <p>There is no reference to specific socio-economic baseline data related to the Northwestern Ontario Métis Community, nor an analysis of factors which may disproportionately impact Métis citizens.</p> <p>As the Impact Assessment Act, 2019 has requirements for the integration of Gender-Based Analysis+, and it has long been regarded as a best practice for many disciplines, this must be a consideration</p>	Please revise to include specific socioeconomic baseline data related to the Northwestern Ontario Métis Community, where available, and please undertake an identification of how Métis citizens may experience impacts differently.	The draft EIS/EA was written to meet the requirements of the Guidelines issued under CEAA 2012 for the Project and the provincially-approved Terms of Reference. FMG is open to including specific socioeconomic baseline data related to the Northwestern Ontario Métis Community, where available through engagement with the Community which may be helpful to identifying how Métis citizens may experience impacts differently based on engagement with the Community.	<p>The final EIS Guidelines include a requirement to understand effect of changes to the health and socio-economic conditions of Indigenous Peoples. In order to assess effects, socio-economic baseline data is required to measure against. This must be included as per the EIS Guidelines.</p> <p>ACTION(S): – Please provide a timeline, outcomes, and next steps collection and integration of NWOMC socio-economic baseline data.</p>	<p>FMG invited the NWOMC to participate in the baseline socio-economic study in May 2021 with continued follow-up to encourage participation throughout the year so that the information could be included in the draft EIS/EA.</p> <p>FMG encourages NWOMC to review the baseline study and provide any additional relevant information.</p> <p>As discussed on May 29, 2023 FMG is preparing to submit the final EIS/EA in the first half of 2024. Therefore, FMG invites all information that may be relevant to environmental assessment, including baseline socio-economic information, to be shared prior to the end of 2023.</p>	EIS Section 3.4.11.
NWO MC-030	4.2 Main Project Components, Page 4-4 (PDF Page 7)	<i>“The Project is expected to be developed over a three-year period. A mine life of approximately 12 years is anticipated based on the extensive work carried out to define the Springpole ore body. Progressive reclamation will be carried out during operations, and final decommissioning and closure of the site will follow once operations cease. The primary decommissioning and closure period will be followed by a period of environmental monitoring.”</i>	Please identify whether environmental monitoring will be undertaken for/during progressive reclamation.	<p>Environmental monitoring will be undertaken throughout all Project phases – construction, operation and closure.</p> <p>Please refer to Section 4.18.2 for additional information on progressive reclamation.</p>	-	-	EIS Sections 5.2, 5.19.

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NWO MC-031	4.3 Existing Facilities and Infrastructure, Page 4-5 (PDF Page 8)	<i>"The Project site is accessible by floatplane to Springpole Lake or Birch Lake during the late spring, summer and early fall. Helicopters are used periodically for field investigations. During the winter, an ice road is periodically used to connect the site to Confederation Lake where all-season road access is available. During lake ice freeze-up in the fall and breakup in spring, the site is only accessible by helicopter. The closest all-season road is the Wenesaga Road, located approximately 18 km from to the Project site."</i>	Will helicopters and floatplanes be used throughout project construction and operation? If so, this will have to be assessed in the noise assessment to ensure nuisance noise does not adversely affect Northwestern Ontario Métis Community harvesters.	There is the potential for periodic helicopter and floatplane support for the site during the construction, operation and closure phases, including for emergency health-related evacuations (helicopter and floatplane) and field investigations including environmental monitoring. Given the transient nature of this activity, it has not been included in the noise assessment. However, if regularly scheduled flights are planned, these aspects will be considered in the noise assessment during the permitting process.	The NWOMC requires helicopter and floatplane noise to be included in the assessment as transient or unpredictable noise can negatively impact NWOMC harvesters.	The noise assessment will be updated for the final EIS/EA to include regularly scheduled flights associated with the Project.	EIS Section 6.3.1.2, Appendix H-3 Section 6.1.
NWO MC-032	4.4.1.2 Pre-development Dewatering Pg 4-6 (PDF Page 9)	<i>"Flocculant or other means may be used in the WSP if needed to help settle suspended sediments."</i> This section lacks sufficient detail in regard to what flocculant will be used.	Please provide more information on what flocculant will be used and/or other means of mitigating elevated TSS in discharge.	Additional engineering is being completed to better assess how suspended solids will be managed during pre-development dewatering and related activities. Preferentially, suspended solids will be managed without use of flocculant. The type of flocculant to be used has not been defined as yet. If a flocculant is expected to be required, it will be provided in the environmental permitting documents submitted to the Province for review and approval prior to construction dewatering.	Any permitting documents related to previously raised NWOMC concerns, such as this comment in relation to flocculant and mitigation of elevated TSS discharge, the permitting documents must be provided to the NWOMC for review prior to submission to the regulator(s).	Permitting documents related to previously raised NWOMC concerns will be provided to the NWOMC for review prior to permit application submission to the regulator(s).	EIS Sections 6.7.1.2, 5.7.1.2.
NWO MC-033	4.4.4.2 Mine Rock – Metal Leaching Potential Pg 4-8 (PDF Page 11)	This section lacks sufficient detail in mitigation strategies and potential involvement of Indigenous communities.	Due to humidity cell tests indicating multiple CoPC, please provide detailed monitoring and mitigation strategies to prevent leaching and the Northwestern Ontario Métis Community can provide feedback or be involved in the monitoring process.	As indicated in the draft EIS/EA geochemistry investigations are ongoing. The information provided in the draft EIS/EA will be updated in the final EIS/EA. If necessary, mitigation strategies and proposed monitoring will updated and through the review of the final EIS/EA, opportunities to provide input/feedback by MNO will occur. Note that additional information regarding mitigation for acid rock drainage is included in the assessment of alternatives	The NWOMC will comment on the ongoing geochemistry investigations following provision of the final EIS/EA, including involvement in the monitoring process.	Comment noted.	EIS Sections 5.7.4.3, 5.7.4.5, 6.5 through 6.9.

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				(Sections 5.7, 5.9 to 5.11) and the impact assessment (Sections 6.5 to 6.9) of the draft EIS/EA.			
NWO MC-034	4.5.3 Ore Stockpiles Pg 4-17 (PDF Page 20)	<p><i>"Runoff and seepage from the stockpiles will be directed into the stockpile contact water management ponds which are part of the integrated site water management system. As needed, the water will be pumped to the WSP for subsequent re-use, or treatment and discharge."</i></p> <p>This section lacks sufficient detail.</p>	Please provide more information about the integrated site water management system for the Northwestern Ontario Métis Community consideration.	<p>Additional engineering for the Project is being completed, including with respect to the overall site plan and integrated water management system. Updated and additional information will be provided in the final EIA/EA as applicable.</p> <p>Additional detail will be provided in the water management-related environmental permitting documents submitted to the Province for review and approval prior to construction.</p>	<p>Any permitting documents related to previously raised NWOMC concerns, such as this comment in relation to site water management systems, the permitting documents must be provided to the NWOMC for review prior to submission to the regulator(s).</p> <p>The NWOMC will comment on the engineering for the Project with respect to the overall site plan and integrated water management system following provision of the final EIS/EA.</p>	Permitting documents related to previously raised NWOMC concerns will be provided to the NWOMC for review prior to permit application submission to the regulator(s).	EIS Sections 5.8, 5.12.
NWO MC-035	Section 4.8 Fisheries Compensation Components, Page 4-31 (PDF Page 34)	<p>First Mining Gold has stated that avoidance of fish habitat is not entirely feasible due to the location of waterbodies in the area. They have also stated that ~228.4 ha of fish habitat is anticipated to be impacted.</p> <p>First Mining Gold has expressed the intention of reviewing and discussing the physical structures associated with the site before finalization with Indigenous communities. However, no details on how this will be completed has been provided.</p> <p>Further, First Mining Gold has not indicated that review and discussion of the mitigation and compensation measures mentioned in the draft Fisheries Offsetting and Compensation Plan in Appendix F will be undertaken.</p>	<p>Further engagement with the Northwestern Ontario Métis Community on the anticipated impacts to fish and fish habitats is required. As impacts to fish and fish habitats are anticipated, this has the potential to also impact the Northwestern Ontario Métis Community right to harvest.</p> <p>This must also be explored through engagement with the Northwestern Ontario Métis Community to determine the extent of impacts on Northwestern Ontario Métis Community values and interests.</p>	<p>FMG remains interested in continuing to work with the Northwestern Ontario Métis.</p> <p>MNO's traditional knowledge study was used to inform the draft EIS/EA and we remain open to consider supporting additional study.</p> <p>For further information on potential effects, please refer to Section 6 of the draft EIS/EA.</p>	<p>ACTION(S):</p> <ul style="list-style-type: none"> – Please provide a timeline, outcomes, and next steps for continued work between FMG and the NWOMC. 	<p>Please see Follow-up Response #23</p> <p>As discussed on May 29, 2023 FMG is preparing to submit the final EIS/EA in the first half of 2024 and therefore invites all information that may be relevant to environmental assessment, including traditional knowledge and land use information, to be shared prior to the end of 2023. As discussed, FMG is open to regular technical meetings with NWOMC to continue the information sharing. NWOMC will be provided with another engagement opportunity in reviewing the final EIS/EA after its submission.</p>	Not applicable

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NWO MC-036	4.15 Site Access Pg 4-42 (PDF Page 42)	<p><i>"A security gate will control access to the mine site at a location to be determined in consultation with Cat Lake First Nation, Slate Falls Nation and the forestry road owner. Speed will be controlled within the security boundary."</i></p> <p>This section illustrates a lack of sufficient engagement with the Northwestern Ontario Métis Community.</p>	Please confirm that FMG will engage with the Northwestern Ontario Métis Community to determine location of security gate for mine access.	The installation of a gate was a specific request made by Cat Lake First Nation. However, plans can be shared in due course. Should the Métis have a view on the preferred gate location that information will be considered.	<p>ACTION(S):</p> <ul style="list-style-type: none"> – Please provide a timeline, outcomes, and next steps for continued work between FMG and the NWOMC. 	<p>At this time the access gate is envisioned to be located at the Birch River crossing near the end of the Wenesaga forestry road. The forestry road itself is public access.</p> <p>Should the NWOMC have a view on the preferred gate location, we'd be pleased to discuss at the next meeting.</p>	Not applicable
NWO MC-037	4.17.3 Decommissioning and Closure Phase Pg 4-47 (PDF Page 50)	<p><i>"Feedback gained through ongoing consultation and engagement activities, and including on the draft EIS/EA will be fully considered in the regulatory closure plan."</i></p> <p>This section lacks detail on how FMG will engage with the Northwestern Ontario Métis Community to acquire feedback for the regulatory closure plan.</p>	Please provide clarification on how the Northwestern Ontario Métis Community will be engaged and how feedback will be considered in the regulatory closure plan.	<p>The closure concepts will be further refined as a result of comments received on the draft EIS/EA and updated in the final EIS/EA document.</p> <p>FMG will also be required to produce a closure plan for the Project that must address the requirements of O.Reg 240. FMG will continue to consult during preparation of the Closure Plan document that will be undertaken during the permitting phase of the Project</p>	<p>No requested clarification was provided on how the NWOMC will be engaged and how feedback will be considered in the regulatory closure plan.</p> <p>ACTION(S):</p> <ul style="list-style-type: none"> – Please provide a timeline, outcomes, and next steps for continued work between FMG and the NWOMC. 	<p>FMG is planning to submit the final EIS/EA in the first half of 2024.</p> <p>FMG is planning to develop the closure plan after the final EIS/EA is submitted and will continue to keep NWOMC informed of the timelines and any changes, as the project progresses.</p>	EIS Sections 2.6.1, 2.7.1.7.
NWO MC-038	Section 4.19 Direct and Indirect Labour, Page 4-57 (PDF Page 60)	First Mining Gold has stated in the Appendix Q-2, that local area residents and Nations will be provided opportunities for employment. However, First Mining Gold has not identified specific opportunities for the Northwestern Ontario Métis Community.	<p>The Project area is located within the Lake of the Woods/Lac Seul Traditional Harvesting Territory. Community Councils in Kenora and Dryden are also near the Project. Therefore, by First Mining Gold's location requirements, the Northwestern Ontario Métis Community should be offered employment opportunities.</p> <p>Please provide information on the employment opportunities that will be offered to the Northwestern Ontario Métis Community.</p>	FMG remains interested in continuing to work with the Northwestern Ontario Métis to identify employment opportunities as the Project advances.	<p>No clarification was provided by FMG on the employment opportunities that will be offered to the NWOMC.</p> <p>ACTION(S):</p> <ul style="list-style-type: none"> – Please provide a timeline and next steps for continued work between FMG and the NWOMC. 	FMG and MNO signed a workplan and budget for community benefits agreement negotiation in April 2023 which outlines expectations and timelines for next steps.	EIS Section 2.7.1.7.
NWO MC-039	5.0 Alternatives Assessment	This section does not include analysis of the options in relation to their potential impacts on Métis rights nor are impacts to Métis rights considered as a criteria or factor in the decision of alternatives	Further consultation is required with the Northwestern Ontario Métis Community to update the alternate options analysis to include impacts to Métis rights.	<p>The potential impacts on Aboriginal and Treaty Rights are included as an indicator within the alternatives assessment.</p> <p>If MNO has specific comments on the alternatives assessment FMG would be pleased to consider these further.</p>	<p>ACTION(S):</p> <ul style="list-style-type: none"> – Please provide a timeline, outcomes, and next steps for continued work between FMG and the NWOMC. 	<p>Please see Follow-up Response #23</p> <p>As discussed on May 29, 2023 FMG is preparing to submit the final EIS/EA in the first half of 2024 and therefore invites all information that may be relevant to environmental assessment, including traditional knowledge and land use information, to be shared prior to the end of 2023. As discussed, FMG is open to regular technical meetings with NWOMC to continue the information sharing. NWOMC will be provided with another engagement opportunity in reviewing the final EIS/EA after its submission.</p>	Not applicable

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NWO MC-040	6.1.1.1 Determination of Biophysical Valued Components, Page 6-2 (PDF Page 3)	<p><i>"A VC can be a habitat, an environmental feature, an assemblage of plants or animals, a species of plant or animal, or an indicator of environmental and social health. Data from extensive biophysical and human environment baseline studies, including input from consultation, engagement and literature sources, have been used to identify VCs for the Project that meet one or more of the following criteria:</i></p> <p><i>Area of notable biological diversity;</i> <i>Significant habitat for locally important species;</i> <i>Significant habitat for uncommon or rare species;</i> <i>Species at risk (SAR);</i> <i>Important corridor linkage for fish and or wildlife movement;</i> <i>Sensitive receiving water environment;</i> <i>Other notable species or species groups;</i> <i>Indicator of environmental health;</i> <i>Important component to the function(s) of other ecosystem elements;</i> <i>Indigenous cultural significance;</i> <i>Economic, social or cultural significance, including as identified through Traditional Knowledge and Traditional Land Use (TK / TLU) studies;</i> <i>Educational, scientific, or aesthetic interest; and</i> <i>Provincial, federal or international significance."</i></p> <p>An additional criteria which could have been used to identify VCs for the Project is species or habitats that are supportive of the exercise of Métis rights. This is separate and distinct from cultural significance and may not have necessarily been identified explicitly through Traditional Knowledge and Traditional Land Use studies.</p>	Please further engage with the Northwestern Ontario Métis Community to understand how rights can be applied as a criteria for VC development.	<p>FMG respects Aboriginal and Treaty rights and recognizes that these rights, which include the right to practice traditional activities such as hunting, trapping, fishing and plant gathering, are protected under Section 35 of the Constitution Act (1982) and Indigenous communities exercise those rights throughout the region.</p> <p>FMG considered species or habitats that are supportive of the exercise of Aboriginal rights in Section 6.21 Traditional Land and Resource Use of the draft EIS/EA. Indicators used in the assessment of this Valued Component included traditionally harvested wildlife species, aquatic species and plants used for food and medicine as determined from the Traditional Knowledge and Traditional Land Use Studies provided.</p> <p>FMG remains interested in continuing to work with the Northwestern Ontario Métis Community to understand, assess and mitigate potential effects on species or habitat that are supportive of the exercising of Métis rights.</p>	<p>The NWOMC is aware, from review of the draft EIS/EA, of FMG's consideration of Aboriginal and Treaty rights. However, NWOMC citizens' rights are more expansive than hunting, trapping, fishing and plant gathering. For example, the NWOMC also holds self-governance rights which have been established through the Canada-Métis Government Recognition and Self-Government Agreement which was signed in 2019. These rights are not supported by species or habitats referenced by FMG but have the potential to be adversely impacted by the Project.</p> <p>Additionally, there are aspects of NWOMC harvesting rights also not covered off by species or habitats such as economic or social considerations.</p> <p>Therefore, the NWOMC's original comment requesting further engagement to expand FMG's understanding still applies.</p> <p>ACTION(S): – Please provide a timeline, outcomes, and next steps for continued work between FMG and the NWOMC.</p>	An assessment of the potential impacts on Aboriginal and Treaty rights due to the Project will be provided in final EIS/EA. This will be based upon an assessment of the effects on Indigenous People, that considers the effects on current use of lands and resources for traditional purposes, socioeconomics, archaeology and cultural heritage. The assessment will be informed by the results of the biophysical and human environment effects assessment and through ongoing engagement with NWOMC.	EIS Section 6.26.

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NWO MC-041	6.1.1.2 Selection of Biophysical Valued Components, Page 6-2 (PDF Page 3)	<p><i>"The above framework allows for an integration of both physical and biological environmental components of the natural environment, and therefore better accommodates an ecosystem-based approach to the definition and assessment of the VCs."</i></p> <p>In a typical assessment process it is necessary to compartmentalize the human and biophysical environment into manageable units appropriate for scientific study. However, this process of categorizing the environment into discrete units dissociates the environment from a holistic viewpoint and can miss key pathways where components interact; contributing to negative impacts.</p> <p>Indigenous Knowledge is foundational to the Northwestern Ontario Métis Community. It provides a comprehensive understanding of the environment including biophysical, social, ceremonial, economic, and cultural aspects, as well as insight into the interconnectedness of those aspects. IK is important; it can support decision-making and enhance sustainability principles of the Nation for present and future generations.</p> <p>The effects for all biophysical and socio-economic valued components included in the Assessment must be considered through an IK lens to ensure that potential interconnections and interrelation with the Northwestern Ontario Métis Community's rights are understood, assessed and the severity identified.</p>	Please further engage with the Northwestern Ontario Métis Community to understand how IK can be applied as a criteria for VC development and greater understanding of the interconnected environment.	<p>Changes in the atmospheric environment (Section 6.2 and 6.3), the aquatic environment (Section 6.6 to 6.10), the terrestrial environment (Section 6.11 to 6.16) and human environment (Sections 6.22 to 6.24) was considered in the assessment of Traditional Land and Resource Use (Section 6.21). This section synthesizes the relevant results under four main indicators, including the changes to:</p> <p>traditionally harvested wildlife species,</p> <p>traditionally harvested aquatic species,</p> <p>traditionally harvested plants used for food and medicine and</p> <p>the habitation and use of spiritual or cultural sites.</p> <p>As stated in Section 6.21.5, consultation and engagement with local Indigenous communities on the draft EIS/EA will be considered to inform the determination of residual effects and the significance.</p> <p>FMG remains interested in continuing to work with the Northwestern Ontario Métis Community regarding context, assessment and residual effects.</p>	<p>FMG's response highlights a continued lack of understanding of the NWOMC original comment. While it is positive that the atmospheric environment, the aquatic environment, the terrestrial environment and the human environment were considered in the assessment of Traditional Land and Resource Use, this does not indicate a co-produced assessment that collaboratively considered Métis IK in those assessments themselves.</p> <p>In fact, it reinforces the compartmentalized approach which the original comment references.</p> <p>For example, what NWOMC information informed and was integrated into the assessment of the atmospheric environment?</p> <p>ACTION(S):</p> <ul style="list-style-type: none">– Please provide a timeline, outcomes, and next steps for continued work between FMG and the NWOMC.	<p>Please see Follow-up Response #23</p> <p>As discussed on May 29, 2023 FMG is preparing to submit the final EIS/EA in the first half of 2024 and therefore invites all information that may be relevant to environmental assessment, including traditional knowledge and land use information, to be shared prior to the end of 2023. As discussed, FMG is open to regular technical meetings with NWOMC to continue the information sharing. NWOMC will be provided with another engagement opportunity in reviewing the final EIS/EA after its submission.</p>	Not applicable

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NWO MC-042	6.1.1.4 Selection of Human Environment Valued Components, Page 6-3 (PDF Page 4)	<p>"Social VCs have been selected in consideration of archaeology, cultural heritage, traditional use of the land and resources by local Indigenous communities as well as human and ecological health, and are the following:</p> <ul style="list-style-type: none"> – Traditional Land and Resource Use; – Archaeology; – Cultural Heritage; and – Human and Ecological Health." <p>See Comment #41</p> 	See Comment #41	See Response to Comment #41	Please see Follow-up Comment #48 (formally Comment #41)	Please see Follow-up Response #41	Not applicable
NWO MC-043	6.1.3 Temporal Boundaries, Page 6-4 (PDF Page 5)	<p><i>"Construction Phase: Years -3 to -1, representing the construction period for the Project.</i></p> <p><i>Operations Phase: Years 1 to 12, with the first year potentially representing a partial year as the Project transitions from construction into operations; ..."</i></p>	Please confirm that this states -3 (negative three) to -1 (negative one) as the phase for construction and then begins at year 1 to 12 for operations.	This is correct. The construction phase of the Project is anticipated to be 3 years with the operations phase of the Project anticipated to be 12 years.	-	-	Not applicable
NWO MC-044	Section 6.1.4 Effects Analysis Methodology, Page 6-5 (PDF Page 7)	<p>"The approach in the above methodology is that a predicted environmental effect is not likely to be significant, if it is of:</p> <ul style="list-style-type: none"> – Low magnitude and/or extent; or – Short term duration including residual effects (i.e., the effect itself is of short-term duration); or – Is likely to occur very infrequently (or not at all) with little potential for long-term effects." <p>Métis harvesters may view this land as non-functional, or less desired, as the area may be avoided by those exercising their harvesting rights based on real or perceived Project effects. It is unclear how this will be characterized under First Mining Gold's residual effects assessment criteria.</p> 	Further engagement with the Northwestern Ontario Métis Community on contextualization, assessment and definition of residual effects is required in order to provide an understanding of potential impacts to Métis rights.	<p>Section 6.21 Traditional Land and Resource Use considers potential effects on TLRU. As stated in Section 6.21.5, consultation and engagement with local Indigenous communities on the draft EIS/EA will be considered to inform the determination of residual effects and the significance.</p> <p>FMG remains interested to continuing to work with the Northwestern Ontario Métis Community regarding context, assessment and residual effects.</p>	<p>ACTION(S):</p> <ul style="list-style-type: none"> – Please provide a timeline, outcomes, and next steps for continued work between FMG and the NWOMC. 	<p>Please see Follow-up Response #23</p> <p>As discussed on May 29, 2023 FMG is preparing to submit the final EIS/EA in the first half of 2024 and therefore invites all information that may be relevant to environmental assessment, including traditional knowledge and land use information, to be shared prior to the end of 2023. As discussed, FMG is open to regular technical meetings with NWOMC to continue the information sharing. NWOMC will be provided with another engagement opportunity in reviewing the final EIS/EA after its submission.</p>	Not applicable
NWO MC-045	Table 6.1-2 Environmental Assessment Criteria, Page 6-2 (PDF Page 13)	<p>In typical environmental assessments/EIS reports, extent characterizes the geographic extent where the effect occurs and is typically set at Project footprint/site, LSA and RSA. However, for this criteria, it has been set at:</p> <ul style="list-style-type: none"> – Level I – LSA – Level II – Beyond the LSA – Level III – Beyond the RSA <p>This makes it difficult for project effects to be deemed significant as a Level II or III rating is required for all attributes to achieve significance. This criteria must be revisited.</p>	Please revisit the criteria for extent to allow for consideration of project effects on the footprint/site, within the LSA and within the RSA.	By definition, the LSA is intended to capture potential direct effects from the Project (such as emissions, discharges and habitat loss) and indirect effects resulting from the Project. As a result, an effect that is confined to the Project footprint or Project Development Area - PDA would be low, or Level I. Effects that extent beyond the LSA but are still within the RSA are considered moderate, or Level II. Any effects that are greater than the RSA would be high, or Level III.	By FMG's provided explanation effects both within the PDA and within the LSA would both be deemed Level I or Low. Effects within the RSA would be identified as Level II, and effects beyond the RSA, where limited data will be collected or known, is a Level III. This skews the criteria rating to be lower and should be adjusted to provide for conservative ratings.	<p>The RSA is the geographic boundary in which the valued component is studied to provide regional characterization. The LSA is the boundary in which potential direct and indirect effects from the Project may occur. The results of the assessment of the potential effects on the valued component within the LSA are compared to results of the RSA characterization, as this provides the appropriate context to understand the potential effect. As a result, an effect within the LSA is considered low, whereas an effect between the LSA and RSA is considered moderate and an effect greater than the RSA is considered high.</p> <p>The description of the project development areas (PDA) is not used for the assessment of effects, rather it</p>	EIS Section 6.1

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						is used to described the footprint of the Project and any necessary buffer to accommodate for Project optimization due to consultation and design engineering.	
NWO MC-046	6.2 Air Quality, Page 6-14 (PDF Page 2)	<i>"Traditional Land and Resource Use (Section 6.21): the construction and operation of the Project has the potential to increase emissions which may affect the use of lands and resources by Indigenous people."</i>	Please update the language within this section to include: "Traditional Land and Resource Use (Section 6.21): the construction and operation of the Project has the potential to increase emissions which may affect exercise of harvesting rights (hunting, trapping, fishing, and gathering) by Indigenous people." [emphasis added to proposed text]	Additional language will be added to Section 6.21 to reference the exercise of established and asserted harvesting rights.	Acknowledged. Please confirm Section 6.2 will be similarly updated.	Section 6.2 provides an assessment of the Project on air quality. However, a new section for the assessment of the potential impacts on Aboriginal and Treaty rights due to the Project will be provided in final EIS/EA. The assessment will be informed by ongoing engagement with NWOMC.	EIS Section 6.21.
NWO MC-047	6.2 Air Quality, Page 6-14 (PDF Page 2)	<i>"Air quality is selected as a VC since adverse air quality parameters such as excess dust, and emissions from fuel combustion, can have an effect on the environment and humans if present in certain concentrations. Dust can also provide a means for heavy metals to enter the environment including watercourses. Air quality has intrinsic importance to the health and well-being of humans, wildlife and vegetation."</i> Air quality may also impact Métis harvesters through perceptive impacts. For example, increased dust may result in avoidance of Métis harvesters from the Project site and surrounding LSA.	FMG must engage with the Northwestern Ontario Métis Community to ensure perceptive effects are assessed and addressed through the EA/EIS.	Section 6.21 Traditional Land and Resource Use acknowledges that effects to TLRU may occur because of direct and indirect effects to the biophysical VCs. This includes air quality, where the construction and operation of the Project has the potential to increase emissions which may affect the use of land and resources by Indigenous people; and human and ecological health where the construction and operation of the Project has the potential to affect air quality, surface water, fish, vegetation and wildlife species consumed by Indigenous communities. Air quality mitigation measures are applicable to potential effects to TLRU. FMG remains interested in continuing to work with the Northwestern Métis Community to understand perceptive effects to be considered and addressed in the final EIS/EA.	Acknowledgement of potential direct and indirect effects does not include enough specificity to ensure that Métis perceptions will be included and considered. This requires additional discussion. ACTION(S): – Please provide a timeline, outcomes, and next steps for continued work between FMG and the NWOMC.	Feedback received during the review of the draft EIS/EA from Indigenous communities, including NWOMC, will be used to inform the revisions to the effects assessment.	EIS Section 6.21.
NWO MC-048	6.2 Air Quality, Page 6-14 (PDF Page 2)	<i>"Traditional Land and Resource Use (Section 6.21): the construction and operation of the Project has the potential to increase emissions which may affect the use of lands and resources by Indigenous people."</i> In addition to the noted indirect interaction, within the Northwestern Ontario Métis Community Springpole VC	Please provide detail on how the raised issue/concern within the Northwestern Ontario Métis Community Springpole VC report was addressed by the EA/EIS.	FMG will consider the potential effects of the Project on traditional land and resource use for multiple generations in the final EIS/EA.	Please clarify if FMG will consider ecosystem level impacts affecting multiple generations specific to the NWOMC or if this will be done as a collective	An assessment of the potential impacts on Aboriginal and Treaty rights due to the Project will be provided in final EIS/EA. This will be based upon an assessment of the effects on Indigenous People, that considers the effects on current use of lands and resources for traditional purposes, socioeconomics, archaeology and cultural heritage, and will be disaggregated by	EIS Section 6.21.

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		Report, the Northwestern Ontario Métis Community indicated that impacts to air quality could result in ecosystem level impacts which could affect multiple generations.			assessment for all Indigenous groups.	Indigenous group. The assessment will be informed by the results of the biophysical and human environment effects assessment and through ongoing engagement with NWOMC.	
NWO MC-049	6.2.1.2 Baseline Air Quality Concentrations, Page 6-15 (PDF Page 3)	<i>"As more data are collected on site, the baseline concentrations will be refined but are not expected to change materially."</i>	As more data is collected, the Northwestern Ontario Métis Community requires ongoing engagement to verify the conclusion that baseline concentrations do not change materially.	FMG remains interested in continuing to work with with the Northwestern Ontario Métis.	ACTION(S): – Please provide a timeline for availability of baseline concentrations and next steps for continued work between FMG and the NWOMC.	The final EIS/EA will include additional available baseline data collected since submission of the draft EIS/EA and the NWOMC will be invited and encouraged to review the final EIS/EA after its submission.	EIS Sections 6.2.1.1, 6.2.1.2, Appendix G-1 Section 4.
NWO MC-050	6.2.1 Existing Conditions, All	No existing conditions in relation to dust levels were described within this section.	Please describe the existing conditions for dust within the Project site, LSA and RSA in order to provide a baseline for comparison of analysis.	Existing conditions were described in the baseline report provided as Appendix G-3 of the draft EIS/EA. The Air Quality Modelling Report (Appendix G-2 of the draft EIS/EA, Table 4-2) provides a summary of the baseline concentrations and provides comparison of the modelled potential effects to these baseline concentrations.	-	-	EIS Sections 6.2.1.1, 6.2.1.2, Table 6.2-3, Appendix G-1 Section 4.
NWO MC-051	6.2.2.1 Construction Phase, Page 6-17 (PDF Page 4)	<i>"Potential air quality effects associated with the construction of the access road, transmission line and aggregate pit development, will be mitigated with standard measures. As a result, a quantitative air quality assessment was not conducted for these components of the Project during construction."</i>	The referenced "standard measures" must be described so that the Northwestern Ontario Métis Community can evaluate their effectiveness based on their experience with mining Projects throughout the Region.	A dust management plan to mitigate dust will be required to support the Provincial Environmental Compliance Approval (Air). This Plan will include all material sources of dust and will address applicable construction phase sources and activities. Note that Appendix G-2, Table 6-1 provides mitigation measures for each source or source group.	-	-	EIS Sections 6.2.1.2, 6.2.5, Appendix G-2 Section 5.1.
NWO MC-052	6.2.2.1 Identification of Potential Environmental Effects - Construction Phase, Page 6-17 (PDF Page 4)	There is no discussion of dust during the construction phase – particularly in relation to the mine access road, or development of the two aggregate pits.	Please describe the potential impacts from dust in relation to the mine access road and development of the two aggregate pits. Additionally, please identify any 'standard measure' applied to address these impacts so the Northwestern Ontario Métis Community can evaluate the effectiveness; particularly as some measures such as usage of dust suppressants can exacerbate impacts on Métis harvesters.	The effects of construction activities associated with access road construction and the aggregate pit(s) operation are considered as sources of dust. . The equipment and sources associated with construction activities are similar in nature to those of the operations phase (e.g., diesel fleet and earth moving), with respect to the air pollutants emitted to the air.	The NWOMC may require involvement in the development and/or review of the referenced dust management plan. Particularly as it is noted as the main mitigation measure related to fugitive dust emissions during construction and operations. ACTION(S):	The specific results will be included in the Appendix for the Air Quality Modelling Report in the final EIS/EA, and summarized in Section 6.2 of the final EIS/EA. The dust management plan is expected to form part of the application for an ECA (air) for the Project. FMG is planning to submit the final EIS/EA in the first half of 2024 and is planning to start to develop permit applications after this submission. FMG will continue to keep NWOMC informed of the permitting timelines and any changes as the project progresses.	EIS Sections 6.2.1.2, 6.2.5, Appendix G-2 Section 5.1.

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				<p>Fugitive dusts generated during the construction phase will be managed with targeted mitigation to control dust emissions at the source, thereby reducing effects.</p> <p>A dust management plan to mitigate dust will be required to support the Provincial Environmental Compliance Approval (Air). This Plan will include all sources of dust and will address construction phase sources and activities.</p> <p>Note that Appendix G-2, Table 6-1 provides mitigation measures for each source or source group.</p>	<p>– Please indicate whether the results noted in FMG’s response (currently within Appendix G-2) will be described within the Air Quality Volume of the final EIS/EA or identified within the Appendix, exclusively.</p> <p>– Please provide a timeline, outcomes, and next steps for continued work between FMG and the NWOMC in relation to the dust management plan so the NWOMC can evaluate their level of participation.</p>		
NWO MC-053	6.2.2.1 Identification of Potential Environmental Effects - Operations Phase, Page 6-17 (PDF Page 4)	<i>“There will also be periodic maintenance activities associated with transmission line and mine access road, but these are expected to be infrequent and of short duration.”</i>	The Northwestern Ontario Métis Community requires specific detail on what is meant by ‘infrequent’ and ‘short duration’ to evaluate whether these maintenance activities will interact with the exercise of Métis harvesting rights.	<p>Periodic monitoring and maintenance is expected to be required, with the timing to be dictated by the operator to ensure continued operability.</p> <p>Based on past experience, monitoring may include ground and/or aerial inspections after major storm events and similar.</p> <p>Maintenance could potentially be required after an inspection, for both the transmission line and access road. Maintenance is expected to be ground-based under most circumstances, although helicopter delivery of equipment / personnel could potentially occur. For the transmission line, vegetation maintenance may occur after a number of years when the woody vegetation grows tall enough to potentially interfere with the conductor (line). Grubbing is not proposed along the transmission line corridor during any phase of the Project.</p>	<p>Will the NWOMC be notified by either FMG or the operator when ground and/or aerial inspections occur? Further, will the NWOMC be notified when maintenance activities are anticipated?</p>	A Communication Plan will be developed for the Project prior to construction and NWOMC will be engaged to provide input into this plan. If the NWOMC desires to be notified of these activities, please let FMG know so the procedure can be established as part of the communication plan development.	Not applicable

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NWO MC-054	6.2.2.3 Spatial and Temporal Boundaries, Pahe 6-19 (PDF Page 7)	<p><i>"From an air quality perspective, the construction of the mine access road and transmission line is anticipated to be a transient activity using mobile equipment that will only occur in one location for a short period of time during construction, therefore the primary area of expected effects is anticipated to be limited to the mine site area of the PDA."</i></p> <p>From a Métis values and interests perspective, limiting the 'area of expected effects' to the PDA because an effect only occurs during construction (estimated to occur over 3 years) is not appropriate.</p>	Please update the Air Quality assessment to include the mine access road and transmission line activities both during construction, as well as during operations (e.g., maintenance activities).	<p>The effects of construction activities associated with access road construction and the aggregate pit(s) operation are recognized as a source of air emissions, including dust and tailpipe emissions from construction equipment. These sources will be included in the management plan for fugitive dust and air emissions will be managed with specific measures listed in Table 6-1 of the Air Quality Modelling Report (Appendix G-2).</p> <p>The equipment and sources associated with construction activities are similar in nature to those of the operations phase (e.g. diesel fleet and earth moving), with respect to the pollutants emitted to the air.</p> <p>As more accurate information becomes available on the construction schedules and road alignments, it will be possible to include a quantitative assessment of potential air quality effects with air dispersion modelling in support of future environmental permitting.</p>	Please see Follow-up Comment #59	Please see Follow-up Response #52 (comment #59 in MNO second submission).	EIS Sections 6.2.1.2, 6.2.5, Appendix G-2 Section 5.1.
NWO MC-055	6.2.3 Mitigation Measures, Page 6-21 (PDF Page 9)	There is no discussion of identified Project effects prior to the discussion of mitigation measures. Instead, the EA/EIS describes the analytical methods used in the assessment, the assumptions and use of the conservative approach, but there is no discussion of the Project effects.	Please describe the Project effects prior to mitigation so the Northwestern Ontario Métis Community can accurately evaluate the effectiveness of proposed mitigation measures on the effects from the Project.	The Air Quality Modelling Report (Appendix G-2 of the draft EIS/EA) provides details of source emissions and the control efficiencies considered.	Will a discussion of identified Project Effects be within the final EIS/EA within the Air Quality volume or will this remain exclusively within the Appendix?	This will remain within the Air Quality Modelling Report (Appendix G-2 of the final EIS/EA).	EIS Sections 6.2.1.2, 6.2.3, 6.2.4, 6.2.5.
NWO MC-056	6.2.3 Mitigation Measures, Page 6-21 (PDF Page 9)	<p><i>"During all phases, dust emissions from roads and mineral stockpiles will be controlled through the application of water spray as needed, supplemented by dust suppressants particularly on roads if required;"</i></p> <p>The usage of dust suppressants can exacerbate potential negative impacts to Métis harvesters both through direct effects as well as perceptive effects.</p>	Ongoing engagement regarding the use of dust suppressants must be undertaken with the Northwestern Ontario Métis Community, including direct and collaborative communication to inform citizens of where and when these dust suppressants will be applied.	FMG remains interested in continuing to work with the Northwestern Ontario Métis throughout all phases of the Project. Additional information on the use of dust suppressants will be included in environmental management plans that will be	The NWOMC may require involvement in the development and/or review of the referenced environmental management plans that will be developed during the permitting phase of the Project.	FMG is planning to submit the final EIS/EA in the first half of 2024 and is planning to start to develop environmental management plans after this submission. The management plans will be developed prior to applicable construction activities. FMG will continue to keep NWOMC informed of the timelines and any changes as the project progresses.	Not applicable

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				developed during the permitting phase of the Project.	ACTION(S): – Please provide a timeline, outcomes, and next steps for continued work between FMG and the NWOMC in relation to the environmental management plans so the NWOMC can evaluate their level of participation.		
NWO MC-057	6.2.3 Mitigation Measures, Page 6-21 (PDF Page 9)	<p><i>“At closure, exposed dust sources will be revegetated, and progressive reclamation will be conducted wherever appropriate to better control dust emissions from the mineral waste stockpiles and CDF.”</i></p> <p>Closure is identified to begin after 3 years of construction and 12 years of operations; effectively 15 years.</p>	Please identify what measures will be undertaken to manage exposed dust sources prior to closure.	<p>A dust management plan to mitigate dust be developed in which all potential sources of dust are identified and details the mitigation measures and monitoring that will be implemented for each identified source.</p> <p>This Plan will be inclusive of the post-closure phase where there is still the potential for dust generation. This Plan will be developed during the permitting phase of the Project.</p>	<p>The NWOMC may require involvement in the development and/or review of the referenced dust management plan.</p> <p>ACTION(S): – Please provide a timeline, outcomes, and next steps for continued work between FMG and the NWOMC in relation to the dust management plan so the NWOMC can evaluate their level of participation.</p>	Please see Follow-up Response #52	EIS Sections 6.2.1.1, 6.2.1.2, 6.2.4, Appendix G-2 Table 6-1.
NWO MC-058	6.2.3 Mitigation Measures, Page 6-22 (PDF Page 10)	<p><i>“A dust management plan will be prepared for the construction and operations phase to identify potential sources of fugitive dusts, outline mitigation measures that will be employed to control dust generation and detail the inspection and record keeping required to demonstrate that fugitive dusts are being effectively managed. Proposed dust control measures will be developed based on current international best practices, which are predictably effective and are not prone to failure. The dust management plan will include opportunities for adaptive management, in which the intensity of the control measures may need to be increased if site inspections and monitoring indicate that current measures are insufficient to prevent offsite dust effects.”</i></p>	The Northwestern Ontario Métis Community must be offered involvement in the development of a dust management plan. Pending internal capacity, this may take the form of active participation, review and comment, or review and acknowledgement.	FMG remains interested in continuing to work with the Northwestern Ontario Métis throughout all phases of the Project. Additional information on the use of dust suppressants will be included in environmental management plans that will be developed during the permitting phase of the Project.	<p>The NWOMC may require involvement in the development and/or review of the referenced dust management plan and environmental management plans.</p> <p>ACTION(S): – Please provide a timeline, outcomes, and next steps for continued work between FMG and the NWOMC in relation to the dust management plan and environmental management plans so the NWOMC can evaluate their level of participation.</p>	Please see Follow-up Response #52	Not applicable

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NWO MC-059	6.2.3 Mitigation Measures, Page 6-22 (PDF Page 10)	<i>"The blast schedule will optimize air dispersion to minimizes effects on air quality, including by avoiding blasting during unfavourable meteorological conditions as needed."</i>	<p>The blast schedule must also consider potential timing (seasonality) to accommodate Métis harvesters who may be exercising their Métis rights in the project vicinity.</p> <p>The Northwestern Ontario Métis Community requires ongoing engagement with regards to blast schedule and planning.</p>	FMG remains interested in continuing to work with the Northwestern Ontario Métis throughout all phases of the Project. Additional information on the blast schedule will be included in environmental management plans that will be developed during the permitting phase of the Project.	<p>The NWOMC may require involvement in the development and/or review of the referenced environmental management plans that will be developed during the permitting phase of the Project.</p> <p>ACTION(S):</p> <ul style="list-style-type: none"> – Please provide a timeline, outcomes and next steps for continued work between FMG and the NWOMC in relation to the environmental management plans so the NWOMC can evaluate their level of participation. 	Please see Follow-up Response #56	Not applicable
NWO MC-060	6.2.4.1 Particulate Matter, Page 6-22 (PDF Page 10)	<p><i>"These predicted concentrations for particulate matter 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 conditions over five years of meteorological data). Conservative background concentrations were also used which will be further refined with onsite monitoring currently being carried out. It is expected that the actual SPM, PM₁₀, and PM_{2.5} background concentrations are lower than those presented in Table 6.2-1, and the predicted effects would, therefore, be overestimated. The concentrations of PM₁₀ and PM_{2.5} within the LSA are well below the respective AAQCs, as shown in Table 6.2-7."</i></p> <p>If the assessment, is indeed, conservative, this must not be used as a justification or minimization of the identified effects. Instead, precautionary mitigation should be developed to address infrequent Ontario AAQC exceedances and a robust monitoring program should be developed to track and evaluate the effectiveness.</p> <p>This is of particular importance as the exceedances were identified 2km north of the leased property boundary towards Birch Lake, where there is potential for Métis harvesters to frequent.</p>		<p>The statement was included to provide assurance that the assessment was carried out in a conservative manner, and that the emission rates and predicted effects are not underestimating potential effects. See the response to comment #51, for further details.</p> <p>The assessment identifies the need for targeted and effective management of dust and will include monitoring of air quality to verify that the dust control is effective in keeping particulate (Suspended Particulate, Particulate Matter 10, and Particulate Matter 2.5) within established standards and guidelines. The air quality modeling will be updated in the final EIS/EA as engineering is advanced.</p> <p>Appendix G-2, Table 7-1 of the draft EIS/EA includes recommended ambient air monitoring. An air quality</p>	<p>The NWOMC may require involvement in the development and/or review of the referenced Air Quality monitoring plan that is anticipated as a condition of the Environmental Compliance Approval within the Provincial environmental permitting process.</p> <p>Additionally, the NWOMC look forward to review and consideration of the air quality monitoring which will be updated and included within the final EIS/EA.</p> <p>ACTION(S):</p> <ul style="list-style-type: none"> – Please provide a timeline, outcomes and next steps for continued work between FMG and the NWOMC in relation to the environmental 	Please see Follow-up Response #56	EIS Section 12.2

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				monitoring plan is expected to be a condition of the Environmental Compliance Approval (Air) within the Provincial environmental permitting process.	management plans so the NWOMC can evaluate their level of participation.		
NWO MC-061	6.2.5 Significance of Residual Effects, Page 6-24 (PDF Page 12)	<p>Geographic Extent</p> <p>See Comment #45</p> <p>In typical environmental assessments/EIS reports, extent characterizes the geographic extent where the effect occurs and is typically set at Project footprint/site, LSA and RSA. However, for this criteria, it has been set at:</p> <ul style="list-style-type: none"> – Level I – LSA – Level II – Beyond the LSA – Level III – Beyond the RSA <p>This makes it difficult for project effects to be deemed significant as a Level II or III rating is required for all attributes to achieve significance. This criteria must be revisited.</p>	See Comment #45	See response to comment #45	Please see Follow-up Comment #59 (formally Comment #45)	Please see Follow-up Response #45	EIS Section 6.1.
NWO MC-062	6.3 Noise and Vibration, Page 6-42 (PDF Page 2)	<i>In addition to disturbing local land users, noise and vibration can also disturb Indigenous harvesters who may be exercising their rights in proximity to the Project site.</i>	<p>Please update this section. Suggested text includes:</p> <p>“Noise is selected as a VC since excessive noise can be disturbing to Indigenous harvesters, local land users, sensitive wildlife species and have the potential to affect human health and well-being. Vibration from Project activities may also affect Indigenous harvesters, local land users, and disturb fish when it occurs in close proximity to fish habitat.” [emphasis added to proposed text]</p>	The term “local land users” is intended to be inclusive of Indigenous harvesters.	Please advise whether the clarification included in FMG’s response will be added to the final EIS/EA for precision of language.	This will be added to the final EIS/EA.	EIS Section 6.3.1.2, Appendix H-3 Section 4.
NWO MC-063	6.3 Noise and Vibration, Page 6-42 (PDF Page 2)	<i>“Traditional Land and Resource Use (Section 6.21): the construction and operation of the Project has the potential to increase sensory disturbances which may affect the use of lands and resources by Indigenous people.”</i>	<p>Please update the language within this section to include:</p> <p>“Traditional Land and Resource Use (Section 6.21): the construction and operation of the Project has the potential to increase sensory disturbances which may affect the exercise of harvesting rights (hunting, trapping, fishing, and gathering) by Indigenous people.” [emphasis added to proposed text]</p>	Additional language will be added to Section 6.21 to reference the exercise of established and asserted harvesting rights.	Acknowledged. Please confirm Section 6.3 will be similarly updated.	Section 6.3 provides an assessment of the Project on noise and vibration. However, a new section for the assessment of the potential impacts on Aboriginal and Treaty rights due to the Project will be provided in final EIS/EA. The assessment will be informed by ongoing engagement with NWOMC.	EIS Section 6.21 and 6.26

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NWO MC-064	6.3.2.3 Spatial and Temporal Boundaries, Page 6-46 (PDF Page 6)	<i>"As the transmission line is anticipated to be a transient activity using mobile equipment that will only occur in one location for a short period of time during construction and potentially during periodic maintenance, it is not expected to result in measurable effects from noise or vibration. As a result, the transmission line corridor has not been included in the LSA and RSA."</i>	Please provide the Northwestern Ontario Métis Community with additional information on the timing and duration of anticipated maintenance activities to allow evaluation as to whether noise from these activities should be included for assessment within the LSA/RSA of the Project. This must include type of maintenance (e.g., will helicopters and/or floatplanes be used? Will maintenance include mechanical grubbing, etc.).	<p>Only infrequent monitoring and maintenance is expected to be required for the transmission line, with the timing to be dictated by the operator to ensure continued operability. Regular, frequent flights and/or ground activity is not expected, and for that reason was not modelled.</p> <p>Based on past experience, monitoring may include ground or aerial inspections after major storm events and similar.</p> <p>Maintenance could potentially be required after an inspection; or after a number of years when the woody vegetation grows tall enough to potentially interfere with the conductor (line). Maintenance is expected to be ground-based under most circumstances, although helicopter delivery of equipment / personnel could potentially occur. Grubbing is not proposed along the transmission line corridor during any phase of the Project.</p>	Please see Follow-up Comment #60	Please see Follow-up Response #53 (comment #60 in MNO second submission).	EIS Section 5.18
NWO MC-065	6.3.3 Mitigation Measures, Page 6-48 (PDF Page 8)	<i>"Prior to construction, a detailed blasting plan will be developed for the Project to determine the maximum allowable explosive loading at various locations within the PDA to ensure compliance with NPC-119, Health Canada and DFO limits for vibration at receptors."</i>	The Northwestern Ontario Métis Community requires review of, and engagement on, any developed blasting plan to ensure Métis citizens can be properly informed of blasting activities which may impact their harvesting activities.	FMG remains interested in continuing to work with the Northwestern Ontario Métis throughout all phases of the Project. Additional information on the blasting plan will be included in the management plans that will be developed during the permitting phase of the Project.	<p>The NWOMC may require involvement in the development and/or review of the referenced blasting plan that is anticipated in the management plans that will be developed during the permitting phase of the Project.</p> <p>ACTION(S):</p> <ul style="list-style-type: none">– Please provide a timeline, outcomes, and next steps for continued work between FMG and the NWOMC in relation to the blasting plan so the	FMG is planning to submit the final EIS/EA in the first half of 2024 and is planning to start to develop environmental management plans after this submission. The blasting plan will be developed prior to operations. FMG will continue to keep NWOMC informed of the timelines and any changes as the project progresses.	EIS Section 12.1

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					NWOMC can evaluate their level of participation.		
NWO MC-066	6.4.5 Significance of Residual Effects, Page 6-72 (PDF Page 9)	<p><i>"With the implementation of mitigation measures, the magnitude of the residual effect from GHG emissions is considered to be low (Level I) as the Project contribution is less than 0.1%. The geographic extent of the residual effects is considered to be high (Level III), as the emissions will extend beyond the LSA. The duration of the residual effect is considered moderate (Level II), as the GHG emissions will occur frequently throughout the operational life of the Project, and therefore frequency is considered to be high (Level III). However, the residual effects are predicted to be fully reversible (Level I), as the GHG emissions will cease once the Project activities cease and the area is reclaimed."</i></p> <p>The determination that GHG emissions are reversible as they will cease upon project closure is inappropriate as ceasing further emissions does not address the initial release and additive nature of these emissions.</p>	<p>Please continue to work with the Northwestern Ontario Métis Community to explore the residual effects criteria for GHG using an landscape level/ecosystem approach.</p>	<p>The contribution of the Project's total Scope 1 and 2 GHG emissions to the total Ontario annual emissions will be approximately 0.05%.</p> <p>At closure, Project activities will cease to emit GHGs in the Project Development Area. As a result, the Project's contribution to the emission of GHGs will return to pre-construction conditions which meets the definition for Level I reversibility.</p>	<p>The original Issue/Concern with regards to the high but reversible GHG emissions remains. Please confirm FMG's willingness to work with the NWOMC in exploring GHG emissions.</p>	<p>Section 6.4.5 of the draft EIS/EA will be revised in the final EIS/EA to reflect that the Project's residual effects on atmospheric GHGs are not fully reversible, however relative to Canada's inventory and commitments under the Canadian Net-Zero Emissions Accountability Act, the Project's annual contribution to Canada's emission inventory will be fully reversible at closure.</p>	EIS Sections 6.4.1.2, 6.4.1.5.
NWO MC-067	6.5.4.2 Seepage Predictions, Page 6-87 (PDF Page 11)	<p><i>"Model results indicate that seepage from CDF emanates radially towards the surrounding surface water features; and that the majority of seepage flow occurs as overland seepage from the CDF facility and thus in reality would be captured by ditches before reaching surface water features."</i></p>	<p>Please describe how seepage will be monitored to ensure that seepage is captured by ditches before reaching surface water features.</p> <p>Additionally, please identify what measures will be undertaken should seepage reach surface water features.</p>	<p>The monitoring of seepage from the co-disposal facility (CDF) will be primarily through regular sampling of groundwater monitoring wells that will be established between the CDF ditching and the surrounding environment. The rock under the CDF is very competent, and very little seepage is expected to reach these monitoring wells, with most seepage expected to flow in the near surface sediments to the ditch.</p> <p>The potential presence of seepage in the monitoring wells will be determined by comparing results year after year to identify whether there are changes / trends in water quality that would indicate the presence of seepage.</p> <p>Action will be taken if there are indications of potentially unexpected seepage in the monitoring well(s), beginning with an investigation to the cause and</p>	<p>Will the monitoring wells produce continuous results or will monitoring be completed at scheduled intervals?</p>	<p>Seepage quality monitoring requirements will be established for the construction, operations and closure phases of the Project as part of the provincial approvals process in consultation with MINES, MECP, and Indigenous communities, as applicable.</p> <p>Subject to regulatory requirements, sample collection for seepage quality is generally completed at regular intervals; flow and level monitoring can be continuous or at regular intervals, dependent on the well location, potential for effects, and phase of the Project.</p>	EIS Section 12.5

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				identification of mitigation measures if required. Contingency measures might include pump back wells whereby groundwater is pumped back into the CDF and/or grouting of bedrock to prevent seepage movement.			
NWO MC-068	6.5.5 Significance of Residual Effects, Page 6-88 (PDF Page 12)	See Comment #45	See Comment #45	See the response to Comment #45.	Please see Follow-up Comment #59 (formally Comment #45)	Please see Follow-up Response #59.	EIS Section 6.1.
NWO MC-069	6.5.5 Significance of Residual Effects, Page 6-89 (PDF Page 13)	<p><i>"The residual effect on groundwater quantity (flow) is that during mine dewatering, most surface water features experience an overall reduction in groundwater contributions to baseflow as the open pit acts as a local sink for groundwater. Groundwater flow is however, expected to return to near baseline conditions in the closure phase, after cessation of open pit mining and dewatering activities, and the filling of the open pit basin. Further, given the large size of Birch Lake and Springpole Lake, and relative size of L-20, the predicted changes in groundwater discharge do not represent a significant component of the lake water balance and are not measurable / discernable from baseline conditions."</i></p> <p>This section does not appropriately explore the smaller unnamed/named waterbodies within the LSA which may experience a reduction in groundwater contributions throughout the Project life (~15 years including construction and operations).</p>	Please provide details on these smaller waterbodies and how this may interact with Métis harvesting.	<p>The small water features which could be temporarily affected by the mine dewatering are all in close proximity to the mine operations, and may be directly or indirectly affected as identified Section 6.10 of the draft EIS/EA.</p> <p>These smaller waterbodies are typically inhabited by small-bodied fish, which were not identified as fish typically harvested in the MNO TKLU study. Beyond the area affected by mine dewatering, there are numerous small waterbodies that are not anticipated to be affected. Regardless, a draft Fish Habitat Offsetting and Compensation Plan (Appendix F) has been developed to offset losses of fish habitat within the affected area, and will mitigate changes in harvesting.</p> <p>After mining ends and the site is reclaimed, groundwater levels is predicted to return to pre-mining levels and pre-mining groundwater flow patterns will generally re-establish themselves. Smaller waterbodies that may have been affected by changes in groundwater levels will return to normal function.</p>	<p>Small-bodied fish may not be identified in the MNO TKLU as fish that are typically harvested, however these fish can support lifecycles of fish that MNO may harvest, where the waterbody can support. It is understood that on the case of the small water features referenced, FMG reports that no additional fish species of note were identified.</p> <p>Additional conversation is required to understand how the draft Fish Habitat Offsetting and Compensation Plan mitigates changes to harvesting as harvesting is not specifically referenced within Appendix F. For example, does the strategic stocking program aim to support harvesting?</p>	It is recognized and appreciated that the small-bodied fish communities are important for bait fish usage to the NWOMC and for their important role in the overall fisheries food web supporting NWOMC harvesting activities. The offset plan includes the reclamation of inland lakes at closure where possible, and the development of new littoral habitat directly connected to Springpole lake which will benefit both small-bodied and large-bodied fish. The inclusion of habitat measures that will benefit small-bodied fish will be specifically described in the revised Plan.	EIS Section 6.5.1.2, Appendix F Section 8.

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NWO MC-070	6.5.5 Significance of Residual Effects, Page 6-89 (PDF Page 13)	<p><i>"The frequency of the residual effects is low (Level I) as it will occur once."</i></p> <p>The frequency is identified as occurring consistently throughout the project life until a return to "near baseline conditions in the closure phase"; therefore the frequency should be identified as Level II which occurs "...with a certain degree of regularity".</p>	Please correct the frequency as per the conclusions made within the EA/EIS.	The effect on groundwater quantity from mine dewatering will only occur once during construction and will be maintained throughout the operation phase. Changes in the groundwater quantity are not anticipated to change once dewatering is completed. As a result, the frequency of the effects is considered to be low, or Level I.	Additional discussion is required in relation to maintained impacts throughout operation phase and how residual effects criteria are applied.	Frequency is defined as the rate of occurrence for the residual effect and duration is defined as the length of time the residual effect is expected to occur. These attributes are assessed separately in the EIS/EA. While the frequency of the effects related to the change in groundwater levels only occurs once during construction and is considered to be low (Level I), the duration of this effect will occur throughout operations and is considered to be moderate (Level II).	EIS Sections 6.5.1.2, 6.5.7.
NWO MC-071	6.6 Birch Lake System, Page 6-102 (PDF Page 2)	<p><i>"Surface water systems were selected as a VC because surface water is critical to the life function of human and non-human biota; supports commercial, and recreational uses; and provides cultural value to humans through various uses including as habitat for aquatic resources and as a medium for travel and recreation. The surface water system VCs encompass aspects related to surface water, including hydrology (surface water volume and flow) as well as surface water quality."</i></p>	<p>Please update this section to include the following language:</p> <p>"Surface water systems were selected as a VC because surface water is critical to the life function of human and non-human biota; supports Indigenous, commercial, and recreational uses; and provides cultural value to humans through various uses including as habitat for aquatic resources and as a medium for travel and recreation. The surface water system VCs encompass aspects related to surface water, including hydrology (surface water volume and flow) as well as surface water quality." [emphasis added to proposed text]</p>	The language in this section is intended to be inclusive of Indigenous users and is also represented by the reference to cultural values.	<p>The original Information Request/Comment is still the preferred action as Indigenous groups should not be categorized or represented by commercial or recreational users and reference to cultural values is not specific enough to refer to Indigenous groups.</p> <p>ACTION(S):</p> <ul style="list-style-type: none"> – Please amend the wording in Section 6.6 as per provided suggestions. 	This will be updated in the final EIS/EA, as requested.	EIS Section 6.6, 6.7, 6.8 and 6.9
NWO MC-072	6.6 Birch Lake System, Page 6-102 (PDF Page 2)	<p><i>"Traditional Land and Resource Use (Section 6.21): the construction and operation of the Project has the potential to change water quality and quantity which may affect the use of lands and resources by Indigenous people."</i></p>	<p>Please update the language within this section to include:</p> <p>"Traditional Land and Resource Use (Section 6.21): the construction and operation of the Project has the potential change water quality and quantity which may affect the exercise of harvesting rights (hunting, trapping, fishing, and gathering) by Indigenous people." [emphasis added to proposed text]</p>	Additional language will be added to Section 6.21 to reference the exercise of established and asserted harvesting rights.	Acknowledged. Please confirm Section 6.6 will be similarly updated.	Section 6.6 provides an assessment of the Project on Birch Lake. However, a new section for the assessment of the potential impacts on Aboriginal and Treaty rights due to the Project will be provided in final EIS/EA. The assessment will be informed by ongoing engagement with NWOMC.	EIS Section 6.26
NWO MC-073	6.6.2.4 Analytical Methodology – Water Balance Modelling, Page 6-110 (PDF Page 10)	<p><i>"These water management features are presented in Error! Reference source not found.. Water balance model predictions were completed for the Project construction, operations, and closure and decommissioning phases;"</i></p>	Reference source requires updating.	Comment noted.	-	-	Not applicable

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NWO MC-074	6.6.3 Mitigation Measures, Page 6-116 (PDF Page 15)	<i>"Monitoring programs will be implemented to verify the accuracy of the predicted effects, assess the effectiveness of the implemented mitigation measures and may be further optimized in response to monitoring data."</i>	<p>The Northwestern Ontario Métis Community should be involved in the development and implementation of a monitoring program to verify the accuracy of predicted effects.</p> <p>This includes involvement in the planning, management, and treatment either through active participation with a Northwestern Ontario Métis Community monitor, or through ongoing information review, depending on the Northwestern Ontario Métis Community internal capacity.</p>	FMG remains interested in continuing to work with the Northwestern Ontario Métis throughout all phases of the Project.	ACTION(S): – Please provide a timeline, outcomes, and next steps for continued work between FMG and the NWOMC.	Please see Follow-up Responses #21, #23, #56.	EIS Section 12
NWO MC-075	6.6.5 Significance of Residual Effects, Page 6-120 (PDF page 20)	<p>See Comment #45</p> <p>In typical environmental assessments/EIS reports, extent characterizes the geographic extent where the effect occurs and is typically set at Project footprint/site, LSA and RSA. However, for this criteria, it has been set at:</p> <ul style="list-style-type: none"> – Level I – LSA – Level II – Beyond the LSA – Level III – Beyond the RSA <p>This makes it difficult for project effects to be deemed significant as a Level II or III rating is required for all attributes to achieve significance. This criteria must be revisited.</p>	<p>See Comment #45</p> <p>Please revisit the criteria for extent to allow for consideration of project effects on the footprint/site, within the LSA and within the RSA.</p>	<p>See response to #45</p> <p>By definition, the LSA is intended to capture potential direct effects from the Project (such as emissions, discharges and habitat loss) and indirect effects resulting from the Project. As a result, an effect that is confined to the Project footprint or Project Development Area - PDA would be low, or Level I. Effects that extent beyond the LSA but are still within the RSA are considered moderate, or Level II. Any effects that are greater than the RSA would be high, or Level III.</p>	<p>Please see Follow-up Comment #59 (formally Comment #45)</p> <p>By FMG's provided explanation effects both within the PDA and within the LSA would both be deemed Level I or Low. Effects within the RSA would be identified as Level II, and effects beyond the RSA, where limited data will be collected or known, is a Level III. This skews the criteria rating to be lower and should be adjusted to provide for conservative ratings.</p>	<p>Please see Follow-up Response #45.</p> <p>The RSA is the geographic boundary in which the valued component is studied to provide regional characterization. The LSA is the boundary in which potential direct and indirect effects from the Project may occur. The results of the assessment of the potential effects on the valued component within the LSA are compared to results of the RSA characterization, as this provides the appropriate context to understand the potential effect. As a result, an effect within the LSA is considered low, whereas an effect between the LSA and RSA is considered moderate and an effect greater than the RSA is considered high.</p> <p>The description of the project development areas (PDA) is not used for the assessment of effects, rather it is used to described the footprint of the Project and any necessary buffer to accommodate for Project optimization due to consultation and design engineering.</p>	EIS Section 6.1
NWO MC-076	6.7 Springpole Lake, North Basin System, Page 6-144 (PDF page 2)	<i>"Surface water systems were selected as a VC because surface water is critical to the life function of human and non-human biota; supports commercial, and recreational uses; and provides cultural value to humans through various uses including as habitat for aquatic resources and as a medium for travel and recreation. The surface water system VCs encompass aspects related to surface water, including hydrology (surface water volumes and flows) as well as surface water quality."</i>	<p>Please update this section to include the following language:</p> <p>"Surface water systems were selected as a VC because surface water is critical to the life function of human and non-human biota; supports Indigenous, commercial, and recreational uses; and provides cultural value to humans through various uses including as habitat for aquatic resources and as a medium for travel and recreation. The surface water system VCs encompass aspects related to surface water, including hydrology (surface water volumes and flows) as well as surface water quality." [emphasis added to proposed text]</p>	The language in this section is intended to be inclusive of Indigenous users and is also represented by the reference to cultural values.	<p>The original Information Request/Comment is still the preferred action as Indigenous groups should not be categorized or represented by commercial or recreational users and reference to cultural values is not specific enough to refer to Indigenous groups.</p> <p>ACTION(S): – Please amend the</p>	This will be updated in the final EIS/EA, as requested.	EIS Sections 6.6 through 6.9 (introductions).

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					wording in Section 6.7 as per provided suggestions.		
NWO MC-077	6.7 Springpole Lake, North Basin System, Page 6-144 (PDF page 2)	<i>"Traditional Land and Resource Use (Section 6.21): the construction and operation of the Project has the potential to change water quality and quantity which may affect the use of lands and resources by Indigenous people."</i>	<p>Please update the language within this section to include:</p> <p>"Traditional Land and Resource Use (Section 6.21): the construction and operation of the Project has the potential to change water quality and quantity which may affect the exercise of harvesting rights (hunting, trapping, fishing, and gathering) by Indigenous people." [emphasis added to proposed text]</p>	Additional language will be added to Section 6.21 to reference the exercise of established and asserted harvesting rights.	Acknowledged. Please confirm Section 6.7 will be similarly updated.	Section 6.7 provides an assessment of the Project on the north basin of Springpole Lake. However, a new section for the assessment of the potential impacts on Aboriginal and Treaty rights due to the Project will be provided in final EIS/EA. The assessment will be informed by ongoing engagement with NWOMC.	EIS Section 6.21
NWO MC-078	6.7.4 Assessment of Residual Environmental Effect, Page 6-152 (PDF Page 10)	<p><i>"Note that the dewatered area in the north basin is targeted as a location for aquatics offsetting / compensation as described in the draft Fisheries Offsetting and Compensation Plan (Appendix F). As a result, the area within the isolated basin has been excluded from further assessment of Project-effects on surface water quantity and quality."</i></p> <p>While the dewatered area in the north basin may be targeted for offsetting / compensation, it must still be considered in terms of water quality as mercury can be created during reservoir development and conditions for mercury creation could be duplicated by the creation of the cofferdam.</p> <p>Without assessment of the Project-effects on surface water quality within the north basin, sufficient mitigation and/or monitoring may not be identified or undertaken following completion of construction.</p>	The assessment must be updated to explore project related impacts on surface water quality within the north basin to allow for sufficient mitigation/monitoring to be identified and undertaken.	<p>Effects to surface waters of the north basin of Springpole Lake are assessed quantitatively using predictive water balance and water quality modelling using industry standard software and include predictions for total mercury concentrations (Appendices M-3, N-2 and N-3). Predictive modelling and the associated effects assessment include the impact(s) of dewatering activities on surface waters of the larger north basin of Springpole Lake (Section 6.7.2.1; Section 6.7.4.1, Section 6.7.4.2). That is, while the isolated dewatered area within the north basin of Springpole Lake is not directly assessed in and of itself, the impacts of temporary dewatering activities in this area on surface waters of the remaining in the north basin are assessed.</p> <p>The specific dewatered area within the north basin is not subject to direct assessment as it is targeted as a location for fish habitat offsetting / compensation as described in the draft Fisheries Offsetting and Compensation Plan (Appendix F).</p> <p>Mercury evolution from bottom sediments coincident with planned dewatering activities in the north</p>	Will the north basin be monitored for mercury to ensure the expected outcomes and modelling are correct?	Yes, surface water quality monitoring, including for mercury concentrations, is ongoing in the north basin of Springpole Lake and will continue as per anticipated provincial approval requirements.	EIS Sections 6.7.1.2, 6.7.6.1.

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				basin is not expected as existing surface water and sediment concentrations of mercury are very low (<0.000026 mg/L and <0.0002 ug/g, respectively).			
NWO MC-079	6.7.4.1 Change to Surface Water Quantity, Page 6-153 (PDF Page 11)	<i>“Controlled dewatering is expected to take approximately six months to complete, based on continuous (24-hour, 7-day per week) pumping. There are no predicted residual effects as a result of cofferdam construction and dewatering of the isolated basin.”</i>	Please specify whether fish rescue activities will be undertaken for the cofferdam. If so, the Northwestern Ontario Métis Community requires more information on these activities including methods, timing, and participation opportunities for citizens.	For additional information please refer to the Fish and Fish Habitat VC chapter and the offsetting/compensation plan. Further details on the fish rescue activities will be developed during the permitting phase of the Project.	Within Appendix F, there is ambiguity in relation to whether fish rescue activities will be undertaken for the cofferdam. Specifically, Appendix F notes “Although a commitment to completing a fish removal program is made, the objectives and end use of the fish will be determined through further engagement with Indigenous communities and federal and provincial regulators. The proposed offset and compensation measures proposed in Section 8.0 and summarized in Section 9.0 of this plan are considered sufficient to account for the existing fish within the dewatered basin such that transferring the fish during construction should not be considered the only option.” This language is repeated within Section 6.10 for Fish and Fish habitat. While it is understood that further details on fish rescue/removal activities will be developed during the permitting phase, the NWOMC requires involvement as per the original Information Request/Comment,	Further details on the fish removal/rescue activities will be developed during the permitting phase of the Project. FMG is planning to submit the final EIS/EA in the first half of 2024 and is planning to start to develop permit applications after this submission. FMG will continue to keep NWOMC informed of the permitting timelines and any changes as the project progresses.	EIS Section 6.10, and Appendix F, Section 5.2.3

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					including information on methods, timing, and participation opportunities for citizens, when available. ACTION(S): – Please provide a timeline, outcomes, and next steps for continued work between FMG and the NWOMC in relation to fish removal/rescue.		
NWO MC-080	6.7.4.2 Changes to Surface Water Quality, Page 6-156 (PDF Page 14)	<p><i>“At final closure, it is assumed that the filled open pit basin will be hydraulically reconnected to Springpole Lake once water quality requirements are achieved (Appendix N-2). Results from pit modelling indicate no exceedances of PWQO in the filling open pit basin by the last two years of pit filling (Appendix N-3). In final closure, no parameters are predicted to be greater than applicable water quality guidelines in the north basin of Springpole Lake (nodes SW-02 and 5).”</i></p> <p>Water quality is of concern to the Northwestern Ontario Métis Community; particularly that contamination may spread beyond the immediate study areas of the project or that water will be contaminated and have ecosystem level impacts for multiple generations.</p>	Please identify what monitoring will be implemented to confirm that no exceedances of PWQO occur past the last two years of pit filling; and confirm that the parameters do not exceed applicable guidelines in the north basin.	The closure monitoring program for the Project will be developed as part of the regulatory Closure Plan (Section 4.18). Water quality will be regularly monitored throughout the closure phase as water in the open pit basin rises to verify water quality predictions and to ensure that regulatory guidelines are met. Monitoring during re-filling of the open pit basin will provide considerable time to identify and implement additional mitigation measures if needed (Section 4.4.5, Section 4.18.3). Further, the open pit basin will be maintained at a target level below the natural Springpole Lake elevation if needed. Once the water quality in the refilled basin meets, and is predicted to continue to meet, all requirements, the refilled basin will be hydraulically reconnected to Springpole Lake.	As specific details of the monitoring will be developed as part of the regulatory Closure Plan, the NWOMC requires input and review of the Closure Plan in development prior to submission for approval. ACTION(S): – Please provide a timeline, outcomes, and next steps for continued work between FMG and the NWOMC in relation to the closure monitoring program.	FMG is planning to submit the final EIS/EA in the first half of 2024. FMG is planning to develop the closure plan and associated monitoring after the final EIS/EA is submitted and will continue to keep NWOMC informed of the timelines and any changes, as the project progresses.	EIS Sections 6.7.1.2, 5.19.3.1, 12.6.
NWO MC-081	6.7.5 Significance of Residual Effects, Page 6-157 (PDF Page 15)	Geographic Extent See Comment #45	See Comment #45	See response to #45	Please see Follow-up Comment #59 (formally Comment #45)	Please see Follow-up Response #45.	EIS Section 6.1

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NWO MC-082	6.8 Springpole Lake, Southeast Arm, Page 6-172 (PDF Page 2)	<i>"Surface water systems were selected as a VC because surface water is critical to the life function of human and non-human biota; supports commercial and recreational uses, and provides cultural value to humans through various uses including as habitat for aquatic resources and as a medium for travel and recreation. The surface water system VCs encompass aspects related to surface water, including hydrology (surface water volumes and flows) as well as surface water quality."</i>	Please update this section to include the following language: "Surface water systems were selected as a VC because surface water is critical to the life function of human and non-human biota; supports Indigenous, commercial and recreational uses, and provides cultural value to humans through various uses including as habitat for aquatic resources and as a medium for travel and recreation. The surface water system VCs encompass aspects related to surface water, including hydrology (surface water volumes and flows) as well as surface water quality." [emphasis added to proposed text]	The language in this section is intended to be inclusive of Indigenous users and is also represented by the reference to cultural values.	The original Information Request/Comment is still the preferred action as Indigenous groups should not be categorized or represented by commercial or recreational users and reference to cultural values is not specific enough to refer to Indigenous groups. ACTION(S): – Please amend the wording in Section 6.8 as per provided suggestions.	This will be updated in the final EIS/EA, as requested.	EIS Section 6.6, 6.7, 6.8, and 6.9
NWO MC-083	6.8 Springpole Lake, Southeast Arm, Page 6-172 (PDF Page 2)	<i>"Traditional Land and Resource Use (Section 6.21): the construction and operation of the Project has the potential to change water quality and quantity which may affect the use of lands and resources by Indigenous people."</i>	Please update the language within this section to include: "Traditional Land and Resource Use (Section 6.21): the construction and operation of the Project has the potential to change water quality and quantity which may affect the exercise of harvesting rights (hunting, trapping, fishing, and gathering) by Indigenous people." [emphasis added to proposed text]	Additional language will be added to Section 6.21 to reference the exercise of established and asserted harvesting rights.	Acknowledged. Please confirm Section 6.8 will be similarly updated.	Section 6.8 provides an assessment of the Project on the southeast arm of Springpole Lake. However, a new section for the assessment of the potential impacts on Aboriginal and Treaty rights due to the Project will be provided in final EIS/EA. The assessment will be informed by ongoing engagement with NWOMC.	EIS Section 6.21
NWO MC-084	6.8.4.2 Change in Surface Water Quality, Page 6-181 (PDF Page 11)	<i>"Water quality model results for the assessment nodes along the southeast arm of Springpole Lake are presented in Table 6.8-8 through Table 6.8-12. Model results indicate there are no exceedances of surface water quality guidelines for the protection of aquatic life in the southeast arm of Springpole Lake in any Project phase as a result of the Project (Table 6.8-9 through Table 6.8-12). Characterization of the initial mixing zone within the southeast arm of Springpole Lake will be expanded upon and detailed further as part of the provincial approvals process."</i>	The Northwestern Ontario Métis Community requires ongoing engagement throughout the referenced provincial approvals process to ensure there is awareness of the characterization of the initial mixing zone within the southeast arm of Springpole Lake.	FMG remains interested in continuing to work with the Northwestern Ontario Métis throughout all phases of the Project, including permitting and approvals.	ACTION(S): – Please provide a timeline, outcomes, and next steps for continued work between FMG and the NWOMC.	FMG is planning to submit the final EIS/EA in the first half of 2024 and is planning to start to develop permit applications after this submission. FMG will continue to keep NWOMC informed of the permitting timelines and any changes as the project progresses. Permitting documents related to previously raised NWOMC concerns will be provided to the NWOMC for review prior to submission to the regulator(s).	EIS Section 6.8.6
NWO MC-085	6.8.4.2 Change in Surface Water Quality, Page 6-181 (PDF Page 11)	<i>"However, concentrations for arsenic, cadmium, cobalt and copper are above baseline concentrations at the discharge point at the assumed point of full mixing."</i> Water quality is of concern to the Northwestern Ontario Métis Community; particularly that contamination may spread beyond the immediate study areas of the project or that water will be contaminated and have ecosystem level impacts for multiple generations.	Please identify what monitoring will be implemented to monitor concentrations which may be above baseline concentration at the assumed point of full mixing.	Water quality will be monitored throughout the construction, operations and closure phases to verify water quality predictions and ensure that regulatory guidelines are met. The monitoring program associated with discharge to the southeast arm of Springpole Lake and the mixing zone will be	As specific details of the monitoring will be developed as part of the provincial permitting process, the NWOMC requires input and review of any required provincial permits in the development stage prior to submission for approval.	FMG is planning to submit the final EIS/EA in the first half of 2024 and is planning to start to develop permit applications after this submission. FMG will continue to keep NWOMC informed of the permitting timelines and any changes as the project progresses.	EIS Section 6.8.1.

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				developed as part of the provincial permitting process. This includes monitoring requirements established by the Environmental Compliance Approval for Industrial Sewage Works (ECA ISW), required for discharge to the southeast arm of Springpole Lake.	ACTION(S): – Please provide a timeline, outcomes, and next steps for continued work between FMG and the NWOMC in relation to the monitoring program associated with discharge to the southeast arm of Springpole Lake.		
NWO MC-086	6.8.5 Significance of Residual Effects, Page 6-184 (PDF Page 14)	Geographic Extent See Comment #45	See Comment #45	See response to #45	Please see Follow-up Comment #59 (formally Comment #45)	Please see Follow-up Response #45	EIS Section 6.1
NWO MC-087	6.9 Local Inland Waterbodies, Page 6-200 (PDF Page 2)	<i>“Surface water systems were selected as a VC because surface water is critical to the life function of human and non-human biota; supports commercial, and recreational uses; and provides cultural value to humans through various uses, including as habitat for aquatic resources and as a medium for travel and recreation. The surface water system VCs encompass aspects related to surface water, including hydrology (surface water volumes) as well as surface water quality.”</i>	Please update the language within this section to include: “Surface water systems were selected as a VC because surface water is critical to the life function of human and non-human biota; supports Indigenous, commercial, and recreational uses; and provides cultural value to humans through various uses, including as habitat for aquatic resources and as a medium for travel and recreation. The surface water system VCs encompass aspects related to surface water, including hydrology (surface water volumes) as well as surface water quality.” [emphasis added to proposed text]	The language in this section is intended to be inclusive of Indigenous users and is also represented by the reference to cultural values.	The original Information Request/Comment is still the preferred action as Indigenous groups should not be categorized or represented by commercial or recreational users and reference to cultural values is not specific enough to refer to Indigenous groups. ACTION(S): – Please amend the wording in Section 6.9 as per provided suggestions.	This will be updated in the final EIS/EA, as requested.	EIS Section 6.6.
NWO MC-088	6.9 Local Inland Waterbodies, Page 6-201 (PDF Page 3)	<i>“Traditional Land and Resource Use (Section 6.21): the construction and operation of the Project has the potential to change water quality and quantity which may affect the use of lands and resources by Indigenous people.”</i>	Please update the language within this section to include: “Traditional Land and Resource Use (Section 6.21): the construction and operation of the Project has the potential to change water quality and quantity which may affect the exercise of harvesting rights (hunting, trapping, fishing, and gathering) by Indigenous people.” [emphasis added to proposed text]	Additional language will be added to Section 6.21 to reference the exercise of established and asserted harvesting rights.	Acknowledged. Please confirm Section 6.9 will be similarly updated.	Section 6.9 provides an assessment of the Project on local inland waterbodies. However, a new section for the assessment of the potential impacts on Aboriginal and Treaty rights due to the Project will be provided in final EIS/EA. The assessment will be informed by ongoing engagement with NWOMC.	EIS Section 6.21
NWO MC-089	6.9.3 Mitigation Measures, Page 6-205 (PDF Page 7)	<i>“During operations, inspect culverts periodically, and remove accumulated material and debris upstream and downstream of the culverts to prevent erosion, flooding, and mobilization of sediment;”</i>	Please provide details on the frequency of proposed culvert inspections.	Based on past experience, inspections would occur on a regular annual basis and after major storm events.	-	-	EIS Sections 6.9.1.2, 6.9.4.

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NWO MC-090	6.10.1 Existing Conditions, All	<p>There is no mention within this section of species of importance to the Northwestern Ontario Métis Community as reported within the Know History TKLUS (2021).</p> <p>Species targeted within the TKLUS study area include walleye, northern pike, trout, perch, sauger, and whitefish; one participant also identified bait fishing.</p>	Please update this section to reference species targeted by Indigenous nations in the exercise of their harvesting rights.	We thank the MNO for this information provided in the TKLUS. Although all of the species targeted within the TKLUS study area were included in the draft EIS/EA as present (with the exception of Sauger), the final EIS/EA will include specific reference to the targeting and reliance on these species in the study area (including Sauger) by the MNO.	-	-	EIS Sections 6.10.1.2, 6.10.2, 6.10.2.5.
NWO MC-091	Section 6.10 Fish and Fish Habitat, Page 6-212 (PDF Page 2)	<p>Noise and Vibration (Section 6.3): <i>"the construction and operation of the Project will require the use of explosives adjacent to fish habitat, which may result in adverse effects on fish due to instantaneous pressure changes and/or peak particle velocity."</i></p> <p>Surface Water Systems (Section 6.6 to 6.9): <i>"the construction, operation and closure of the Project has the potential to adversely change water quality in fish-frequented waterbodies."</i></p> <p>Commercial Land and Resource Use (Section 6.17): <i>"the construction and operation of the Project has the potential to change the abundance and quality of fisheries resources used by local users."</i></p> <p>Outdoor Recreation (Section 6.18): <i>"the construction and operation of the Project has the potential to change the abundance and quality of fisheries resources used for outdoor recreational activities and tourism."</i></p> <p>Traditional Land and Resource Use (Section 6.21): <i>"the construction of the Project has the potential to change in traditionally harvested fish species used by Indigenous people."</i></p> <p>Human and Ecological Health (Section 6.24): <i>"the construction and operation of the Project may increase potential contaminants that could be ingested by fish and subsequently affect human health through consumption."</i></p> <p>First Mining Gold has identified that indirect effects between fish and fish habitat with other VCs could occur. The effects listed may cause an effect on water quality, lowering the quantities and quality of fish</p>	First Mining Gold must continue meaningful engagement with the Northwestern Ontario Métis Community and discuss strategies for addressing project impacts to the Northwestern Ontario Métis Community values and interests arising from changes to Fish and Fish Habitat.	FMG remains interested in continuing to work with the Northwestern Ontario Métis throughout all phases of the Project.	ACTION(S): – Please provide a timeline, outcomes, and next steps for continued work between FMG and the NWOMC.	As discussed on May 29, 2023, FMG is interested in progressing work on the FHOCp throughout this year and would like to have a workshop with NWOMC as soon as possible (currently expected in July) to discuss potential ideas about fish offsetting.	EIS Section 6.10.

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		available. The Northwestern Ontario Métis Community also notes ecosystem level effects may occur on the food chain. The magnitude of impact on Fish and Fish Habitat does not only result in the "potential to change in traditionally harvested fish species used by Indigenous people", but it results in an impact on the ability of the Northwestern Ontario Métis Community to harvest fish and practice our values and interests.					
NWO MC-092	6.10.2 Potential Environmental Effects, Page 6-216 (PDF Page 6)	<p><i>"Two cofferdams will be constructed in the north basin of Springpole Lake to support the development of the open pit. The construction of the cofferdams and dewatering of the isolated basin area will result in the direct loss of fish habitat within the footprint, and could adversely affect fish due to the introduction of sediment from the construction materials."</i></p> <p>Species of particular interest to the Northwestern Ontario Métis Community including Lake Trout, Northern Pike and Walleye are located in Springpole Lake and could be impacted by dewatering. Should these species be impacted by dewatering, harvesting will be impacted.</p>	Please provide details on how First Mining Gold will identify and address potential impacts to harvesting in relation to dewatering.	<p>Species of traditional importance are considered in the environmental assessment as is traditional and commercial use information.</p> <p>Specific to dewatering, Section 6.21.4.2 Changes in the Availability, Access to and Experience related to Traditional Fishing states:</p> <p><i>"The effects on the health, distribution, and abundance of traditionally harvested fish during all phases of the Project may be affected by changes in surface water quality, the removal of fish from dewatered areas during construction and increase pressure on traditionally harvested fish during all phases. With the implementation of the measures outlined in Sections 6.6, 6.7, 6.8 and 6.9, the effects to water quality will be mitigated. In addition, Indigenous communities and traditional land and resource users will be provided the opportunity to be involved in the relocation of fish removed from those waterbodies that are dewatered during construction to ensure traditional users receive the initial benefit from resource removal. Further, measures to prohibit fishing by employees and contractors within the PDA will improve the condition of the resource during all phases of the Project."</i></p>	The conditional language within the reference outlined in the response does not constitute an assessment of potential impacts to harvesting in relation to dewatering (e.g., The effects on ... harvested fish during all phases of the Project may be affected by... the removal of fish from dewatered areas." Further, application of mitigation measures from Sections 6.6, 6.7, 6.8 and 6.9 does not constitute direct or proportional mitigation to any potential impact. Please continue discussions with the NWOMC to ensure impacts are understood and proportional mitigation is applied.	An assessment of the effects on Indigenous People will be provided in final EIS/EA, that considers the effects on current use of lands and resources for traditional purposes, socioeconomics, archaeology and cultural heritage. The assessment will be informed by the results of the biophysical and human environment effects assessment and through ongoing engagement with NWOMC.	EIS Sections 6.26.2.8, 6.26.3, 6.26.4, 6.21.3, 6.21.4.

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NWO MC-093	6.10.3 Mitigation and Offsetting Measures, Page 6-220 (PDF Page 10)	<i>"Remove fish from the work area, prior to undertaking in-water works for the construction of Project infrastructure;"</i>	The Northwestern Ontario Métis Community requires more information on this fish removal; namely, will it include a fish rescue component? What methods are proposed? What is the anticipated timing? And will there be opportunity for citizen involvement?	FMG remains interested in continuing to work with the Northwestern Ontario Métis throughout all phases of the Project. Further details on the fish rescue activities will be developed during the permitting phase of the Project.	While it is understood that further details on fish rescue/removal activities will be developed during the permitting phase, the NWOMC requires involvement as per the original Information Request/Comment, including information on methods, timing, and participation opportunities for citizens, when available. ACTION(S): – Please provide a timeline, outcomes, and next steps for continued work between FMG and the NWOMC in relation to fish removal/rescue.	Further details on the fish rescue/removal activities will be developed during the permitting phase of the Project. FMG is planning to submit the final EIS/EA in the first half of 2024 and is planning to start to develop permit applications after this submission. FMG will continue to keep NWOMC informed of the permitting timelines and any changes as the project progresses. Permitting documents related to previously raised NWOMC concerns will be provided to the NWOMC for review prior to submission to the regulator(s).	EIS Section 6.10.4, Appendix F.
NWO MC-094	6.10.4.1 Changes in Fish Habitat, Page 6-222 (PDF Page 12)	<i>"The loss of this fish habitat may affect fish spawning, juvenile rearing, adult forage and overwintering for local species. However, fish productivity in these systems will be partially mitigated by relocating fish that occur in the affected waterbodies to downstream habitats prior to constructing the CDF."</i>	The Northwestern Ontario Métis Community requires involvement in any fish relocation undertaken by FMG. This will ensure that downstream habitats selected are within areas that harvesters frequent and will increase citizen awareness of ecosystem level changes that may impact their harvesting rights.	FMG remains interested in continuing to work with the Northwestern Ontario Métis throughout all phases of the Project. Further details on the fish rescue activities will be developed during the permitting phase of the Project.	While it is understood that further details on fish relocation activities will be developed during the permitting phase, the NWOMC requires involvement as per the original Information Request/Comment, including ensuring downstream habitats selected are within areas harvesters frequent, and increasing citizen awareness of ecosystem level changes that may impact their harvesting rights. ACTION(S): – Please provide a timeline, outcomes, and next steps for continued work between FMG and the NWOMC in relation to fish relocation.	Please see Follow-up Response #93	Appendix F, Section 5.2.3

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NWO MC-095	6.10.4.1 Changes in Fish Habitat, Page 6-222 (PDF Page 12)	<i>"The WSP will also overprint entirely unnamed waterbody L-2 (11.5 ha). However, during the closure phase, the unnamed waterbody L-2 will be reinstated and therefore the residual effects to fish habitat will be reversed."</i>	The Northwestern Ontario Métis Community requires further engagement to understand how the habitats overprinted will be re-established following reinstatement, including which species will be reinstated to these locations (L-2).	The Project team looks forward to further discussion with the MNO on the reinstatement of fish and fish habitat described in the draft EIS/EA documentation. Additional information on the proposed restored lake L-2 is provided in Section 8.1.4 of Appendix F.	Specific details on species to be reinstated in Restored Lake L-2 are not specified within Section 8.1.4 of Appendix F beyond colonization from Springpole Lake. Therefore, there is continued requirement for ongoing engagement required in relation to reinstatement of fish and fish habitat. ACTION(S): – Please provide a timeline, outcomes, and next steps for continued work between FMG and the NWOMC.	Please refer to the follow-up response to comment #91.	EIS Section 6.10.4, Appendix F.
NWO MC-096	6.10.4.1 Changes in Fish Habitat, Page 6-223 (PDF Page 13)	<i>"Where there is interest from local Indigenous communities, establishment of a micro hatchery to strategically stock selected species of fish to mitigate the temporary loss of fish production from the dewatered basin. This effort would be continued until the dewatered basin is restored as an active part of the Springpole Lake and may be continued by Indigenous communities if there is interest."</i>	The Northwestern Ontario Métis Community requires more engagement with regards to the micro hatchery for strategic stocking of fish. Including where it is proposed to be located, species that will be stocked, what the responsibilities of involved Nations would be, and whether ongoing capacity funding will be provided to support ongoing participation; particularly as hatcheries can pose impacts in and of themselves, additive to Project impacts.	The micro hatchery is included in the draft EIS/EA document as a potential measure to mitigate the loss of fish production in the dewatered north basin of Springpole Lake. Additional information about the proposed measure is provided in Section 8.1.8 of Appendix F. The measure is proposed with the recognition that further engagement with Indigenous communities including the MNO would be required to confirm interest and support for the program and to refine details such as species and the locations of micro hatcheries.	The information contained within Section 8.1.8 of Appendix F identifies that components of the strategic stocking program (i.e., micro hatcheries) are yet to be defined or approved. Therefore, the NWOMC's original Information Request/Comment for additional engagement with regards to where the micro hatchery is proposed to be located, species that will be stocked, what the responsibilities of involved Nations would be, and whether ongoing capacity funding will be provided to support ongoing participation are still outstanding.	Please refer to the follow-up response to comment #91.	EIS Section 6.10.1.2, Appendix F.

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					<p>Additionally, there is no discussion of potential impacts the micro hatchery could pose on its own, additive to the Project impacts. This must be considered.</p> <p>ACTION(S):</p> <ul style="list-style-type: none">– Please provide a timeline, outcomes, and next steps for continued work between FMG and the NWOMC in relation to the proposed micro hatchery.		
NWO MC-097	6.10.4.1 Changes in Fish Habitat, Page 6-224 (PDF Page 14)	<p><i>“It is anticipated that 492 ha of fish habitat will be created through these offsetting measures (Table 6.10-4), and as a result, there will be no residual effects to fish habitat.”</i></p> <p>The 492 hectares of fish habitat referenced will not be available until closure. This means there will be an interruption in the ability of Métis harvesters to exercise their rights in overprinted or affected waterbodies.</p>	<p>Please update the assessment to include the interruption of the exercise of Métis rights for the Project duration.</p>	<p>FMG respects Aboriginal and Treaty rights and recognizes that these rights, which include the right to practice traditional activities such as hunting, trapping, fishing and plant gathering, are protected under Section 35 of the Constitution Act (1982) and Indigenous communities exercise those rights throughout the region.</p> <p>FMG considered species or habitats that are supportive of the exercise of Aboriginal rights in Section 6.21 Traditional Land and Resource Use of the draft EIS/EA. Indicators used in the assessment of this Valued Component included traditionally harvested wildlife species, aquatic species and plants used for food and medicine as determined from the Traditional Knowledge and Traditional Land Use Studies provided.</p> <p>FMG remains interested in continuing to work with the Northwestern Ontario Métis Community to understand, assess and mitigate potential effects on</p>	<p>While referenced in FMG’s response, Section 6.21 does not include an assessment of the interruption of the exercise of Métis rights for the Project duration.</p> <p>While it is acknowledged in this volume that the construction of cofferdams and the dewatering of a portion of the north basin could result in the direct loss of fish habitat and affect aquatic harvesting areas, there is no discussion or analysis of what this direct loss means in terms of interruption of use.</p> <p>Further, as measures outlined in the Fish Habitat and Offsetting and Compensation Plan are viewed by FMG to fully mitigate effects to traditional harvesting of aquatic resources, this highlights the need for further discussion both in</p>	<p>The draft EIS/EA included proposed mitigation measures for identified potential effects. As discussed on May 29, 2023 FMG is preparing to submit the final EIS/EA in the first half of 2024 and therefore, FMG invites all information that may be relevant to environmental assessment, including any feedback on the proposed mitigation measures, to be shared prior to the end of 2023.</p> <p>Further to this, FMG is interested in progressing work on the FHOCP throughout this year and would like to have a workshop with NWOMC as soon as possible to discuss potential ideas about fish offsetting.</p> <p>NWOMC will be provided with another engagement opportunity related to theses topics in reviewing the final EIS/EA after its submission.</p>	<p>EIS Sections 6.26.2.8, 6.26.3, 6.26.4, 6.21.3, 6.21.4.</p>

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				species or habitat that are supportive of the exercising of Métis rights.	relation to pathways of impact, the loss of harvesting locales, the importance of place based harvesting, and collaborative development of mitigation. ACTION(S): – Please provide a timeline, outcomes, and next steps for continued work between FMG and the NWOMC in relation to effects and mitigation discussions.		
NWO MC-098	6.10.4.2 Changes to Fish Communities, Page 6-224 (PDF Page 14)	<i>"Prior to dewatering this area, a comprehensive fish removal program (fish out) is proposed to minimize the unintentional death of fish associated with cofferdam construction and dewatering of the isolated basin."</i> This section references a comprehensive fish removal program, (fish out) but the details of this comprehensive program are not listed within this section of the EA/EIS.	Please update the EA/EIS to include the specific details of the comprehensive fish removal program referred to herein.	Further details on the fish rescue activities will be included in the final EIS/EA where available and are expected to be further developed during the permitting phase of the Project.	The NWOMC looks forward to review of the final EIS/EA for the further details on the fish rescue activities. Where these activities are not included in the final EIS/EA, the NWOMC requires involvement during their development during the permitting phase of the Project. ACTION(S): – Please provide a timeline, outcomes, and next steps for continued work between FMG and the NWOMC.	Please see Follow-up Response #93	EIS Section 6.10.4, Appendix F Section 5.2.3.
NWO MC-099	6.10.4.2 Changes to Fish Communities, Page 6-225 (PDF Page 15)	<i>"With the implementation of the blasting plan that meets DFO criteria, no residual effects to fish communities due to blasting are anticipated."</i>	As this section relies on the implementation of a blasting plan to ensure there are no overpressure impacts in fish, the Northwestern Ontario Métis Community requires ongoing engagement in relation to the blasting plan to ensure the Northwestern Ontario Métis Community is adequately informed.	FMG remains interested in continuing to work with the Northwestern Ontario Métis throughout all phases of the Project. Additional information on the blasting plan will be included in environmental management plans that will be developed during the permitting phase of the Project.	ACTION(S): – Please provide a timeline, outcomes, and next steps for continued work between FMG and the NWOMC.	Please see Follow-up Response #65.	EIS Section 12.1

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NWO MC-100	6.10.4.2 Changes to Fish Communities, Page 6-225 (PDF Page 15)	<i>"To mitigate the potential effects to fish communities due to entrainment or impingement from the operation of water intakes during all phases, a screen or other deterrents at the pump intakes will be implemented per DFO (2020) Code of Practice or equivalent review / assessment. As a result, no residual effects on fish are anticipated due to entrainment or impingement."</i>	Additional detail is required on other deterrents that will be used to ensure there is no fish impingement. Further, additional detail on intake velocities must be included within the EA/EIS.	<p>The referenced text is associated with the proposed Birch Lake water intake. Detailed design of the water intake has not been undertaken, however for the purpose of assessing effects and determining potential for residual effects, we have relied on the current DFO (2020) Code of Practice for End-of-pipe fish protection screens for small water intakes in freshwater. The code describes best practices for design installation and maintenance of small water intakes with flow rates up to 0.150 m³/s. Currently the Birch Lake water intake flow rate is approximately 0.036 m³/s, which is at the low end of the flow range for the Code. Typically, and consistent with the Code, the deterrent to entrainment for a small water intake such as the Birch Lake water intake would be the use of a screened structure (box, cylinder or drum).</p> <p>Additional details of the screened structure, velocities or other deterrents will be provided in the final fish habitat offset and compensation plan during permitting of the Project.</p>	<p>Please confirm the details of FMG's response will be included in the final EIS/EA within Section 6.10.</p> <p>Further, as details of the screened structure velocities and other deterrents will be outlined in the final fish habitat offset and compensation plan during permitting of the Project, the NWOMC requires ongoing involvement in development.</p> <p>ACTION(S):</p> <ul style="list-style-type: none"> – Please provide a timeline, outcomes, and next steps for continued work between FMG and the NWOMC in relation to the development of the Fish Habitat and Offset and Compensation Plan. 	Please see Follow-up Response #91.	EIS Section 6.10.6.1.
NWO MC-101	6.11.2.1 Identification of Potential Environmental Effects, Page 6-238 (PDF Page 5)	<p><i>"The interaction related to the temporary construction camp, buildings, and onsite infrastructure as well as commissioning of the process plant, are not anticipated to have a potential effect once the site preparation activities have been completed."</i></p> <p>This is a faulty assumption as the temporary construction camp, buildings, and onsite infrastructure cannot be progressively reclaimed and impacts to vegetation will persist until closure; with the exception of the temporary construction camp.</p>	Please revisit this assumption.	As noted in Section 6.1, Table 6.1-1, site preparation activities in the mine site area of the Project Development Area includes vegetation clearing. Section 6.11 includes an assessment of these potential effects on vegetation. Further, it has been assumed that all vegetation within the PDA will completely removed, and that these effects will continue until final rehabilitation is complete in the post-closure phase.	Please explain how FMG's response relates to the conclusion in Section 6.11.2.1 which states "The interaction related to the temporary construction camp, buildings, and onsite infrastructure as well as commissioning of the process plant, are not anticipated to have a potential effect once the site preparation activities have been completed" as	Vegetation within the footprint of the temporary construction camp, buildings, and onsite infrastructure will be removed during the construction phase when site preparation activities occur and will not be revegetated until the decommissioning phase. As a result, this loss of vegetation will extend until the end of the operations phase. The actual construction of these facilities would not result in further effects to vegetation.	EIS Section 6.11

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ID	Specific Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Where Addressed
					it appears that they are misaligned.		
NWO MC-102	6.11.2.1 Identification of Potential Environmental Effects, Page 6-238 (PDF Page 5)	<p><i>"Final reclamation activities will include revegetating disturbed areas to provide stable slopes and reduce the potential for erosion. These activities would support the re-establishment of vegetation communities in the PDA, however, could lead to changes in vegetation species from the baseline condition."</i></p> <p>It is important for Northwestern Ontario Métis Community citizens to have the land reclaimed back to a equivalent land capability which includes native vegetation species. The introduction of non-native species will affect the establishment of native species and ecosites surrounding the PDA.</p>	Please provide confirmation that only native species will be included in the vegetation plans and that mitigations will be in place to stop the invasion of non-native species.	As noted in Section 6.11.3, revegetation plans developed for progressive and final rehabilitation during operation and closure phase will consider the use of local species, including plant species of interest to Indigenous communities and will avoid non-native species as practical.	<p>The use of conditional language such as "...will consider the use of local species" and "...will avoid non-native species as practical" does not sufficiently confirm to the NWOMC that only native species will be included in the vegetation plans and that mitigations will be in place to stop the invasion of non-native species.</p> <p>Can FMG specifically confirm?</p>	Species used in revegetation plans will be determined based on their effectiveness in achieving the desired outcome and will take into consideration input provided by government agencies and Indigenous communities. The revegetation plans will include measures to mitigate the spread of invasive species and NWOMC will be invited to review reclamation plans.	EIS Sections 6.11.1.2, 6.11.4, 6.11.6.1.
NWO MC-103	6.11.2.4 Analytical Methodology, Page 6-241 (PDF Page 8)	Invasive plants are detrimental to native species and introduction of non-native plants will indirectly impact wildlife habitat which is linked to the ability of Métis citizens to exercise their rights. Invasive species pose a risk to culturally significant plant species by outcompeting these important plants.	Please continue engagement with the Northwestern Ontario Métis Community on preventative measures for invasive species.	FMG remains interested in continuing to work with the Northwestern Ontario Métis throughout all phases of the Project.	<p>ACTION(S):</p> <ul style="list-style-type: none">– Please provide a timeline, outcomes, and next steps for continued work between FMG and the NWOMC in relation to preventative measures for invasive species.	The draft EIS/EA included proposed mitigation measures for identified potential effects. FMG is preparing to submit the final EIS/EA in the first half of 2024. Therefore, FMG invites all information that may be relevant to environmental assessment, including any feedback on the proposed mitigation and preventative measures, to be shared prior to the end of 2023. NWOMC will be provided with another engagement opportunity related to theses topics in reviewing the final EIS/EA after its submission.	EIS Section 6.11.4

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ID	Specific Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Where Addressed
NWO MC-104	6.11.3 Mitigation Measures Pg 6-242 (PDF Page 9)	<p>"Measures to be implemented to avoid, reduce or minimize the effects of the Project on vegetation communities include:</p> <ul style="list-style-type: none"> – Development of a compact mine site to limit the footprint of disturbance. – Minimize the clearing of vegetation within the mine access road corridor as feasible. – Implement mitigation measures for potential effects on groundwater relevant to wetlands (Section 6.5). – During construction and operation, minimize the removal of woody vegetation within the transmission line corridor to maintain natural cover to adjacent areas. The removal of woody vegetation will be limited to hazard trees and clearing to provide safe construction access and infrastructure needs. – During construction and operation phases, undertake progressive rehabilitation of mine development areas, where practical, through the: <ul style="list-style-type: none"> – Implementation of a revegetation plan that uses local vegetation sources, incorporates plant species of interest to Indigenous communities, and avoids the use of non-native or invasive species; and – Preserving organic material in place where reasonable and/or stockpiling material onsite. – During the closure phase of the Project, undertake final rehabilitation activities of the mine development areas to create a stable, productive and naturalized state. The plan includes the rehabilitation of disturbed lands (using commercially available native seed sources) and the establishment of self-sustaining vegetative cover. – Vehicular access will be restricted along the mine access road, and the road will be scarified to alleviate surface compaction to aid in vegetative regeneration during the closure phase. – A dust management plan will be implemented during all phases. – Monitoring programs will be implemented to verify the accuracy of the predicted effects to vegetation" <p>The Northwestern Ontario Métis Community was not engaged in relation to mitigation proposed for vegetation communities.</p> 	<p>Plants are an important part of Metis culture and diet. Therefore, more engagement is required. Northwestern Ontario Métis Community citizens have insight on how plants are used and harvested which could help better target proposed measures.</p>	<p>FMG remains interested in continuing to work with the Northwestern Ontario Métis. MNO's traditional knowledge study was used to inform the draft EIS/EA and we remain open to consider supporting additional study.</p> <p>If there is specific information that can be shared as a result of the draft EIS/EA review please provide to FMG for further consideration.</p>	<p>ACTION(S):</p> <ul style="list-style-type: none"> – Please provide a timeline, outcomes, and next steps for continued work between FMG and the NWOMC. 	<p>Please see Follow-up Response #23</p>	<p>EIS Section 6.11.2</p>

Table C-7.1: First Mining Gold Response to the Northwestern Ontario Métis Community Comments on the Springpole Gold Project Draft Environmental Impact Statement/Environmental Assessment

ID	Specific Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Where Addressed
NWO MC-105	6.11.3 Mitigation Measures, Page 6-242 (PDF Page 9)	<p><i>"Monitoring programs will be implemented to verify the accuracy of the predicted effects to vegetation communities and wetlands, and assess the effectiveness of the implemented mitigation measures, and may be further optimized in response to monitoring data."</i></p> <p>First Mining Gold has not identified opportunities for Indigenous nations to be involved in the monitoring of Vegetation Communities and Wetlands.</p>	the Northwestern Ontario Métis Community requires additional engagement related to future environmental monitoring opportunities, and potential capacity funding to support this.	FMG remains interested in continuing to work with the Northwestern Ontario Métis throughout all phases of the Project, including future environmental approvals and associated monitoring.	ACTION(S): – Please provide a timeline, outcomes, and next steps for continued work between FMG and the NWOMC in relation to future environmental approvals and associated monitoring.	<p>FMG is planning to submit the final EIS/EA in the first half of 2024 and is planning to start to develop permit and approvals applications after this submission, including associated monitoring programs. FMG will continue to keep NWOMC informed of the permitting timelines and any changes as the project progresses.</p> <p>Permitting and approvals documents related to previously raised NWOMC concerns will be provided to the NWOMC for review prior to submission to the regulator(s).</p>	EIS Section 12.8
NWO MC-106	6.11.4.1 Change in the Relative Abundance and Area of Vegetation Communities, Page 6-242 (PDF Page 9)	<p><i>"The PDA has an area of 2,009 ha (mine site area 1,528 ha, mine access road 185 ha and transmission line 296 ha), of which approximately 1,357 ha of vegetation communities (excluding wetlands) will be removed in the PDA (mine site area 1,109 ha, mine access road 101 ha and transmission line 146 ha). Overall, this loss represents 1.2% of these communities in the RSA. There will be an anticipated direct removal of 1,020 ha of the coniferous treed vegetation community, corresponding to approximately 2.1% within the RSA. Most areas are heavily dominated by Black Spruce and Jack Pine, Labrador Tea, and blueberries. These vegetation community types within the LSA may provide late winter Moose habitat, habitat for furbearers and may contribute to woodlands supporting area sensitive woodland breeding birds species (Section 6.12)."</i></p>	Please provide the percentage loss of communities within the LSA rather than the RSA, particularly as the vegetation community types within the LSA are referenced in relation to winter moose habitat, etc., which support Métis harvesting.	Section 6.11, Table 6.11-6 provides the percent change in the Local Study Area (LSA) as a result of the Project.	<p>For clarity, the original Information Request/Comment was requesting the percentage loss within the LSA to be included within this section as vegetation types within the LSA support winter moose habitat and the comparison is important.</p> <p>The total loss within the LSA is 5.4% in comparison to the listed loss of 1.2% in the RSA. Additionally, for coniferous treed 5.9% will be lost in the LSA versus 1.3% in the RSA.</p> <p>Please update Section 6.11.4.1.</p>	As noted in the response to Follow-up Comment #45, the RSA is the appropriate comparison to determine the significance of the residual effect. However, Table 6.11-6 has been included in this section of the draft EIS/EA showing the comparison to the LSA.	EIS Section 6.11.6.1, Table 6.116.
NWO MC-107	6.11.4.1 Change in the Relative Abundance and Area of Vegetation Communities, Page 6-243 (PDF Page 10)	<p><i>"The PDA has an anticipated direct displacement of 38 ha of sparse treed vegetation community, which corresponds to approximately 5.4% within the RSA. These habitats are relatively rare in the RSA, occurring where shallow soil limits tree growth. The anticipated direct displacement from the PDA of 267 ha of the mixed tree vegetation community makes up approximately 8.2% within the RSA."</i></p>	Please provide the approximate percentage of direct displacement of sparse treed vegetation within the LSA; particularly as these habitats are relatively rare in the RSA, which can be extrapolated to mean they are also rare within the LSA.	Section 6.11, Table 6.11-6 provides the percent change for sparse treed in the Local Study Area (LSA) as a result of the Project.	<p>For clarity, the original Information Request/Comment was requesting the approximate percentage of direct displacement of sparse treed vegetation within the LSA be reporting in this comparison section. This is important as these habitats are rare in the RSA/LSA.</p>	As noted in the response to Follow-up Comment #45, the RSA is the appropriate comparison to determine the significance of the residual effect. However, Table 6.11-6 has been included in this section of the draft EIS/EA showing the comparison to the LSA.	EIS Section 6.11 Table 6.116.

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ID	Specific Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Where Addressed
					<p>The total loss within the LSA is 28% in contrast to the listed loss of 5.4% in the RSA.</p> <p>Please update Section 6.11.4.1.</p>		
NWO MC-108	6.11.4.1 Change in the Relative Abundance and Area of Vegetation Communities, Page 6-243 (PDF Page 10)	<p><i>"Site conditions within the PDA will be permanently altered, and the vegetation communities are not likely to return to the existing conditions. However, rehabilitation measures are to be implemented during the operation and closure phases and will be outlined in the approved Closure Plan. During the closure phase, areas within the PDA will be revegetated through active seeding of commercially available native plant species and natural revegetation."</i></p>	the Northwestern Ontario Métis Community requires involvement and input into any identified seed mixtures to ensure the revegetation is conducive to supporting Métis harvest in the future.	FMG remains interested in continuing to work with the Northwestern Ontario Métis throughout all phases of the Project, including progressive rehabilitation and closure planning.	<p>ACTION(S):</p> <ul style="list-style-type: none"> – Please provide a timeline, outcomes, and next steps for continued work between FMG and the NWOMC in relation to seed mixtures to ensure revegetation is conducive to supporting Métis harvest in the future. 	Please see Follow-up Response #80	EIS Section 6.11.4
NWO MC-109	6.11.4.2 Change in the Abundance of Plant Species of Interest, including Species of Interest to Indigenous communities, SAR and Species of Conservation Concern, Page 6-243 (PDF page 10)	<p><i>"During construction, the removal of habitat that supports known plant species of interest to Indigenous communities (specifically Black Ash) and other Species of Conservation Concern from the PDA, is not anticipated to affect the viability of the populations of these species in the LSA and RSA. It should be noted that Black Ash has not been identified to date within the PDA (Figure 6.11-3). During the development of rehabilitation measures to support the closure plan, opportunities will be provided to Indigenous communities to refine the list of plant species in the revegetation plans. As a result, there are no residual effects predicted."</i></p> <p>While it is acknowledged that the viability of species of interest to Indigenous communities is not anticipated to be affected, it must be noted that there is an element of locationality within Métis harvesting.</p> <p>This means that the location of harvest can, in some cases, be as important as the species. Places are taught and passed down generationally, may have cultural or spiritual significance, or may be a place that contributes to the overall well-being of harvesters out on the land by providing aesthetic appeal.</p>	This locational element must be considered for any plant species identified by the Northwestern Ontario Métis Community which may be removed within the PDA, including blueberries, chokecherries, cranberries, fiddleheads, Labrador tea, nuts, raspberries, pin cherries, saskatoon berries, wild rice, chaga and mushrooms and the residual effects revisited.	<p>Surveys were conducted in 2011, 2012 and 2021, and the results are summarized in Appendix P-1 and P-3. Section 5 of Appendix P-3 includes Figures 5-1 to 5-7 illustrating the vegetation communities observed in the study area. A detailed description of these vegetation communities, including typical plant species, is also provided in Section 5.</p> <p>Through ongoing engagement, Indigenous communities may identify sites associated with Indigenous cultural and/or social value important for teaching, which will be assessed as part of the potential effects on traditional land and resource use in the final EIS/EA.</p>	<p>This comment is not responsive to the original Information Request/Comment whereby it referred specifically to locational importance of harvesting spots. Please undertake further engagement and study, where required, with the NWOMC to understand this locational element of harvesting areas.</p> <p>ACTION(S):</p> <ul style="list-style-type: none"> – Please provide a timeline, outcomes, and next steps for continued work between FMG and the NWOMC in relation to improving FMG's understanding of the locational nature of harvest for inclusion in the final EIS/EA. 	Please see Follow-up Response #23.	EIS Section 6.11.1.2.

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ID	Specific Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Where Addressed
NWO MC-110	6.11.4.3 Change in the Relative Abundance and Area of Wetland Extent, Page 6-243 (PDF Page 10)	<p><i>"During construction, existing wetlands in the PDA will be removed, as shown in Figure 6.11-4 to Figure 6.11-6 and Table 6.11-6. The environmental effects on wetlands within the PDA are direct and localized, as wetlands are common throughout the LSA and RSA."</i></p> <p>See Comment #109</p>	See Comment #109	<p>Surveys were conducted in 2011, 2012 and 2021, and the results are summarized in Appendix P-1 and P-3. Section 5 of Appendix P-3 includes Figures 5-1 to 5-7 illustrating the vegetation communities observed in the study area. A detailed description of these vegetation communities, including typical plant species, is also provided in Section 5.</p> <p>Through ongoing engagement, Indigenous communities may identify sites associated with Indigenous cultural and/or social value important for teaching, which will be assessed as part of the potential effects on traditional land and resource use in the final EIS/EA.</p>	Please see Follow-up Comment #116 (formally Comment #109)	Please see Follow-up Response #109	EIS Section 6.11.2
NWO MC-111	6.11.4.3 Change in the Relative Abundance and Area of Wetland Extent, Page 6-243 (PDF Page 10)	<p><i>"There will be an anticipated direct removal of 127 ha of swamp community, corresponding to approximately 0.8% of this community within the RSA. The PDA has an anticipated direct displacement of 18 ha of bog communities which represents 1.5% of these communities within the RSA. The PDA has an anticipated direct displacement of 8 ha of fen communities, which represents 2.6% of these communities within the RSA. The PDA has an anticipated direct displacement of 40 ha of wetland areas, representing 0.7% of these communities within the RSA."</i></p>	Please provide the approximate percentage of direct removal of swamp community within the LSA; and the direct displacement of bog communities, fen communities, and wetland areas within the LSA.	Section 6.11, Table 6.11-6 provides the percent change for swamp, bog, fen and wetland areas in the Local Study Area (LSA) as a result of the Project.	<p>For clarity, the original Information Request/Comment was requesting the approximate percentage of direct removal of swamp communities within the LSA in comparison in this section.</p> <p>The total loss within the LSA is 11.6% (open bog), 11.9% (open fen), 4.6% (treed bog), and 6.8% (treed fen) in contrast to the listed loss in the RSA.</p> <p>Please update Section 6.11.4.3.</p>	As noted in the response to Follow-up Comment #45, the RSA is the appropriate comparison to determine the significance of the residual effect. However, Table 6.11-6 has been included in this section of the draft EIS/EA showing the comparison to the LSA.	EIS Section 6.11 Table 6.116.

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ID	Specific Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Where Addressed
NWO MC-112	6.11.4.3 Change in the Relative Abundance and Area of Wetland Extent, Page 6-243 (PDF Page 10)	<p><i>"During the closure phase, rehabilitation will support the growth of native vegetation communities. However, it is unlikely that wetland communities will be reclaimed, and there will be a net loss of wetlands in the PDA. Once pit dewatering ceases, any operational impacts to groundwater levels contributing to local wetlands will return to pre-development conditions after closure. There may be opportunities to recreate wetland habitat during closure in the potential aggregate locations."</i></p> <p>The loss of wetland communities must be evaluated in relation to Métis rights and what this irreversible loss means for Métis harvesters accessing their territories in the exercise of their rights. This has not been considered within the EA/EIS.</p>		<p>FMG is open to further engagement to gain a better understanding of where, how and when wetlands are used.</p> <p>Based on information provided, we can better identify measures to identify mitigation or avoidance measures.</p> <p>Section 6.11 of the draft EIS/EA considers the impact of groundwater loss to vegetation communities during construction and operation of the Project. Once pit dewatering ceases, groundwater levels will return to pre-development conditions after closure. There may be opportunities to recreate wetland habitat during closure.</p> <p>Section 6.21 of the draft EIS/EA includes an assessment of the effects on Traditional Land and Resource Use and notes that during closure activities, progressive and final rehabilitation of the mine site area will include a revegetation plan that will incorporate plant species of interest to Indigenous communities, where practical. Further, reclamation efforts carried out during closure will be guided by input from Indigenous communities and land use planning documents.</p>	<p>ACTION(S):</p> <ul style="list-style-type: none">– Please provide a timeline, outcomes, and next steps for continued work between FMG and the NWOMC in relation to improved understanding of wetland importance to the NWOMC for integration into the final EIS/EA.– Please provide a timeline, outcomes, and next steps for continued work between FMG and the NWOMC in relation to post closure wetland recreation and the proposed revegetation plan.	Please see Follow-up Responses #23 and #80.	EIS Sections 6.11.1.2, 6.21.6.3, 6.21.7.3, 6.26.1.2.
NWO MC-113	6.11.5 Significance of Residual Effects, Page 6-245 (PDF Page 12)	See Comment #45	See Comment #45	See response to #45	Please see Follow-up Comment #59 (formally Comment #45)	Please see Follow-up Response #45	EIS Section 6.1

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ID	Specific Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Where Addressed
NWO MC-114	6.11.5 Significance of Residual Effects, Page 6-245 (PDF Page 12)	<i>"With the implementation of mitigation measures, the magnitude of the residual effect due to a decrease in relative abundance and area of upland vegetation is considered to be low (Level I) due to the predicted limited change (<3% change) in the RSA and unlikely to threaten the long-term viability of vegetation communities."</i>	Please re-evaluate this statement with the predicted change in the LSA.	The Regional Study Area provides context for the Valued Component being considered, whereas the Local Study Area (LSA) is the geographic extent of the anticipated direct and /or indirect effects on the Valued Component. As a result, a comparison of the magnitude of effects within the LSA would be inappropriate, as it does not take into consideration the regional context of the Valued Component.	As per Section 6.1, the Regional Study Area "...is the maximum geographical extent or zone of influence in which potential effects from the Project are assessed." By looking at this impact via this extent, the impacts to relative abundance and area of upland vegetation is diluted. While it is understandable to describe the vegetation communities in the RSA for context and existing conditions, the assessment of direct Project effects must be considered within the LSA. The original comment, therefore, has not been addressed.	As noted in the response to Follow-up Comment #45, the RSA is the appropriate comparison to determine the significance of the residual effect. However, Table 6.11-6 has been included in this section of the draft EIS/EA showing the comparison to the LSA.	EIS Section 6.11 Table 6.116.
NWO MC-115	6.11.5 Significance of Residual Effects, Page 6-245 (PDF Page 12)	<i>"In addition, the frequency of the residual effect is considered to be low (Level I) as it occurs once during construction."</i>	As the impacts are continuous and persist, the frequency of impact must be revisited.	Section 6.11.2.5 conservatively assumes that all vegetation within the Project Development Area (PDA) will completely removed during construction, and that these effects will continue until final rehabilitation is complete. There is no expectation that vegetation communities will be continually impacted throughout operations, once removed during construction. As a result, the frequency of the effect will be once and is considered to be low (Level I).	The argument that because all vegetation will be removed and prevented from re-establishing that there are not continuous impacts is inappropriate. Continuous, persistent impacts to vegetation are, by definition, the continuous prevention of vegetation re-establishment on the Project site. The NWOMC will raise this concern with the application of residual effects criteria during final EIS/EA review.	As noted in Section 6.11, the frequency of the direct effects related to the change in relative abundance and area of upland vegetation will occur once during construction and is considered to be low (Level I). However, the frequency of the indirect effects related to the change in the quality and function of vegetation communities and wetlands will occur continuously throughout operations and is considered to be high (Level III).	EIS Sections 6.11.1.2, 6.11.7.1.

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ID	Specific Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Where Addressed
NWO MC-116	6.12 Wildlife and Wildlife Habitat, Page 6-261 (PDF Page 2)	<p><i>"Wildlife and wildlife habitat is selected as a VC due to potential interactions of wildlife species with Project activities. The wildlife species included in this VC are considered to have ecological, aesthetic, recreational, economic and/or cultural importance. For the purposes of this methodology, wildlife refers to birds, mammals, reptiles and amphibians, but excludes SAR which have been identified and assessed as separate VCs (Sections 6.13 to Section 6.16)."</i></p> <p>Wildlife are important to the Northwestern Ontario Métis Community for ecological and cultural importance, but also are important as part of citizens' diet.</p>	Please update the language within the section to include wildlife as a component of Métis diet.	This will be updated in the final EIS/EA.	-	-	EIS Section 6.12 (introduction).
NWO MC-117	Section 6.12 Wildlife and Wildlife Habitat, Page 6-261 (PDF Page 2)	<p>"In the absence of mitigation, indirect effects between wildlife and wildlife habitat and other VCs could occur, and are further analyzed in the following sections:</p> <ul style="list-style-type: none"> – Air Quality (Section 6.2): the construction and operation of the Project has the potential to result in dust deposition that may affect wildlife habitat. – Noise and Vibration (Section 6.3): the construction and operation of the Project has the potential to result in sensory disturbances that may affect wildlife. – Vegetation Communities and Wetlands (Section 6.11): the construction of the Project will result in the loss of vegetation and potentially result in the removal and alteration of wildlife habitat for species. – Species at Risk (Section 6.13 to Section 6.16): the construction and operation of the Project has the potential to affect SAR through changes in habitat. – Commercial Land and Resource Use (Section 6.17): the construction of the Project has the potential to change the abundance of wildlife and associated habitat which could result in the loss of wildlife resources used by local users. – Outdoor Recreation (Section 6.18): the construction and operation of the Project has the potential to affect outdoor recreation activities and tourism reliant on wildlife species. – Traditional Land and Resource Use (Section 6.21): the construction of the Project has the potential to change the abundance of wildlife and associated habitat which could result in the loss of traditionally harvested wildlife species used by Indigenous people." <p>While the potential change to the abundance of wildlife and associated habitat may result in impacts to the Northwestern Ontario Métis Community, there are</p>	Further engagement with the Northwestern Ontario Métis Community is necessary to ensure Métis values and interests are fully understood and incorporated in this section of the EIS, as well as Section 6.21.	<p>Section 6.21 of the draft EIS/EA considers the effects of the Project on the experience of traditional wildlife harvesting.</p> <p>FMG remains interested in continuing to work with MNO and input received through ongoing engagement activities will be considered as appropriate in the final EIS/EA.</p>	<p>While Section 6.21 of the draft EIS/EA considers the effects of the Project on the experience of traditional wildlife harvesting, it does not explore potential perceptive effects to harvesting and the potential for increased avoidance behaviors as per the original Issue/Concern or Information Deficiency.</p> <p>ACTION(S):</p> <ul style="list-style-type: none"> – Please provide a timeline, outcomes, and next steps for continued work between FMG and the NWOMC in relation to improved understanding of other interactions to Métis values which must be considered. 	<p>FMG is preparing to submit the final EIS/EA in the first half of 2024. Therefore, FMG invites all information that may be relevant to environmental assessment, including traditional knowledge and land use information, to be shared prior to the end of 2023.</p> <p>An assessment of the potential impacts on Aboriginal and Treaty rights due to the Project will be provided in final EIS/EA. This will be based upon an assessment of the effects on Indigenous People, that considers the effects on current use of lands and resources for traditional purposes, socioeconomics, archaeology and cultural heritage. The assessment will be informed by the results of the biophysical and human environment effects assessment and through ongoing engagement with NWOMC.</p> <p>NWOMC will be provided with another engagement opportunity in reviewing the final EIS/EA after its submission.</p>	EIS Sections 6.21.3, 6.26.3.

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		<p>other interactions to Métis Values and Interests which must be considered outside of strict biophysical assessment.</p> <p>For example, there may be perceptive effects to harvesting which occur due to increased negative perceptions of wildlife species or habitats in proximity to the project; there may be increased avoidance of critical harvesting areas due to project activities, etc. These must be considered to complete a holistic assessment of impacts on the Northwestern Ontario Métis Community, in addition to the biophysically focused assessment of Traditional Land and Resource Use.</p>					
NWO MC-118	Section 6.12.1 Existing Conditions, Page 6-262 (PDF Page 3)	<p><i>“Field studies undertaken in 2012, 2017 and 2019 (Appendix P) focused on spatial coverage and characterization in the areas directly within and immediately adjacent to the Project, specifically around the proposed mine site. The results of the 2021 terrestrial baseline studies (as described in Section 3) are summarized as follows”</i></p> <p>On page 6-264 of the EIS, First Mining Gold quotes “The Traditional Knowledge and Land Use Study for the FMG Springpole Mine Project (Know History 2022) prepared for the Métis Nation of Ontario Region 1 noted that harvesting of wildlife in the RSA occurs. Species that are harvested include bear, deer, Moose, wolf, rabbit, Sharptailed grouse, Spruce grouse, Ruffed grouse, ducks and geese.”</p> <p>However, First Mining Gold did not include deer or geese, and does not delineate between grouse species including Sharptailed, Spruce and Ruffed Grouse.</p>	Please provide rationale as to why specific species listed within the Northwestern Ontario Métis Community TKLUS were not specifically considered in the EA/EIS.	The inclusion of other species will be updated in the final EIS/EA. A summary of the species considered in the draft EIS/EA, based on the species identified by MNO in the TKLUS is provided in the attached Table 1.	Acknowledged. The NWOMC will consider the inclusion of Table 1 in the final EIS/EA, when available.	Acknowledged.	EIS Section 6.12.2.7.
NWO MC-119	Section 6.12.2.1 Identification of Potential Environmental Effects, Page 6-265 (PDF Page 6)	<p><i>“During decommissioning and closure, the removal of assets, demolition of remaining materials, the disposal of demolition-related wastes and the filling of the open pit basin is not expected to have an interaction with wildlife.”</i></p> <p>This section assumes that decommissioning activities will not interact with wildlife and wildlife habitat. However, these activities have the potential to create additional disturbance, such as increased noise and traffic to and from the site, both of which activities have already been determined as potentially disruptive during the construction phase.</p>	Decommissioning activities must be explored as a potential effect to wildlife and wildlife habitat as noise and traffic changes have the potential to disrupt wildlife and wildlife habitat.	Direct effects to wildlife habitat would occur during construction phase during site preparation activities and continue until final rehabilitation is completed. Indirect effects to wildlife habitat would occur during construction and operation phases. As a result, decommissioning and closure activities are unlikely to create any new effects to wildlife with the exception of reclamation activities for impacted areas.	-	-	EIS Sections 6.12.3, 6.12.6, 6.12.7.

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NWO MC-120	6.12.2.1 Identification of Potential Environmental Effects, Page 6-265 (PDF Page 6)	<p>"Operations Phase The operations phase is anticipated over a 12-year period, but the majority of potential effects on wildlife and wildlife habitat will occur during the construction phase. The following activities could result in potential effects on wildlife and wildlife habitat during operations, which will be evaluated and mitigated:</p> <ul style="list-style-type: none"> – Operation of the process plant, open pit, CDF and ore stockpiles will result in the indirect alteration due to sensory disturbance from noise, light and dust.; – Operation of the mine access road will result in the indirect alteration of habitat due to creation of a semi-permeable movement barrier from sensory disturbances such as noise, dust and light and the potential increased risk to mortality due to interactions with Project-related traffic; – Operation of the accommodations complex could result in nuisance wildlife due to domestic waste; – Operation of the water management and treatment facilities could result in changes to hydrology that could affect habitat for wildlife; – Operation of the ore stockpiles, surficial soil stockpile and mine site infrastructure within the mine site area could result in the indirect alteration due to sensory disturbance from noise, dust and light; and – Progressive reclamation activities and the initial filling of the open pit with water are unlikely to interact with wildlife and wildlife habitat as these will be limited during the operation phase." <p>First Mining Gold has not considered potential impacts on wildlife due to noise disturbances caused by aircraft and/ or helicopters.</p> 	<p>Access roads and airstrips, and the transportation activities associated with them, can impact the Northwestern Ontario Métis Community values and interests.</p> <p>Please consider the impacts on the Northwestern Ontario Métis Community values and interests due to impacts on wildlife caused by aircraft.</p> <p>Further, the Northwestern Ontario Métis Community requires further engagement to discuss impacts and identify potential mitigation measures.</p>	<p>Site access to the regional road network is planned via an all-season road. The effects of which have been included in the draft EIS/EA.</p> <p>There may be ongoing helicopter use during construction and operation to support accessing remote areas, on a sporadic basis. Given the infrequent occurrence, under limited conditions, it has not been considered as a potential effect on wildlife.</p> <p>An airstrip to support up to 2 flights per week during construction, operation and closure phases of the Project may be constructed onsite (for use by Dash-8 type aircraft). The effects of the construction and operation of the airstrip on air quality, noise and wildlife will be assessed in the final EIS/EA.</p>	Acknowledged. The NWOMC will consider the inclusion of the effects of construction and operation of the airstrip on air quality, noise, and wildlife in the final EIS/EA, when available.	Acknowledged	EIS Section 6.3.1.2, Appendix H-3 Section 6.1.
NWO MC-121	6.12.4.1 Direct Effects on Wildlife Habitat, Page 6-268 (PDF Page 9)	<p>"Furbearers (including Fisher and Lynx): loss of 1,493 ha for potential habitat for furbearers which includes coniferous, deciduous, mixed treed, and wetland (swamp, fen and bog) land cover types. This makes up 1.09% of the available habitat in the RSA.</p> <p>Beaver: loss of 320 ha for potential habitat for beaver which includes open water and marsh land cover type. This makes up 0.63% of the available habitat in the RSA.</p> <p>Herptiles: loss of 32 ha for potential habitat for herptiles which includes marsh, bog and fen wetland land cover types. This makes up 0.54% of the available habitat in the RSA.</p> <p>Migratory Birds:</p> <p>Songbirds: loss of 1,493 ha for potential songbird habitat cover which includes coniferous, deciduous,</p>	Please update this section to include the percentage of available habitat for the LSA.	Section 6.12, Table 6.12-4 and Table 6.12-5 provides the percent change for various habitat types used by wildlife in the Local Study Area (LSA) as a result of the Project.	<p>For clarity, the original Information Request/Comment was requesting the percentage of available habitat within the LSA in comparison in this section rather than just RSA as the LSA is meant to capture the "...potential direct effects from the Project"</p> <p>Please update Section 6.12.4.1.</p>	As noted in the response to Follow-up Comment #45, the RSA is the appropriate comparison to determine the significance of the residual effect. However, Table 6.12-4 and 6.12-5 have been included in this section of the draft EIS/EA showing the comparison to the LSA.	EIS Section 6.12 Tables 6.128, 6.129.

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		<p><i>mixed treed, and wetland (swamp, fen and bog) land cover types. This makes up 1.09% of the available habitat in the RSA.</i></p> <p>Waterfowl: <i>loss of 32 ha for potential late winter habitat cover which includes marsh, bog and fen wetland land cover types. This makes up 0.54% of the available habitat in the RSA.</i></p> <p>Waterbirds (including Common Loon and Bonaparte’s Gull): <i>loss of 320 ha for potential habitat for waterbirds which includes open water land cover types. This makes up 0.64% of the available habitat in the RSA.</i></p> <p>Raptors (including Osprey and Northern Goshawk): <i>loss of 1,648 ha for potential habitat for raptors which includes open habitat (disturbed), coniferous, deciduous, mixed treed, and swamp wetland land cover types. This makes up 0.95% of the available habitat in the RSA.</i></p> <p>Boreal Owl: <i>loss of 1,493 ha for potential habitat for Boreal Owl which includes coniferous, deciduous, mixed treed, and wetland (swamp, fen and bog) land cover types. This makes up 1.09% of the available habitat in the RSA.</i></p> <p>Sharp-tailed Grouse: <i>loss of 39 ha for potential habitat for Sharp-tailed Grouse which includes sparse treed land cover types. This makes up 1.73% of the available habitat in the RSA.”</i></p> <p><i>And</i></p> <p>“Moose: <i>loss of 1,493 ha for potential late winter habitat cover which includes coniferous, deciduous, mixed treed, and wetland (swamp, fen and bog) land cover types. This makes up 0.29% of the available habitat in the RSA.</i></p> <p><i>There is also a loss of 32 ha of potential foraging habitat for moose that consists of marsh, bog and fen land cover types, which makes up 0.07% of the available habitat in the RSA. Overall, there may be a loss of 1,525 ha of potential moose habitat, which makes up 0.27% of the available habitat in the RSA.</i></p> <p>Wolf: <i>loss of 1,493 ha of potential Wolf habitat which includes coniferous, deciduous, mixed treed, and wetland (swamp, fen and bog) land cover types. This makes up 0.29% of the available habitat in the RSA.</i></p> <p>Black Bear: <i>loss of 1,493 ha of potential Black Bear habitat which includes coniferous, deciduous, mixed treed, and wetland (swamp, fen and bog) land cover types. This makes up 0.29% of the available habitat in the RSA.”</i></p>					

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		Earlier within this section it species that the changes in wildlife habitat will be discussed in terms of the LSA and RSA scale, however, the percentage of available habitat is only described for the RSA.					
NWO MC-122	6.12.4.1 Direct Effects on Wildlife Habitat, Page 6-269 (PDF Page 10)	<p><i>“The loss of wildlife habitat in the PDA during construction will be partially offset with rehabilitation measures during the closure phase. Further, forage availability from linear disturbances may be locally enhanced for Moose, which is predicted to offset residual effects. Therefore, the residual effects on local wildlife will be minimized or avoided on sessile / less vagile species and assemblages that use cover types incurring the greatest amount of removal, or that may rely on uncommon cover types that incur the greatest proportion of loss.”</i></p> <p>There is no consideration of the interruption of species typically harvested by Northwestern Ontario Métis Community citizens. Further, there is no consideration of the fragmentation that wildlife habitat will experience and how this may impact wildlife movement.</p>	Please update the EA/EIS to consider the interruption of harvest and the fragmentation of wildlife habitat.	<p>Section 6.21 of the draft EIS/EA considers the effects of the Project on the availability of habitat to support traditional wildlife harvesting.</p> <p>Wildlife responses to the construction and operation phases may result in a decline in species abundance and resource condition due to habitat fragmentation which would directly affect traditional wildlife harvesting. However, with the implementation of the mitigation measures for wildlife (Section 6.12), the effects on wildlife resource condition will be limited. These measures include: the development of a compact mine site, avoidance of clearing and construction activities during sensitive periods, prohibiting hunting and trapping by non-Indigenous employees and contractors within the Project Development Area while working on site, and enforcing speed limits along Project-controlled roads within high quality wildlife habitat.</p> <p>FMG remains interested in continuing to work with Indigenous communities and input received through ongoing engagement activities will be considered in the assessment of potential effects on traditional wildlife harvesting, and updated as appropriate in the final EIS/EA.</p>	<p>While referenced in FMG’s response, Section 6.21 does not include an assessment of the interruption of the exercise of Métis rights for the Project duration.</p> <p>While it is acknowledged in this volume that the construction phase, operations, and development of potential aggregate resources could result in the direct loss of wildlife habitat and potentially affect wildlife harvesting areas, there is no discussion or analysis of what this direct loss means in terms of interruption of use by Métis harvesters. Indeed, FMG’s response is focused on the biophysical impacts to the underlying species without consideration of the right itself.</p> <p>ACTION(S):</p> <ul style="list-style-type: none">– Please provide a timeline, outcomes, and next steps for continued work between FMG and the NWOMC in relation to effects and mitigation discussions.	The draft EIS/EA included proposed mitigation measures for identified potential effects. FMG is preparing to submit the final EIS/EA in the first half of 2024. Therefore, FMG invites all information that may be relevant to environmental assessment, including any feedback on the proposed mitigation measures, to be shared prior to the end of 2023. A new section for the assessment of the potential impacts on Aboriginal and Treaty rights due to the Project will be provided in final EIS/EA. The assessment will be informed by ongoing engagement with NWOMC. NWOMC will be provided with another engagement opportunity related to theses topics in reviewing the final EIS/EA after its submission.	EIS Sections 6.12.1.2, 6.12.6.2, 6.26.1.2.

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NWO MC-123	6.12.4.2 Indirect Effects on Wildlife Habitat, Page 6-269 (PDF Page 10)	<p><i>"Indirect effects to wildlife habitat will occur during all phases, but the greatest effects will occur during the operations phase. The indirect habitat loss or alteration at the LSA scales will result from activity within the PDA and includes sensory disturbance, avoidance / displacement behaviours, altered movement / barrier effects, altered predation risk, altered habitat suitability, and/or altered community dynamics."</i></p> <p>Similar to wildlife species, Northwestern Ontario Métis Community harvesters also experience avoidance / displacement behaviours, altered movement / barrier effects and altered preferred conditions of harvest. This must be evaluated by the EA/EIS to ensure a fulsome understanding of potential impacts to the Northwestern Ontario Métis Community.</p>	Please update the EA/EIS to consider avoidance / displacement behaviours, altered movement / barrier effects and altered preferred conditions of harvest of Métis harvesters/citizens.	<p>Section 6.21 of the draft EIS/EA considers the effects of the Project on the availability of habitat for traditional wildlife harvesting.</p> <p>The effects to wildlife species include avoidance / displacement behaviours, altered movement / barrier effects, and altered predation risk (as noted in Section 6.12). Wildlife responses to construction and operation may result in a decline in species abundance and resource condition which would directly affect traditional wildlife harvesting. However, with the implementation of the mitigation measures for wildlife (Section 6.12), the effects on wildlife resource condition will be limited. These measures include: the development of a compact mine site, avoidance of clearing and construction activities during sensitive periods, prohibiting hunting and trapping by non-Indigenous employees and contractors within the Project Development Area while working on site, and enforcing speed limits along Project-controlled roads within high quality wildlife habitat.</p> <p>FMG remains interested in continuing to work with Indigenous communities and input received through ongoing engagement activities will be considered in the assessment of potential effects on traditional wildlife harvesting, and updated as appropriate in the final EIS/EA.</p>	<p>While referenced in FMG's response, Section 6.21 does not include an assessment of avoidance / displacement behaviors / barrier effects and altered preferred conditions of harvest for Métis harvesters/citizens. Instead, FMG's response relates these aspects to wildlife.</p> <p>FMG's response is focused on the biophysical impacts to the underlying species without consideration of the right itself.</p> <p>ACTION(S):</p> <ul style="list-style-type: none"> – Please provide a timeline, outcomes, and next steps for continued work between FMG and the NWOMC in relation to understanding Métis rights, potential adverse impacts to those rights and mitigation discussions. 	An assessment of the potential impacts on Aboriginal and Treaty rights due to the Project will be provided in final EIS/EA. This will be based upon an assessment of the effects on Indigenous People, that considers the effects on current use of lands and resources for traditional purposes, socioeconomics, archaeology and cultural heritage, and will be disaggregated by Indigenous group. The assessment will be informed by the results of the biophysical and human environment effects assessment and through ongoing engagement with NWOMC.	EIS Sections 6.21.1.2, 6.26.1.2, Table 6.261.
NWO MC-124	6.12.5 Significance of Residual Effects, Page 6-272 (PDF Page 13)	See Comment #45	See Comment #45	See response to #45	Please see Follow-up Comment #59 (formally Comment #45)	Please see Follow-up Response #45	EIS Section 6.1

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NWO MC-125	6.12.5 Significance of Residual Effects, Page 6-272 (PDF Page 13)	<i>"The geographic extent of the residual effects be confined to the PDA (Level I)."</i> While this reference includes the Northwestern Ontario Métis Community suggested criteria for geographic extent, it is incongruent with the geographic extent as listed within the above table (unnumbered).	Please clarify this discrepancy.	As the Project Development Area (PDA) is within the Local Study Area (LSA), the extent of the effect is considered to be consistent with Level I, which is restricted to within the LSA.		-	EIS Section 6.1
NWO MC-126	6.13 Caribou (Boreal Population), Page 6-290 (PDF Page 2)	<i>"Traditional Land and Resource Use (Section 6.21): the construction of the Project has the potential to change localized abundance of wildlife and associated habitat, which could result in change to traditionally harvested wildlife species used by Indigenous people."</i> The Northwestern Ontario Métis Community oversee the sustainability of the environment and protection of it for future generations. This is particularly true for caribou. While it was a historically harvested species, present day harvesters conserve and protect caribou for future generations. Observations of harvesters have indicated that caribou in that area are moving more north and are increasingly rare. Calving areas must be protected and this must be considered for all phases of the Project.	Please update this section to reflect the stewardship aspects of the Northwestern Ontario Métis Community's relationship with caribou, rather than focus on harvesting of the species.	Acknowledged, this will be considered in the final EIS/EA. FMG remains interested in continuing to work with Indigenous communities and input received through ongoing engagement activities will be acknowledged in the final EIS/EA. The information will be considered in the assessment of potential effects on caribou and traditional land and resource use, and updated as appropriate in the final EIS/EA.	ACTION(S): – Please provide a timeline, outcomes, and next steps for continued work between FMG and the NWOMC in relation to input for integration into the final EIS/EA.	Please see Follow-up Response #23	EIS Sections 6.13.1.2, 6.26.4.
NWO MC-127	Section 6.13 Caribou (Boreal Population), Page 6-290 (PDF Page 2)	<i>"Caribou hold important cultural and spiritual significance for Indigenous people. They naturally occur at low spatial density (typically 0.02 to 0.03 caribou/km²) but have large spatial home range requirements for well-connected old-growth boreal forest and lichen-rich peatlands so that they can spatially separate from predators and alternative prey, and avoid disturbance (ECCC 2020)."</i> Caribou are of cultural and spiritual significance to the Northwestern Ontario Métis Community.	The Northwestern Ontario Métis Community would like involvement in stewardship opportunities for this species, subject to availability and capacity.	FMG remains interested in continuing to work with the Northwestern Ontario Métis throughout all phases of the Project.	ACTION(S): – Please provide a timeline, outcomes, and next steps for continued work between FMG and the NWOMC in relation to involvement in stewardship opportunities for caribou.	One of the components of the mitigation measures for the effects on Caribou is the requirement to obtain an Overall Benefit Permit under section 17(2)(c) of the Endangered Species Act, which will include additional measures to reduce the effects including a combination of compensatory actions. As part of the EA process, FMG is seeking feedback and input from NWOMC on proposed mitigation measures for Caribou in 2023. As discussed on May 29, 2023, FMG is interested in having a workshop with NWOMC as soon as possible (currently expected in July) to discuss caribou. FMG is planning to submit the final EIS/EA in the first half of 2024 and is planning to start to develop permit applications after this submission. FMG will continue to keep NWOMC informed of the permitting timelines and any changes as the project progresses. Permitting documents related to previously raised NWOMC concerns will be provided to the NWOMC for review prior to submission to the regulator(s).	EIS Section 2.6.1.7.

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NWO MC-128	6.13.1 Existing Conditions, Page 6-291 (PDF Page 3)	<p><i>"Available traditional knowledge, traditional land use studies and land use plans were reviewed for information related to Caribou. The Project is outside the planning area however the Cat Lake – Slate Falls Community Based Land Use Plan (NDMNR 2019), a joint plan between Cat Lake First Nation and Slate Falls Nation, recognizes the many shared interests and values, close family ties, shared historical occupancy and traditional use along the Cat River system. The objectives of the Plan include strategic direction to contribute to the sustainability of lands and resources with respect to sustaining biological diversity and abundance, including support for the needs of wildlife species at risk such as Caribou. It was noted that historically, Wabauskang First Nation members hunted Caribou until their local extirpation to the area northeast of Trout Lake. Further, Wabauskang First Nation members noted seasonal movements by Caribou, including an area between Trout Lake and Parker Lake, and a major crossing at Woodland Caribou Provincial Park, west of Red Lake (ArrowBlade 2014)."</i></p> <p>No information from the Know History TKLUS (2021) was included within this section despite information on caribou being contained within the report and potential adverse effects on Caribou being identified as a priority issue and concern within the Northwestern Ontario Métis Community VC report.</p>	Please update this section to include specific details from provided Northwestern Ontario Métis Community documents, including comments contained within this review.	The information and potential effects on Caribou as noted in the TKLUS has been considered in Section 6.13 of the draft EIS/EA; however, this will be more explicitly stated in the final EIS/EA.	Acknowledged. The NWOMC will consider the inclusion of specific details from the Know History TKLUS in relation to caribou in the final EIS/EA, when available.	Acknowledged. If NWOMC has any specific feedback on how TKLUs has been considered in Section 6.13 of the draft EIS/EA to be considered in developing the final EIS/EA, please let us know.	EIS Section 6.13.1.2.
NWO MC-129	Section 6.13.3 Mitigation Measures, Page 6-299 – 6-300 (PDF Page 11-12)	<p><i>"Design and implement the creation of a habitat restoration program for Caribou targeting existing disturbed areas for Caribou in collaboration with Indigenous communities and MECP and monitor for effectiveness in meeting Caribou habitat requirements;"</i></p> <p>Caribou is a particularly important species to the Northwestern Ontario Métis Community both culturally and spiritually. First Mining Gold has identified opportunity for Indigenous communities to participate in a habitat restoration program for Caribou but has not specified details on the committee including the committee's goals, list of participants, participant responsibilities and funding available.</p>	Please clarify Northwestern Ontario Métis Community inclusion in this habitat restoration program for Caribou and provide more details on the program.	FMG remains interested in continuing to work with the Northwestern Ontario Métis throughout all phases of the Project. Additional information will be available as the Project progresses and will continue to be refined during the permitting phase of the Project.	<p>Please specifically identify the NWOMC inclusion in the referenced habitat restoration program for caribou.</p> <p>Further, subject to capacity, the NWOMC requires ongoing involvement throughout the permitting phase of the Project as additional information becomes available and is refined.</p>	Please see Follow-up Response #127.	EIS Section 2.6.1.7.

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NWO MC-130	6.13.4.1 Direct Habitat Changes, Page 6-301 (PDF Page 13)	<p><i>"The Project will result in the direct loss of 0.91 km² of Category 1 and 1.05 km² of Category 2 and 8.17 km² of Category 3 habitat (Table 6.13-3). Temporally, long term effects are limited to the time span it takes for the forest to regenerate after closure to a state suitable for Caribou use. The effects will be fully mitigated once the habitat returns to mature coniferous refuge habitat for Caribou. Effective application of mitigation is predicted to reduce residual Project effects on Caribou habitat loss and long-term effects are not predicted to be detectable at the LSA or RSA scale."</i></p> <p>The reliance on a return to a state suitable for Caribou use following closure is inappropriate as FMG cannot guarantee caribou will return to the project site upon closure after the alteration in movement patterns have occurred for upwards of 15 years. This must be reconsidered.</p>		FMG will be undertaking a comprehensive rehabilitation program during closure to support future use by Boreal Caribou. Successful habitat restoration is anticipated to be a condition of the Endangered Species Act permit for Boreal Caribou, including a detailed monitoring program that will extend through closure to monitor site rehabilitation, function of the restored habitat and the distribution and abundance of Boreal Caribou within and adjacent to the rehabilitated mine footprint areas.	The FMG response does not address the original Issue/Concern or Information Deficiency. While successful habitat restoration is a condition of the Endangered Species Act permit, it does not fully consider the alteration of movement patterns for upwards of 15 years.	<p>As noted in Section 6.13.5, the duration of the residual effect on Caribou due to the indirect loss of habitat through a semi-permeable barrier to movement dynamics created by linear corridor development is considered high (greater than 20 years), as the effects may only be fully mitigated once the habitat is restored.</p> <p>A Caribou telemetry study is currently underway to improve the understanding of Caribou habitat use and movements around the proposed Project. The ongoing telemetry study data will inform the evaluation of the spatial and temporal scale effects on Caribou movement from the Project. It should be noted that while mine development is predicted to indirectly affect habitat around the Project, a large proportion of this area overprints Birch Lake and the associated islands/peninsulas.</p>	EIS Sections 6.13.2.2, 6.13.3, 6.13.5.1, 6.13.5.2, 6.13.5.3, 6.13.5.4.
NWO MC-131	6.13.5 Significance of Residual Effects, Page 6-304 (PDF page 16)	See Comment #45	See Comment #45	See response to #45	Please see Follow-up Comment #59 (formally Comment #45)	Please see Follow-up Response #45	EIS Section 6.1
NWO MC-132	Section 6.14 Wolverine, Page 6-322 (PDF Page 2)	<p><i>"Wolverine are classified as a species of Special Concern (federally) and Threatened (provincially) and were selected as a VC. Wolverine and their habitat are protected under the ESA. Wolverines are indicators of boreal forest ecosystem health and hold cultural importance with Indigenous peoples."</i></p> <p>Wolverines are a complicated species which are not only important because of cultural significance to the Northwestern Ontario Métis Community, they are also a highly successful predator that can lead to additional displacement of prey species.</p>	Please update the EA/EIS to reflect that Wolverine have both benefits and drawbacks as a species within the Project area through further engagement with the Northwestern Ontario Métis Community.	FMG remains interested in continuing to work with Indigenous communities and input received through ongoing engagement activities will be considered in the assessment of potential effects on wolverine, and updated as appropriate in the final EIS/EA.	ACTION(S): – Please provide a timeline, outcomes, and next steps for continued work between FMG and the NWOMC in relation to wolverine.	<p>Please see Follow-up Response #23 and #97</p> <p>Response #23: As discussed on May 29, 2023 FMG is preparing to submit the final EIS/EA in the first half of 2024 and therefore invites all information that may be relevant to environmental assessment, including traditional knowledge and land use information, to be shared prior to the end of 2023. As discussed, FMG is open to regular technical meetings with NWOMC to continue the information sharing. NWOMC will be provided with another engagement opportunity in reviewing the final EIS/EA after its submission.</p>	EIS Sections 6.14.1.2, 6.12.2.
NWO MC-133	6.16.2.1 Identification of Potential Environmental Effects, Page 6-354 (PDF Page 7)	<p><i>"Those interactions with the potential to cause adverse residual effects or that are of particular interest to the government, Indigenous communities, or the public are further described below."</i></p> <p>There is no information that connects the adverse residual effects to, or interest in, birds to Indigenous nations.</p>	Please outline how Project impacts on birds may result in impacts to Northwestern Ontario Métis Community values and interests.	The potential effects on birds are assessed in Section 6.12 of the draft EIS/EA. In addition, the potential effects on SAR birds is assessed in Section 6.16. In both sections, mitigation measures are provided to eliminate and/or reduce potential effects on birds. The effectiveness of these measures on the use by Indigenous people is further assessed in Section 6.21.	<p>Please update Section 6.16.2.1 to connect the adverse residual effects to, or interest in, birds to Indigenous groups such as the NWOMC.</p> <p>ACTION(S): – Please provide a timeline, outcomes, and next steps for continued work between FMG and</p>	<p>Please see Follow-up Response #23 and #97</p> <p>Response #23: As discussed on May 29, 2023 FMG is preparing to submit the final EIS/EA in the first half of 2024 and therefore invites all information that may be relevant to environmental assessment, including traditional knowledge and land use information, to be shared prior to the end of 2023. As discussed, FMG is open to regular technical meetings with NWOMC to continue the information sharing. NWOMC will be provided with</p>	EIS Section 6.16.1.2.

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				FMG remains interested in continuing to work with Indigenous communities and input received through ongoing engagement activities will be considered in the assessment of potential effects on traditional land and resource use, and updated as appropriate in the final EIS/EA.	the NWOMC in relation to birds and the adverse residual effects identified.	another engagement opportunity in reviewing the final EIS/EA after its submission.	
NWO MC-134	6.16.3 Mitigation Measures, Page 6-358 (PDF Page 11)	There is no information on the Northwestern Ontario Métis Community will be involved in post-construction and closure monitoring.	Please provide full details on the environmental monitoring committee.	Refer to response #11	Response #11 within the FMG Response Document is generic and encourages ongoing participation of the Métis and that FMG intends to continue providing the Métis with reasonable support for consultation throughout the process. Please respond directly and provide confirmation that the NWOMC will be involved in post-construction and closure monitoring to the degree preferred by the NWOMC.	NWOMC will be involved in post-construction and closure monitoring to the degree preferred by the NWOMC.	EIS Sections 6.21.1.2, 6.21.4.
NWO MC-135	6.18.4.4 Change in Navigation, Page 6-399 (PDF Page 10)	<i>"The construction and operation of the Project will remove existing portage routes that cross the PDA."</i> Portaging is both a historical and contemporary mode of travel for the Northwestern Ontario Métis Community.	Please engage further with the Northwestern Ontario Métis Community to better refine the existing conditions to specifically identify whether the six portage routes within the LSA and two located within the PDA, are, in fact used by the Northwestern Ontario Métis Community in the exercise of their rights. Additionally, should these routes be identified by the Northwestern Ontario Métis Community, additional engagement is required to ensure proposed mitigation of alternative routes is satisfactory.	FMG remains interested in continuing to work with the Northwestern Ontario Métis. MNO's traditional knowledge study was used to inform the draft EIS/EA and we remain open to consider supporting additional study. If there is specific information that can be shared as a result of the draft EIS/EA review please provide to FMG for further consideration.	ACTION(S): – Please provide a timeline, outcomes, and next steps for continued work between FMG and the NWOMC in relation to further refinements in relation to the six portage routes within the LSA and two within the PDA for consideration in the final EIS/EA.	Please see Follow-up Response #23 and #97 Response #23: As discussed on May 29, 2023 FMG is preparing to submit the final EIS/EA in the first half of 2024 and therefore invites all information that may be relevant to environmental assessment, including traditional knowledge and land use information, to be shared prior to the end of 2023. As discussed, FMG is open to regular technical meetings with NWOMC to continue the information sharing. NWOMC will be provided with another engagement opportunity in reviewing the final EIS/EA after its submission.	EIS Section 6.18.4
NWO MC-136	6.19.4 Assessment of Residual Effects, Page 6-421 (PDF Page 11)	<i>"The Project demand for labour during construction and operation phases will increase local and regional employment levels and labour income. This positive effect will be enhanced by preferentially employing local and regional residents."</i>	Please clarify that, when referring to local and regional employment, this include Indigenous nations such as the Northwestern Ontario Métis Community. Please update the EA/EIS for clarity.	When referring to local and regional employment, this includes Indigenous nations, this will be clarified in the final EIS/EA..	-	-	EIS Sections 6.19.1.2, 6.19.4.

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NWO MC-137	6.20.1.2 Indigenous Communities, Page 6-453 (PDF Page 11)	<p><i>"Educational services and facilities available to Métis people in Ear Falls, Red Lake and Sioux Lookout are covered in the municipal sections above."</i></p> <p>The Northwestern Ontario Métis Community has educational and training supports available which should be captured within this Section. Supports include k-12 education support, post-secondary education, early learning & child care, Métis employment programs, Métis training programs, and education and cultural camps.</p>	Please update the EA/EIS to reflect Northwestern Ontario Métis Community specific information.	This information will be included in the final EIS/EA	-	-	EIS Section 6.20.1.2.
NWO MC-138	6.20.1.2 Indigenous Communities, Page 6-457 (PDF Page 15)	<p><i>"Health services and other programs available to Métis people in Ear Falls, Red Lake and Sioux Lookout are covered in the municipal section."</i></p> <p>The Northwestern Ontario Métis Community has healing and wellness supports available which should be captured within this Section. Supports include mental health and addictions services, gaming & gambling awareness programs, victim services, justice programs, community wellness worker program, community support services program, Métis family wellbeing program, Métis healthy babies healthy children program, Canada pre-natal nutrition program, community action program for children, aging at home program, anti-human trafficking program, diabetes awareness strategy, cancer care, and health research initiatives & projects.</p>	Please update the EA/EIS to reflect Northwestern Ontario Métis Community specific information.	This information will be included in the final EIS/EA	-	-	EIS Section 6.20.1.2.
NWO MC-139	6.20.1.2 Indigenous Communities, Page 6-458 (PDF Page 16)	<p><i>"Social services and other supports available to Métis people in Ear Falls, Red Lake and Sioux Lookout are covered in the municipal section."</i></p> <p>See Comment #138</p>	See Comment #138	This information will be included in the final EIS/EA	-	-	EIS Section 6.20.1.2.
NWO MC-140	6.21 Traditional Land and Resource Use, Page 6-477 (PDF Page 2)	<p><i>"The effects to TLRU may occur because of direct and indirect effects to the biophysical VCs, which are further analyzed in the following:</i></p> <ul style="list-style-type: none"> <i>– Air Quality (Section 6.2): the construction and operation of the Project has the potential to increase emissions which may affect the use of land and resource by Indigenous people.</i> <i>– Noise and Vibration (Section 6.3): the construction and operation of the Project has the potential to create noise and vibration. These changes could directly affect the experience of being on-the-land during TLRU activities, and indirectly affect the success of TLRU activities due to potential disturbance of wildlife.</i> <i>– Surface Water Systems (Section 6.6 to Section 6.9):</i> 	Please update wording within each biophysical VC to be reflective of the exercise of Indigenous rights as per previous comments within this table.	Additional language will be added to Section 6.21 to reference the exercise of established and asserted harvesting rights.	-	-	EIS Section 6.21.1.1.

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		<p><i>the construction and operation of the Project has the potential to change water quality in Springpole Lake and could affect species that rely on surface waters systems, including local downstream uses.</i></p> <ul style="list-style-type: none"><i>– Fish and Fish Habitat (Section 6.10): the construction and operation of the Project has the potential to change the quantity and quality of aquatic resources and indirectly affect aquatic harvesting activities.</i><i>– Vegetation Communities and Wetlands (Section 6.11): the construction and operation of the Project has the potential to change the quantity and quality of existing plant communities, indirectly affect plant harvesting activities.</i><i>– Wildlife and Wildlife Habitat (Section 6.12): the construction and operation of the Project has the potential to change the quantity and quality of terrestrial wildlife resources (including large mammals) and indirectly affect wildlife harvesting activities.</i><i>– Species at Risk (Section 6.13, Section 6.14 and Section 6.16): the construction and operation of the Project has the potential to affect the recovery of species at risk (including Caribou, Wolverine, and birds including Bald Eagle) and the overall opportunity to interact with these species during TLRU activities.</i><i>– Archaeology (Section 6.22): the construction of the Project has the potential to affect the archaeological resources of importance to Indigenous communities.</i><i>– Cultural Heritage (Section 6.23): the construction of the Project has the potential to affect the cultural heritage resources of importance to Indigenous communities.</i><i>– Human and Ecological Health (Section 6.24): the construction and operation of the Project has the potential to affect air quality, surface water, fish, vegetation and wildlife species consumed by Indigenous communities.”</i>					
NWO MC-141	6.21.1 Existing Conditions, Page 6-478 (PDF Page 3)	<p>“TLRU activities are described further below according to the following categories:</p> <ul style="list-style-type: none">– Traditional harvesting of wildlife species, including hunting and trapping;– Traditional harvesting of aquatic resources, including fishing;– Traditional harvesting of plants; and– The habitation, and use of cultural and spiritual sites.” <p>The Northwestern Ontario Métis Community right to hunt, trap, fish, gather and use or habitat cultural or</p>	Please continue engagement with the Northwestern Ontario Métis Community to ensure an understanding of the scope and breadth of Métis rights.	<p>FMG remains interested in continuing to work with the Northwestern Ontario Métis. MNO’s traditional knowledge study was used to inform the draft EIS/EA and we remain open to consider supporting additional study.</p> <p>If there is specific information that can be shared as a result of the</p>	<p>ACTION(S):</p> <ul style="list-style-type: none">– Please provide a timeline, outcomes, and next steps for continued work between FMG and the NWOMC in relation to further refinements of the final EIS/EA to include an understanding of the scope and breadth of Métis rights.	Please see Follow-up Response #23	EIS Section 2.6.1.7.

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		<p>spiritual sites and have many components to those rights other than subsistence or occupation alone. For example, hunting may have an intergenerational learning component, an economic component for trade or otherwise.</p> <p>Therefore, the focus on the species or resources means that critical aspects of the rights are not understood or assessed.</p>		<p>draft EIS/EA review please provide to FMG for further consideration.</p>			
NWO MC-142	6.21.2.1 Identification of Potential Environmental Effects, Page 6-481 (PDF Page 6)	<p><i>“Site preparation activities in the mine site area including clearing, grubbing, and bulk earthworks will result in the direct loss of vegetation and wildlife habitat and potentially affect wildlife and plant harvesting areas, as well as changes in the access to wildlife harvesting areas, plant harvesting areas and habitation, cultural and spiritual sites. There is an increased risk of wildlife mortality due to interactions with Project-related equipment which could affect traditional wildlife harvesting. In addition, the indirect alteration due to sensory disturbance from noise, light and changes in viewscapes could affect the experience of practicing all TLRU activities.”</i></p> <p>Sensory disturbance has the potential to result in increased avoidance behaviors of the Project area by Métis harvesters. This means that the area of impact can be increased depending on the type and level of sensory disturbance.</p>	<p>Further engagement is required to understand aspects of avoidance behaviors which may occur due to distinct types and levels of sensory disturbances which may not align with wildlife behaviors.</p>	<p>FMG remains interested in continuing to work with the Northwestern Ontario Métis. MNO’s traditional knowledge study was used to inform the draft EIS/EA and we remain open to consider supporting additional study.</p> <p>If there is specific information that can be shared as a result of the draft EIS/EA review please provide to FMG for further consideration.</p>	<p>ACTION(S):</p> <ul style="list-style-type: none">– Please provide a timeline, outcomes, and next steps for continued work between FMG and the NWOMC in relation to further refinements of the final EIS/EA to include an understanding of harvester avoidance behaviors which may occur due to distinct types and levels of sensory disturbances.	<p>Please see Follow-up Response #23 and #97</p>	<p>EIS Sections 2.6.1.7, 6.21.1.2.</p>

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ID	Specific Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Where Addressed
NWO MC-143	6.21.2.2 Indicators and Measurable Parameters Page 6-483 (PDF Page 8)	Assessment of potential effects related to harvesting competition and scarcity of resources must be undertaken.	Please provide an assessment of potential effects related to harvesting competition and work with the Northwestern Ontario Métis Community to identify and develop relevant mitigation strategies.	<p>FMG remains interested in continuing to work with the Northwestern Ontario Métis Community to discuss additional potential effects and mitigation measures.</p> <p>As noted in Section 6.21.4.1 of the draft EIS/EA, the Project Development Area (PDA) is 2,009 hectares (ha), which is conservatively assumed to be fully cleared during Project development. Vegetation within the transmission line portion (295.8 ha) of the PDA will not be fully cleared (i.e., grubbing will not occur), but will continue as an altered vegetation community and provide habitat for wildlife species.</p> <p>Based on assessment in Section 6.12, the Project will affect 2,009 ha of wildlife habitat in the PDA. This translates to affecting 6.8% of the wildlife Local Study Area (LSA) and 0.9% of the wildlife Regional Study Area (RSA). The Project will affect 2,009 ha of large mammal habitat or 2.1% of the large mammal LSA and 0.25% of the large mammal RSA. This provides an overestimation of the amount of habitat removed based on the assumption that all habitat within the PDA will be removed.</p> <p>The assessment of the effects assumes that final rehabilitation activities will be completed during the closure phase and does not consider progressive rehabilitation. By minimizing the Project footprint, the disturbance to wildlife harvesting areas will be limited. The effects on wildlife resources due to habitat loss will be partially reversed at closure</p>	<p>The FMG response focuses on the underlying biophysical components without consideration for the original Information Request/Comment whereby the NWOMC requires consideration of harvesting competition between other Indigenous groups and non-Indigenous land users.</p> <p>ACTION(S):</p> <ul style="list-style-type: none">– Please provide a timeline, outcomes, and next steps for continued work between FMG and the NWOMC in relation to assessment of potential effects and development of relevant mitigation strategies.	Please see Follow-up Response #23 and #97	EIS Section 2.6.1.7.

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				<p>after reclamation activities in the mine site area of the PDA to promote the restoration of wildlife habitat.</p> <p>Overall, the proportion of wildlife harvesting areas affected by the Project within the RSA is limited. The effects to wildlife species are discussed in Section 6.12 and include avoidance / displacement behaviours, altered movement / barrier effects, and altered predation risk. Wildlife responses to construction and operation may result in a decline in species abundance and resource condition which would directly affect traditional wildlife harvesting. However, with the implementation of the mitigation measures for wildlife (Section 6.12), the effects on wildlife resource condition will be limited. These measures include: the development of a compact mine site, avoidance of clearing and construction activities during sensitive periods, prohibiting hunting and trapping by non-Indigenous employees and contractors within the PDA while working on site, and enforcing speed limits along Project-controlled roads within high quality wildlife habitat.</p>			
NWO MC-144	6.21.2.2 Indicators and Measurable Parameters Page 6-483 (PDF Page 8)	Harvesting on the land and water is essential to the Métis way of life; the Northwestern Ontario Métis Community express and experience their culture and heritage through harvesting (among other things). Harvesting can include collecting food, medicines, materials for clothing and crafts. Species of traditional importance are included in the EA/EIS but assessment of potential effects to the right itself has not been completed, and, therefore, mitigation strategies were not included.	Please provide an assessment of potential effects on Northwestern Ontario Métis Community rights related to harvesting and work with the Northwestern Ontario Métis Community to develop targeted mitigation strategies.	<p>Section 6.21 of the draft EIS/EA provides an assessment of effects on the availability, access to and experience related to traditional plant harvesting, including mitigation measures.</p> <p>FMG remains interested in continuing to work with the Northwestern Ontario Métis in order to gather further details related to harvesting. MNO's traditional knowledge study was</p>	<p>As described throughout the Follow-up Comments, the assessment of effects within Section 6.21 lacks key considerations of importance to the NWOMC.</p> <p>ACTION(S):</p> <ul style="list-style-type: none">– Please provide a timeline, outcomes, and next steps for continued	Please see Follow-up Response #23 and #97	EIS Sections 2.6.1.7, 6.21.6.3.

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				used to inform the draft EIS/EA and we remain open to consider supporting additional study.	work between FMG and the NWOMC.		
NWO MC-145	6.21.3 Mitigation Measures, Page 6-485 (PDF Page 10)	<i>"During all Project phases, engage Indigenous environmental monitors from local communities in the implementation of mitigation and monitoring measures;"</i>	Please confirm that environmental monitors from the Northwestern Ontario Métis Community will be engaged and deployed.	Please see the response to comment #21.	ACTION(S): – Please provide a timeline, outcomes, and next steps for continued work between FMG and the NWOMC in relation to a community environmental monitor.	FMG and MNO signed a workplan and budget for community benefits agreement negotiation in April 2023 which outlines expectations and timelines for next steps.	EIS Sections 6.21.1.2, 6.21.4.
NWO MC-146	6.21.3 Mitigation Measures, Page 6-485 (PDF Page 10)	<i>"Where there is interest, provide opportunities to local Indigenous communities and traditional resource users the opportunity in the harvest of vegetation and aquatic resources within the PDA prior to construction;"</i>	Please confirm that the Northwestern Ontario Métis Community will be a part of the vegetation and aquatic resources harvest within the PDA, subject to availability and capacity.	The Métis will be invited to participate in vegetation and aquatic resources harvest opportunities subject to availability and capacity.	-	-	EIS Sections 6.21.1.2, 6.21.4.
NWO MC-147	6.21.3 Mitigation Measures, Page 6-485 (PDF Page 10)	<i>"Prior to construction, develop an access management strategy with local Indigenous communities to manage access in the PDA, north of the Birch River crossing, throughout all phases of the Project;"</i>	Please confirm that the Northwestern Ontario Métis Community will be involved in the development of an access management strategy, subject to availability and capacity.	FMG remains interested in continuing to work with the Northwestern Ontario Métis. FMG will share plans and invites all information that may be relevant on access management as those plans are developed.	Please confirm the NWOMC will be invited to develop an access management strategy, subject to NWOMC availability and capacity.	FMG confirms the NWOMC will be invited to develop an access management strategy, subject to NWOMC availability and capacity.	EIS Sections 6.21.1.2, 6.21.4, 6.21.6.1, 6.21.6.3, 6.21.6.4, Table 6.21-18.
NWO MC-148	6.21.3 Mitigation Measures, Page 6-486 (PDF Page 11)	<i>"In addition to the mitigation measures to reduce potential environmental effects on TLRU, FMG is committed to fostering cultural awareness across the company through all phases of the Project and providing opportunities for local Indigenous communities to share TLRU knowledge for incorporation into Project planning."</i>	FMG must also work with the Northwestern Ontario Métis Community to develop targeted mitigation to address any outstanding impacts to Métis rights, as identified by the Northwestern Ontario Métis Community. This must be completed during ongoing Project engagement, in addition to the already proposed mitigation developed by FMG.	FMG remains interested in continuing to work with the Northwestern Ontario Métis to gain a better understanding of potential effects on the exercising of Métis rights.	ACTION(S): – Please provide a timeline, outcomes, and next steps for continued work between FMG and the NWOMC in relation to development of targeted mitigation to address any impacts identified by the NWOMC.	-	EIS Section 6.21.4

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NWO MC-149	6.21.4.1 Changes in the Availability, Access to and Experience related to Traditional Wildlife Harvesting, Page 6-486 (PDF Page 11)	<p><i>"The PDA is 2,009 ha, which is conservatively assumed to be fully cleared as part of Project development. However, it should be noted that vegetation within the transmission line portion (295.8 ha) of the PDA will not be fully cleared at construction (i.e., grubbing will not occur), but will continue as an altered vegetation community and provide habitat for wildlife species. Based on assessment in Section 6.12, the Project will affect 2,009 ha of wildlife habitat in the PDA."</i></p> <p>This finding of affecting 2,009 ha of wildlife habitat in the PDA means that, at minimum, 2,009 ha of land will no longer be available to the Northwestern Ontario Métis Community for the exercise of their rights. Instead of offsetting this loss or undertaking targeted mitigation discussions to address the removal of this area, the EA/EIS takes an approach that it is limited with the overall RSA and therefore limited in scope; and also limited in timescale.</p> <p>However, the timeframe for operations and construction is a substantial proportion of a harvesters active years and the PDA may be in a preferred locale of harvest. This must be considered.</p>	The Northwestern Ontario Métis Community requires further engagement with regards to the displacement of harvesters from the PDA as well as the timescale of the Project for this displacement to ensure FMG understanding of potential impacts to Métis rights.	<p>Based on Figure 2 in the Traditional Knowledge and Land Use Study for the Springpole Gold Project, MNO land use does not appear to overlap with the PDA and the closest use identified is a non-commercial fish harvesting area. However, it is acknowledged that the general Project area is a land use area for MNO and therefore to mitigate potential effects to TLRU, among other mitigations, the Project will:</p> <p>During all Project phases, engage Indigenous environmental monitors from local communities in the implementation of mitigation and monitoring measures;</p> <p>Where there is interest, provide opportunities to local Indigenous communities and traditional resource users the opportunity in the harvest of vegetation and aquatic resources within the PDA prior to construction; and</p> <p>Prior to construction, develop an access management strategy with local Indigenous communities to manage access in the PDA, north of the Birch River crossing, throughout all phases of the Project.</p> <p>FMG remains interested in continuing to work with the Northwestern Ontario Métis Community regarding to potential displacement of harvesters from the PDA and timescale.</p>	ACTION(S): – Please provide a timeline, outcomes, and next steps for continued work between FMG and the NWOMC in relation to understanding of Métis rights versus site specific identification of harvesting.	An assessment of the potential impacts on Aboriginal and Treaty rights due to the Project will be provided in final EIS/EA. This will be based upon an assessment of the effects on Indigenous People, that considers the effects on current use of lands and resources for traditional purposes, socioeconomics, archaeology and cultural heritage, and will be disaggregated by Indigenous group. The assessment will be informed by the results of the biophysical and human environment effects assessment and through ongoing engagement with NWOMC.	EIS Sections 6.21, 6.26.

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NWO MC-150	6.21.4.1 Changes in the Availability, Access to and Experience related to Traditional Wildlife Harvesting, Page 6-487 (PDF Page 12)	<i>"During construction and operation of the Project, access to wildlife harvesting areas for trapping and hunting will be altered due to the Project. There will be increased access to wildlife harvesting area due to the new corridor for the transmission line, but access to wildlife harvesting area within the PDA may be altered."</i>	Please provide disaggregated data which points to an increase in wildlife harvesting along the transmission line as this may constitute an area that is not preferred in the exercise of Métis rights.	There will be an increase in access due to the new transmission corridor; however, it is unknown if this will directly result in an increase in wildlife harvesting. Based on Figure 2 in the Traditional Knowledge and Land Use Study, MNO land use does not appear to overlap the PDA; however, FMG understands that the general Project area is a land use area for MNO and therefore mitigation measures are proposed in the draft EIS/EA to mitigate potential effects to TLRU. FMG remains interested in continuing to work with MNO and invites all information and feedback on these mitigation measures.	Please amend this section to include the referenced uncertainty in the FMG response. Suggested text includes: "During construction and operation of the Project, access to wildlife harvesting areas for trapping and hunting will be altered due to the Project. There will be increased access to wildlife harvesting area due to the new corridor for the transmission line, however, it is unknown if this will directly result in an increase in wildlife harvesting."	Feedback received during the review of the draft EIS/EA from Indigenous communities, including NWOMC, will be used to inform the revisions to the effects assessment.	EIS Sections 6.21.6.1, 6.26.1.2.
NWO MC-151	6.21.4.3 Changes in the Availability, Access to and Experience related to traditional Plant Harvesting, Page 6-488 (PDF Page 13)	<i>"During closure activities, the progressive and final rehabilitation of the mine site area will include a revegetation plan that will incorporate plant species of interest to Indigenous communities, where practical."</i>	Please confirm that the Northwestern Ontario Métis Community can be involved in the development and execution of a revegetation plan, subject to availability and capacity.	MNO will be invited to participate in the development of the Closure Plan, including revegetation planning.	-	-	EIS Section 6.21.4
NWO MC-152	6.21.4.3 Changes in the Availability, Access to and Experience related to traditional Plant Harvesting, Page 6-488 (PDF Page 13)	<i>"During construction and operation of the Project, access to traditional plant harvesting areas will be altered due to the Project. There will be increased access to plant harvesting areas due to the new corridor for the transmission line, but access to plant harvest areas may be altered within the PDA."</i>	See Comment #150	See the response to comment #150.	Please see Follow-up Comment #157 (formally Comment #150)	Please see Follow-up Response #150	EIS Section 6.21.6.3.

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NWO MC-153	6.21.5 Significance of Residual Effects, Page 6-489 (PDF Page 14)	<p><i>"Consultation and engagement with local Indigenous communities on the draft EIS/EA will be considered to inform the residual effects and the significance."</i></p> <p>First Mining Gold has stated that residual effects and significance of impacts on Traditional Land and Resource Use will be formed with further consultation and engagement with Indigenous communities but has not specified these details.</p>	Please provide information on what consultation and engagement will take place with the Northwestern Ontario Métis Community to form the residual effects and significance of this section.	MNO's traditional knowledge study will further inform residual effects and their significance. Additional consultation on the draft EA comments with Métis citizens and updates made to the Project for a final EA will also inform the Project and mitigations measures. We remain open to consider supporting additional interviews towards the collection of additional traditional knowledge and land use. We note that this work is important to initiate this fall to inform the final EA.	<p>A traditional knowledge study, within an environmental assessment framework constitutes the existing conditions of the exercise of harvesting rights, informed by the NWOMC harvesters Indigenous Knowledge. It can sometimes include elements of an effects assessment. However, this study does not include a characterization of residual effects nor a significance determination. This must be undertaken separately.</p> <p>ACTION(S):</p> <ul style="list-style-type: none">– Please provide a timeline, outcomes and next steps for continued work between FMG and the NWOMC in relation to significance of impacts and potential residual effects.	Section 6.21 was prepared for the draft EIS/EA based on the available information at the time, and will be updated for the final EIS/EA in consideration of any further information and input provided by Indigenous communities. A characterization of the residual effects will be provided in the final EIS/EA.	EIS Sections 2.6.1.7, 6.21.1.2, 6.21.6, 6.21.7.
NWO MC-154	Table 6.21-4: Concordance with 'Métis Nations of Ontario Traditional Knowledge and Land Use Study for the First Mining Gold (FMG) Springpole Mine Project, Page 6-501 (PDF Page 26)	<p><i>"We can do better by working together. FMG's goal is to:</i></p> <ul style="list-style-type: none"><i>– Increase Indigenous employment in the Project;</i><i>– Increase Indigenous business involvement in the Project; and</i><i>– Prioritize information and topics most important to the communities.</i><i>– FMG will continue to work with MNO to establish:</i><i>– Sharing in the financial benefits generated from the mine;</i><i>– Training and employment opportunities; and</i><i>– Business opportunities related to mine construction and operation."</i>	The Northwestern Ontario Métis Community looks forward to receiving more details about the economic opportunities that will be provided by First Mining Gold.	Comment noted, FMG remains interested in continuing these discussions as the Project progresses.	-	-	Not applicable

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NWO MC-155	6.23.4 Assessment of Residual Environmental Effects, Page 6-525 (PDF Page 6)	<i>"One potential heritage property (CHR 2; Springpole Exploration Camp) will be screened during a site visit to determine if the property has potential cultural heritage value or interest. If it is determined that the resource has potential cultural heritage value or interest then a Cultural Heritage Evaluation Report will be completed. If no potential cultural heritage value or interest is identified, then no future cultural heritage work will be recommended for CHR 2. Cultural Heritage Evaluation Reports will be completed for four potential heritage properties (CHR 1, CHR3, CHR4 and CHR 5) to establish the presence, or absence, of cultural heritage values or interests. Once completed and if values or interests are identified, then a Heritage Impact Assessment will be prepared."</i>	Subject to internal capacity the Northwestern Ontario Métis Community must be involved in the screening of sites to ensure the value or interest in the site can be included for consideration. This must be undertaken for all five potential heritage properties located within the PDA where avoidance is not feasible.	FMG remains interested in continuing to work with the Northwestern Ontario Métis related to cultural heritage studies. If there is specific information that can be shared as a result of the draft EIS/EA review please provide to FMG for further consideration.	ACTION(S): – Please provide a timeline, outcomes, and next steps for continued work between FMG and the NWOMC.	Please see Follow-up Responses #23 and #97.	EIS Section 6.23.1.2.
NWO MC-156	6.24.3 Mitigation Measures Page 6-539 (PDF Page 7)	<i>"Measures to be implemented to avoid, reduce or minimize the effects of the Project on human and ecological health include, but are not limited to: – Implement the mitigation measures for the potential effects on air quality (Section 6.2); – Implement the mitigation measures for the potential effects on surface water (Section 6.6, 6.7, 6.8 and 6.9); – Implement the mitigation measures for potential effects on fish and fish habitat (Section 6.10); and – Implement the mitigation measures for potential effects on wildlife and wildlife habitat (Section 6.12)"</i>	Please revise mitigation section and include measures for the potential effects on soil and overburden, and vegetation. Appropriate sections will need to be revised as well.	Implementing the proposed mitigation measures for the potential effects on air quality (Section 6.2) and surface water (Section 6.6, 6.7, 6.8 and 6.9) will act to mitigate potential effects on soil, overburden and vegetation by minimizing emissions and dust deposition and runoff to soil, overburden and vegetation. This will be updated as needed in the final EIS/EA.	Acknowledged. The NWOMC will consider revised mitigation sections in the final EIS/EA, when available.	Acknowledged.	EIS Sections 6.24.1.2, 6.24.4.
NWO MC-157	6.24.4.2 Changes in Ecological Health Page 6-540 (PDF Page 8)	<i>"The results of the ERA screening identified 14 COPCs in soil, air, water and/or Project-influenced media based on exceedances of their respective criteria / guidelines / standards. All 14 were carried forward for a quantitative ERA."</i> There was insufficient engagement with the Northwestern Ontario Métis Community to identify potential COPCs. COPCs pose a risk to community members and the Northwestern Ontario Métis Community should be sufficiently engage in a two way dialogue to identify potential COPCs.	Please revise section to include COPCs identified through continued engagement with the Northwestern Ontario Métis Community.	FMG remains interested in continuing to work with the Northwestern Ontario Métis. If there is specific information that can be shared as a result of the draft EIS/EA review please provide to FMG for further consideration.	ACTION(S): – Please provide a timeline, outcomes, and next steps for continued work between FMG and the NWOMC.	Please see Follow-up Response #97.	EIS Section 6.24.2, and Appendix R
NWO MC-158	6.24.4.2 Changes in Ecological Health Page 6-540 (PDF Page 8)	<i>"The country foods assessment and quantitative ecological risk assessment relied mainly on the use of modelled chemical concentration data. As a result, a conservative approach was taken to manage for the uncertainties associated with the predictions, which</i>	Please add clarification within this section as to how the assessment of country foods was completed (i.e., were only certain organs tested)?	Plants, fish and wild game were included in the assessment of ecological and human health: "Supporting Appendix A of the HEHRA technical support	-	-	EIS Section 6.24.1.2, Appendix R.

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		likely overestimates the calculations used to determine potential adverse effects. At this time, no potential risk to mammals and birds via exposure to chemicals in Project-influenced media within the LSA is anticipated.”		<p>documentation (Appendix R), includes baseline sampling and analytical results for plants. A summary of all baseline chemical concentrations considered in the HEHRA and incorporated into the HEHRA model is also included in Appendix A of Appendix R.</p> <p>Where data was not available, chemical concentrations of selected inorganic chemicals of potential concern (COPCs) in air, soil or water were modelled into plants and soil organisms, mammals and birds, and aquatic receptors, for use in the country foods component of the human health risk assessment, and for use in the ecological risk assessment.” (Section 6.24.1)</p> <p>Section 1.2 in Appendix A of the HEHRA technical support documentation (Appendix R) presents the results of the baseline country foods sampling (plants and fish) to date. Sampled terrestrial plants included Labrador tea, blueberries and raspberries. Sampled aquatic plants included sweet flag, cattails, pond lily, pondweed. Baseline fish tissue concentrations used in the HEHRA (Northern Pike) are also presented in this section.</p> <p>Where data was not available (e.g. wild game), baseline chemical concentrations of selected inorganic chemicals of potential concern (COPCs) in air, soil or water were modelled into the tissue (e.g. wild game), for use in the country foods component of the human health risk assessment, and for use in the ecological risk assessment</p>				

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				Section 2 in Appendix A of the HEHRA technical support documentation (Appendix R) presents the modelling methods used to predict concentrations in soil, vegetation (plants), wild game and fish as a result of the Project.			
NWO MC-159	6.24.4.2 Changes in Ecological Health Page 6-540 (PDF Page 8)	<i>"The country foods assessment and quantitative ecological risk assessment relied mainly on the use of modelled chemical concentration data. As a result, a conservative approach was taken to manage for the uncertainties associated with the predictions, which likely overestimates the calculations used to determine potential adverse effects. At this time, no potential risk to mammals and birds via exposure to chemicals in Project-influenced media within the LSA is anticipated."</i>	Please revise this section to include the ecological health changes in the PDA and RSA areas.	<p>Assessing human and ecological health changes in the Local Study Area (LSA) is considered a worst case assessment of potential Project effects on human and ecological health.</p> <p>"The LSA encompasses the area adjacent to the mine site area of the PDA to capture the maximum predicted ground-level concentrations due to the Project and where air quality can be predicted or measured with a reasonable degree of accuracy. For the human and ecological risk assessment, the LSA is defined as an area that extends approximately 10 km from the main Project emission sources." (Section 6.24.2.3 and Appendix R, Section 3.1.1)</p> <p>"During the active phases of the Project (i.e., Construction, Operations, and Decommissioning and Closure) access to the mine site area of the PDA will be restricted, and most of the mine site area of the PDA will be cleared and subject to extensive heavy equipment use therefore nearly eliminating suitable habitat. As such, the potential health effects on mammals and birds as a result of the Project are expected to be much lower than predicted herein." (Appendix R, Section 5.6.2)</p>	-	-	EIS Sections 6.24.1.2, 6.24.2.3, Appendix R Section 3.1.1.

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NWO MC-160	6.24.4.2 Changes in Ecological Health Page 6-540 (PDF Page 8)	<p><i>"The country foods assessment and quantitative ecological risk assessment relied mainly on the use of modelled chemical concentration data. As a result, a conservative approach was taken to manage for the uncertainties associated with the predictions, which likely overestimates the calculations used to determine potential adverse effects. At this time, no potential risk to mammals and birds via exposure to chemicals in Project-influenced media within the LSA is anticipated."</i></p> <p>Clarification is required within this section pertaining to the type of country foods considered. For example, plants should be included because they form part of the Métis diet as well as being used for medicinal and/or cultural purposes.</p> <p>Further, the country foods assessment needs to be revised to include consideration within the PDA and RSA.</p>	Please provide clarification on which country foods (e.g., wildlife species or plants) were assessed. Further, please update the assessment to consider the PDA and RSA.	<p>Plants, fish and wild game were included in the assessment of ecological and human health.</p> <p>See the response to comment # 158 for further details.</p>	-	-	EIS Section 6.24.1.2, Appendix R Section 3.1.1.
NWO MC-161	6.25.3 Effects of Changes to the Environment on Indigenous People, Page 6-546 (PDF Page 3)	<p><i>"FMG recognizes that Indigenous people live, work, hunt, fish, trap, collect water, and harvest throughout their lands and rely on them for their individual as well as their communities' overall cultural, social, spiritual, physical, and economic well-being. Further to this, FMG recognizes that these traditional lands are inextricably connected to a community's identity and culture, inclusive of ceremonial and spiritual recognition. As a result, FMG recognizes the importance of assessing any Project-related impacts as these relate to traditional land and resource use activities and practices and is committed to working with all communities to identify and mitigate any such related impacts."</i></p> <p><i>The draft EIS/EA describes the effects of changes the Project may cause to the environment, with respect to Aboriginal Peoples, on health and socioeconomic conditions, physical, cultural heritage, the current use of lands and resources for traditional purposes, or any structure, site or thing that is of historical, archeological, paleontological, or architectural significance as per the EIS guidelines (Appendix B)."</i></p> <p>The title of this section refers to Indigenous People rather than Indigenous Peoples. The plural of Peoples recognizes that more than one distinct group is being referenced; this must be updated.</p>	<p>FMG and the Northwestern Ontario Métis Community should work together to ensure the language is updated in the EA/EIS to reflect Métis rights and ensure they are properly assessed and considered.</p> <p>Additionally, terminology should be updated as specified.</p>	<p>Comment noted, the terminology will be updated as specified. FMG remains interested in continuing to work with MNO in order to further understand how established and asserted rights may be affected.</p>	-	-	EIS Section 6.21

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		Project effects on potential or established rights of Indigenous Peoples is the foundational reason the duty to consult exists. Without consideration of rights and how the Project interacts with those rights, the Crown may not have sufficient information to inform their duty.					
NWO MC-162	6.25.4.1 Fisheries Act, Page 6-548 (PDF Page 5)	<i>"Springpole Lake provides habitat for a diverse fish community, including eight sportfish species (Burbot, Cisco, Lake Trout, Lake Whitefish, Northern Pike, Rock Bass, Walleye and Yellow Perch) and 16 forage and baitfish species. Birch Lake has been sampled and 26 species of fish have been documented. Small unnamed waterbodies (lake / ponds) in the vicinity of the Project and are characterized with low fish diversity and abundance."</i>	Please update the wording in this section as follows: "Springpole Lake provides habitat for a diverse fish community, including eight sportfish species (Burbot, Cisco, Lake Trout, Lake Whitefish, Northern Pike, Rock Bass, Walleye and Yellow Perch), species fished by Indigenous harvesters (Walleye, Northern Pike, Trout, Sauger, Whitefish and baitfish, and 16 forage and baitfish species. Birch Lake has been sampled and 26 species of fish have been documented. Small unnamed waterbodies (lake / ponds) in the vicinity of the Project and are characterized with low fish diversity and abundance." [emphasis add to proposed text]	This language is intended to provide a description of the habitat in Springpole Lake and the species noted are mentioned in the sentence. More information on the Traditional Harvesting of Aquatic Resources, including Fishing is included in Section 6.21.1 and species listed in Table 6.21-6.	-	-	EIS Sections 6.21.2.4, 6.21.2.10, Table 6.21.15.
NWO MC-163	6.25.4.1 Fisheries Act, Page 6-548 (PDF Page 5)	<i>"The offsetting measures as described in the Fish Habitat Offsetting and Compensation Plan (Appendix F) will be implemented during the construction and operation phase of the Project. The remaining fish offsetting measures will be implemented during the last two years of operation and active closure phase. It is anticipated that 493 ha of fish habitat will be created through these offsetting measures, and as a result, there will be no residual effects to fish habitat."</i> Often, offsetting includes compensatory measures that could result in less preferred habitat (aquatic or otherwise) than was available to the Northwestern Ontario Métis Community prior to the Project. By approaching offsetting to allow for a 'net gain', the Proponent can ensure there is enough habitat (aquatic or otherwise) available to support the Northwestern Ontario Métis Community's exercise of their rights and way of life.	The Northwestern Ontario Métis Community requires all offsetting or compensation measures adhere to a "net gain" model. Net gain ensures improved outcomes to support sustainability in the Region by ensuring no net loss in fish habitat and then providing additional gains to support biodiversity.	FMG agrees with MNO that the final fish habitat compensation and offsetting plan should result in a net gain to fish and fish habitat. Currently the draft EIS/EA document and specifically Appendix F (draft Fish Habitat Compensation and Offsetting Plan) propose several diverse compensatory and mitigation measures to ensure a net gain of fish or fish habitat. These measures will be refined and adjusted as needed through consultation with the Indigenous communities, stakeholders and regulators	-	Please see Follow-up Response #91.	Appendix F Section 9.0.
NWO MC-164	Table 7.2-2: Spatial Extents for Use in Assessing Cumulative Effects, Page 7-6 and 7-7 (PDF Page 8 and 9)	By limiting the spatial extents to the LSA for most VCs (with the exception of Caribou) FMG risks underestimating interactions from other Projects; particularly in relation to Traditional Land and Resource Use which relies on available Crown Land or land to which the Northwestern Ontario Métis Community has a right of access for the ongoing exercise.	Please continue engagement with the Northwestern Ontario Métis Community to identify the appropriateness of the selected spatial extents.	The LSA was used for the assessment of cumulative effects as this is the likely geographic extent that potential effects from the Project would be predicted to occur. The residual effects (after mitigation) of another project or activity would have to occur within the LSA for there to be a potential cumulative effect.	The approach is incongruent. In this case the LSA is noted to be used for the assessment of cumulative effects as it is the likely geographic extent that potential effects from the Project would be predicted to occur, however in relation	The approach is consistent with the methodology outlined in the draft EIS/EA. The RSA was used to identify projects and activities that have the potential to act cumulatively with the Springpole Project. The specific effects considered in the cumulative effects assessment were based on the LSA.	EIS Section 7.1.

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				FMG remains interested in continuing to work with Indigenous communities and input received through engagement activities will be considered in the assessment of potential cumulative effects and updated as appropriate in the final EIS/EA.	to vegetation effects, the RSA is used to contextualize the regional extent. This selective use of the study areas to minimize impacts is inappropriate.		
NWO MC-165	Section 9.0 Malfunctions and Accidents	<p>Throughout this entire section, First Mining Gold has not considered the importance of the health and safety to the Northwestern Ontario Métis Community. Some accidents listed have the potential to compromise the health and safety of nearby harvesters, while other could cause substantial environmental damage, impacting the ability of citizens to harvest.</p> <p>Additionally, there is also no information on how the Northwestern Ontario Métis Community would be notified of an emergency and involved in the potential clean up or remediation afterwards.</p>	<p>Please include information on how the accidents described could impact the health and safety of the Northwestern Ontario Métis Community citizens, and the ability of Northwestern Ontario Métis Community citizens to harvest.</p> <p>Further, the Northwestern Ontario Métis Community must be informed and able to comment on the emergency response plans for this Project.</p>	<p>The potential environmental concerns are discussed in Section 9.0 of the draft EIS/EA and consider in the effects to harvest areas.</p> <p>An emergency response plan will be developed prior to operation and implemented in the event that a malfunction or accident occurs. The plan will include further details on appropriate notifications to Indigenous communities and regulatory agencies.</p> <p>Identified potential effects will be updated in Section 9.0 of the final EIS/EA as needed based on additional engineering information available.</p> <p>Additional details on the effects on Indigenous harvesting and traplines will be presented in Section 6.21 of the final EIS/EA.</p>	<p>Please confirm that the NWOMC will be able to review and comment on the emergency response plan prior to implementation.</p> <p>Response is acknowledged in relation to the additional details reference for inclusion in Section 6.21 of the final EIS/EA. The NWOMC will consider revised sections in the final EIS/EA, when available.</p>	NWOMC will be able to review and comment on the emergency response plan prior to implementation.	EIS Section 9.2.8.
NWO MC-166	11.1 Federal Environmental Approvals, Page 11-1 (PDF Page 2)	<i>"An Offsetting Plan for the Paragraph 35(2)(b) Authorization and a Fish Habitat Compensation Plan for the Schedule 2 MDMER listing are anticipated to be required for the development of the Project. A combined draft plan is provided in Appendix F. Once finalized, this plan will be submitted to DFO and ECCC for approval, to address the overall fisheries compensation and offset requirements for the Project."</i>	The Northwestern Ontario Métis Community requires further engagement on the Fisheries Offset and Compensation plan to ensure the goal of 'net-gain' is achieved.	FMG remains interested in continuing to work with MNO related to the Fisheries Offset and Compensation plan, through the EA and permitting process.	ACTION(S): – Please provide a timeline, outcomes, and next steps for continued work between FMG and the NWOMC in relation to the development of the Fish Habitat Compensation and Offsetting Plan.	Please see Follow-up Response #91.	Appendix F Section 9.0.

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NWO MC-167	12.3 Environmental Monitoring Plans Page 12-2 (PDF Page 3)	<i>"FMG will be responsible for development, implementation, reporting, review and updating of monitoring programs to include applicable environmental approval and permit conditions, as well as federal and provincial requirements and guidelines. It is envisioned that community environmental monitors will continue to participate in data collection, and community input will be considered in the development of monitoring programs. Reporting will meet regulatory requirements."</i>	The Northwestern Ontario Métis Community requires more detail regarding the community environmental monitors and if their citizens will be considered for these positions.	FMG is open to discussing the opportunity for MNO to identify a community environmental monitor should the Project proceed to construction. At this time Springpole is a remote site with limited access and much of the field work has been completed for the EA. FMG will provide for the necessary on-site training for the role including environmental monitoring/ technician training with available accreditation.	ACTION(S): – Please provide a timeline and next steps for continued work between FMG and the NWOMC in relation to a community environmental monitor.	FMG and MNO signed a workplan and budget for community benefits agreement negotiation in April 2023 which outlines expectations and timelines for next steps.	EIS Sections 6.21.1.2, 6.21.4.
NWO MC-CL-001	Potential Lake Sturgeon Reintroduction	There are no baseline studies referenced related to this activity, and without information provided about the program, goals, and measures of success further detailed studies are required. Additional studies should include the ability of Springpole Lake to support sturgeon, as well as where specimen larval fish and eggs will be sourced.		<p>At this draft stage of the Fish Offset and Compensation Plan and the draft EIS/EA, the reintroduction of Lake Sturgeon measure was presented at a conceptual level to determine interest at both the community and regulatory levels. Comments to date suggest that there is potential interest for the reintroduction of Lake Sturgeon to selected waterbodies in the Project area based on their historical occurrence.</p> <p>Traditional knowledge has confirmed that the adjacent waterbodies, including Springpole and Birch Lakes, have supported Lake Sturgeon in the past. Since there has not been any physical changes to these waterbodies, it would be reasonable to expect that these waterbodies could continue to support Lake Sturgeon. As stated in the draft Fish Offset and Compensation Plan (Appendix F), a Lake Sturgeon Reintroduction Plan will be developed in cooperation with Indigenous communities and regulators as part of the final Fish Offset and Compensation Plan during permitting.</p>	<p>Subject to capacity, the NWOMC requires participation in the development of future iterations of the Fish Offset and Compensation Plan, as well as the final EIS/EA to ensure adequate development of program goals and measures of success for the proposed Lake Sturgeon reintroduction and restoration program.</p> <p>More detail is required in relation to program goals, measures and outcomes prior to NWOMC support for the self-identified "rudimentary framework of the offsetting measures" included in Appendix F.</p> <p>As Cat Lake First Nation and Slate Falls First Nation are referenced throughout Appendix F in relation to this program - the NWOMC must be added to this reference as an Indigenous group being involved and consulted.</p>	As discussed on May 29, 2023; FMG is committed to working with the NWOMC on the Fish Offset and Compensation plan and are looking to schedule a workshop and regular technical update meetings with NWOMC. FMG is interested in progressing work on the FHOCP throughout this year and would like to have a workshop with NWOMC as soon as possible (proposed June) to discuss potential ideas about fish offsetting.	EIS Sections 6.10.1.2, 6.10.4, Appendix F Section 1.4.

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				Currently there is evidence that remnant Lake Sturgeon populations exist in Lake St. Joseph, and traditional knowledge identified historic spawning locations at four locations along the flow path between Cat Lake and Lake St. Joseph. There would be a preference to collect brood stock from the remnant populations in the local waterbodies. Additional investigations using eDNA methods are proposed in these historically identified locations to better confirm brood stock locations.	<p>Further, within the FMG Response, the Draft EIS/EA and Appendix F, there is not sufficient information to indicate Springpole Lake can currently support Sturgeon. Instead, a proposed measure in the Draft Fish Offset and Compensation Plan is to “...implement research and targeted reintroduction of Lake Sturgeon into waters historically supporting the species within and adjacent to the Project.” This must be further confirmed prior to acceptance of this measure as an appropriate offset credit.</p> <p>Finally, from FMG’s response it appears that Lake St. Joseph or spawn locations between Lake St. Joseph and Cat Lake may be locations where brood stock can be secured. NWOMC requires reporting from FMG and potential involvement in all activities related to specimen larval fish and egg sourcing.</p> <p>ACTION(S):</p> <ul style="list-style-type: none">– Subject to capacity, involvement of NWOMC in development of Fish Offset and Compensation Plan– Subject to capacity, discussion with NWOMC of program goals and		

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					measures of success for the proposed Lake Sturgeon reintroduction and restoration program – Update references in EIS/EA and Appendix F to include NWOMC in addition to Cat Lake First Nation and Slate Falls First Nation – Development and reporting of evidence by FMG that Springpole Lake can support Lake Sturgeon as part of the final EIS/EA, and – Subject to capacity, involvement of NWOMC in identification of brood stock locations.		
NWO MC-CL-002	Methylmercury (MeHg)	The pike samples taken from Springpole Lake are extremely high in MeHg; upon looking at the CCME (2000) guidelines, the data generated is concerning. The observed 4.47 µg/g is harmful enough to kill small to medium animals. FMG needs to indicate whether there has there been any investigation into this outlier to determine this order of magnitude anomaly as it is greater than the average amounts found in large ocean fish. As part of this investigation findings should also be compared with available data from surrounding lakes in the area.		We appreciate the MNO’s detailed review of the baseline data and the identification of the unusual data points. We agree and have reviewed the data sets presented in the draft EIS/EA (Appendix O, Aquatic Resources Technical Support Documents) and have identified a reporting error was made. Several of the tables in Appendix B (Fish Tissue Data) of both the 2020 and 2021 documents include the concentration of metals in fish tissue as dry weight (dwt) values rather than wet weight (wwt) called for in the table headings. As such the wet weight values appear elevated and are incorrectly reported. Using the formula $WWT = DWT \times ([100 - \%moisture]/100)$, the identified concentrations of 4.47 ug/g dry weight when converted to wet weight is 0.854 ug/g. As a result, the wwt values are in fact consistent with the historic data for Springpole Lake and the data collected by the	Subject to capacity, the NWOMC looks forward to reviewing the corrected data when the addenda is prepared and provided. Please advise on a timeline for provision. ACTION(S): – Advise on timeline for the provision of the addenda and anticipated comment period.	The addenda was provided to NWOMC on April 4, 2023 and FMG would appreciate any comments on this addenda by the end of June if possible.	EIS Section 6.10. and Appendix O-1, Section 3.1.3

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				<p>MECP for Birch Lake.</p> <p>We apologize for this error. A detailed correction of the data in the format of an addenda is being prepared and will be provided to the MNO and made available on the Project website.</p>			
NWO MC-CL-003	Stocking of Fishless Lakes	In a recent Impact Assessment Agency of Canada (IAAC) hearing for the Marathon Palladium Project; the Department of Fisheries and Oceans (DFO) expressed that they do not prefer the stocking of fishless lakes as a method for compensation as it negatively impacts smaller fish species and amphibian habitat. The community values amphibian habitat; there is a risk that this activity creates additional unintended impacts and is there an alternative to this plan in the event it is not supported/approved by regulators such as DFO.		<p>Our understanding of the Marathon Palladium Project findings is that the stocking of naturally fishless lakes was not supported as the lakes had a functioning ecosystem that is based upon a lack of a fish community. In the case of Springpole lake, stocking can both maintain existing fish abundance using brood stock from species already present and help reestablish specific fish species in selected waterbodies such as Lake Sturgeon that was historically present.</p>	<p>The original comment from the Cover Letter requested details on alternatives to the proposed Lake Sturgeon reintroduction and restoration program with information from the Marathon Palladium Project as context.</p> <p>Please provide alternatives or evidence of support of this program by MNRF and/or the DFO.</p> <p>ACTION(S):</p> <ul style="list-style-type: none">– Provide confirmation of support of the proposed Lake Sturgeon reintroduction and restoration program by MNRF, DFO, or other relevant Ministries.– Provide alternatives to the program.	Please see response to comment Cover Letter 1. A revised FHOCP for inclusion in the final EIS is expected to be prepared in early 2024.	Appendix F

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NWO MC-CL-004	TKLUS Integration	<p>Overall, the TKLUS integration appears satisfactory within Section 6.21, as is required by the Canadian Environmental Assessment Act, 2012 and the Ontario Environmental Assessment Act. Most noted species are identified in the related biophysical volume (e.g., caribou within wildlife); and while not all species are assessed (e.g., deer is not assessed within wildlife), the TKLUS can be seen to have informed some aspects of the assessment.</p> <p>However, as the EA/EIS is not disaggregated per Nation within volumes 6.2 thru 6.24, it is difficult to identify where, within the biophysical or socio-economic volumes, Northwestern Ontario Métis Community information has informed the assessment beyond species targeted within the TKLUS. This is particularly relevant for existing conditions and consideration of residual effects criteria. Additionally discussion of non-biophysical aspects of the exercise of Métis rights are not highlighted within the EA/EIS.</p>		Non-confidential TKLU information will be disaggregated in the final EIS/EA.	<p>Subject to capacity, the NWOMC requires review of all relevant disaggregated data related to NWOMC input prior to submission; along with clear timelines for provision of this information for review and expected timelines for comment.</p> <p>Further, FMG's response did not address the gap with the draft EIS/EA whereby non-biophysical aspects of Métis rights are not highlighted or discussed. A further response is required.</p> <p>ACTION(S):</p> <ul style="list-style-type: none"> – Advise on timeline for the provision of the disaggregated data related to NWOMC input; including a timeline for provision, a timeline for review and expected timelines for provision of comment. – Provide a response related to lack of integration of non-biophysical aspects of Métis rights. 	An assessment of the effects on Indigenous People will be provided in final EIS/EA that includes the effects on current use of lands and resources for traditional purposes, socioeconomics, archaeology and cultural heritage. Non-confidential TKLU information provided by Indigenous community during the preparation of the final EIS/EA will be summarized and disaggregated by Indigenous group. The assessment will be informed by the results of the biophysical and human environment effects assessment and through ongoing engagement with NWOMC.	EIS Sections 6.6.1.2, 6.6.2.3, 6.21.1.2, 6.23.1.2., 6.23.2, 6.24.1.2, 6.24.2, Appendix S-12.
NWO MC-CL-005	Contextualize Métis Rights	<p>The approach to understand and assess the potential effects of the Project on the rights and interests of Northwestern Ontario Métis Community citizens could have considered addition sources to further contextualize Métis rights. Some examples of sources such include:</p> <ul style="list-style-type: none"> – the MNO-MNRF Framework Agreement on Métis Harvesting, and – the MNO-Canada Métis Government Recognition and Self-Government Agreement (2019). 		We appreciate the helpful information sharing. In addition to feedback received during engagement activities with Northwestern Ontario Métis Community and other Indigenous communities, these documents and other recommended sources will be considered in the preparation of the final EIS/EA to understand and assess the potential effects of the Project.	The conditional tense within FMG's response is problematic. Métis rights must be properly contextualized in order to allow for assessment of potential impacts to those rights. Please confirm that suggested sources will be used to contextualize Métis rights rather than be 'considered' by FMG.	An assessment of the potential impacts on Aboriginal and Treaty rights due to the Project will be provided in final EIS/EA. This will be based upon an assessment of the effects on Indigenous People and will be informed by the results of the biophysical and human environment effects assessment and through ongoing engagement with NWOMC. The MNO-MNRF Framework Agreement on Métis Harvesting and MNO-Canada Métis Government Recognition and Self-Government Agreement will be acknowledged and used to contextualize Métis rights.	EIS Sections 2.6.1.7, 6.26.

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		In partnership with the Northwestern Ontario Métis Community, these documents can help FMG contextualize Métis rights to allow for better assessment of potential effects.			<p>Further, please confirm that ongoing focused engagement with the NWOMC will be undertaken, subject to NWOMC capacity, to ensure Métis rights are fully contextualized.</p> <p>ACTION(S):</p> <ul style="list-style-type: none">– Confirm provided sources of information will be used to contextualize Métis rights.– Confirm that the NWOMC will be engaged to further contextualize Métis rights.		
NWO MC-CL-006	Biophysical Focus	<p>In relation to, Traditional Land and Resource Use (Section 6.21), biophysical components are used to represent impacts to rights (e.g., change to fishing or fishing areas or fishing opportunities rather than a change to the ability to exercise fishing rights). This approach was struck down in Clyde River (Hamlet) v Petroleum Geo-Services Inc. 2017 SCC 40 at para 45 which states “...the consultative inquiry is not properly into environmental effects per se. Rather, it inquires into the impact on the right. No consideration was given in the NEB’s environmental assessment to the source – in a treaty – of the appellants’ rights to harvest marine mammals, nor to the impact of the proposed testing on those rights.”</p> <p>Therefore, assessment of Northwestern Ontario Métis Community rights, specifically, must be attempted in partnership with the Northwestern Ontario Métis Community to allow for a collaborative approach and shared learnings about Métis rights. We recommend that the Northwestern Ontario Métis Community and FMG work together to contextualize targeted Métis rights in the Project area and then collaboratively assess potential impacts to those rights (e.g., harvesting rights). This process will allow for comprehensive, direct mitigation development, and improve the Project assessment overall.</p>		FMG invites all information from the Northwestern Ontario Métis Community that may be relevant to understanding potential impacts to Métis rights, and FMG remains interested in continuing to work with the Northwestern Ontario Métis Community to understand and contextualize targeted rights in the Project area. The information obtained through engagement activities will be used to assess the potential effects of the Project on the Northwestern Ontario Métis Community and support the development of appropriate mitigation.	<p>FMG’s response includes aspects that frame the engagement with NWOMC as extractive. This is typical of environmental assessment processes whereby information provided by Indigenous groups is analyzed by project proponents and their EIS/EA service provider and “useful” aspects of that information that fits within a western science framework are applied.</p> <p>This approach separates the information from the people and way of life surrounding this knowledge.</p>	An assessment of the potential impacts on Aboriginal and Treaty rights due to the Project will be provided in final EIS/EA. This will be based upon an assessment of the effects on Indigenous People, that considers the effects on current use of lands and resources for traditional purposes, socioeconomics, archaeology and cultural heritage. The assessment will be informed by the results of the biophysical and human environment effects assessment and through ongoing engagement with NWOMC.	EIS Section 6.21.1, and Section 6.26

Table C-7.1: First Mining Gold Response to the Northwestern Ontario Métis Community Comments on the Springpole Gold Project Draft Environmental Impact Statement/Environmental Assessment

ID	Specific Reference	Initial Comments & Rationale	Proposed Action / Solution	FMG Response	Commenter Response	FMG Response 2	Where Addressed
NWO MC-CL-007	Joint Environmental Committee	Within the EA/EIS, it notes that FMG has worked with the Shared Territory Protocol Nations to establish a joint environmental committee. While the Northwestern Ontario Métis Community has been invited to this committee, it is unclear at this preliminary stage the actions this committee can take to ensure Northwestern Ontario Métis Community involvement in the post-approval phases. This must be clarified through ongoing engagement moving forward.		FMG encourages the ongoing participation of the Métis and aims to support that involvement in the EA process and beyond. We are pleased with the work to date with respect to traditional knowledge and land use, Valued Components workshop, terms of reference review and draft EA review. FMG intends to continue providing the Métis with reasonable support for consultation and review of EA related materials throughout the process and looks forward to continued participation in the post-approvals phases. This is similar to the First Nations who established their joint Environment Committee.	The NWOMC looks forward to continued discussion on the Fish Offset and Compensation Plan. Please advise a timeline for these discussions to allow for integration of NWOMC perspectives in the EIS/EA Appendix F. ACTION(S): – Advise on a timeline for further discussion related to the Fish Offset and Compensation Plan to allow for integration in the EIS/EA	Please see the response to follow-up comment Cover Letter 1. The timeline for the FHOCP was presented in the meeting on May 29, 2023.	Not applicable
NWO MC-CL-008	'No Net Loss' versus 'Net Gain'	The expected conditions which will be defined under Fisheries Offset and Compensation Plan should align with the Northwestern Ontario Métis Community requirement for the continuing exercise of Metis rights and way of life. As such, the offset and compensation measures in the Plan should be sufficient to increase the loss to gain ratio beyond current levels, to the satisfaction of the Northwestern Ontario Métis Community. By approaching offsetting to allow for a 'net gain', the Proponent can ensure there is enough suitable habitat to support the exercise of Métis rights and way of life.		The Fish Offset and Compensation Plan should and will include sufficient measures to result in a net gain to fish and fish habitat. Although the currently proposed draft plan is expected to undergo revision based on comments from Indigenous communities and government regulators, it currently relies (and is expected to continue to rely) on both the reuse of existing habitats as well as the development of new areas to achieve this goal. FMG looks forward to further discussions with the MNO to ensure continued alignment on this expectation.	ACTION(S): – Please advise whether the clarification within FMG's response will be integrated in the final EIS/EA to ensure clarity of use for the term 'communities'.	-	Appendix F Section 9.0.