Annex A3: Note to Readers

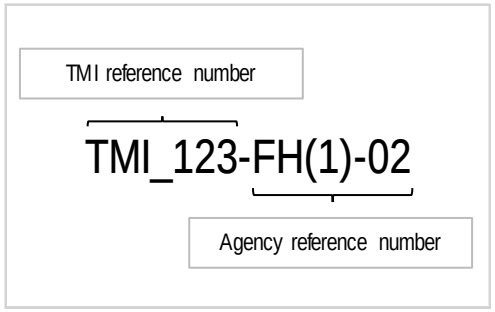
Introduction

In April 2015, Treasury Metals Inc. (TMI) submitted an Environmental Impact Statement (EIS) for the proposed Goliath Gold Project (the Project) to the Canadian Environmental Assessment Agency (the Agency) for consideration under the Canadian Environmental Assessment Act (CEAA), 2012. The Agency reviewed the submission and informed TMI that the requirements of the EIS Guidelines for the Project were met and that the Agency would begin its technical review of the submission. In June 2015, the Agency issued a series of information requests to TMI regarding the EIS and supporting appendices (referred to herein as the Round 1 information requests). The Round 1 information requests included questions from the Agency, other federal and provincial reviewers, First Nations and other Aboriginal peoples, as well as interested stakeholders. As part of the Round 1 information request process at the request of the Agency, TMI has consolidated the responses to the information requests into a revised EIS for the Project.

In total, there were 859 questions and comments divided into 4 annexes:

- Annex 1: Questions and comments for the Agency and other government reviewers.
- Annex 2: Questions and comments from government reviewers regarding the permitting process for the Project. Treasury Metals have yet to start the formal permitting process for the Project.
- Annex 3: Questions and comments from First Nations and other Aboriginal peoples.
- Annex 4: Questions and comments from interested stakeholders.

The enclosed document provides the final responses from 330 to 686, as well as 777 to 859 of the Round 1 information requests included as Annex A3. For ease of cross-referencing, each information request response has been provided a unique identifier comprised of a sequential TMI reference number (from 330 to 686 and 777 to 859 of the 859 information requests) and the IR reference number provided in the packages forwarded to Treasury Metals by the Canadian Environmental Assessment Agency (the Agency). The naming convention is illustrated below.



The responses are provided in a tabular form, with each response including the original “Summary of Comment / Rationale” as well as the “Information Request” for reference. In preparing the response package, there were some requests that require the provision of figures, tables and attachments that did not lend themselves to inclusion in the response tables. This information is appended to this response package, with the information presented in the order it is cited.

Index for Annex A3 Information Request Responses

To guide the users in locating specific responses, the next section of this document provides an index of where each of the responses are located, or where the response is referenced in another response. The index makes use of the unique identifier described above.

Annex A3 Index

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
330	AC(1)-04	Eagle Lake First Nation Naotkamegwanning First Nation Wabauskang First Nation Wabigoon Lake Ojibway Nation			**Information Request / Comment:** Shared information about baseline fish and fish habitat conditions: -Thunder Lake is cold water trout habitat; -fish spawning area around Christie Island. Two waterways drain into this fish spawning area; -minnows and shiners can be found in almost every creek; -baitfish have been found in the irrigation ponds, other ponds in the area, and along creeks; -suckers have also been found on the site; -Thunder Lake is clear and spring water fed, and flows into Wabigoon Lake. The water flows through the water bodies in the region in a counterclockwise direction; -spawning areas in Thunder Creek and Nugget Creek (walleye), Blackwater Creek (sucker), and along the shoreline of Wabigoon Lake (northern pike); and -Blackwater Creek has one main bed that branches off into at least 10 other creeks, then into bogs. Identified baseline conditions are not adequately described in the EIS. More detailed mapping of potentially affected habitat is needed, including a scaled figure delineating the potentially affected watershed. The EIS is missing fishing areas in Wabigoon Lake and within the project area. Requested that mitigation measures for prevention of contamination of water bodies and impacts on fish and fish habitat be described. **Response:** A summary of the baseline fisheries information is provided in Section 5.8.4 of the revised EIS. The original EIS relied on baseline fisheries data from two sources. Fisheries field investigations conducted in 2010 and 2011 were presented in Appendix G to the original EIS. The fisheries field investigations conducted in 2012 and 2013 were presented in Appendix Q to the original EIS. The 2012-2013 field investigations focused on areas where it was felt that additional baseline information would be helpful in assessing potential effects of the Project, or potential offsetting measures. Since submission of the original EIS, Treasury Metals has been refining their understanding of fish and fish habitat in the study area. Treasury Metals has prepared a Summary Fisheries Baseline Report (2011–2016) which is provided as Appendix Q to the revised EIS. This report includes a well-organized summary of the baseline fish and fish habitat investigations that were presented in Appendix G and Appendix Q to the original EIS, as well as new information that has been acquired since the filing of the original EIS. All relevant provincial information at the time of reporting has been included as part of the summary report. This summary report is consistent with the observations regarding fish and fish habitat shared by the reviewer. In preparing the EIS, Treasury Metals has made efforts to engage and elicit input from Aboriginal peoples regarding the Project. Although no Project-specific traditional knowledge and traditional land use studies were prepared for, or shared with, Treasury Metals; limited information was obtained about traditional land use areas. Treasury Metals made efforts to incorporate information

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					provided and to address comments and issues raised by Aboriginal peoples during the engagement process. A summary of the issues raised during the engagement process was provided in Section 8 and Appendix DD to the original EIS. As part of the Round 1 IRs, the Agency has requested that Treasury Metals expand and update the information presented in Appendix DD to the EIS. This information is provided as Appendix DD Aboriginal Engagement Report to the revised EIS and is summarized in Section 9. The Aboriginal Engagement Report provides a listing of the disaggregate comments from Aboriginal peoples, and how those were addressed in the revised EIS. Treasury Metals will continue to discuss potential Project effects on traditional land use activities with potentially affected Aboriginal peoples throughout the life the Project. As additional information regarding an Aboriginal community's traditional land use and practices become available, Treasury Metals will review and consider it in the design of mitigation measures, follow-up monitoring and management plans for the Project, as appropriate. In the revised EIS, Treasury Metals describes the mitigation measures, as well as the Project design elements intended to avoid or reduce the potential effects on the Project on fish and fish habitat. One of the most important is the commitment from Treasury Metals (Table 10.0.1 of the EIS) that the effluent from the Project during operations would meet the Provincial Water Quality Objectives (PWQO) prior to being discharged to Blackwater Creek. The PWQO are established to ensure protection for sensitive aquatic receptors.
331	AC(1)-05	Eagle Lake First Nation			**Information Request / Comment:** Asked questions about what impacts to fish in Wabigoon and Thunder Lake will be. Concerned about the relocation of fish from waterbodies within the project area. **Response:** Removal of fish from dewatered areas of Blackwater Creek Tributary 1 (open pit mine) and Blackwater Creek Tributary 2 (tailings storage facility (TSF) and plant site area) will be determined through engagement with appropriate regulators at the Ministry of Natural Resources and Forestry (MNRF). These fish are expected to be non-game species (e.g., minnows, brook sticklebacks, white suckers). The location where these fish will be relocated to will be determined in engagement with the MNRF. Prior to relocating fish, Treasury Metals would need to obtain the requisite License to Collect Fish for Scientific Purposes. This location where fish were to be relocated would be specified as a condition of that license. It is expected that the fish would be transferred to other locations within the Blackwater Creek system. An expanded assessment of the potential effects of the Project on fish and fish habitat is provided in Section 6.14of the revised EIS.

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332	AC(1)-06	Wabauskang First Nation			**Information Request / Comment:** Concerns with adequacy of potential impacts and mitigation measures to fish and fish habitat identified by the proponent. **Response:** An expanded assessment of the potential effects of the Project on fish and fish habitat has been developed since the submission of the original EIS. The effects assessment to fish and fish habitat is provided in Section 6.14of the revised EIS.
333	AC(1)-07	Wabigoon Lake Ojibway Nation			**Information Request / Comment:** Identified potential water quantity impacts to Lola Lake wetlands from the Project. The wetlands drain down into irrigation ponds on Treasury Metals Inc. (TMI) property that will supply water for the Project. Asked for clarification if TMI will also use the irrigation pond in the north of the site as a water source. **Response:** The current plans for the Project include the provision to take fresh water from the irrigation ponds at the former Ministry of Natural Resources and Forestry (MNRF) tree nursery. Two of these ponds are located on Thunder Lake Tributary 3, which drain downstream of Lola Lake. Withdrawing water from the ponds will not affect the water levels or flows at Lola Lake, which is upstream of the Tree Nursery Ponds.
334	AC(1)-08	Wabigoon Lake Ojibway Nation			**Information Request / Comment:** Identified beavers frequently dam Blackwater Creek, and asked how TMI will manage the issue of flow restriction due to beaver ponds located along the creek (i.e., how will beavers be managed). **Response:** Nuisance wildlife, such as beaver dams on Blackwater Creek and site drainage features, could interfere with the Project operations or successful implementation of the environmental management programs, and will need to be removed. Treasury Metals will prepare a Wildlife Management Plan (Section 12.9 of the revised EIS), which will include procedures for managing nuisance wildlife. Specifics of beaver removal procedures will be discussed with the Ministry of Natural Resources and Forestry (MNRF), the registered trapline owner, Aboriginal peoples and interested stakeholders. Any furs gathered through the removal of nuisance wildlife are expected to be made available to the registered trapline owner.
335	AC(1)-09	Wabigoon Lake			**Information Request / Comment:**

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		Ojibway Nation			Identified that water from water processing plant may not be safe for fish. Asked how water will be re-mineralized after the reverse osmosis treatment process to support aquatic life. **Response:** Reverse osmosis was identified as the water treatment technology best suited for the Project, which includes re-mineralization. Treated effluent from the Project will be discharged into Blackwater Creek, where it will combine with the baseline flows and runoff before reporting to Wabigoon Lake. Refer also to response TMI_104-SW(1)-18 for a more comprehensive discussion regarding the proposed RO treatment system.
336	AC(1)-10	Eagle Lake First Nation Wabigoon Lake Ojibway Nation Naotkamegwanning First Nation			**Information Request / Comment:** Shared information about baseline migratory bird and bird habitat conditions, including: • owls (barn and long horn), wild turkeys and robins observed in the project area; • project area is a fly through area for migratory birds that may be impacted by the Project; • migratory bird nesting area located to the north of the site; and • blueberry areas attract robins and other birds. **Response:** A summary of the baseline wildlife information was provided in Section 5.9 of the original and revised EIS, with Section 5.9.5 providing a summary of the observations related to birds. The original EIS relied on baseline fisheries data from two sources. Field investigations conducted in 2010 and 2011, as presented in Appendix G to the original EIS, and field investigations conducted in 2012 and 2013, as presented in Appendix R to the original EIS. Since submission of the original EIS, Treasury Metals has been refining their understanding of wildlife and wildlife habitat in the study area and has prepared the Summary Wildlife Baseline Report (2011–2016), provided as Appendix R to the revised EIS.0 In preparing the revised EIS, Treasury Metals has made efforts to engage and elicit input from Aboriginal peoples regarding the Project. Although no Project-specific traditional knowledge and traditional land use studies were prepared for, or shared with, Treasury Metals; limited information was obtained about traditional land use areas. Treasury Metals made efforts to incorporate information provided and to address comments and issues raised by Aboriginal peoples during the engagement process. Treasury Metals appreciates the information shared by the reviewers, and will consider it in the design of mitigation measures, follow-up monitoring and management plans for the Project, as appropriate.
337	AC(1)-11	Naotkamegwanning First Nation Wabigoon Lake Ojibway Nation			**Information Request / Comment:** It is impossible to monitor the movement of birds and material. Raised concern that if birds access tailings it will be difficult to monitor effects. **Response:**

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					As part of the original and revised EIS, Treasury Metals prepared an ecological risk assessment (Appendix W to the EIS) that considered the potential effects to wildlife that accessed the tailings storage facility (TSF), drinking water or consuming food from the TSF. This study did not identify any unacceptable risks to birds that accessed the TSF either during operations or post-closure. Please also refer to the response to TMI_557-AC(1)-231.
338	AC(1)-12	Eagle Lake First Nation**			**Information Request / Comment:** Comments and questions about potential human health effects from air quality impacts from the Project, including: • what will be in air emissions from the site, including smoke; • will toxins, including fungus (e.g., blastomycosis dermatitis), be released into the air as soil and rocks are extracted from the open pit; • concerns about increased lung disorders and cancer rates; and • what will be done to mitigate impacts and protect air quality for current and future generations. **Response:** Appendix J to the revised EIS includes a thorough evaluation of the air emissions and effects associated with the Project. These effects are summarized in Section 6.6 of the revised EIS. The following addresses the specific components of the question: • The Project is expected to result in emissions of particulate matter (TSP, PM_{10} and $PM_{2.5}$), gaseous emissions (NO_X, NO_2, SO_2 and CO) and airborne metals during the site preparation and construction phase, the operations phase, and the closure phase. No air emissions are expected in post-closure. The emissions from the Project are provided in Table 3 (site preparation and construction), Table 4 (operations) and Table 8 (closure) of the Environmental Air Quality Assessment (included as Appendix J-2 to the EIS). Emissions are also presented in Section 6.6 of the revised EIS. • *Blastomyces*, which is the fungus that causes blastomycosis, is most likely to be found in sandy, acidic soils near bodies of fresh water (Gaunt et al., 2009). Living near a river or lake, or having access to recently excavated areas has also been demonstrated to increase the risk of infection (Gaunt et al., 2009; Baumgardner et al, 1995). Treasury Metals indicated in the EIS that access to the site will be restricted for safety and security reasons throughout the operating life of the Project. This restriction would apply to both dog owners and their dogs. • A screening level risk assessment was completed as part of the revised EIS (Appendix W), which looked at the potential effects of the Project on humans from all pathways, including air quality. The assessment considered both cancer and non-cancer end-points in Appendix W. • Appendix J to the revised EIS includes a list of the mitigation measures identified to reduce the potential air quality effects associated with the Project, as well as a draft Best Management Practices Plan for Dust. Additional details on mitigation, follow-up monitoring and management plans for air quality are provided in Sections 6.6.6, 12.7 and 13.6 of the revised EIS.

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					References Cited Baumgardner, D.J., D.P. Paretsky and A.C. Yopp A.C. 1995. The epidemiology of blastomycosis in dogs: north central Wisconsin, USA. J Med Vet Mycol. 1995 May-Jun;33(3):171-6. PubMed PMID: 7666297. Gaunt, M. Casey, Susan M. Taylor, and Moira E. Kerr. 2009. Central nervous system blastomycosis in a dog. Can Vet J. 2009 Sep; 50(9): 959–962. PMCID: PMC2726023
339	AC(1)-13	Wabigoon Lake Ojibway Nation			**Information Request / Comment:** Concerned about close proximity of mine to residents, including community members. Community member owns private lands adjacent to open pit and waste rock. Asked if there are exceptions to the provincial air quality requirements that would allow exceedances that could affect nearby residents. Identified potential winter dust impacts on nearby residents, and asked how impacts will be mitigated, particularly with northwest wind in the Village of Wabigoon. **Response:** The Project will be required to obtain an Environmental Compliance Approval (ECA) from the Ministry of the Environment and Climate Change (MOECC). There will be no exceedances allowed as part of the ECA permitting process. The mitigation measures to be used to mitigate dust from the Project are detailed in the Dust Best Management Practices Plan (included as Appendix J-4 to the revised EIS). The plan will also allow for a complaint/feedback process that will be monitored regularly by the MOECC.
340	AC(1)-14	Wabigoon Lake Ojibway Nation Aboriginal People of Wabigoon			**Information Request / Comment:** Provided comments about potential effects to groundwater quantity and the information presented in the EIS: • concerns with data in the EIS, including gaps in seasonal flow measurements in Thunder Creek; • ground and surface water interactions in Blackwater Creek, may result in contamination of groundwater from effluent discharge; • Identified private and artesian wells located in the vicinity of the Project that are not identified in the EIS. • Asked how TMI will manage additional water if artesian wells are hit during drilling, as pit will overflow if water is not managed • Asked if TMI can identify the depth at which the artesian wells flow; • Shared that community member's artesian well runs at 55g/min. The water comes out at 47 degrees. **Response:** The baseline data collected of flows to support the revised EIS focused on those watercourses that

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					could be affected by the Project (see Figure 5.7.2 in the revised EIS). The watercourse most likely to have flows affected by the Project is Blackwater Creek, as the treated effluent from the Project will be discharged into the creek through a small constructed structure to dissipate flows and minimize the risk of erosion (Section 3.8.7 of the revised EIS). Other streams potentially affected include four tributaries to Thunder Lake. Thunder Lake Tributary 2 and Thunder Lake Tributary 3 are located to the north of the Project and flow through the former Ministry of Natural Resources and Forestry (MNRF) tree nursery. Although there will be no discharges from the Project to these watercourses, the current proposal is to withdraw fresh water from the irrigation ponds formed in the 1970s by MNRF placing dams on both of the tributaries. The final two watercourses studied are Hoffstrom's Bay Tributary and Little Creek. There will be no withdrawals from, or discharges to, either of these watercourses as part of the Project. However, they are close enough to the Project that concerns have been raised about the effect of the mine dewatering on the flows. There is no expectation that the Project will have any measurable effect on the flows in Thunder Creek. Additionally, Thunder Creek is not a naturally flowing watercourse. The flows in Thunder Creek are controlled by the MNRF dam located in Aaron Provincial Park. Treasury Metals has made the commitment to treat the effluent discharged from the Project to a level that will not affect the receiving environment (Table 10.0.1 of the revised EIS). For most parameters, the effluent will be treated to meet Provincial Water Quality Objectives (PWQO) criteria. The PWQO are set at a level of water quality which is protective of all forms of aquatic life and all aspects of the aquatic life cycles during indefinite exposure to the water. For parameters with no PWQO, Treasury Metals has committed to meet the Canadian Environmental Quality Guidelines (CEQG) from the Canadian Council of Ministers of the Environment (CCME). Finally, Treasury Metals has committed to effluent discharges that are at, or below, the background levels of mercury in Blackwater Creek. Therefore, there will be no issue with the effluent discharges at these levels adversely affecting either the surface or groundwater downstream of the Project. Treasury Metals has identified wells based on the information provided in Ministry of the Environment and Climate Change (MOECC) Water Well Information System (WWIS). However, it is well known that the WWIS contains inaccuracies and is not comprehensive. Treasury Metals has undertaken checks on the WWIS data and continues to improve Treasury Metals' own record of wells within the vicinity of the Project through contact with concerned residents. Treasury Metals welcomes further information on wells from your communities, including the community member's well with the unusually high artesian flows of 55 gallons / minute. The depth at which artesian wells flow may vary depending on location. It is most likely that artesian flows are encountered on low ground where clay overburden covers the basal sand and / or the shallow bedrock. During construction of the proposed open pit, any artesian flows encountered are not expected to be sustained as there is limited recharge through the clay overburden; the bedrock stores little water (i.e., it has very limited porosity) and the basal sand

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					(which may store some water) is thin and discontinuous. In addition, the proposed open pit is located on relatively high ground where artesian flows are less likely. Additionally, Treasury Metals has identified the need to continuously dewater both the open pit and underground mine workings during operations. Consequently, artesian flows are not considered to be an issue for the safe construction and operation of the proposed open pit.
341	AC(1)-15	Eagle Lake First Nation Wabigoon Lake Ojibway Nation			**Information Request / Comment:** Identified concerns about potential impacts to water level in local wells and the information provided in the EIS: • water table is high near Wabigoon, and therefore have concerns about watershed impacts to community and to nearby lakes due to dewatering of the open pit; • mitigation measures for impacts to wells are not adequate; • asked how community members will get their water back if wells are drained by the Project during operation or post-closure period; and • asked if TMI has dug new wells on site and if they have been monitoring the wells.
					Response: The ability of the bedrock to transmit water (i.e., its permeability) is simply too low to allow any significant amount of water to flow through the rocks. Groundwater seepage towards the dewatered open pit will be negligible and will not affect water levels in either Thunder Lake or Wabigoon Lake. Simply stated, the water from Thunder Lake and Wabigoon Lake will not drain into the Goliath open pit. Groundwater monitoring wells have been installed by Treasury Metals and these are presently being monitored. New groundwater monitoring wells will be installed as part of the groundwater monitoring program, which is presented in Section 13.11 of the revised EIS. Treasury Metals has had discussions with nearby residents who have expressed concerns about their wells.. Treasury Metals have also identified a comprehensive set of mitigation measures in various responses to the Round 1 information requests, which have been incorporated into the mitigation table in Section 6.0 of the revised EIS (Table 6.22-1). A comprehensive set of mitigation measures for private wells will also be incorporated into the Contingency Plan required by the Ministry of the Environment and Climate Change as part of the Environmental Compliance Approval (ECA) and the Permit to Take Water. As noted in the commitment registry, financial assurance will be set aside by Treasury Metals to deepen and/or re-drill deeper wells in the event that the water table is temporarily lowered by the dewatering of the mine (open pit and underground).
342	AC(1)-16	Eagle Lake First Nation			**Information Request / Comment:** Asked how the water will be treated and discharged, the amount of cyanide that will be used, the

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					contaminants and transportation methods for cyanide.
					Response: As described in Section 3.6 of the EIS, gold will be extracted from the ore in the processing plant using a standard carbon-in-leach (CIL) process. In this process, a cyanide solution will be used. Once the gold has been extracted from the crushed ore using the cyanide solution, the process waters containing cyanide will be reused to the extent possible, and then treated using the INCO/SO_2 process (which is widely used in the mining industry) to destroy the majority of the remaining cyanide. The resulting waste from processing, known as tailings, is a mixture of liquid and finely crushed rock from which gold has been extracted. The tailings will be pumped to the tailings storage facility (TSF) where the finely crushed rock in the tailings will settle over time. After treatment using the INCO/SO_2 cyanide destruction process, tailings directed to the TSF will meet the 1 mg/L total cyanide effluent discharge limit set out in the federal Metal Mining Effluent Regulations (MMER). The water covering the TSF will be recycled and used in the processing plant, and excess water that cannot be recycled will be treated in the effluent treatment plant and ultimately discharged to Blackwater Creek. Treasury Metals has committed (Table 10.0.1 of the EIS) that the final effluent discharged to Blackwater Creek will meet the Provincial Water Quality Objectives (PWQO) established in Ontario to be protective to sensitive aquatic receptors. The PWQO are more stringent than the standards in Ontario for drinking water. Reagents (process chemicals) to be used in the gold extraction process will be delivered to the Project site by truck, with three to five operating days' worth of reagents stored in the processing plant, and additional storage (approximately two days' worth) provided at the existing warehouse at the former Ministry of Natural Resources and Forestry (MNRF) tree nursery. Cyanide would be delivered to the site in the preferred dry (solid) form as sodium cyanide pellets or briquettes, to avoid the possibility of liquid spills during transport. All activities at the Project site are designed to comply with the International Cyanide Code, as well as federal and provincial regulations. All deliveries of cyanide to the site would be performed by regulated transport companies, who would be required to comply with relevant federal regulations such as the Transportation of Dangerous Goods Act.
343	AC(1)-17	Eagle Lake First Nation Wabigoon Lake Ojibway Nation			**Information Request / Comment:** EIS shows there will be mercury in the seepage and discharge from the mine. Concerns about mercury contamination and potential impacts to Grassy Narrows First Nation.
					Response: Treasury Metals is aware of issues related to mercury in the region and has made a commitment to minimize any mercury from the Project. During operations, all of the effluent will be treated before being discharged to Blackwater Creek. Treasury Metals is committed that the mercury in effluent will meet concentrations that are equal to, or less than background concentrations in Blackwater Creek (Table 10.0.1 of the revised EIS).

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					The waste rock storage area (WRSA) and tailings storage facility (TSF) will be designed to minimize any seepage, with the small amounts of seepage collected and used in the process before eventual treatment and discharge. The dewatering of the open pit and underground mine during operations will result in a drawdown cone, capturing the groundwater and seepage from the site. This water will be used in the process, treated and discharged. At closure, the WRSA will be reclaimed using a low-permeability cover to isolate the waste rock from oxygen and to minimize the amount of infiltration and seepage. The open pit will be flooded to isolate the waste rock and exposed mine faces from oxygen, thus minimizing any further acid rock drainage and metal leaching (ARD/ML). Finally, the tailings water will be withdrawn from the TSF at closure, treated and used to fill the open pit. The tailings will then be covered with a granular cover to physically isolate the tailings. Finally, the tailings will be capped to isolate the tailings from oxygen so as to prevent ARD. The tailings cap will consist of either a low-permeability dry cover or a water cover using non-process water.
344	AC(1)-18	Eagle Lake First Nation Wabigoon Lake Ojibway Nation			**Information Request / Comment:** Identified concerns that lakes and wells will be contaminated, and asked questions about how tailings and water will be managed at the site, including: • Limited consideration of groundwater flow in TSF design; • What will the tailings storage facility be lined with; • How long the water will be retained in the tailings storage facility; • The amount of water that will be used at the mine site; • The amount of discharge into the tailings storage facility; and • The source(s) of the water supply. Can water quality be guaranteed following closure of the mine? Identify the measures to be taken to control water quality impacts to the local watersheds.
					Response: Since the submission of the original EIS, Treasury Metals has been advancing their engineering for the Project. A summary of the refinements to the Project since the completion of the original EIS is presented in Section 3.16 of the revised EIS. Section 3.16 includes refinements to the physical layout of the Project as well as refinements to the Project water balance. This information was used when providing the following responses to the specific requested information: • The design of the tailings storage facility (TSF) has, and will, include consideration of the physical settings, geology, soil conditions and groundwater characteristics. The likely groundwater characteristics were included as part of Appendix D (Tailings Storage Facility). The TSF location is located relatively high in the watershed, where more recharge than discharge would be expected, and therefore groundwater inflow to the TSF is not anticipated. A drain network (blanket drain) will be constructed into the base of the TSF embankments to drain

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					groundwater from the foundation. • The TSF will be contained behind a clay lined, zoned earthfill dam. The TSF is proposed for an area identified as being a natural clay basin, however, Treasury Metals will use a combination of clay and synthetic to line the TSF should the soil conditions warrant additional lining materials. The TSF will also be equipped with an internal drain system with a secondary downstream seepage and pump back system. • Process water and tailings will be treated to recover and remove cyanide before being discharges to the TSF. The TSF will be maintained with a water cover throughout the operations phase of the Project to isolate the tailings from oxygen and prevent the onset of acidification. Excess water from the TSF will be withdrawn and used within the process, if practical, treated, and ultimately discharge to Blackwater Creek. All effluent discharged to Blackwater Creek during operation will meet the Provincial Water Quality Objectives (PWQO). At closure, the water cover on the TSF will be withdrawn, treated, and used to help fill the open pit. The tailings will be physically isolated by applying a granular cover. The tailings will then be isolated from oxygen to prevent acidification using either a dry low-permeability cover, or a wet cover using non-process water. • The refined water balance for the Project has been provided as an Appendix JJ to the revised EIS.Appendix JJ – Water Report provides revised water predictions that are based on the Project refinements since the submission of the original EIS. In total, the site will use 3,044 m^3/d. This water is comprised of a combination of reclaim process water, raw water and fresh water. • The total discharge to the TSF will be approximately 2,913 m^3/day as described in the Water Report . A portion of this water will remain within the tailings, while the balance will form the water cover that isolates the tailings from oxygen and prevents acidification. Excess water from the TSF will be used in the process and treated prior to being discharged to the environment. During operations, all water discharged to Blackwater Creek will meet the PWQO. Reclaim water from within the site will be used to ensure the water cover is maintained on the TSF. • The majority of the water used at the Project will come from reclaimed process water, water from dewatering the open pit and underground mines, and runoff collected within the perimeter ditch around the “operations area”. As identified in the water balance (Appendix JJ to the revised EIS), there will be the need to use fresh water in the process. The fresh water will be taken from the irrigation ponds at the former Ministry of Natural Resources and Forestry (MNRF) tree nursery. These ponds are located on Thunder Lake Tributary 2 and Thunder Lake Tributary 3. The amount of fresh water required will vary depending on the time on year and whether it is a dry, wet or average season. The specific requirements for water withdrawal from the irrigation ponds are presented in Table 1 of Appendix F to the revised EIS. At no point would the withdrawal from either pond exceed 5% of the average monthly flow into the ponds. • There will be a number of measures incorporated in the Project to protect water quality during operations and after the closure of the mine. During operations, the discharges from the Project to Blackwater Creek will be treated to meet PWQO. At the close of mining operations, the waste

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					rock storage area (WRSA) will be capped with a low-permeability cover to isolate the tailings and minimize the potential for acid rock drainage and metals leaching (ARD/ML). The water cover on the TSF will be withdrawn, treated and used to help fill the open pit. The tailings will be physically isolated by applying a granular cover. The tailings will then be isolated from oxygen to prevent acidification using either a dry low-permeability cover, or a wet cover using non-process water. The open pit will be allowed to fill following closure, which will isolate the waste rock stored in the open pit and the exposed mine faces from oxygen to prevent acidification. As the open pit is filling, Treasury Metals will monitor the quality of water in the pit to identify whether mitigation will be required in order to meet PWQO. The mitigation required during filling of the open pit would likely include batch treatment processes, such as the addition of lime, to adjust the pH of the water and reduce the concentrations of metals in the water. Once the pit is flooded, the water will be allowed to discharge into Blackwater Creek Tributary 1.
345	AC(1)-19	Wabigoon Lake Ojibway Nation Eagle Lake First Nation			**Information Request / Comment:** Concerns of acid generating potential and over flow of pit during closure. No detailed analysis of open pit water contamination, overflow potential and containment of potential acid generating material. Impacts to groundwater and contamination are a concern. **Response:** The original EIS provided a detailed analysis of the potential water quality in the open pit, following closure (see Appendix C of Appendix F to the original EIS). The analysis was done so that: i) appropriate management activities can be implemented if necessary to minimize the potential for acid rock drainage (ARD), and, ii) to have mitigating measures in place should they be necessary to manage any identified ARD risks. This information has been updated and elaborated on in Section 5 of the Water Report, provided as Appendix JJ to the revised EIS.
346	AC(1)-20	Eagle Lake First Nation			**Information Request / Comment:** Describe the protocols to be followed to secure and verify proper sampling, analysis, and reporting are done. Indicate any opportunities to involve First Nations as monitors in the monitoring program as well as clarify who will be responsible for monitoring tailing ponds for the next 100 years. **Response:** The environmental monitoring programs are described in the revised EIS (Section 13.0), and has been further developed in engagement with Federal and Provincial governments, Aboriginal peoples, and public stakeholders since submission of the original EIS. Additional elements of the follow-up program and environmental management plans that reflect the feedback received during the IR Round 1 and engagement to date have been incorporated in Section 13.0 of the revised EIS. The potential involvement of Aboriginal peoples as monitors with the monitoring programs will be discussed as part of the engagement involved in further developing the monitoring plans. It should be noted that Treasury Metals has committed to maintain a local hiring policy (Table 10.0.1 of the

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					revised EIS), which includes Aboriginal communities and peoples. With respect to monitoring of the tailings pond, during the operating life of the mine (about 11 years), a water cover will be maintained on the tailings storage facility (TSF) to reduce the potential for acid rock drainage (ARD). However, Treasury Metals plans to drain the water from the tailings pond at closure and cover the TSF with a low-permeability cover to reduce water infiltration (Section 3.14 of the revised EIS). There will be no tailings pond to monitor once the closure has been completed.
347	AC(1)-21	Eagle Lake First Nation Wabigoon Lake Ojibway Nation			**Information Request / Comment:** Potential contamination of food sources (e.g., fish, moose, deer, wild rice, rabbit) from effluent discharge. **Response:** Treasury Metals has made the commitment (Table 10.0.1 of the revised EIS) to treat all of the effluent during operations to meet the Provincial Water Quality Objectives (PWQO) prior to being released to the environment. The screening level risk assessment (Appendix W to the revised EIS) does not identify any concerns associated with the consumption of traditional foods during the operations and post-closure phases of the Project.
348	AC(1)-22	Wabigoon Lake Ojibway Nation			**Information Request / Comment:** Identified potential impacts to community economic conditions including: • Potential impacts to tourism, including businesses offering temporary accommodation, guiding, fishing, and hunting outposts. Some local businesses are owned by community members, and many community members guide for hunting and fishing; • Potential impacts to wild rice. Identified wild rice is important for community economic development and that wild rice grows in Thunder Creek and Blackwater Creek; • Potential impacts to chanterelles. Chanterelles are located throughout the area and have high economic value. Also asked TMI to describe the socio-economic benefits to the community from the Project. **Response:** Treasury Metals acknowledges Wabigoon Lake Ojibway Nation's identification of potential Project-related effects on tourism, wild rice and chanterelles and welcomes any additional input or information the community may be able to share to further Treasury Metals understanding of the potential effects. Treasury Metals acknowledges that there are a number of questions from the Agency and other reviewers related to the approach used in the original EIS for organizing and presenting information regarding the potential effects of the Project. In order to effectively address these issues, and to address issues raised through the responses to Round 1 questions, Treasury Metals has prepared

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					a revised EIS. Treasury Metals is committed to ongoing engagement with Aboriginal peoples throughout the life of the Project and will work with Wabigoon Lake Ojibway Nation, potentially affected stakeholders and other Aboriginal communities to develop a socio-economic monitoring and management plan designed to address potential Project-related socio-economic effects identified through the environmental assessment process and/or at later stages of the Project, including those identified in this IR. A range of socio-economic benefits are anticipated as a result of the Project construction, operation and decommissioning activities, including, but not limited to: • Training (pre-employment and on-the-job training); • Employment (wages and benefits); and • Contracting and procurement opportunities through the supply of goods and services to the Project. Project-related training, employment, and contracting opportunities will help to diversify and strengthen the local economy. In addition to the benefits noted above, the Project will provide broader economic benefits through government revenues (e.g., payroll taxes including Canada Pension Plan, Employment Insurance, Employer Health Tax and Federal Income tax).
349	AC(1)-23	Naotkamegwanning First Nation			**Information Request / Comment:** Identified potential impacts to water quality, and perception of contamination may affect sales from commercial fishing licenses in Thunder Lake, Butler Lake, Wabigoon Lake and other lakes in the area (approximately 23 licenses in total). The economic development from these fisheries is important to the community. **Response:** Treasury Metals recognizes the economic importance of fishing for commercial and subsistence harvest purposes to Naotkamegwanning First Nation and other Aboriginal peoples in the socio-economic study area. Since the submission of the EIS, Treasury Metals has been advancing their engineering for the Project, including refining the water balance and flows for the site. This refinement will modify some of the water-related predictions. To capture these changes, and to reflect changes suggested by the responses to the Round 1 IRs, Treasury Metals has prepared a Water Report, provided as Appendix JJ to the revised EIS. Treasury Metals is committed to ongoing engagement with Aboriginal peoples throughout the life of

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					the Project and will work with potentially affected stakeholders and Indigenous communities to develop a socio-economic monitoring and management plan designed to address potential Project-related socio-economic effects identified through the environmental assessment process and/or at later stages of the Project. Monitoring of sales of commercial fishing licenses for Thunder Lake, Butler Lake, Wabigoon Lake and other identified lakes may be included in the monitoring efforts of Project-related effects as an indicator of perception of water quality and contamination. The quality of the water leaving the Project site will be monitored and will contribute to the understanding of the quality of fish harvested in downstream lakes.
350	AC(1)-24	Eagle Lake First Nation			**Information Request / Comment:** Identified that Lola Lake is in close proximity to the Project and asked how the park may be impacted.
					Response: Lola Lake is located within the LSA used for the revised EIS, but is located upstream from the Project. There will be no water discharges from the Project that will affect Lola Lake. The current plans for the Project include the potential to take water from the irrigation ponds at the former Ministry of Natural Resources and Forestry (MNRF) tree nursery. Two of these ponds are located on Thunder Lake Tributary 2, which is downstream of Lola Lake. Withdrawing water from these ponds will not affect the water levels or flows at Lola Lake, which is upstream of the Tree Nursery Ponds. To safely operate the open pit and underground, it will be necessary to dewater the mine workings. As a result of the dewatering, there will be a groundwater drawdown in the basal sand/shallow bedrock. The predicted zone of influence (ZOI) for the drawdown is presented in Figure 21 in Appendix M to the revised EIS. The predicted ZOI does not extend to Lola Lake, and it will not be affected by dewatering.
351	AC(1)-25	Wabigoon Lake Ojibway Nation			**Information Request / Comment:** Identified that Butler Park (across Wabigoon Lake) is nearby and asked if potential impacts to the park had been evaluated.
					Response: Butler Lake Provincial Park is a nature reserve located on the south shore of Wabigoon Lake, approximately 6 kilometres from the Project. The park is beyond the LSA and RSA used for evaluating the effects of the Project on most of the biophysical components of the revised EIS. Although not explicitly evaluated, the effects of the Project on Butler Lake Provincial Park can be expected to be negligible given the distance from the Project. The EIS demonstrated that all of the non-negligible effects of the Project on the biophysical components of the environment were

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					contained within a 5 km radius of the Project (i.e., the LSA).
352	AC(1)-26	Wabigoon Lake Ojibway Nation			**Information Request / Comment:** Identified concerns regarding the scope of the effects assessment for potential effects to Aboriginal peoples is limited to arrowheads, subsistence land uses, and impacts on reserve only. Population of Village of Wabigoon is 75% Aboriginal peoples. **Response:** In preparing the revised EIS, Treasury Metals paid particular attention to the potential effects of the Project to all Aboriginal peoples, both those on reserves as well as those living outside of reserve lands (e.g., Village of Wabigoon). The effects assessment considered a range of potential effects including the following: • Changes to the environment, such as air quality, noise, surface water quality and quantity, wildlife, vegetation and fish; • Changes to human health resulting from exposures to air quality, as well as the consumption of fish and wildlife that were exposed to the emissions from the Project; • Heritage resources within the area affected by the Project; • Socio-economic effects, including affects land use and economic factors that extend into the wider region; and • Effects on Aboriginal people that could result directly, or as a results of the change in the environment. An expanded assessment of the effects of the Project on the environment, along with a discussion of the mitigation measures to address those effects is provided in Section 6.0 of the revised EIS. Treasury Metals has made efforts to engage and elicit input from Aboriginal peoples regarding the Project. No Project-specific traditional knowledge and traditional land use studies were prepared for, or shared with, Treasury Metals; limited information was obtained about traditional land use areas. Treasury Metals made efforts to incorporate information provided and to address comments and issues raised by Aboriginal peoples during the engagement process. A summary of the issues raised during the engagement process was provided in Section 8 and Appendix DD to the original EIS. As part of the Round 1 IRs, the Agency has requested that Treasury Metals expand and update the information presented in Appendix DD to the revised EIS. This information is provided as Appendix DD (Aboriginal Engagement Report to the revised EIS). The Aboriginal Engagement Report provides a listing of the disaggregate comments from Aboriginal peoples, and how those were addressed in the revised EIS. Treasury Metals will continue to discuss potential Project effects on traditional land use activities with potentially affected Aboriginal peoples throughout the life the Project. As additional information regarding an Aboriginal community's traditional land use and practices become available, Treasury Metals will review and consider it in the design of mitigation measures, follow-up monitoring and

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					management plans for the Project, as appropriate.
353	AC(1)-27	Naotkamegwanning First Nation			**Information Request / Comment**: Identified sacred aspects of the environment in the Project area, including turtles, frogs, rocks and boulders, and that there are sacred sites south of Wabigoon. The community has a strong connection to the land, and the community cannot relocate if there are impacts from the Project to the environment. **Response:** Treasury Metals has been engaged with Aboriginal peoples within the Project area for a number of years and has attempted to negotiate agreements for sharing traditional knowledge and preparing traditional land use studies. Those attempts are described in the Aboriginal Engagement Report, Appendix DD to the revised EIS. Treasury Metals continues to be willing to undertake TK/TLU studies with affected communities. Where available, TK/TLU information that has been collected has been integrated into the EIS. Any traditional knowledge shared by the communities will be incorporated into the design of Project mitigation, follow-up monitoring plans and environmental management plans, as appropriate.
354	AC(1)-28	Wabigoon Lake Ojibway Nation			**Information Request / Comment:** Identified sites of physical and cultural heritage value that may be affected by the Project, and provided comments on the assessment provided in the EIS: • assessment should consider both reserve and non-reserve lands and not focus solely on archaeological artifacts and sites; • Thunder Lake was used as a traditional canoe route to Rice Lake. Elders camped throughout on the sandy beaches. Travel routes identified from Wabigoon to Thunder Lake to Ghost Lake to Rice Lake to gather wild rice; • ceremonial sites in the area are not identified in the EIS, including stone circles found on residential properties around the project site; • view of Thunder Lake has cultural importance to the elders; • Wabigoon Lake is the biggest wild rice area in Canada and is used as a spiritual and teaching area; and • Spiritual values should be considered its own human environment component - just as important to elders as water. **Response:** The information request indicates that Wabigoon Lake Ojibway Nation (WLON) "identified sites of physical and cultural heritage value that may be affected by the project," and summarizes the values identified in a series of bullets. The points raised are directed to both archaeological assessment and traditional knowledge (TK) in the project area. They include suggestions for

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					changes to the geographic scope of study and to the categories of heritage values considered. WLON comment that they have identified sites of physical and cultural heritage value that may be affected by the Project. These sites include a traditional canoe route between Wabigoon Lake and Rice Lake, wild rice beds in Wabigoon Lake, stone circles identified on residential properties around the project site, the Thunder Lake viewshed, and spiritual values as an environmental component. It is not clear from the comment whether the information on the sites in question has been transmitted to Treasury Metals. While the identified sites (canoe route, wild rice beds and viewshed) are within the local study area defined for the EIS, these areas are not proposed for any physical disturbance. Treasury Metals is committed to working with WLON to accurately map and develop mitigation protocols for any archaeological or cultural heritage sites brought to their attention that lies within the local study area and may be affected by the proposed undertaking. It is important that these sites are identified, mapped and evaluated in order to plan mitigation strategies. The archaeological assessment was focused on the development area, the parts of the property that will be directly impacted by the construction of the open pit mine and associated infrastructure. Evaluation of archaeological potential for any property considers areas adjacent to the property under consideration to confirm the evaluations made. For example, the low potential evaluated for the development area is supported by the contrast in potential evident in the areas adjacent to Thunder Lake and Wabigoon Lake. These areas would have been the preferred locations for settlement, and this settlement would have been related to available food resources (fish, rice), and access (canoe routes) among other variables. Given this, Treasury Metals does not see the benefit of expanding the geographic scope of the archaeological and heritage assessment study to include areas beyond the development area, as this would not substantively change the results of the assessment or evaluation of impacts. The traditional canoe route between Wabigoon Lake, through Thunder Lake and Ghost Lake to access Rice Lake is an important, but intangible, cultural heritage value. The route provides access between lakes supporting large and culturally significant wild rice beds. The canoe route identified lies beyond the area of anticipated impact from the development and should not be compromised. The information that Elders camped on sandy beaches along the route is valuable, and confirms the general approach taken in evaluating archaeological potential. Under the direction of the Archaeological and Cultural Heritage Resource Management Plan this information will support restrictions on development within 300 metres of major water sources and within 300 metres of historical travel routes without an archaeological assessment being completed. WLON have also commented that the scope of assessment should be expanded to include a range of intangible heritage values (spiritual sites and viewsheds). Spiritual values, ceremonial sites (stone circles on residential properties outside of the study area), the view of Thunder Lake, and the use of wild rice areas as a spiritual and teaching area are identified. Both the rice beds and the stone circle lie outside of the development area and will not be impacted by the Goliath project. The view of

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					Thunder Lake is identified as being culturally important to Elders. We note that the development area will be more than 300 metres from Thunder Lake. This may be sufficient to preserve the view of the lake, depending on the vantage point used. Treasury Metals is open to discuss how this use can be accommodated. The comment also notes that "spiritual values should be considered its own human environment component". For planning purposes, values requiring protection need to be defined spatially, and for this the material component forms the basis for the value definition. In the absence of a material component or clear geographical extent indicated, it is impossible to map and to determine appropriate protective measures. In cases where there is a material component to a site, as with a stone circle, the value can be mapped and protection provided. Where the spiritual value is subject to a specific traditional practice, the location of the practice can be mapped and prescriptions for protection developed. More broadly, however, expanding the scope of the EIS in response to the WLON comment would require clarification and direction from CEAA.
355	AC(1)-29	Wabigoon Lake Ojibway Nation			**Information Request / Comment:** Identified potential archaeological sites in the vicinity of the Project, and provided comments on the assessment provided in the EIS: • archaeological sites in Thunder Lake and Wabigoon Lake could be underwater. Spring fed ponds has been identified near ceremonial sites on community member's property which is in close proximity to the site; • inaccuracies/contradictions in archaeology section of EIS. Thunder Lake is identified as historical hunting/fishing area, but the EIS then states that First Nations were never in the area; • EIS also identifies no cultural resources were found in Aaron Park – this is inaccurate; • Two grave sites in project site. Letters were written to TMI identifying sites in 2008; • Concern about how archaeological resources will be managed. Elders say archeological sites and objects should stay where they are; and • Burial ground and fishing camp have been identified on Christie Island. **Response:** The *information request* identifies several cultural heritage locations known to community members, and possible areas for additional cultural heritage and archaeological values investigation. The comments also suggest that the EIS in inaccurate or contradictory in terms of the long term occupation of the local study area by Aboriginal people. Archaeological and cultural heritage resource management concerns are also raised in the comments. The Wabigoon Lake Ojibway Nation (WLON) comment that areas of archaeological potential may be underwater in Thunder Lake and Wabigoon Lake, and also note that spring fed ponds on a nearby property show unspecified evidence of use as ceremonial sites. This information is of considerable interest, but does not materially affect the outcome of the assessment of the

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					development area. Archaeological sites located beneath the water level of the lakes are beyond the area of anticipated impact. However, all proposed development activities that may impact shorelines or lake beds will be subject to additional review and assessment. Where archaeological assessment is required for additional proposed development work, Treasury Metals will contact WLON for information on sites or areas of cultural heritage value in these areas. Generally, all areas within 300 m of lakes and ponds will require some level of assessment. The text of the original EIS is identified as containing an internal contradiction: the Thunder Lake area is identified as a historical hunting and fishing area, but elsewhere seems to suggest that First Nations people did not occupy the area. Treasury Metals believe that this is a concern arising from the wording of the original EIS text, and acknowledge the long-term use and occupation of the regional study area by Aboriginal people. The intensity of use and occupation across the Project area would have varied through time and according to resource availability and accessibility. The WLON comment that the absence of archaeological or cultural heritage resource data for Aaron Provincial Park is inaccurate. We note that the archaeological assessments completed for the Project in 2012 drew on information available through the Ministry of Tourism, Culture and Sport (MTCS) database and other sources. Then, as now, there are no archaeological sites registered with the province for Aaron Lake Provincial Park. If there is additional information on archaeological or cultural heritage sites within Aaron Lake Provincial Park, this information would be important to understanding the culture history of the region. While this information may contribute to the evaluation of archaeological potential for the development area, it is unlikely to change the outcome of the assessment unless these sites occupy unusual positions on the landscape. Two comments made in the information request refer to graves, two within the Project area and an undisclosed number on Christie Island in Wabigoon Lake. The locations of the graves are not known to Treasury Metals and planning cannot accommodate protection for them without this information. The 2008 letter does not appear to be available from files maintained by Treasury Metals, the Agency or WLON, and so it is unclear what information was transmitted at that time. The potential for disturbance to graves is of significant concern. Treasury Metals will work with WLON confirm and verify the locations of any graves within the Project area, and to avoid impacts to any graves located within the development area from adverse effects. We note that the greatest potential for disturbance is within the development area, where construction, operation and decommissioning activities may cause site or soil disturbance. The sites on Christie's Island, (both the graves and the fishing camp) will be unaffected by the proposed mining development. The one registered archaeological site on the island will be similarly unaffected. It is important to note that any grave sites present in the development area will be protected, and where graves can be verified in the field they will be subject to a site disposition agreement under the terms of O.Reg 30/11 of the *Funeral, Burial and Cremation Services Act*, S.O. 2002, c.33, and separate agreements between the landowner and WLON as necessary. We also note that the proposed Archaeological and Cultural Heritage Resource Management Plan will outline the

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					requirements for managing graves, and responding to accidental disturbance of burial sites. As a general note, WLON indicate that Elders prefer that archaeological resources to be curated *in situ*; that is, that artifacts are maintained and preserved at the sites where they are identified. The Archaeology and Cultural Heritage Resource Management Plan will reflect this preference. Determining the short and long term disposition of archaeological materials requires the participation of MTCS in decision making, and certain conditions for curation apply. Preserving archaeological resources *in situ* maintains the connection between artifacts and the sites, and ancestors and descendants. But is also leaves sites and artifacts vulnerable to adverse effects that may be impossible to manage both during and after the proposed operational lifespan of the Project. Treasury Metals will conduct additional background research for the Archaeology and Cultural Heritage Resource Management Plan on this concern. For example, Quetico Provincial Park and Lac la Croix First Nation have developed a draft cultural resources management plan that emphasizes *in situ* management of archaeological resources, and implementation experience data may be available.
356	AC(1)-30	Wabigoon Lake Ojibway Nation			**Information Request / Comment**: Treaty 3 is quoted and interpreted in EIS Appendix DD section 2.1. Treaty interpretation should not be part of EIS. **Response:** At the request of the Agency, Treasury Metals has prepared a revised Appendix DD, referred to as the Aboriginal Engagement Report. The Aboriginal Engagement Report provides a detailed record of contacts with Aboriginal peoples, identifies concerns and questions raised by each Aboriginal person, a detailed list of concerns and how they were addressed in the EIS. The Aboriginal Engagement Report shows Treasury Metals' efforts to provide relevant Project-related information and efforts to solicit information and concerns from the Aboriginal peoples.
357	AC(1)-31	Eagle Lake First Nation			**Information Request / Comment**: The Great Earth Law is very important. Connections between every aspect of the environment must be recognized. Describe what will be done to mitigate impacts and protect the environment for current and future generations and wildlife. Anishawbe people want to protect environment, especially water, for future generations. The preservation of land is a key concern over economic benefits of the Project. **Response:** Treasury Metals will engage with Treaty 3 First Nations for the life of the Project with the goal of understanding impacts and jointly developing mitigation measures that respect Great Earth Law. Mitigation measures including obligations for on-going engagement will be registered in the Commitments Registry of the EIS, and will become enforceable commitments on Treasury Metals. Furthermore, the Crown will consult Treaty 3 First Nations for the life of the Project to understand

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					impacts and will incorporate appropriate terms and conditions into the permits that are issued to Treasury Metals to mitigate impacts during site preparation and construction, operations and closure phases of the Project.
358	AC(1)-32	Eagle Lake First Nation Wabigoon Lake Ojibway Nation Naotkamegwanning First Nation			**Information Request / Comment:** Shared information about wildlife baseline conditions: • characterized soils as sandy northeast of Thunder Lake, including the proposed location for the tailings storage facility; • blueberries grow in sand areas and are known to move, the entire area should be identified as blueberry habitat; • denning habitat for fox in the area of the proposed tailings storage facility; • project area includes bear denning habitat. Dens have been identified along first gate to the tree nursery, property line to tree nursery, and the proposed tailings storage facility location; and • moose population near Blackwater Creek and up the site. **Response:** In collecting environmental baseline data, consideration was given to the possible presence of dens, mast areas, and the distribution of wildlife populations. No dens were specifically noted during field surveys, however, to the extent possible, the information that was shared with Treasury Metals was considered in preparing the EIS. Treasury Metals will continue to discuss potential Project effects on traditional land use activities with local communities and local Aboriginal communities throughout the life the Project. Treasury Metals will continue to engage Aboriginal peoples throughout the life of the Project. As information regarding the communities' traditional use of the lands and traditional knowledge becomes available, and is shared, Treasury Metals will consider it in the design of mitigation measures, follow-up monitoring and management plans for the Project, as appropriate.
359	AC(1)-33	Eagle Lake First Nation Wabigoon Lake Ojibway Nation			**Information Request / Comment:** Identified potential impacts to wildlife in the area and asked how impacts would be mitigated, including impacts to: • moose and moose habitat; • furbearers (e.g., beaver and muskrat); • water animals; and • other wildlife (i.e. chipmunks, mice, and squirrels). Identified that wildlife have large ranges so impacts will not be confined to project site, in particular if wildlife is exposed to tailings. Asked if the pit and tailings storage facility will be fenced in to prevent access by animals. **Response:** Treasury Metals acknowledges that there are a number of questions from the Agency and other

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					reviewers related to the approach used in the EIS for organizing and presenting information regarding the potential effects of the Project. In order to effectively address these issues, and to address issues raised through the responses to Round 1 questions, Treasury Metals has prepared a revised EIS. The revised EIS sets out the assessment of effects and impacts associated with the Project in a clear and traceable manner. The revised EIS provides a structured evaluation of the potential effects of the Project on wildlife and wildlife. Where warranted, mitigation measures to reduce potential effects are identified and the effects that remain are passed forward for the determination of significance. The potential effects of wildlife accessing the tailings storage facility (TSF) during the Project operations and into post-closure was evaluated as part of the risk assessment (Appendix W) completed to support the EIS. No unacceptable risks were identified. As part of the operational procedures, Treasury Metals will prepare a wildlife management plan to address issues such as restricting access to wildlife for the safety of both the wildlife and the Project personnel. Additional details on this plan and the mitigation measures being considered are presented in Section 12.9 of the revised EIS. The methods used in the assessment of Project effects, including selection of valued components and study areas) are provided in Section 6.1 of the revised EIS. The potential effects assessment and related information on wildlife and wildlife habitat are provided in Section 6.12 of the revised EIS. The significance of residual effects on wildlife and wildlife habitat is discussed in Section 8.12 of the revised EIS.
360	AC(1)-34	Wabigoon Lake Ojibway Nation			**Information Request / Comment:** Historically, and while the tree nursery was in operation, the community used to have open access to the site for land use. During the tree nursery operation access to hunting trails and the rest of the site was available 5 days a week. Identified community members' access to lands and resources has been affected by the Project in recent years, and also identified additional impacts that may occur, including: • hunting trails and roads throughout the project area (currently not included in the EIS); • Project may restrict access to Thunder Lake and areas north of the proposed tailings storage facility; • plant harvesting, including blueberries, stump mushrooms, chanterelles, medicinal plants and other berries. Low bush cranberries, snowbush berry, Labrador Tea, low bush hemlock/ ground hemlock are known medicines in the area. • peat resources in the area are used by the community;

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					• baitfishing; • hunting; • cutting wood for subsistence and economic purposes; and • trapping (Aboriginal community members from Eagle Lake First Nation and Wabigoon Lake Ojibway Nation hold the trapline licenses for the three trapline areas which are directly affected by the Project).
					Response: Treasury Metals has made efforts to engage and elicit input from Aboriginal peoples regarding the Project. Although no Project-specific traditional knowledge and traditional land use studies were prepared for, or shared with, Treasury Metals; limited information was obtained about traditional land use areas. Treasury Metals made efforts to incorporate information provided and to address comments and issues raised by Aboriginal peoples during the engagement process. A summary of the issues raised during the engagement process was provided in Section 8 and Appendix DD to the original EIS. As part of the Round 1 IRs, the Agency has requested that Treasury Metals expand and update the information presented in Appendix DD to the original EIS. This information is provided as the updated Appendix DD Aboriginal Engagement Report to the revised EIS. The Aboriginal Engagement Report provides a listing of the disaggregate comments from Aboriginal peoples, and how those were addressed in the revised EIS. The available information related to Aboriginal traditional knowledge or current land and resource use by WLON in the area of the Project is limited; WLON did not share any Project-specific information or knowledge with Treasury Metals before the EIS was filed. Treasury Metals will continue to discuss potential Project effects on traditional land use activities with potentially affected Aboriginal peoples throughout the life the Project. As additional information regarding an Aboriginal community's traditional land use and practices become available, Treasury Metals will review and consider it in the design of mitigation measures, follow-up monitoring and management plans for the Project, as appropriate. An expanded evaluation of the potential effects of the Project on Aboriginal peoples, including potential changes to their access to areas for practicing traditional uses of the land, is provided in the revised EIS. The potential effects of the Project on land use and Aboriginal people are described in Sections 6.16 and 6.21, respectively.
361	AC(1)-35	Wabigoon Lake Ojibway Nation			**Information Request / Comment**: Wabigoon Lake is the biggest wild rice area in Canada and is used as a spiritual and teaching area. Concerns about effluent flowing into Wabigoon Lake through Blackwater Creek. Wild rice is important to lifestyle and culture. Concerns about the impacts to health and quality of life due to taking away food source.
					Response:

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					The presence of wild rice within Wabigoon Lake was identified in the EIS, and considered in the evaluation of potential effects. In order to protect the ecosystem downstream of the Project, Treasury Metals is committed to ensure that the effluent from the Project would meet Provincial Water Quality Objectives (PWQO) prior to being discharged into Blackwater Creek. The PWQO were established at levels that provide protection to sensitive aquatic receptors. An expanded evaluation of the potential effects of the Project on the surface water quality, fish and fish habitats, as well as Aboriginal peoples (including potential effects on the gathering of traditional foods, such as wild rice) is provided in the revised EIS in Sections 6.8 (surface water quality), 6.14 (fish and fish habitat), 6.15 (wetlands and vegetation) and 6.21 (Aboriginal peoples).
362	AC(1)-36	Eagle Lake First Nation			**Information Request / Comment**: Elder identified he picks blueberries at the area where the tailings storage facility will be located. Identified Aboriginal land use in Wabigoon and Thunder Lakes includes fishing (two commercial licenses), as well as wild rice harvesting. The EIS does not include any information about impacts on Rice, Sandy, Gardner, Mud and Turtle Lake, which are also used by Aboriginal peoples. **Response:** The EIS included an evaluation of the potential effects of the Project on the receiving environment. The potential effects to both Wabigoon lake and Thunder Lake were considered within the effects assessment presented in the EIS. An expanded evaluation of the potential effects of the Project on the surface water quality, fish and fish habitats, as well as Aboriginal peoples (including potential effects on the gathering of traditional foods, such as wild rice) is provided in the revised EIS in Sections 6.8 (surface water quality), 6.14 (fish and fish habitat), 6.15 (wetlands and vegetation) and 6.21 (Aboriginal peoples). Effects on more distant waterbodies were not explicitly evaluated as there is no identified mechanism for the Project to affect those waterbodies. During the early stages of the site preparation and construction phase, Treasury Metals will construct a perimeter ditch around the operations area where mining and milling activities will eventually occur. These ditches will collect the runoff from the site for use in the water management system, and preventing their release, untreated, to the environment. Once operations start, Treasury Metals will have an effluent treatment system in place that will treat all effluent released from the Project to meet Provincial Water Quality Objectives (PWQO) prior to release to Blackwater Creek. There will be no operations releases from the Project to Thunder Lake or the tributaries that feed into Thunder Lake. During the life of the Project, Treasury Metals will need to withdraw fresh water for use in the processing. This water will be drawn from the irrigation ponds at the former Ministry of Natural Resources and Forestry (MNRF) tree nursery. One of these ponds is located on Thunder Lake Tributary 2, while the remaining two ponds are located on Thunder Lake Tributary 3. Treasury Metals has made efforts to engage and elicit input from Aboriginal peoples regarding the Project. No Project-specific traditional knowledge and traditional land use studies were prepared for, or shared with, Treasury Metals; limited information was obtained about traditional land use areas.

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					Treasury Metals made efforts to incorporate information provided and to address comments and issues raised by Aboriginal peoples during the engagement process. A summary of the issues raised during the engagement process was provided in Section 8 and Appendix DD to the original EIS. As part of the Round 1 IRs, the Agency has requested that Treasury Metals expand and update the information presented in Appendix DD to the original EIS. This information is provided as the updated Appendix DD Aboriginal Engagement Report to the revised EIS. The Aboriginal Engagement Report provides a listing of the disaggregate comments from Aboriginal peoples, and how those were addressed in the revised EIS. Treasury Metals will continue to discuss potential Project effects on traditional land use activities with potentially affected Aboriginal peoples throughout the life the Project. As additional information regarding an Aboriginal community's traditional land use and practices become available, Treasury Metals will review and consider it in the design of mitigation measures, follow-up monitoring and management plans for the Project, as appropriate.
363	AC(1)-37	Wabauskang First Nation			**Information Request / Comment**: Identified gaps in understanding of current use of lands and resources for traditional purposes and the need for a traditional land use study. There is hunting in the area (e.g., moose, rabbit, and partridge). Concerns with adequacy of potential impacts and mitigation measures to Aboriginal peoples identified by the proponent.
					Response: Treasury Metals has made efforts to engage and elicit input from Aboriginal peoples regarding the Project. While no Project-specific traditional knowledge and traditional land use studies were prepared for, or shared with, Treasury Metals; limited traditional knowledge and information about traditional land use areas was collected from by Aboriginal peoples during the engagement process. Treasury Metals made efforts to incorporate the information shared and to address comments and issues raised in the original EIS. Treasury Metals also recognizes that engagement does not stop with the filing of the EIS and will continue throughout the life of the Project. Treasury Metals will continue to try to engage the Aboriginal peoples meaningfully with respect to the Project. Treasury Metals will continue to discuss potential Project effects on traditional land use activities with potentially affected Aboriginal peoples throughout the life the Project. As additional information regarding an Aboriginal community's traditional land use and practices become available, Treasury Metals will review and consider it in the design of mitigation measures, follow-up monitoring and management plans for the Project, as appropriate.
364	AC(1)-38	Wabauskang First Nation Aboriginal People of			**Information Request / Comment**: The proposed Project will infringe upon Aboriginal and Treaty Rights.
					Response:

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		Wabigoon			A number of Aboriginal peoples have stated that the Project will infringe on Aboriginal and treaty rights, however, the way in which the Project will infringe on those rights has not been identified. The revised EIS considers the effects on Aboriginal and treaty rights as expressed through the use of resources for traditional purposes. Treasury Metals is committed to continue to engage with Aboriginal communities to fully understand their Project-related concerns. Should additional information regarding an Aboriginal community's traditional practices or potential Project-related effects on Aboriginal and treaty rights become available, Treasury Metals will review and consider the information in the development of mitigation measures, follow-up monitoring, and management plans, as appropriate.
365	AC(1)-39	Aboriginal People of Wabigoon			**Information Request / Comment:** Community's traditional trapping, fishing, hunting, berry and medicinal plant collecting, timber harvesting, and potential land claims are being impacted. Mitigation measures must be identified to protect or remunerate for potential damaging effects. **Response:** Treasury Metals has made efforts to engage and elicit input from Aboriginal peoples regarding the Project. While no Project-specific traditional knowledge and traditional land use studies were prepared for, or shared with, Treasury Metals; limited traditional knowledge and information about traditional land use areas was collected from by Aboriginal peoples during the engagement process. Treasury Metals made efforts to incorporate the information shared and to address comments and issues raised in the EIS. Treasury Metals also recognizes that engagement does not stop with the filing of the EIS and will continue throughout the life of the Project. Treasury Metals will continue to try to engage the Aboriginal peoples meaningfully with respect to the Project. Treasury Metals will continue to discuss potential Project effects on traditional land use activities with potentially affected Aboriginal peoples throughout the life the Project. As additional information regarding an Aboriginal community's traditional land use and practices become available, Treasury Metals will review and consider it in the design of mitigation measures, follow-up monitoring and management plans for the Project, as appropriate. In order to effectively address these concerns, and to address issues raised through the responses to Round 1 questions, Treasury Metals has prepared a revised EIS. The revised EIS presents the linkage between Project-related effects on components of the environment and effect on the use of lands and resources for traditional purposes by Aboriginal peoples in Section 6.21.
366	AC(1)-40	Grassy Narrows First Nation			**Information Request / Comment**: Since time immemorial, we have occupied, used, and possessed land waters in the vicinity of the Project. Because this Project stands to impact our First Nation, our direct participation in the development and assessment of any mitigation measures, monitoring programs, or

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					compensation plans is essential before this Project can be permitted to proceed.
					Response: Treasury Metals will engage with Grassy Narrows First Nation for the life of the Project with the goal of understanding impacts and jointly developing mitigation measures that respect their historic and current uses of the land. Mitigation measures including obligations for on-going engagement will be registered in the Commitments Registry of the EIS, and will become enforceable commitments on Treasury Metals. Furthermore, the Crown will consult Grassy Narrows First Nation for the life of the Project to understand impacts and will incorporate appropriate terms and conditions into the permits that are issued to Treasury Metals to mitigate impacts during site preparation and construction, operations and closure phases of the Project.
367	AC(1)-41	Grand Council Treaty # 3 Grassy Narrows First Nation Eagle Lake First Nation Métis Nation of Ontario Naotkamegwanning First Nation Wabigoon Lake Ojibway Nation Wabauskang First Nation			**Information Request / Comment:** Identified the need for a traditional knowledge/ traditional land use study to understand potential impacts to community members. Request for funding for comprehensive traditional knowledge and land use studies in project area directed to groups/communities likely to be impacted by the Project.
					Response: Treasury Metals has been engaged with Aboriginal peoples within the Project area, including MNO, for a number of years regarding the Project and this will continue for the life of the Project. This on-going engagement is described in Appendix DD Aboriginal Engagement Report to the revised EIS. Treasury Metals has attempted to negotiate agreements for sharing traditional knowledge and preparing traditional land use studies. Those attempts are described in the Aboriginal Engagement Report. Treasury Metals continues to be willing to provide reasonable financial support for independent technical reviews and TK/TLU studies with affected communities. Where available, TK/TLU information that has been collected has been integrated into the EIS. Any traditional knowledge shared by the communities in the future will be incorporated into the design of Project.
368	AC(1)-42	Naotkamegwanning First Nation			**Information Request / Comment**: Identified that the Dryden area is part of the community's traditional hunting (e.g., moose and deer), trapping and fishing area. The community holds traditional ecological knowledge for the area, but need elder approval to share this knowledge as part of the EA.
					Response: Treasury Metals has engaged in discussions with affected Aboriginal communities for the purposes of negotiating an agreement for the communities to undertake TK/TLU studies in support of identifying potential Project-related effects on traditional land uses and incorporation of traditional knowledge into Project designs, as appropriate. To date, no agreements are in place for undertaking TK/TLU studies. Treasury Metals will continue to discuss potential effects of the Project on traditional land use activities with potentially affected Aboriginal communities throughout the life

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					of the Project. Should additional information regarding an Aboriginal community's traditional practices become available, Treasury Metals will review and consider the information in the development of mitigation measures, follow-up monitoring, and management plans, as appropriate.
369	AC(1)-43	Eagle Lake First Nation Naotkamegwanning First Nation Wabigoon Lake Ojibway Nation			**Information Request / Comment:** With respect to the decommissioning and abandonment phases of the project site, describe how the site will compare to pre-treaty conditions (i.e. state of pit), plans for abandoning site and possible land access and uses during the abandonment phase. **Response:** A high level description of the plans for the closure landscape are provided in Section 3.2.3 of the revised EIS, with more details of the conceptual closure plan provided in Section 3.14. These sections describe how the Project is expected compare to the baseline conditions prior to the site preparation and construction phase. These baseline conditions include the disturbances to the area that have happened over time, such as logging and the presence of a former tree nursery. The Project is located in an area covered under Treaty 3, which was signed in 1873. At that point in time, the area would have been in a largely undisturbed state. Closed out infrastructure described in the abovementioned sections and summarized below describes the principle difference between baseline conditions and the post-closure conditions, as a result of the Project: • Open pit: Once mining operations cease, the open pit will be flooded through a combination of active pumping, rainfall and runoff and natural seepage. Prior to flooding, a perimeter fence of boulders or overburden will be constructed. All equipment and infrastructure will be removed before flooding. The slopes above the eventual fill depth will be vegetated and a natural spillway constructed so natural discharges to Blackwater Creek can occur once the pit is flooded. • Underground mine: The underground mine will be sealed and allowed to flood once operations cease. Prior to flooding, all equipment and infrastructure will be removed from the underground mine. • Stockpiles: The mine rock and overburden stockpiles will be progressively reclaimed once they reach their maximum heights. The overburden and segregated non-acid generating mine rock will be shaped, scarified and revegetated. The mine rock identified as potentially acid generating (PAG) will be reclaimed with a multi-layer cover designed to encapsulate the rock, isolate the rock from oxygen and control long-term acid rock drainage (ARD). • Tailings storage facility (TSF): Once operations cease, the water cover on the TSF used to prevent ARD during operations will be removed, treated and used to help fill the pit. The TSF will then be covered with a pioneer layer to physically isolate the tailings to make the surface trafficable. Finally, the TSF will be covered to isolate the tailings from oxygen and prevent long-term ARD. The cover will either be a multi-layer dry cover, or a water cover using non-process

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					water. • Other structures and utilities: Once operations cease, the buildings and majority of the infrastructure associated with the Project will decommissioned and removed. Some infrastructure will remain to help with the active filling of the open pit, but will be decommissioned and removed once the filling of the open pit is complete. Hardened areas and roads will be scarified and seeded to enhance revegetation. The Project footprint, to the extent possible, makes use of pre-existing disturbance and areas where the natural vegetation has already been cleared. It is expected that, at the end of the closure phase, these areas will be available to gradually be reclaimed by natural vegetation similar to the process occurring in these disturbed areas today (see also the response to TMI_145-WL(1)-02). As stated in the EIS (Section 3.0), the overall Project footprint will cover approximately 188 ha during the maximum of extent of operations with the entire footprint on Treasury Metals lands that are either patented or leased (mining rights and surface rights), to which there is currently no public access. It is expected that these lands will remain in private ownership following the decommissioning and abandonment of the Project.
370	AC(1)-44	Métis Nation of Ontario Eagle Lake First Nation Wabigoon Lake Ojibway Nation Naotkamegwanning First Nation			**Information Request / Comment:** Concerned about potential for tailings spill (like Mount Polley). Concerns that the tailing dam may be weak, and that there may be seepage into Wabigoon Lake. Request that TMI demonstrate that funds are being used to ensure the efficacy and safety of design, and describe the safeguards proposed to protect against a tailings breach, including justification that a twenty metre dam will be able to retain the volume of water. In the event of a spill, would communities will be compensated as individuals or as whole? Clarify if TMI's insurance covers accidents similar to Mount Polley. Describe the mitigation measures that will be put in place to reduce potential impacts on fish and fish habitat in the event of an accident. Outline the provisions to demonstrate there will be sufficient funds for an emergency and unanticipated clean up. Provide the contingency and response plans that will apply, including the evacuation plan details, such as: • response times; • monitoring and impacts; • details on how the broader community will be informed; and • plans for transportation and the housing of people. Identified that the railway passage over Wabigoon Lake is very low and could easily be washed out if there was an influx of water.
					Response: There appear to be two separate issues addressed in the question, the first relates to seepage from

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					the tailings storage facility (TSF), while the second relates to the potential effects that could result in the highly unlikely event of a failure of the TSF. *Seepage from the TSF* During operations, only a limited quantity of seepage is expected to originate from the TSF, which will be designed to minimize seepage. Seepage from the toe of the TSF dam will be captured via a perimeter collection ditch and pond, and returned back to the tailings pond on the TSF surface. Any seepage from the TSF that escapes the seepage collection system will be captured within the drawdown cone caused by active dewatering of the open pit and underground mine, which will ultimately report to the open pit. This seepage water will be collected as part of the dewatering activities and transferred to the water management system, where it will either be recycled for use in the process plant or treated prior to discharge to the environment. At closure, the tailings water will be withdrawn from the TSF, treated and used to aid in the flooding of the open pit. The tailings will be covered with granular material to physically isolate the tailings and capped so as to prevent acid rock drainage (ARD) by isolating the tailings from oxygen. The tailings cap will consist of either a low-permeability dry cover or a water cover comprised of non-process water. During the post-closure phase, groundwater modelling shows that seepage from the TSF will ultimately reach the surface watercourses following closure and pit flooding. Updated surface water quality modelling to reflect the potential effects of this seepage on water quality has been provided in the Water Report, Appendix JJ to the revised EIS. The Water Report reflects changes suggested by the responses to the Round 1 IRs, as well as the refined water balances developed as Treasury Metals has been advancing their engineering for the Project. An updated water quality model for seepage during the post-closure phase is provided in Section 6 of the Water Report. *Potential Failure of the TSF* As part of the EIS and supporting documentation, a potential failure of the TSF was evaluated. However, this accident was determined to be highly unlikely to occur, and a potential failure of the TSF is not a reflection of the actual safety conditions of the TSF after it is designed and built. The worst case failure mode for the TSF was determined to be an overtopping failure (see Appendix GG to the EIS), where flood waters in the TSF exceed the capacity of the facility and flow over the top of the embankment resulting in a breach and failure. The design of the TSF will ensure sufficient capacity to contain the Environmental Design Storm (EDS), which for the Project has been assigned as the runoff volume resulting from the 1 in a 1,000-year, 24-hour event. An emergency overflow spillway has been included in the embankment design to maintain stability during the occurrence of storm events exceeding the EDS, up to the Inflow Design Flood (IDF). The current design of the TSF includes 1.5 m of freeboard above the elevations of the emergency overflow spillway. The dam and associated spillway have therefore been designed to safely pass the peak flow from the IDF without overtopping the dam. The probability of the IDF event will be much more unlikely that once

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					every thousand years, in accordance with the *Lakes and Rivers Improvement Act,* technical bulletins and the Canadian Dam Association Dam Safety Guidelines, which makes the potential of an overtopping failure even more unlikely given the operating life of the mine will be approximately 10 years. Following operations, the water on the TSF will be withdrawn, treated and used to help fill the open pit mine. The physical design of the embankment used to contain the TSF is described Section 3.7 of the EIS. The objective of the design for the TSF is to safely and securely contain the tailings from the Project during the 10-year operating life of the mine, and to provide a safe and secure long-term containment for those tailings that are not co-disposed in the underground mine workings. The dam design will be appropriate to contain the tailings and associated water within the TSF. In the highly unlikely event of a TSF failure, Appendix GG describes the potential environmental consequences. Firstly, none of the tailings present within the TSF were predicted to reach Wabigoon Lake during the modelled failure event. The tailings that would be released in the unlikely event of a TSF failure were predicted to be deposited on land, or in Blackwater Creek downstream of the TSF. The EIS describes that Treasury Metals will implement their spill response procedures following a TSF failure, whereby the released tailings would be contained and cleaned-up. The liquid present within the TSF (supernatant water, pore water and rainfall) is predicted to flow down Blackwater Creek and reach Wabigoon Lake in the highly unlikely event of a TSF failure. However, the quality of the water released into Blackwater Creek during the unlikely event of a TSF failure will meet the water quality authorized limits in the federal Metal Mining Effluent Regulations (MMER), with the exception of lead. The authorized limits in the MMER are the concentrations of various substances the federal government allows mining facilities to discharge to the environment. Therefore, the quality of the water released during the unlikely event of a TSF failure would generally meet the levels considered acceptable as discharges by federal regulations. These limits are reflective of continuous discharges from mining facilitates, whereas a TSF failure would represent a one-time release. Additionally, these concentrations would also be rapidly diluted once the waters reach Wabigoon Lake. The assessment of effects in the highly unlikely event of a TSF failure presented in Appendix GG did identify the potential for the physical impacts within Blackwater Creek as a result of the flood wave. This influx of water would likely cause effects to the small bodied fish using the Blackwater Creek, and could result in erosion of the channel near to the TSF. However, the low gradient nature of the channel and the presence of beaver dams and bends within the watercourse would dissipate the energy before reaching Wabigoon Lake. Based on the above, Treasury Metals acknowledges that there would be effects in Blackwater Creek in the highly unlikely event of a TSF failure due to the physical effects of the floodwater released and the deposition of tailings downstream of the TSF, until remediated in accordance with spill response procedures. However, there is no basis to conclude that there would be ecological effects in Wabigoon Lake, or that there would be any requirement for the evacuation and housing of

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					residents. In the highly unlikely event of a TSF failure, the priority response for Treasury Metals will be to ensure the immediate safety of staff on-site, and people potentially affected by the temporary flood that would travel down Blackwater Creek. Specific response procedures will be established in the emergency response plan for the Project, which include clear instructions on response actions and communication procedures. Once the initial flood has dissipated, the emphasis of the response will shift to the containment of any tailings released, and their ultimate remediation. The procedures involved in the response and remediation of the released tailings will be set out in the spill response plan for the Project. As with any spills of sufficient magnitude in Ontario, the Ministry of the Environment and Climate Change (MOECC) would be informed of the release and involved in the design and implementation of clean-up activities. Treasury Metals will hold operators insurance for the Project to the level such that any reasonably foreseeably possible event will be covered, and to the level that is reasonable as per industry standards. Beyond that, the company will remain responsible for any unforeseeable events that may occur and any associated clean up or mitigation.
371	AC(1)-45	Eagle Lake First Nation			**Information Request / Comment:** Clarify who runs the models of risk assessment.
					Response: There were a number of different numerical models used in preparing the EIS, only a couple of which were described as "risk models". The screening level risk assessment (SLRA) presented in Appendix W uses models to characterize the potential human health risks and ecological risks associated with the Project. The SLRA presented in Appendix W was prepared by Tetra Tech Inc.
372	AC(1)-46	Eagle Lake First Nation			**Information Request / Comment:** Describe the safeguards and the response plans in the event of water contamination during the transport and handling of cyanide.
					Response: All aspects of the Project associated with the handling, use and treatment of cyanide are designed to operate and comply with the International Cyanide Code. Cyanide to be used in the process will be delivered by truck in the preferred form of dry (solid) sodium cyanide pellets or briquettes to avoid the possibility of liquid spills during transport. Three to five operating days' worth of cyanide pellets will be stored in the processing plant, with additional storage provided at the existing warehouse at the former Ministry of Natural Resources and Forestry (MNRF) tree nursery. All deliveries of cyanide to the site would be performed by regulated transport companies, who would be required to comply with relevant federal regulations such as the Transportation of Dangerous Goods Act. All carriers would be required under the Act to have detailed emergency response and contingency plans in place in the unlikely event of an accident during transport.

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					Within the Project site, Treasury Metals has committed to develop detailed emergency response and contingency measures in the event of an accident or spill involving cyanide. These plans and safeguards would be consistent with the International Cyanide Code, and would, at the most fundamental level, be focused on procedures and safeguards to avoiding accidents and protect workers.
373	AC(1)-47	Eagle Lake First Nation			**Information Request / Comment:** Concerns about cumulative impacts to human health (i.e. cancer, asthma, lung disorder and stillborn babies). Examples include E.coli in Thunder Lake and increased cancer rates near the mill. **Response:** The Project will be subject to federal and provincial permitting requirements and be required to operate in compliance with a number of federal and provincial regulations, all of which are designed to protect health risk to human health and the environment. With respect to potential effects on human health these were evaluated in a screening level risk assessment (Appendix W), which evaluated such outcomes as developmental/reproductive effects, neurological effects, and cancer, non-cancer end-points.
374	AC(1)-48	Wabigoon Lake Ojibway Nation			**Information Request / Comment:** Identified that contaminants in sport fish (e.g., walleye) in Wabigoon Lake are high already. Concerned about cumulative effects to wildlife and people if additional contaminants are put into the watershed. **Response:** It is recognized that concentrations of mercury in sport fish in the region are elevated prompting the issuance of fish consumption advisories from the province. However, as discussed in the screening level human health risk assessment (appendix W of the EIS), incremental contributions of mercury and lead to the surrounding watershed are sufficiently low (i.e., 0.0016% to a 0.04% over background) that they are considered insignificant in terms of additional health risk. Additionally, Treasury Metals has made the commitment (Table 10.0.1 of the EIS) that during operations, the effluent from the Project will be treated such that mercury will be equal to the background concentration in Blackwater Creek before it is discharged to the environment.
375	AC(1)-49	Wabigoon Lake Ojibway Nation			**Information Request / Comment:** Potential cumulative effects on wildlife (moose), and the community from forestry and mining in the region. Moose populations have dropped because of forestry and mining. **Response:** Moose populations appear to be decreasing across northern Ontario, as well as other regions in Canada and the US. The cause of these population declines is currently poorly understood but

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					appears to be tied to a number of interacting factors including climate change, increased deer populations (and the associated brain worms), and overharvesting. The Ministry of Natural Resources and Forestry (MNRF) is currently undertaking research to better understand moose population declines in Ontario. This research includes looking at how climate change may be affecting the interplay of elements within ecological systems including weather, habitat and the prevalence of parasites and diseases. Based on the effects assessment presented in the original EIS, Treasury Metals was satisfied they had sufficient baseline information to understand and characterize the potential effects of the Project on wildlife and wildlife habitat, including the effects on moose. The EIS concluded that there would be no significant adverse effects on moose (as described by the ungulate VC) as a result of the Project. An additional evaluation of the effects of the Project on the ungulate VC, which would include moose, is provided in Section 6.12 of the revised EIS. The revised EIS also includes a description of mitigation measures, follow-up monitoring and management plans to address potential effects on wildlife and wildlife habits in Sections 6.12.6, 12.9 and 13.12. An expanded cumulative effects assessment is provided in Section 7.3.
376	AC(1)-50	Eagle Lake First Nation			**Information Request / Comment:** Concerns about location of waste rock site. **Response:** As described in Section 2.3.3 of the EIS, there were a number of factors involved in the selection of the location and method of disposing of the waste rock, including backfilling the open pit with waste rock as practicable. The location selected to the north of the open pit (waste rock storage area; WRSA) was chosen for a combination of practical, economic and environmental reasons. Of particular importance from an environmental perspective is the proximity to the open pit, which reduces haul distances (also reducing air emissions) and allows for a simplified runoff collection from the WRSA, which is identified as potentially acid generating (PAG). The direction of runoff from the WRSA is to the open pit as this location is predominantly up slope of the open pit, which has long term water management benefits. There was a small portion of the WRSA presented in the EIS that was located in the watershed to Thunder Lake. However, none of the runoff from the WRSA would have been allowed to drain to Thunder Lake. All of the runoff from the WRSA would have been collected and directed to the open pit. Since the submission of the EIS, Treasury Metals has been advancing their engineering for the Project, including refining the layout of the Project footprint. One of the refinements is a change to the shape of the WRSA such that the entire footprint of the WRSA is within the Blackwater Creek catchment area and none of the footprint is in the catchment for Thunder Lake. This and other refinements to the Project design since the completion of the EIS are presented in Section 3.16 of

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					the revised EIS.
377	AC(1)-51	Wabigoon Lake Ojibway Nation			**Information Request / Comment:** Comments and questions about the design of the tailings storage facility, including: • Clarify if the community is able to influence the engineering of the tailings storage facility. There is seepage with the proposed design. Identify if the tailings area can be lined; • Clarify if the tailing storage facility has to be on private land. Community member lives right next to tailings pond; and • Concerns about tailings storage and why dry stack storage is not considered. Feel that the choices being made are economically cheapest. **Response:** As part of the engineering design and EIS activities, a comprehensive evaluation of the options for tailings disposal was completed. This evaluation, which follows the Guidelines for the Assessment of Alternatives for Mine Waste (Environment Canada, 2013), is presented in Appendix D of the EIS, and the results are summarized in Section 2.3.6 of the EIS, with the preferred option described more fully in Section 3.7 of the EIS. The engineering design requirements to be used with respect to the dam are closely regulated in Canada, and these will be adhered to and followed for the Project. As is the case with all tailings storage facilities, there is the potential for some seepage from the tailings storage facility (TSF) at the Project. The TSF is designed to manage seepage with a seepage collection system. Captured seepage will be returned to the TSF. The preferred location for the TSF places it over a clay / silt unit that will reduce and limit seepage. The selection of the location for the TSF was also a component of the alternatives evaluated in Appendix D and summarized in Section 2.7 of the original EIS. A revised multiple accounts analysis for the location and storage methods for the TSF, as well as the location of the minewater pond has been added to Section 2.0 of the revised EIS and has been included as Appendix D-2 to the revised EIS. Alternatives that were situated outside of the Treasury Metals property boundary were screen out of the assessment as a fatal flaw. Three separate tailings disposal technologies were considered in the evaluation, including conventional tailings, thickened tailings and dry stack tailings. The choice of preferred tailings technology considered environmental, technical, Project economic, and socio-economic considerations.
378	AC(1)-52	Eagle Lake First Nation			**Information Request / Comment:** Clarify if an open pit or a shaft is safer. State if the use of an open pit is favored by all. **Response:** Both an open pit and underground mine can be operated safely. There is rigid legislation and

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					associated regulations which the mine must comply with, that supports this assertion. Treasury Metals is proposing to use both an open pit and underground mine, with a decline access as part of the Project. The preferred choice was identified as part of the alternatives assessment presented in Appendix X to the EIS and summarized in Section 2.3.1 of the EIS.
379	AC(1)-53	Eagle Lake First Nation			**Information Request / Comment:** Identify the impacts to the mine in the event of a tornado. **Response:** Critical plant and mine infrastructure which may be affected by a tornado event are the explosives, reagent and bulk fuel storage facilities. However, these facilities will be designed in accordance with the Ontario Building Code. Therefore, they would not be susceptible to tornadoes that could otherwise result in damage to the building and possible rupture and spills of the materials they are designed to safely store. Critical components of the tailings storage facility (TSF) that may be affected by a tornado event consist of the upstream embankment and low-permeable zone as well as the embankment crest. The effects of tornadoes on the water cover during operations will consist of generating waves within the facility. Other effects can potentially consist of increased evaporation rate from the pond. There is a risk reduction associated with overtopping from wave run-up that is based on operations of the TSF. Containment for tailings solids, operational and stormwater management is established with the perimeter embankment and the established crest elevation. The elevation of the crest is raised at strategic times over the life of the facility to accommodate the required storage capacity. The tailings surface elevation increases with the tailings deposition and the tailings rate of rise is established based on the design throughput of the plant. The risk of overtopping from wave run-up is significantly reduced during initial periods of tailings deposition for each embankment stage as significant elevation difference is present between the embankment crest level and the tailings beach level. The engineering design for wave run-up to establish the required crest height is based on the highest tailings beach surface for each stage. For all process plant and mine infrastructure component design, the design wind loads will be determined in accordance with the Ontario Building Code (based on the Canadian National Building Code) Section 4.1.7. The design wind load is calculated by: a. The reference velocity pressure (q) is based on a probability of being exceeded in any one year of 1-in-50, and the reference velocity pressure design factor used for the project will be specified in the building code for the Dryden site location.

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					b. The ultimate load combination for a limit state design applies a 1.4 factor to the calculated wind load. c. An Importance Factor (Iw) is applied and is 1.0 for Normal Importance Category structures, or 1.15 for High Importance Category structures (i.e., storage facilities containing toxic, explosive or other hazardous substances). The site wind velocity pressure data is determined from wind load data recordings at nearby weather stations and is reported in the building code. Plant and mine infrastructure structures will be designed, checked and signed-off by licenced professional engineers (P.Eng.) who are certified and in good standing with Professional Engineers Ontario (PEO). Items such as oils, transformers, fuels or reagents will be stored on-site within diked/bunded areas sized to capture 110% of the largest spill plus one hour of fire suppression water from either fixed fire suppression systems or fire hose streams. The TSF detailed design will include suitable freeboard for containment of operational, stormwater and freeboard. Design for freeboard is completed in accordance with the Lakes and Rivers Improvement Act for Provincial approval by the Ministry of Natural Resources and Forestry (MNRF). Freeboard is determined for each embankment stage to ensure that overtopping from wave run-up is prevented. Determination of required freeboard utilizes computations of wind-generate wave height, set-up and run-up that incorporate a selection of reasonable combined occurrences of reservoir level, wind velocity, wind direction and wind duration based on site specific studies. Planning, design and construction strategies to minimise potential environmental effects from tornadoes on the TSF are summarized below: Planning • Include protective covers over low-permeable zones for protection and to prevent erosion. • Utilize non-woven geotextile in embankment construction to provide additional protection against erosion of protection layers to low-permeable zones. • Use riprap erosion protection layer on upstream slope of embankment to add additional protection from wave action for the embankment fill that includes the low-permeable zone.

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					• Apply freeboard to contain wave run-up for each TSF embankment stage to prevent overtopping and protect the crest and dam. Design • Protective cover zones for low-permeable zones to properly filter graded and assigned sufficient thickness for protection. • Non-woven geotextile design to be completed for wave action condition and also properly filter graded to prevent loss of cover material to maintain protection of low-permeable zone. • Rip rap gradation designed to withstand the design wave for the site to prevent embankment erosion • Freeboard design to be completed in accordance with the LRIA and the MNRF Best Management Practices to prevent wave run-up from overtopping the dam. Minimum freeboard design to be assigned under worst case conditions consisting of maximum tailings beach level. Freeboard allowance to be assigned for each TSF embankment stage. Construction • Preparation of Construction Drawings and Technical Specifications sealed by a Professional Engineer in Ontario and submitted for MNRF approval under the LRIA. • Construction monitoring to be completed by a qualified engineer to ensure that the construction product meets the requirements of the Construction Drawings and Technical Specifications to ensure the dam embankment and protection achieves the design intent. • Implementation of a Quality Assurance and Quality Control Program (QA/QC) to ensure that the embankment zones and engineered products used for construction meet the requirements of the Construction Drawing and Technical Specifications Please refer to response for Information Request TMI_261-EE(1)-04 for further information.
380	AC(1)-54	Wabigoon Lake Ojibway Nation			**Information Request / Comment:** There are inconsistencies in distances describing the project location in the EIS.

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					Response: In preparing the EIS, Treasury Metals tried to ensure that there were no inconsistencies with the data presented. However, there were a couple of apparent inconsistencies in how the EIS describes the location of the Project. The Executive Summary and Section 1.2.1 of the EIS identify the Project as being located "20 km east of Dryden". This value is approximate and refers to the travel distance along the roadways. As-the-crow-flies, there are portions of Dryden that are closer to the Project. In fact, the limits of the City boundary extend to enclosed portions of the shoreline of Thunder Lake. Section 5.2.1, which describes the study area for air quality, suggests that Dryden is "approximately 15 km west". This distance is approximately the distance "as-the-crow-flies" from the open pit to the eastern edge of the developed area of Dryden. None of these apparent inconsistencies will alter the predicted effects of the Project, or conclusions presented in the EIS.
381	AC(1)-55	Wabigoon Lake Ojibway Nation			**Information Request / Comment:** State the height of the tailings dam.
					Response: The characteristics of the tailings storage facility (TSF), including the height of the embankment to hold the tailings in place is detailed in Section 3.7 of the EIS. The height of the TSF will increase over the life of the Project, as shown in Figure 3.7.1-2. The ultimate elevation of the crest of the embankment is 420 metres (m) above sea level, or about 22 m above the foot of the embankment (see Figure 3.7.2-3).
382	AC(1)-56	Wabigoon Lake Ojibway Nation			**Information Request / Comment:** State the capacity of the mill facility, minimum threshold per day and the depth of the underground pit.
					Response: The design capacity of the processing plant as proposed is 2,700 tonnes per day. This is based on full production capacity and the mine will require a period of time to ramp up to this production rate (likely between 6 and 18 months). There will be a period of time when open pit and underground operations are running simultaneously, but the processing plant is designed to remain at the stated production rate. This will be achieved by feeding less ore material from the open pit and supplementing this reduced input with ore material from the underground to maintain the processing plant of the design capacity. It should be noted that, as with other industrial operations, there will be some fluctuations in the production rate, and as per the industry standard, this stated daily rate is based on an annualized average.

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					The Project includes both an open pit mine and underground mine. The open pit will operate for about five years and will be comprised of three separate pit bottoms that will be mined in sequence from the west to east (Section 3.3.3 of the EIS). Based on known resources and the current design, the deepest pit will be a maximum of 180 m deep. The underground mine will be used to access the ore that is too deep to practically access with open pit mining. The lowest levels of the underground mine will be about 410 m below the surface, based on current information. Figure 3.4-1 of the EIS provides a cross section showing the proposed depths of both the open pit and the underground mine.
383	AC(1)-57	Eagle Lake First Nation			**Information Request / Comment:** How much water will be used over time?
					Response: Since the submission of the EIS, Treasury Metals has been advancing their engineering for the Project, including refining the water balance for the site. This refined water balance will modify some of the water related predictions in the original. To capture these changes, and to reflect changes suggested by the responses to the Round 1 IRs, Treasury Metals has prepared a Water Report as Appendix JJ to the revised EIS. A discussion on water management is in Section 3.8 of the revised EIS.
384	AC(1)-58	Eagle Lake First Nation			**Information Request / Comment:** Asked what safety standards are being met by the Project (i.e., ISO #?).
					Response: The Project will be designed to meet or exceed any applicable safety standards. Typically, these standards fall under provincial jurisdiction such as the Ontario Building code for infrastructure on site and Ontario Occupational Health and Safety Act, RSO 1990, c. O.1. It should be noted that throughout the design process, infrastructure components will be designed and checked by an Engineer with a professional designation prior to construction. Further to this, Treasury Metals will be working under its own management policies including specific policies for health and safety, and environmental issues.
385	AC(1)-60	Eagle Lake First Nation			**Information Request / Comment**: Request opportunity to tour the project site.
					Response: Treasury Metals has engaged in discussions with affected Aboriginal communities and as part of this process has invited all said parties to the Project site to tour the Project Office and development area. Treasury Metals invites all impacted stakeholders including Aboriginal, and public to tour the site and receive the most up to date information regarding the Project.

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386	AC(1)-61	Grand Council Treaty # 3 Grassy Narrows First Nation Eagle Lake First Nation Naotkamegwanning First Nation Wabigoon Lake Ojibway Nation Wabauskang First Nation			**Information Request / Comment:** Request sufficient time to: (I) adequately review the Environmental Impact Statement; (2) complete traditional knowledge and traditional land use studies; and (3) determine how the Project will impact Aboriginal and Treaty rights to identify mitigation to these impacts. **Response:** Treasury Metals has been engaging with Treaty 3 First Nations for several years in attempts to discuss the Project and its potential effects and to initiate traditional land use studies. The original EIS was filed in 2015 and supplied to the Aboriginal communities at that time. This request for more time to study the EIA and to conduct studies is noted; the schedule will be guided by the regulator.
387	AC(1)-62	Grand Council Treaty # 3 Grassy Narrows First Nation Eagle Lake First Nation Métis Nation of Ontario Wabigoon Lake Ojibway Nation Wabauskang First Nation Naotkamegwanning First Nation			**Information Request / Comment:** Concerns with level of engagement completed by proponent, including absence of engagement on the following topics: - valued components; - baseline studies; - traditional knowledge and traditional land use; - potential impacts to Aboriginal and Treaty rights; - potential environmental effects; - mitigation measures; and - monitoring program. **Response:** At the request of the Agency, Treasury Metals has updated Appendix DD Aboriginal Engagement Report to the original EIS, which is referred to as the Appendix DD Aboriginal Engagement Report in the revised EIS. The Aboriginal Engagement Report provides a detailed record of contacts with Aboriginal peoples, identifies concerns and questions raised by each Aboriginal person, a detailed list of concerns and how they were addressed in the EIS. The Aboriginal Engagement Report also details Treasury Metals' efforts to provide relevant Project-related information and efforts to solicit information and concerns from the Aboriginal peoples. Treasury Metals is committed to ongoing engagement with Aboriginal peoples throughout the life of the Project. In conjunction with this Treasury Metals will work with communities to develop monitoring and management plans designed to address potential Project-related effects identified through the environmental assessment process and/or at later stages of the Project, including implementation of any follow-up programs.
388	AC(1)-63	Métis Nation of Ontario			**Information Request / Comment:** Identified requirements of EIS Guidelines were not met, including deficiencies in the following areas: - early Aboriginal engagement to identify potential impacts to potential or established Aboriginal and

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					Treaty rights and related interests; - opportunity for Aboriginal groups to participate in or influence the results of the baseline studies; - opportunity to review draft VCs, to comment on the VCs, or to contribute to the selection of VCs; - discussion of why specific VCs were included/excluded in the EIS; - Information on the establishment of assessment boundaries for each VC (spatial, temporal, technical and administrative); - Information on the scope of the assessment, including potential effects, measurable parameters and a significance threshold, traditional knowledge and traditional use information, and information on the influence of engagement on the assessment; - overall lack of Aboriginal traditional knowledge; - effects assessment methodology; including definition of temporal and spatial boundaries, description of analytical methods, assumptions and conservative approach; - sufficient description of potential effects, potential mitigation, characterization and determination of significance of residual effects of residual effects (not completed with scientific rigor), and details of confidence and risk; and - Outline of follow-up monitoring. Sufficient information is needed to understand the entire project, potential impacts, mitigation measures, residual effects and significance conclusions. Cannot proceed with a collaborative engagement process until significant and systematic failings within the EIS are addressed. If this is not done, any future engagement will ultimately be meaningless and superficial because of the underlying deficiencies within the EIS.
					Response: The EIS Guidelines were used in preparing the EIS for the Project. To the extent possible, the requirements set out in the guidelines were met, or attempted to be met, by Treasury Metals. Treasury Metals began engagement efforts with Aboriginal peoples regarding the Project early in the process. Engagement activities with Aboriginal peoples started in 2008, and engagement with MNO started in 2009. To the extent information about concerns related to the Project, or traditional uses in the area was shared with Treasury Metals, it was incorporated into the EIS. While no Project-specific traditional knowledge and traditional land use studies were prepared for, or shared with, Treasury Metals; limited information was obtained about traditional land use areas. Treasury Metals made efforts to incorporate information provided and to address comments and issues raised by Aboriginal peoples during the engagement process. A summary of the issues raised during the engagement process was provided in Section 8 and Appendix DD to the original EIS. As part of the Round 1 IRs, the Agency has requested that Treasury Metals expand and update the information presented in Appendix DD to the original EIS. This information is provided as Appendix DD Aboriginal Engagement Report to the revised EIS. The Aboriginal Engagement Report provides a listing of the disaggregate comments from Aboriginal peoples, and how those were

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					addressed in the EIS. Treasury Metals will continue to discuss potential Project effects on traditional land use activities with potentially affected Aboriginal peoples throughout the life the Project. As additional information regarding traditional land use and practices become available, Treasury Metals will review and consider it in the design of mitigation measures, follow-up monitoring and management plans for the Project, as appropriate. Treasury Metals acknowledges that there are a number of questions from the Agency and other reviewers related to the approach used in the original EIS for organizing and presenting information regarding the potential effects of the Project. In order to effectively address these issues, and to address issues raised through the responses to Round 1 questions, Treasury Metals has prepared a revised EIS. Treasury Metals recognizes that engagement does not stop with the filing of the EIS and will continue throughout the life of the Project. Treasury Metals will continue to try to engage the Aboriginal peoples, including MNO, meaningfully with respect to the Project.
389	AC(1)-64	Eagle Lake First Nation			**Information Request / Comment:** No current Traditional Environmental Knowledge incorporated in the report or within the valued components **Response:** Treasury Metals has been engaged with Treaty 3 First Nations within the Project area for a number of years and has attempted to negotiate agreements for sharing traditional knowledge and preparing traditional land use studies. Those attempts are described in Appendix DD Aboriginal Engagement Report. Treasury Metals continues to be willing to undertake reasonable TK / TLU studies with affected communities. Where available, TK / TLU information that has been collected has been integrated into the EIS. Any traditional knowledge shared by the communities in the future will be incorporated into the design of Project and considered in the design of mitigation measures, follow-up monitoring and management plans for the Project, as appropriate. In the absence of specific feedback from Eagle Lake First Nation regarding valued components, Treasury Metals has selected valued components that are consistent with the environmental assessment processes for recent and on-going mining projects in Treaty 3. With respect to the selection of biological valued components, sensitive indicator species with habitat ranges that include the Project area have been selected so that if the mitigation measures are protective of these indicator species then they will be protective of the other species that are present. An expanded assessment of the effects of the Project has been provided in the revised EIS and sets out the assessment of effects and impacts associated with the Project in a clear and traceable

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					manner.
390	AC(1)-65	Eagle Lake First Nation Grand Council Treaty # 3 Grassy Narrows First Nation Métis Nation of Ontario Naotkamegwanning First Nation Wabauskang First Nation Wabigoon Lake Ojibway Nation			**Information Request / Comment:** Lack of funding from the proponent for technical review, engagement, collection of traditional knowledge and traditional land use information. Request funding for capacity and resources to complete traditional knowledge and land use studies and provide adequate technical review of EIS, including proposed mitigation measures. **Response:** Treasury Metals has been engaged with Aboriginal peoples within the Project area for a number of years and has attempted to negotiate agreements for sharing traditional knowledge and preparing traditional land use studies. Those attempts are described in the Aboriginal Engagement Report, Appendix DD to the revised EIS. Treasury Metals continues to be willing to provide reasonable financial support for independent technical reviews and TK / TLU studies with affected communities. Where available, TK / TLU information that has been collected has been integrated into the EIS. Any traditional knowledge shared by the communities in the future will be incorporated into the design of Project.
391	AC(1)-66	Grassy Narrows First Nation			**Information Request / Comment:** An appropriate engagement process is required to enable our First Nation's participation and to provide: a) A fair opportunity analyze and examine the impacts associated with Treasury Metals' planned planned projects and activities; b) Real participation in the development of appropriate mitigation strategies; c) A respectful means of engaging in internal engagement with band members; d) Equitable terms that ensures First Nation support for the project and the sharing benefits and business opportunities; and e) A coordinated and on-going forum to ensure meaningful input the planned projects and activities that will impact our lands, waters, members, resources, and rights **Response:** Treasury Metals has made efforts to engage and elicit input from Aboriginal peoples regarding the Project. While no Project-specific traditional knowledge and traditional land use studies were prepared for, or shared with, Treasury Metals; limited traditional knowledge and information about traditional land use areas was collected from by Aboriginal peoples during the engagement process. Treasury Metals made efforts to incorporate the information shared and to address comments and issues raised in the EIS. The engagement activities prior to filing the original EIS were summarized in Section 8, and more fully documented in Appendix DD to the original EIS. As part of the Round 1 IRs, the Agency has requested that Treasury Metals expand and update the information presented in Appendix DD to

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					the EIS. This information is provided as an updated document called the Aboriginal Engagement Report, provided as Appendix DD to the revised EIS. The Aboriginal Engagement report provides a listing of the disaggregate comments from Aboriginal peoples, and how those were addressed in the Project design and EIS. Treasury Metals also recognizes that engagement does not stop with the filing of the EIS and will continue throughout the life of the Project. Treasury Metals will continue to try to engage the Aboriginal peoples meaningfully with respect to the Project on the environment, along with a discussion of the mitigation measures to address Project. Treasury Metals will continue to discuss potential Project effects on traditional land use activities with potentially affected Aboriginal peoples throughout the life the Project. As additional information regarding an Aboriginal community's traditional land use and practices become available, Treasury Metals will review and consider it in the design of mitigation measures, follow-up monitoring and management plans for the Project, as appropriate. Treasury Metals, as part of the continued development of the Project, will continue to engage the Aboriginal peoples and present all up to date Project related material. Further to this once the opportunity is presented Treasury Metals will work with Aboriginal peoples to provide a venue for the solicitation of business opportunities associated with the development.
392	AC(1)-67	Eagle Lake First Nation			**Information Request / Comment:** The community's concerns have yet to be fully addressed and at this point there is no consent for the project by the community. **Response:** Treasury Metals has been engaged with Aboriginal peoples, including Eagle Lake First Nation, within the Project area for a number of years regarding the Project and this will continue for the life of the Project. That engagement is described in the Aboriginal Engagement Report, Appendix DD to the revised EIS. Any traditional knowledge or mitigation measures to identified concerns will be incorporated into the design of Project. Treasury Metals will continue to attempt to engage Eagle Lake First Nation in an effort to ensure the community understands the Project, identifies their concerns and agrees with the mitigation measures for the identified concerns. Furthermore, Treasury Metals intends to continue discussions about benefits to the community from the Project such as employment and contracting opportunities.
393	AC(1)-68	Wabigoon Lake Ojibway Nation			**Information Request / Comment:** Concerns identified regarding adequacy and documentation of proponent-led Aboriginal engagement. Identified that the community has not received responses to questions that have been asked. For example, asked TMI for clarification on impacts to water on March 28, 2013 and did not receive a response. Identified the need for cultural sensitivity training. Also identified consistency and factual errors throughout the EIS and are concerned the documents are leading people to

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					believe the Project has been approved. **Response:** Treasury Metals has made efforts to engage and elicit input from Aboriginal peoples regarding the Project. While no Project-specific traditional knowledge and traditional land use studies were prepared for, or shared with, Treasury Metals; limited traditional knowledge and information about traditional land use areas was collected from by Aboriginal peoples during the engagement process. Treasury Metals made efforts to incorporate the information shared and to address comments and issues raised in the EIS. The engagement activities prior to filing the original EIS were summarized in Section 8, and more fully documented in Appendix DD to the original EIS. As part of the Round 1 IRs, the Agency has requested that Treasury Metals expand and update the information presented in Appendix DD to the EIS. This information is provided as an updated document called the Aboriginal Engagement Report, provided as Appendix DD to the revised EIS. The Aboriginal Engagement report provides a listing of the disaggregate comments from Aboriginal peoples, and how those were addressed in the Project design and EIS. Treasury Metals also recognizes that engagement does not stop with the filing of the EIS and will continue throughout the life of the Project. Treasury Metals will continue to try to engage the Aboriginal peoples meaningfully with respect to the Project on the environment, along with a discussion of the mitigation measures to address Project. Treasury Metals will continue to discuss potential Project effects on traditional land use activities with potentially affected Aboriginal peoples throughout the life the Project. As additional information regarding an Aboriginal community's traditional land use and practices become available, Treasury Metals will review and consider it in the design of mitigation measures, follow-up monitoring and management plans for the Project, as appropriate. A revised assessment those effects are provided in the revised EIS. Information about potential Project effects and mitigation measures can be located in the revised EIS which sets out the assessment of effects and impacts associated with the Project, including consideration of the responses to questions raised in the Round 1 IRs, in a clear and traceable manner. Treasury Metals, as part of the continued development of the Project, will continue to engage the Aboriginal peoples and present all up to date Project related material. Treasury Metals is committed to providing a working and training environment which incorporates cultural awareness training for all employees.
394	AC(1)-69	Grassy Narrows First Nation			**Information Request / Comment:** Concerns regarding documentation of engagement in the EIS. Identified that there has been no engagement with the community to date, and that the assumptions in the EIS, including the generalizations and assumptions regarding rights, habitat and histories of Treaty 3 First Nations, lack foundation. Assertions in EIS that the project will only occupy 55 hectares of the 142,450

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					square kilometers of Treaty 3 lands are demonstrative of the lack of meaningful engagement with First Nations.
					Response: Appendix DD to the revised EIS, the Aboriginal Engagement Report, was prepared by Treasury Metals to accompany the Round 1 IR responses. Section 4.6 of this report details the efforts made by Treasury Metals and Grassy Narrows First Nation to engage over several years. Treasury Metals is committed to continue to engage with Aboriginal and non-Aboriginal communities.
395	AC(1)-70	Eagle Lake First Nation Grand Council Treaty # 3			**Information Request / Comment**: Identified that TMI should engage the Grand Council of Treaty 3 to identify potentially affected communities, as per the process defined in Manito Aki Inakonigaawin. The objectives of engagement under Manito Aki Inakonigaawin are to: 1. Understand potential effects of the Project on the environment in Treaty #3 territory; and 2. Understand potential effects of the Project on our treaty and aboriginal rights and interests; 3. Determine whether the Anishinaabe Nation will provide its consent to the Project and, if so, the conditions of such authorization; and 4. If authorization is granted, to provide a basis for negotiating agreements between Treasury Metals and the Anishinaabe Nation to establish a mutually beneficial relationship.
					Response: Treasury Metals will continue their effort to engage Eagle Lake First Nation, and will also continue to reach out to engage with the Grand Council Treaty #3. As described in the Aboriginal Engagement Report (Appendix DD to the revised EIS), Treasury Metals did engage with the Grand Council of Treaty #3 as requested by Eagle Lake First Nation. Treasury Metals will continue its efforts on points 1 and 2 above, as well as mitigating potential effects and seeking agreement on the mitigation measures. Treasury Metals will continue its efforts to engage regarding areas of mutual interest to develop a positive relationship with Grand Council Treaty #3, Eagle Lake First Nation and the other rights bearing communities potentially affected by the Project
396	AC(1)-71	Wabauskang First Nation			**Information Request / Comment:** Engagement and Accommodation Protocol has been provided to the proponent, and should be followed. Do not have the capacity to engage with the proponent nor has there been any agreement on an engagement process. The proposed Project will infringe upon Aboriginal and Treaty rights.
					Response: The Aboriginal Engagement Report, provided as Appendix DD to the revised EIS, details the efforts

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					made by Treasury Metals and Wabauskang First Nation to engage over several years. Treasury Metals is committed to continue to engage with Aboriginal and non-Aboriginal communities. Wabauskang First Nation, and other Aboriginal peoples, have stated that the Project will infringe on Aboriginal and treaty rights, however, the way in which the Project will infringe on those rights has not been identified. The revised EIS considers the effects on Aboriginal and treaty rights as expressed through the use of resources for traditional purposes. Treasury Metals is committed to continue to engage with Aboriginal communities to for fully understand their Project-related concerns. Should additional information regarding an Aboriginal community's traditional practices or potential Project-related effects on Aboriginal and treaty rights become available, Treasury Metals will review and consider the information in the development of mitigation measures, follow-up monitoring, and management plans, as appropriate.
397	AC(1)-72	Eagle Lake First Nation			**Information Request / Comment**: Why are the First Nations not involved in the Mining Act development process?
					Response: Treasury Metals cannot answer this question. This question would better be posed to the Ministry of Northern Development and Mines (MNDM).
398	AC(1)-73	Eagle Lake First Nation Wabigoon Lake Ojibway Nation			**Information Request / Comment:** No detailed closure plan available for review or any financial assurance for perpetual care of the site. Provide draft closure plan to communities for review before the final is submitted to the Ministry of Northern Development and Mines.
					Response: Prior to construction commencing, Treasury Metals is required to and will file a certified closure plan and post financial assurances with the Ministry of Northern Development and Mines (MNDM). This is a requirement under Part VII of the *Ontario Mining Act*. Engagement with Aboriginal communities prior to submission of a certified closure plan is also a requirement under Ontario Regulation 240/00. Although the Project is currently in the early stages of the approval process, Treasury Metals has developed a conceptual closure plan, which is presented in Section 3.14 of the EIS. The certified closure plan is expected to be a refinement of the conceptual closure plan presented in the EIS, structured in the format preferred by the MNDM.
399	AC(1)-74	Eagle Lake First Nation Wabigoon Lake Ojibway Nation			**Information Request / Comment:** Concerns about funding for rehabilitation and mine closure such as clean-up costs/rehabilitation costs. What happens to the area after the mine ceases to operate is important to the community. The following concerns need to be addressed: • clarify if clean-up costs are calculated at today's prices; • identify what will happen when funds run out; and

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					• Identify impacts to community after mine closure.
					Response: Prior to any construction commencing, Treasury Metals is required to and will file a certified closure plan and post financial assurances with the Ministry of Northern Development and Mines (MNDM). Costs are calculated based on present day unit rates. The closure plan is intended to be a living document (as required by the MNDM). Costs will be revisited as needed during future closure plan amendments during operations to reflect the circumstances at the time, including Project changes, if any. Given the relatively short life of the mine (about 10 years of active mining), the present costs are not anticipated to be materially different than the costs at closure. The financial assurance is required to ensure there are sufficient funds available to execute the certified closure plan once mining operations cease and the onset of mine closure commences. The financial assurance is held by the Provincial government until such time as they are satisfied with the reclamation work completed. Treasure Metals cannot access this money to pay for its work. Accordingly, the financial assurance effectively acts as a back-up to cover costs, if needed. The costs to undertake closure is a requirement under Part VII of the Ontario Mining Act. Engagement with Aboriginal communities prior to submission of a certified closure plan is also a requirement under Ontario Regulation 240/00. Following the end of mining operations, there will be a period when closure activities will be underway. These activities, which are described in Section 3.14 of the EIS, are aimed at isolating the tailings and potentially acid generating (PAG) materials and returning the Project site to a state where there is a functioning ecosystem. During this phase, the filling of the open pit with water will commence, and will continue for a period of approximately nine years. Following the filling of the pit, the remaining infrastructure at the site will be decommissioned and a period of care and maintenance, including post-closure monitoring, will commence. This will continue until the regulators are assured that there are no remaining impacts associated with the Project.
400	AC(1)-75	Eagle Lake First Nation			**Information Request / Comment:** Improvements to MMER regulations are proposed. What will be done to meet these new regulations in two years?
					Response: Federal regulatory processes are frequently updated to ensure they are current and reflect the levels of environmental protection expected by Canadians. Proposed and existing facilities would be expected to comply with any new regulatory requirements on the timeline indicated in any such amendment. As the proposed Project moves forward to the approvals stage, engineering design and permitting process, Treasury Metals will continue to engage and consult with regulators about recent and

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					proposed changes to the various regulations that will apply to the Project. Treasury Metals has committed to comply with the most relevant regulations.
401	AC(1)-76	Wabigoon Lake Ojibway Nation			**Information Request / Comment:** TMI drained beaver ponds when drilling and blasting.
					Response: Treasury Metals, as a private land owner, is entitled to take appropriate actions, within the law, to manage nuisance beavers on their property. During the exploration phase of the Project, it was necessary for Treasury Metals to remove beaver dams so that drilling and exploration drilling work could proceed safely. This was done in accordance with the Ministry of Natural Resources and Forestry (MNRF) regulations. Treasury Metals is still in the explorations, engineering and regulatory approvals process for the Project. Mining activities, such as blasting, have not yet commenced at the Project site. As detailed in the response to TMI_334-AC(1)-08, nuisance wildlife, such as beavers and beaver dams that could interfere with the Project operations or successful implementation of any environmental management programs, are anticipated to need to be removed periodically during the life of the Project. The procedures for implementation will be provided in the Wildlife Monitoring Plan (discussed in Section 13.12 of the EIS), to be prepared by Treasury Metals. Specifics of beaver removal procedures during the life of the Project will be discussed with the registered trap line owner, Aboriginal peoples and applicable interested stakeholders.
402	AC(1)-77	Wabigoon Lake Ojibway Nation			**Information Request / Comment**: Heard from a worker that a ceremonial site was found on the site and disturbed by TMI.
					Response: Treasury Metals has no knowledge of a ceremonial site on the Goliath Project based on exploration activities, environmental and heritage resource studies, and engagement with Aboriginal peoples. Should additional information be received from Aboriginal peoples regarding potential physical or cultural heritage resources within the local study area, Treasury Metals will review and consider any potential effects, and develop and implement necessary mitigation measures, as appropriate. In addition, Treasury Metals committed in the EIS to developing an Archaeological and Heritage Resource Management Plan with the objective to identify and appropriately protect heritage resources. This plan will be prepared before Project construction begins and Treasury Metals will engage Project area Aboriginal peoples, as appropriate, in the development of the plan. Mitigation measures for heritage resources are also discussed in Section 6.20.5 of the EIS.

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403	AC(1)-78	Eagle Lake First Nation Wabigoon Lake Ojibway Nation			**Information Request / Comment:** Weak financial profile of the company at 38 cents a share (TSX), market capitalization of 29 million and less than 145 million net profit is expected. There are concerns with economics of the Project. Revenue proposed by the Project ($144 Million) would not cover a disaster. **Response:** Prior to development of the Project, Treasury Metals will be undertaking more detailed studies to evaluate the economic potential of the Project as a whole and will only be proceeding with the construction and operation of the Project if there is sufficient economic justification to do so.
404	AC(1)-79	Eagle Lake First Nation Wabigoon Lake Ojibway Nation			**Information Request / Comment:** Concerns about cover-ups to make financial gains. Worried about honesty of company. **Response:** Treasury Metals has and will continue to operate with integrity as a positive contributor to the local communities.
405	AC(1)-80	Wabigoon Lake Ojibway Nation			**Information Request / Comment:** Identified a potential conflict of interest as the VP of TMI is also a councillor for the City of Dryden. The City of Dryden and MNRF jointly manage Arron Park, which may be affected by the Project. **Response:** At the time of writing, the individual referred to does currently hold both the position of Vice President within Treasury Metals while at the same time sitting on the City of Dryden's municipal council. This individual has, and will continue to recuse themselves from any potential conflict of interests in their duties as part of the City of Dryden council. Further to this, it should be noted that each member of the city council is responsible to adhere to both the Municipal Act of Ontario and more specifically the Municipal Conflict of Interest Act, R.S.O. 1990, c. M.50.
406	AC(1)-81	Wabigoon Lake Ojibway Nation			**Information Request / Comment:** Does the proponent plan to expand the project (i.e., expand the pit physically, or increase ore production) or accept ore from other mines for processing at the mill? **Response:** The current mineral resource is defined as part of the National Instrument (NI) 43-101 process, which is a regulatory framework of the Ontario Securities Commission that must be strictly adhered to. There is no reasonable or justifiable method to estimate whether there are future gold resources for this Project. All published information regarding resources and reserves is available on the SEDAR website. The design capacity of the processing plant is 2,700 tonnes per day as an annualized average at full capacity. The Project will require a period of time to ramp up to this production rate (likely

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					between 6 and 18 months). The mill will initially rely on ore from the open pit, but will gradually replace that feed with ore from the underground mine. There are no plans to accept ore from other mines.
407	AC(1)-82	MNO	Environmental Impact Statement Executive Summary Section 2.0 Participants in Environmental Assessment Section 9.0 Aboriginal Engagement Section 9.1 Potential Effects on Water Resources, Water Quality and Water Bodies 9.2 Effects on Fishing 9.3 Potential Effects on Hunting and Trapping EIS, Section 2.2.1.2 Alternatives Assessment Approach		**Information Request / Comment**: The executive summary does not include a disaggregated listing of participants in the environmental assessment. Section 9.0, 9.1, 9.2, 9.3 of the EIS Summary outlines information in an aggregated format. MNO requires disaggregated information in order to adequately assess whether MNO involvement was adequate. Section 2.2.1.2 (EIS) states that "The alternatives assessment was accomplished with consideration of any comments received to date from Aboriginal communities…" Please provide specific detail on the type of comment received from MNO in relation to the alternatives assessment. Further, please provide the information in a disaggregated format to allow for proper consideration of each Aboriginal communities specific issues and concerns. CEAA has previously requested proponents provide disaggregated information for consideration. Specifically, as part of the correspondence in reference to the Pacific NorthWest LNG Ltd. Assessment (Reference Number 80032) CEAA specified that "Without the benefit of disaggregating by each Aboriginal group, for each factor considered under 5(1)(c), including related baseline information, it is difficult for the Agency to determine if enough detail exists to effectively assess the potential for significant adverse environmental effect that could potentially impact Aboriginal peoples. In other words, the conclusions regarding impacts on 5(1)(c) and Aboriginal rights contained in the EIS cannot be confidently relied upon without the benefit of a thorough understanding of the information used to support the conclusion." Without a disaggregation of information, MNO cannot accurately identify information from MNO, if any; accurately review the conclusions of the report; and review any potential mitigation. **Response:** Treasury Metals has made efforts to engage and elicit input from Aboriginal peoples, specifically the MNO, regarding the Project. While no Project-specific traditional knowledge and traditional land use studies were prepared for, or shared with, Treasury Metals; limited information was obtained about traditional land use areas. Treasury Metals made efforts to incorporate information provided and to address comments and issues raised by Aboriginal peoples during the engagement process. A summary of the issues raised during the engagement process was provided in Section 8 and Appendix DD to the original EIS. As part of the Round 1 IRs, the Agency has requested that Treasury Metals expand and update the information presented in Appendix DD to the EIS. This information is provided as an updated document called the Aboriginal Engagement Report, provided as Appendix DD to the revised EIS. The Aboriginal Engagement Report provides a listing of the

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					disaggregate comments from Aboriginal peoples, and how those were addressed in the EIS. Treasury Metals will continue to discuss potential Project effects on traditional land use activities with potentially affected Aboriginal peoples throughout the life the Project. As additional information regarding an Aboriginal community's traditional land use and practices become available, Treasury Metals will review and consider it in the design of mitigation measures, follow-up monitoring and management plans for the Project, as appropriate. Information related to Aboriginal traditional knowledge or current land and resource use by MNO in the area of the Project is limited; MNO did not share any Project-specific information or knowledge with Treasury Metals before the original EIS was filed. The EIS Guidelines (CEAA, 2013) provided the framework that was used in preparing the original EIS. Based on the feedback from the Agency and other technical reviewers provided in IR Round 1 questions, there are a number of issues related to the approach used in the EIS for organizing and presenting the relevant information regarding the potential effects of the Project. In order to effectively address these issues, Treasury Metals has prepared a revised EIS which sets out the assessment of effects and impacts associated with the Project in a clear and traceable manner. The selection of valued components and the description of potential effects on Aboriginal peoples are described in Sections 6.1.3 and 6.21. Mitigation of effects and the significance of residual effects on Aboriginal peoples are described in Sections 6.21.6 and 8.20.
408	AC(1)-83	MNO	Environmental Impact Statement Executive Summary 2.1.5 Aboriginal Groups		**Information Request / Comment:** MNO requires additional information on the "Direction from the Provincial Crown (Ministry of Northern Development and Mines)" that was provided to identify the Aboriginal Groups engaged. MNO requires information on the level of engagement recommended by the Crown for a Class EA as well as any other specific direction provided by the Ministry of Northern Development and Mines. MNO understands that the Project is not subject to a provincial environmental assessment and is instead subject to a Class EA. **Response:** The provincial crown (Ministry of Northern Development and Mines) has identified the MNO as a potentially impacted Indigenous community. As Treasury Metals advances the through the provincial Class EA process, there will continue to be additional engagmentengagementopportunities following the applicable provincial procedures.
409	AC(1)-84	MNO	Environmental Impact Statement Executive Summary		**Information Request / Comment:** MNO requires additional detail on the potential socio-economic effects of using the Dryden rail facility for material arriving by rail. **Response:**

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			4.1.4 Railway		Treasury Metals has prepared a revised EIS that sets out the assessment of effects and impacts associated with the Project, including a discussion and justification for component specific study areas, in a clear and traceable manner. While no effects on the Dryden rail facility were identified in the EIS, information about the social and economic effects of the Project are presented in Sections 6.17 and 6.18 of the revised EIS.
410	AC(1)-85	MNO	Environmental Impact Statement Executive Summary 4.2.2 Surface and Mine Water Management		**Information Request / Comment:** MNO requires additional detail on the beaver dams within the Project footprint which will be removed during dewatering activities. Beaver is an important species to MNO that is traditionally hunted and commercially trapped. The executive summary does not contain enough information on the removal of the dams as currently written.
					Response: Treasury Metals will engage and consult both the local trapping council and the Ministry of Natural Resources and Forestry to prepare and plan for beavers and wildlife encounters (also see response TMI-281-RG(1)-16). The Wildlife Management Plan will serve as the basis of this interaction and will evolve during the on-going engagement process to reflect regulatory and Aboriginal perspectives in wildlife management for the Project. Specifics of beaver removal procedures during the life of the Project will be discussed with the registered trap line owner, Aboriginal peoples and applicable interested stakeholders.
411	AC(1)-86	MNO	Environmental Impact Statement Executive Summary 4.5.2 Pipelines		**Information Request / Comment:** MNO requires additional detail related to the proposed natural gas pipeline that is currently being discussed, including the type of regulatory application that will be required and level of engagement undertaken.
					Response: Section 3.6.3 of the revised EIS indicated the following: A pipeline will bring natural gas from a main pipeline running adjacent to the Trans-Canada Highway up to the plant area. Discussions are in progress with the natural gas utility supplier regarding the process for having a pipeline tapped from the main and run to the process plant site. The regulatory process, any engagement, and associated construction of a natural gas pipeline to provide gas to the Project will be the responsibility of the gas distributor in the region (Union Gas). The requisite pipeline will not be within the care-and-control of Treasury Metals.
412	AC(1)-87	MNO	Environmental Impact		**Information Request / Comment:** MNO requires additional information on the specific progressive rehabilitation that is proposed for

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
			Statement Executive Summary 4.13.3 Stockpiles		the mine rock and overburden piles. **Response:** Section 4.13.3 of the Executive Summary to the original EIS provided only a summary of the closure information which was presented more fully in Section 11.2.1 of the original EIS (conceptual closure plan). Prior to construction commencing, Treasury Metals is required to and will file a certified closure plan and post financial assurances with the Ministry of Northern Development and Mines (MNDM). This is a requirement under Part VII of the Ontario Mining Act. Engagement with Aboriginal communities prior to submission of a certified closure plan is also a requirement under Ontario Regulation 240/00. The certified closure plan is expected to be a refinement of the conceptual closure plan presented in Section 11 of the original EIS, structured in the format preferred by the MNDM (see also the response to TMI_398-AC(1)-73). It will include planned progressive reclamation measures for the entire site. At the request of the Agency and as part of the Round 1 IR process, Treasury Metals has prepared a revised EIS. The conceptual closure plan is described in Section 3.14 of the revised EIS.
413	AC(1)-88	MNO	Environmental Impact Statement Executive Summary 4.13.8 Roads, Pipelines and Power Distribution		**Information Request / Comment:** The statement that "[l]ocal vegetation will be transplanted at selected sites if practical" is largely permissive. Suggest rewording to "local vegetation will be transplanted on roads, pipeline and power distribution sites." **Response:** Section 4.13 of the Executive Summary to the original EIS provides a summary of the conceptual closure plan presented in Section 11 of the original EIS. The language used was not intended to be "permissive", but was intended to be reflective of potential difficulties that may be experienced during closure. Local vegetation for use in reclamation may not be readily available, or may be successfully transplanted for certain Project components. Prior to construction commencing, Treasury Metals is required to and will file a certified closure plan and post financial assurances with the Ministry of Northern Development and Mines (MNDM). This is a requirement under Part VII of the Ontario Mining Act. Engagement with Aboriginal communities prior to submission of a certified closure plan is also a requirement under Ontario Regulation 240/00. The certified closure plan is expected to be a refinement of the conceptual closure plan presented in Section 11 of the EIS, structured in the format preferred by the MNDM (see also the responses to TMI_398-AC(1)-73, TMI_412-AC(1)-87). At the request of the Agency and as part of the Round 1 IR process, Treasury Metals has prepared a revised EIS. The conceptual closure plan is described in Section 3.14 of the revised EIS.
414	AC(1)-89	MNO	Environmental	11.2 Measures	**Information Request / Comment**:

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			Impact Statement Executive Summary 4.14 In-Design Mitigation	to address impacts on Aboriginal Rights	MNO was not involved in the development of in-design mitigation features, to date. MNO requires engagement on the developed in-design mitigation and involvement in further mitigation that is proposed to be incorporated into the design of the Project. **Response:** Treasury Metals has made efforts to engage and elicit input from Aboriginal peoples regarding the Project. No Project-specific traditional knowledge and traditional land use studies were prepared for, or shared with, Treasury Metals; limited information was obtained about concerns regarding the in-design mitigation. Treasury Metals made efforts to incorporate information provided and to address comments and issues raised by Aboriginal peoples during the engagement process. A summary of the issues raised during the engagement process was provided in Section 8 and Appendix DD to the original EIS. As part of the Round 1 IRs, the Agency has requested that Treasury Metals expand and update the information presented in Appendix DD to the original EIS. This information is provided as an updated document called the Aboriginal Engagement Report, provided as Appendix DD to the revised EIS. The Aboriginal Engagement Report provides a listing of the disaggregate comments from Aboriginal peoples, and how those were addressed in the EIS. Treasury Metals will continue to discuss potential Project effects and mitigation measures with the MNO throughout the life the Project. As additional information regarding the MNO's traditional land use and practices become available, Treasury Metals will review and consider it in the design of mitigation measures, follow-up monitoring and management plans for the Project, as appropriate. Information related to Aboriginal traditional knowledge or current land and resource use by MNO in the area of the Project is limited; MNO did not share any Project-specific information or knowledge with Treasury Metals before the EIS was filed.
415	AC(1)-90	MNO	Environmental Impact Statement Executive Summary 4.14.1 Private Land Use		**Information Request / Comment**: The application specifies that "The project as currently designed is 71% held in these land parcels. This limits encroachment on crown land parcels and mitigates loss of traditional treaty lands." Please provide specific detail on the assessment and subsequent process for identification of mitigation related to the use of private land in mitigating the loss of traditional lands. MNO requires more specific information related to the assessment of potential effect related to the encroachment on crown land and the subsequent steps in developing the mitigation referenced. **Response:** The information required to respond to this information request is set out in the sections of the revised EIS pertaining to effects assessment and associated information, namely Section 6.16 (land use), 6.17 (social) and 6.21 (Aboriginal peoples). Treasury Metals has made efforts to engage and elicit input from Aboriginal peoples regarding the Project. No Project-specific traditional knowledge and traditional land use studies were prepared for,

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					or shared with, Treasury Metals; limited information was obtained about traditional land use areas. Treasury Metals made efforts to incorporate information provided and to address comments and issues raised by Aboriginal peoples during the engagement process. A summary of the issues raised during the engagement process was provided in Section 8 and Appendix DD to the original EIS. As part of the Round 1 IRs, the Agency has requested that Treasury Metals expand and update the information presented in Appendix DD to the original EIS. This information is provided as an updated document called the Aboriginal Engagement Report, provided as Appendix DD to the revised EIS. The Aboriginal Engagement Report provides a listing of the disaggregate comments from Aboriginal peoples, and how those were addressed in the EIS. Treasury Metals will continue to discuss potential Project effects on traditional land use activities with potentially affected Aboriginal peoples throughout the life the Project. As additional information regarding an Aboriginal community's traditional land use and practices become available, Treasury Metals will review and consider it in the design of mitigation measures, follow-up monitoring and management plans for the Project, as appropriate. Information related to Aboriginal traditional knowledge or current land and resource use by MNO in the area of the Project is limited; MNO did not share any Project-specific information or knowledge with Treasury Metals before the original EIS was filed and did not supply any information in this information request. An expanded evaluation of the potential Project effects and mitigation measures related to these effects can be located in the revised EIS in the sections noted above.
416	AC(1)-91	MNO	Environmental Impact Statement Executive Summary 4.14.3 Air Quality and Noise Mitigation	11.2 Measures to address impacts on Aboriginal Rights	**Information Request / Comment**: MNO was not involved in the development of air quality and noise mitigation as outlined in the executive summary. Therefore the suggested mitigation cannot be expected to address the potential adverse impacts of the Project on MNOs established Aboriginal rights and related interest. **Response:** Treasury Metals has made efforts to engage and elicit input from Aboriginal peoples regarding the Project. No Project-specific traditional knowledge and traditional land use studies were prepared for, or shared with, Treasury Metals; limited information was obtained about concerns regarding the in-design mitigation. Treasury Metals made efforts to incorporate information provided and to address comments and issues raised by Aboriginal peoples during the engagement process. A summary of the issues raised during the engagement process was provided in Section 8 and Appendix DD to the original EIS. As part of the Round 1 IRs, the Agency has requested that Treasury Metals expand and update the information presented in Appendix DD to the original EIS. This information is provided as an updated document called the Aboriginal Engagement Report, provided as Appendix DD to the revised EIS. The Aboriginal Engagement Report provides a listing of the disaggregate comments from Aboriginal peoples, and how those were addressed in the EIS. Treasury Metals will continue to discuss potential Project effects and mitigation measures with the

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					MNO throughout the life the Project. As additional information regarding the MNO's traditional land use and practices become available, Treasury Metals will review and consider it in the design of mitigation measures, follow-up monitoring and management plans for the Project, as appropriate. Information related to Aboriginal traditional knowledge or current land and resource use by MNO in the area of the Project is limited; MNO did not share any Project-specific information or knowledge with Treasury Metals before the original EIS was filed.
417	AC(1)-92	MNO	Environmental Impact Statement Executive Summary 5.2.1 Site Preparation Phase, 5.2.2 Construction Phase		**Information Request / Comment:** MNO requires engagement on the establishment and implementation of environmental protection and monitoring plans referenced in these sections. **Response:** Treasury Metals has made efforts to engage and elicit input from Aboriginal peoples regarding the Project. While no Project-specific traditional knowledge and traditional land use studies were prepared for, or shared with, Treasury Metals; limited traditional knowledge and information about traditional land use areas was collected from by Aboriginal peoples during the engagement process. Treasury Metals made efforts to incorporate the information shared and to address comments and issues raised in the EIS. The engagement activities prior to filing the EIS were summarized in Section 8, and more fully documented in Appendix DD to the original EIS. As part of the Round 1 IRs, the Agency has requested that Treasury Metals expand and update the information presented in Appendix DD to the original EIS. This information is provided as an updated document called the Aboriginal Engagement Report, provided as Appendix DD to the revised EIS. The Aboriginal Engagement report provides a listing of the disaggregate comments from Aboriginal peoples, and how those were addressed in the Project design and EIS. Treasury Metals also recognizes that engagement does not stop with the filing of the EIS and will continue throughout the life of the Project. Treasury Metals will continue to work to engage with MNO meaningfully with respect to the Project on the environment, along with a discussion of the mitigation measures to address Project. Treasury Metals will continue to discuss potential Project effects on traditional land use activities with MNO throughout the life the Project. As additional information regarding MNO's traditional land use and practices become available, Treasury Metals will review and consider it in the design of mitigation measures, follow-up monitoring and management plans for the Project, as appropriate.
418	AC(1)-93	MNO	Environmental Impact Statement Executive Summary 5.2.4 Closure and Post		**Information Request / Comment:** MNO requires engagement on any developed closure plan prior to the filing of such a plan with the regulator. **Response:** This is understood and noted. Treasury Metals will file a closure plan that is certified in accordance with Ontario Regulation 240/00 (as amended) and compliant with the Mine Rehabilitation Code of

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			Closure Phase		Ontario. Treasury Metals will continue to engage MNO regarding the Project and any approvals, including the closure plan.
419	AC(1)-94	MNO	Environmental Impact Statement Executive Summary 6.0 Description of the Environment	9.1.2 Biophysical Environment	**Information Request / Comment:** This section does not include a description of the existing ambient light levels at the project site or night-time illumination levels during different weather conditions and seasons. **Response:** Please refer to the response to TMI_179-AE(1)-17.
420	AC(1)-95	MNO	Environmental Impact Statement Executive Summary 6.0 Description of the Environment		**Information Request / Comment:** Section is largely inconsistent with the reporting of effects and mitigation appearing for some components of the environment while not being described at all for others. MNO suggests rewriting this entire section to have a consistent template and flow. **Response:** Section 6 of the Executive Summary to the original EIS presented a high level overview of the existing environmental conditions in the Project area. A more fulsome description of existing conditions was provided in Section 5 of the original EIS, and the various appendices to the EIS. Section 6 of the Executive Summary did not describe effects and mitigation, which were summarized in Section 12 of the Executive Summary, but did describe some of the existing conditions at levels that could be misconstrued as being a description of effects. For example, the description of existing conditions included a description of the potential for rocks to be acid generating (geochemistry). Acid rock drainage (ARD) is a natural phenomenon that occurs when sulphide minerals present in rocks are exposed to air and water, producing sulphuric acid through a natural chemical reaction. The potentially acid generating (PAG) nature of the rocks is an important aspect of the existing conditions. Similarly, the hydrogeology section provided information related to drawn down effects from dewatering wells that help characterize the existing groundwater regime.
421	AC(1)-96	MNO	Environmental Impact Statement Executive Summary 6.2 Air Quality, Noise, and Vibration	9.1.2 Biophysical Environment	**Information Request / Comment:** While the use of the Ministry of the Environment and Climate Change stations near Thunder Bay provides a conservative analysis of future background conditions, it does not provide the necessary information on the current baseline conditions of the Project study area. MNO requires additional information is collected on the current baseline conditions for air quality. **Response:** The effects and impacts for the Project were determined by comparing the combined model predictions and background concentrations to the ambient air criteria. The background

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					concentration in Thunder Bay is expected to be higher than the background levels near the Project. Therefore, the assessment probably overstated the impacts. This is a more conservative approach to assessing the potential impacts of the Project on air quality.
422	AC(1)-97	MNO	Environmental Impact Statement Executive Summary 6.2 Air Quality, Noise, and Vibration	9.2 Potential or established Aboriginal and Treaty rights and Related Interests	**Information Request / Comment**: MNO has not completed a Traditional Land Use Study to date nor has Treasury engaged MNO in engagement related to this topic. Therefore, the referenced receptors for vibration levels cannot include information from MNO and is likely deficient. **Response:** Treasury Metals has been engaged with Aboriginal peoples within the Project area, including MNO, for a number of years regarding the Project and this will continue for the life of the Project. This on-going engagement is described in the Aboriginal Engagement Report. Treasury Metals has attempted to negotiate agreements for sharing traditional knowledge and preparing traditional land use studies. Those attempts are described in the Aboriginal Engagement Report. Treasury Metals continues to be willing to provide reasonable financial support for independent technical reviews and TK / TLU studies with affected communities. Where available, TK / TLU information that has been collected has been integrated into the EIS. Any traditional knowledge shared by the communities in the future will be incorporated into the design of Project. Treasury Metals will continue to discuss potential Project effects on traditional land use activities with potentially affected Aboriginal peoples throughout the life the Project. As additional information regarding an Aboriginal community's traditional land use and practices become available, Treasury Metals will review and consider it in the design of mitigation measures, follow-up monitoring and management plans for the Project, as appropriate. Information related to Aboriginal traditional knowledge or current land and resource use by MNO in the area of the Project is limited; MNO did not share any Project-specific information or knowledge with Treasury Metals before the EIS was filed and they have not identified in this IR any locations where their members could potentially be impacted by noise or vibration associated with Project activities. The following table provides a concordance showing where information about potential Project effects and mitigation measures related to these concerns can be located in Sections 6.16 (land use), 6.17 (social), 6.19 (human health) and 6.21 (Aboriginal peoples) of the revised EIS. The determination of significance of residual effects is described in Section 8.0.
423	AC(1)-98	MNO	Environmental Impact Statement	11.1.1 Methodology	**Information Request / Comment:** The statement that "Mitigation strategies will likely be required to manage mine rock and tailing and to prevent acidic drainage and negative effects on downstream water quality at the site post closure

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			Executive Summary 6.4 Geochemistry		and potentially during operations" does not provide sufficient detail. MNO requires mitigation strategies be developed and proposed as part of the application development process in order to allow for rigorous review of the same. **Response:** Section 6 of the Executive Summary to the original EIS presented a high level overview of the existing environmental conditions in the Project area. A more fulsome description of existing conditions was provided in Section 5 of the original EIS, and the various appendices to the EIS. The Section 6.4 of the Executive Summary provided a description of the potential for rocks to be acid generating (geochemistry). Acid rock drainage (ARD) is a natural phenomenon that occurs when sulphide minerals present in rocks are exposed to air and water, producing sulphuric acid through a natural chemical reaction. The potentially acid generating (PAG) nature of the rocks is an important aspect of the existing conditions. The identification of PAG rocks in the existing conditions warrants the comment for the need to "…manage the mine rock and tailings to prevent acid drainage". Sections describing the potential effects of ARD on water quality, and the appropriate mitigation measures to manage ARD were presented in Section 12 of the Executive Summary to the original EIS (these were also described more fully in Section 6 of the EIS). The first three mitigation measures presented in Table ES.12.1 specifically addressed the issue of ARD, namely: • backfilling of the pits with waste rock minimizes the amount of waste rock to be stored above grade; • storage of waste rock underwater in the pit lake is expected to mitigate potential changes to soil chemistry associated with seepage from the waste rock storage area (WRSA); and • encapsulation of the WRSA and tailings storage facility (TSF) at closure. At the request of the Agency and as part of the Round 1 IR process, Treasury Metals has prepared a revised EIS. Information about potential Project effects and mitigation measures related to geochemistry is provided in Section 6.3 of the revised EIS.
424	AC(1)-99	MNO	Environmental Impact Statement Executive Summary		**Information Request / Comment:** The statement "The closest water wells outside of the company's property are those on Thunder Lake, approximately 1.5 km from the proposed pit. Otherwise, there are no wells within 2 km of the proposed pit…" does not make sense. There are, in fact, wells within 1.5 km of the proposed pit. The fact that there are no other wells within 2 km is irrelevant. Please clarify the statement. **Response:** The EIS identified, and evaluated the potential effects of the Project on existing water wells, including those identified on Thunder Lake, approximately 1.5 km from the proposed pit. The

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					statement identified from the Executive Summary to the original EIS is technically correct. However, it could have been better written as follows: *The closest water wells outside of the company's property are those on Thunder Lake, approximately 1.5 km from the proposed pit. There are no other wells within 2 km of the proposed pit, and no wells identified to the north or east.*
425	AC(1)-100	MNO	Environmental Impact Statement Executive Summary 6.7 Vegetation	9.1.2 Biophysical Environment	**Information Request / Comment**: MNO has not completed a Traditional Land Use Study to date nor has Treasury engaged MNO in engagement related to this topic. Therefore, of the 270 species identified in the LSA during the course of field survey activities, none can be confirmed to be used by MNO in the current use of lands and resources for traditional purposes by MNO. MNO requires Treasury to consult with MNO on critical species used by MNO in the exercise of their Aboriginal rights both in advance of and through the execution of a TLUS.
					Response: Treasury Metals has been engaged with Aboriginal peoples within the Project area, including MNO, for a number of years regarding the Project and this will continue for the life of the Project. This on-going engagement is described in the Aboriginal Engagement Report. Treasury Metals has attempted to negotiate agreements for sharing traditional knowledge and preparing traditional land use studies. Those attempts are described in the Aboriginal Engagement Report. Treasury Metals continues to be willing to provide reasonable financial support for independent technical reviews and TK / TLU studies with affected communities. Where available, TK / TLU information that has been collected has been integrated into the EIS. Any traditional knowledge shared by the communities in the future will be incorporated into the design of Project. Treasury Metals will continue to discuss potential Project effects on traditional land use activities with potentially affected Aboriginal peoples throughout the life the Project. As additional information regarding an Aboriginal community's traditional land use and practices become available, Treasury Metals will review and consider it in the design of mitigation measures, follow-up monitoring and management plans for the Project, as appropriate. Information related to Aboriginal traditional knowledge or current land and resource use by MNO in the area of the Project is limited; MNO did not share any Project-specific information or knowledge with Treasury Metals before the EIS was filed and have not identified in this IR any specific species that exist in the LSA as being used for their traditional purposes. Information about potential Project effects and mitigation measures related to these concerns can be located in Sections 6.12 (wildlife and wildlife habitat), 6.14 (fish and fish habitat), 6.16 (land use) and 6.21 (Aboriginal peoples) of the revised EIS. The determination of the significance of residual

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					effects for these concerns are described in Section 8.0.
426	AC(1)-101	MNO	Environmental Impact Statement Executive Summary 6.8 Wildlife	9.1.2 Biophysical Environment	**Information Request / Comment**: MNO has not completed a Traditional Land Use Study to date nor has Treasury engaged MNO in engagement related to this topic. Therefore, of the species identified in the LSA during the course of field survey activities, none can be confirmed to be used by MNO in the current use of lands and resources for traditional purposes by MNO. MNO requires Treasury to consult with MNO on critical species used by MNO in the exercise of their Aboriginal rights both in advance of and through the execution of a TLUS. **Response:** Treasury Metals has been engaged with Aboriginal peoples within the Project area, including MNO, for a number of years regarding the Project and this will continue for the life of the Project. This on-going engagement is described in the Aboriginal Engagement Report. Treasury Metals has attempted to negotiate agreements for sharing traditional knowledge and preparing traditional land use studies. Those attempts are described in the Aboriginal Engagement Report. Treasury Metals continues to be willing to provide reasonable financial support for independent technical reviews and TK / TLU studies with affected communities. Where available, TK / TLU information that has been collected has been integrated into the EIS. Any traditional knowledge shared by the communities in the future will be incorporated into the design of Project. Treasury Metals will continue to discuss potential Project effects on traditional land use activities with potentially affected Aboriginal peoples throughout the life the Project. As additional information regarding an Aboriginal community's traditional land use and practices become available, Treasury Metals will review and consider it in the design of mitigation measures, follow-up monitoring and management plans for the Project, as appropriate. Information related to Aboriginal traditional knowledge or current land and resource use by MNO in the area of the Project is limited; MNO did not share any Project-specific information or knowledge with Treasury Metals before the EIS was filed and have not identified in this IR any species identified in the LSA as being used for their traditional purposes. Information about potential Project effects and mitigation measures related to these concerns can be located in Sections 6.12 (wildlife and wildlife habitat), 6.14 (fish and fish habitat), 6.16 (land use) and 6.21 (Aboriginal peoples) of the revised EIS. The determination of the significance of residual effects for these concerns are described in Section 8.0.
427	AC(1)-102	MNO	Environmental Impact	9.1.2 Biophysical	**Information Request / Comment**: MNO has not completed a Traditional Land Use Study to date nor has Treasury engaged MNO in

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			Statement Executive Summary 6.9 Aquatic Biology	Environment	engagement related to this topic. Therefore, of the thirty-six species identified during a review of historical records and thirty-one identified in the LSA during the course of field survey activities, none can be confirmed to be used by MNO in the current use of lands and resources for traditional purposes by MNO. MNO requires Treasury to consult with MNO on critical species used by MNO in the exercise of their Aboriginal rights both in advance of and through the execution of a TLUS.
					Response: Treasury Metals has been engaged with Aboriginal peoples within the Project area, including MNO, for a number of years regarding the Project and this will continue for the life of the Project. This on-going engagement is described in the Aboriginal Engagement Report. Treasury Metals has attempted to negotiate agreements for sharing traditional knowledge and preparing traditional land use studies. Those attempts are described in the Aboriginal Engagement Report. Treasury Metals continues to be willing to provide reasonable financial support for independent technical reviews and TK / TLU studies with affected communities. Where available, TK / TLU information that has been collected has been integrated into the EIS. Any traditional knowledge shared by the communities in the future will be incorporated into the design of Project. In the absence of specific feedback from MNO regarding valued components, Treasury Metals has selected valued components that are consistent with recent mining projects in MNO Region 1. An expanded description of the selection of valued components, indicators and measures are provided in Section 6.1 of the revised EIS.
428	AC(1)-103	MNO	Environmental Impact Statement Executive Summary 6.10 Land and Resource Use, Traditional Knowledge and Land Use	2.3 Aboriginal engagement	**Information Request / Comment**: The statement in this section that states "Traditional land uses, and traditional knowledge related to the Project area from … Métis Nation of Ontario has not been received" does not provide sufficient detail of the ongoing process to complete the referenced study. Further, the description of traditional food uses, hunting practices, and fish species traditional use is deficient as MNO information has yet to be collected and incorporated into the EIS.
					Response: Treasury Metals has made efforts to engage and elicit input from the MNO regarding the Project. No Project-specific traditional knowledge and traditional land use studies were prepared for, or shared with, Treasury Metals; limited information was obtained about traditional land use areas. Treasury Metals made efforts to incorporate information provided and to address comments and issues raised by the MNO during the engagement process. A summary of the issues raised during the engagement process was provided in Section 8 and Appendix DD to the original EIS. As part of the Round 1 IRs, the Agency has requested that Treasury Metals expand and update the information presented in Appendix DD to the original EIS. This information is provided as an updated document called the Aboriginal Engagement Report, provided as Appendix DD to the revised EIS. The

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					Aboriginal Engagement Report provides a listing of the disaggregate comments from Aboriginal peoples, and how those were addressed in the EIS. Treasury Metals will continue to discuss potential Project effects on traditional land use activities with the MNO throughout the life the Project. As additional information regarding the MNO's traditional land use and practices become available, Treasury Metals will review and consider it in the design of mitigation measures, follow-up monitoring and management plans for the Project, as appropriate. Information related to MNO traditional knowledge or current land and resource use by MNO in the area of the Project is limited; MNO did not share any Project-specific information or knowledge with Treasury Metals before the original EIS was filed and has not provided any additional information in this IR.
429	AC(1)-104	MNO	Environmental Impact Statement Executive Summary 7.2 Project Alternative	8.0 Alternative Means of Carrying out the Project	**Information Request / Comment:** This section of the executive summary contains no detail related to the potential effects of each alternative means on potential or established Aboriginal rights and related interests. Please update to include. **Response:** Alternative means to the Project and potential effects of each alternative means on potential or established Aboriginal rights and related interests were described within Section 2, Appendix D, and Appendix X to the original EIS. Further to this as stated in TMI_30-AA(1)-11 as part of the first round of Information Requests, additional information was requested and recommendations and areas of clarification were provided for the Alternatives Assessment by the Agency and stakeholders. To address these various information requests, an update to the alternatives assessment has been prepared by Treasury Metals (TMI_34-AA(1)-15_Attachment_1). Updates to Tables 4.1 through 4.9 are provided within TMI_34-AA(1)-15_Attachment_2. See also the responses to the following IRs: • TMI_32-AA(1)-13 • TMI_33-AA(1)-14 • TMI_34-AA(1)-15 • TMI_35-AA(1)-16 • TMI_36-AA(1)-17 • TMI_37-AA(1)-18 • TMI_38-AA(1)-19 As part of the Round 1 IRs, the Agency has requested that Treasury Metals prepare a revised EIS. The updated alternatives assessment is described in Section 2.0 and also provided as Appendix X to the revised EIS.
430	AC(1)-105	MNO	Environmental Impact	9.1.3 Human Environment	**Information Request / Comment:** This section of the executive summary contains no reference to matters that affect the MNO as part

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			Statement Executive Summary 6.14 Socio-economics		of the socio-economic assessment. Please update the section to include matters of importance to the MNO. **Response:** An expanded evaluation of the effects of the Project has been provided in the revised EIS. The potential socio-economic effects of the Project are addressed in the land use (6.16), social factors (6.17), economic factors (6.18) and Aboriginal people (6.21) sections of the revised EIS. Treasury Metals has made efforts to engage and elicit input from the MNO regarding the Project. No Project-specific traditional knowledge and traditional land use studies were prepared for, or shared with, Treasury Metals; limited information was obtained about traditional land use areas or specific matters of importance. Treasury Metals made efforts to incorporate information provided and to address comments and issues raised by the MNO during the engagement process. A summary of the issues raised during the engagement process was provided in Section 8 and Appendix DD to the original EIS. As part of the Round 1 IRs, the Agency has requested that Treasury Metals expand and update the information presented in Appendix DD to the original EIS. This information is provided as an updated document called the Aboriginal Engagement Report, provided as Appendix DD to the revised EIS. The Aboriginal Engagement Report provides a listing of the disaggregate comments from Aboriginal peoples, and how those were addressed in the EIS. Treasury Metals will continue to discuss potential matters of importance with the MNO throughout the life the Project. As additional information regarding the MNO's traditional land use and practices becomes available, along with other matters of importance, Treasury Metals will review and consider it in the design of mitigation measures, follow-up monitoring and management plans for the Project, as appropriate. Information related to MNO matters of importance in the area of the Project is limited; MNO did not share any Project-specific information or knowledge with Treasury Metals before the EIS was filed.
431	AC(1)-106	MNO	Environmental Impact Statement Executive Summary 9.0 Aboriginal Engagement	10.1.3 Effects of changes to the environment	**Information Request / Comment:** The EIS states that "The goal of engagement for the Project is to provide Aboriginal communities with information and gather their feedback about: … anticipated environmental effects and management strategies…" This approach is wholly inappropriate. MNO is not responsible for the identification of anticipated environmental effects or management strategies. Instead, MNO can assist Treasury through the collection of necessary baseline information (namely the TLUS) and can collaboratively work with Treasury to identify impacts. **Response:** Treasury Metals will continue its efforts to engage Aboriginal peoples regarding the Project. The EIS Guidelines indicate that Treasury Metals should provide access to relevant Project information to Aboriginal persons so as to allow them to understand the Project and to determine its potential

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					impacts on their rights and interests. In particular, Treasury Metals understands that the goal is to ensure MNO understands the Project, has identified impacts to their rights, and has the opportunity to collaborate on mitigation measures and the manner in which the mitigation measures are implemented. Treasury Metals has been engaged with Aboriginal peoples within the Project area, including MNO, for a number of years regarding the Project and this will continue for the life of the Project. This on-going engagement is described in the Aboriginal Engagement Report (Appendix DD to the revised EIS). Treasury Metals has attempted to negotiate agreements for sharing traditional knowledge and preparing traditional land use studies. Those attempts are described in the Aboriginal Engagement Report. Treasury Metals continues to be willing to undertake affordable independent technical reviews and TK/TLU studies with affected communities.
432	AC(1)-107	MNO	Environmental Impact Statement Executive Summary 9.1 Potential Effects on Water Resources, Water Quality and Water Bodies		**Information Request / Comment:** MNO requires specific detail on whether fisheries offset plans are required for the loss of fish habitat within the area within adjacent lakes, or streams in order to maintain fish populations. Should a fisheries offset plan be required, MNO further requires engagement on the offset plan prior to submission of the plan to the regulator. **Response:** Treasury Metals will be required to file a fish habitat offset plan, however, no specific project offset has been proposed. The EIS Appendix II - DRAFT FISHERIES COMPENSATION STRATEGY AND PLANS, Section 5.0 (Impact to Offset Balance) states "No current locations for in-kind offset habitat locations have been selected due to non-finalized Project design, and lack of First Nation and public input into the design of the NNLP". It goes on to say in Section 5.2.1 (Impact to Offset Balance – Section 35(2) NNLP- Watershed Based Enhancements) "This approach [watershed based enhancements], suggested by the local Ministry of Natural Resources and Forestry (MNRF), would be focused on reversing long term impacts of slumping and sedimentation of Wabigoon Lake. The specific locations of these sites and where offset activities would be best placed will require engagement with MNRF, First Nations, and public stakeholders. Restoration techniques may include bank stabilization, and where appropriate, armoring. The proposed strategy would be designed to work with current FMP goals." Since the submission of the original EIS, Treasury Metals has been refining their understanding of fish and fish habitat impacts in the study area. As a result, potential offsetting requirements and measures will be re-examined. Treasury Metals, as part of the continued engagement of the Project, will engage Fisheries and Oceans Canada (DFO), Environment Canada (EC), and MNRF in defining the offsetting strategy as part of the Fish Management Plan and will engage with Aboriginal peoples regarding the offsetting plan.

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433	AC(1)-108	MNO	Environmental Impact Statement Executive Summary 9.3 Potential Effects on Hunting and Trapping		**Information Request / Comment:** The EIS states that "…no issues relating to hunting, fishing or gathering have been identified that are specific to the Project area." MNO objects to the characterization as MNO has identified their Aboriginal rights in the project vicinity on numerous occasions and has requested capacity to document information related to these rights, to no avail. Treasury has willfully and knowingly proceeded with its project development without the collection of MNO TLUS and has proceeded with the Project application without fulsome engagement with the MNO.
					Response: Treasury Metals has been engaged with Aboriginal peoples within the Project area, including MNO, for a number of years regarding the Project and this will continue for the life of the Project. This on-going engagement is described in the Aboriginal Engagement Report. Treasury Metals has attempted to negotiate agreements for sharing traditional knowledge and preparing traditional land use studies. Those attempts are described in the Aboriginal Engagement Report. Treasury Metals continues to be willing to provide reasonable financial support for independent technical reviews and TK / TLU studies with affected communities. Where available, TK / TLU information that has been collected has been integrated into the EIS. Any traditional knowledge shared by the communities in the future will be incorporated into the design of Project. Treasury Metals will continue to discuss potential Project effects on traditional land use activities with the MNO throughout the life the Project. As additional information regarding the MNO's traditional land use and practices become available, Treasury Metals will review and consider it in the design of mitigation measures, follow-up monitoring and management plans for the Project, as appropriate. Information related to MNO traditional knowledge or current land and resource use by MNO in the area of the Project is limited; MNO did not share any Project-specific information or knowledge with Treasury Metals before the original EIS was filed and they have not identified any specific uses or resources in the Project area in this IR.
434	AC(1)-109	MNO	Environmental Impact Statement Executive Summary 9.3 Potential Effects on Hunting and Trapping	7.2.1 Spatial Boundaries	**Information Request / Comment:** While much of the Project is located on private land, this does not, in and of itself, reduce the impact to hunting. The Project effects extend beyond the Project footprint to a Local and Regional Study area which must be assessed and considered.
					Response: Section 9.3 of the Executive Summary of the original EIS was highlighting that only 55 ha of Crown land will become restricted to the public for hunting purposes as a result of the Project. Treasury Metals acknowledge that the effects of the Project can extend beyond the Project footprint, including effects on wildlife, and effects on hunting and trapping for both Aboriginal people and non-

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					Aboriginals. The overall effects of the Project on wildlife populations and wildlife habitat has been considered throughout the EIS at multiple scales beyond the Project footprint. These potential effects, as well as the linkages to other components such as land use (hunting and trapping) and Aboriginal peoples are addressed further in the revised EIS in Sections 6.12 (wildlife and wildlife habitat), 6.16 (land use) and 6.21 (Aboriginal peoples).
435	AC(1)-110	MNO	Environmental Impact Statement Executive Summary 9.3 Potential Effects on Hunting and Trapping		**Information Request / Comment**: Additional detail is required to support the claim that "Trapping on Crown lands in the vicinity of the Project site will not be altered as a result of the development of the Goliath Gold Mine." What assessment was undertaken to reach this conclusion? What information from MNO was used in the determination? **Response:** Treasury Metals has made efforts to engage and elicit input from the MNO regarding the Project. No Project-specific traditional knowledge and traditional land use studies were prepared for, or shared with, Treasury Metals; limited information was obtained about traditional land use areas. Treasury Metals made efforts to incorporate information provided and to address comments and issues raised by the MNO during the engagement process. A summary of the issues raised during the engagement process was provided in Section 8 and Appendix DD to the original EIS. As part of the Round 1 IRs, the Agency has requested that Treasury Metals expand and update the information presented in Appendix DD to the original EIS. This information is provided as an updated document called the Aboriginal Engagement Report, provided as Appendix DD to the revised EIS. The Aboriginal Engagement Report provides a listing of the disaggregate comments from Aboriginal peoples, and how those were addressed in the EIS. An expanded evaluation of the effects of the Project has been provided in the revised EIS and sets out the assessment of effects and impacts associated with the Project in a clear and traceable manner. Information about potential Project effects and mitigation measures related to wildlife and wildlife habitat, land use and aboriginal peoples is provided in Sections 6.12, 6.16 and 6.21 of the revised EIS. Treasury Metals will continue to discuss potential Project effects on traditional land use activities with the MNO throughout the life the Project. As additional information regarding the MNO's traditional land use and practices become available, Treasury Metals will review and consider it in the design of mitigation measures, follow-up monitoring and management plans for the Project, as appropriate. Information related to MNO traditional knowledge or current land and resource use by MNO in the area of the Project is limited; MNO did not share any Project-specific information or knowledge with Treasury Metals before the original EIS was filed.

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436	AC(1)-111	MNO	Environmental Impact Statement Executive Summary 9.4 Gathering Plants and Berries Environmental Impact Statement 5.11.5.1 Vegetation		**Information Request / Comment:** The determination that "…although the gathering of plants and berries may be ongoing from year to year, the specific area where gathering may take place can change within a very short time." Is wholly inappropriate. Firstly, this determination was made without sufficient credible information from the MNO. It is also a generalization that lacks credible back-up or foundation in fact. Indeed, while berry patches can change from time to time. There are often established areas for gathering which reoccur from year to year which has not been considered or identified by Treasury. **Response:** Treasury Metals does not feel that there are any discrepancies between what was stated in the Executive Summary of the original EIS and the comments made above by MNO. The Executive Summary states that berry picking locations can persist from year to year, and they may also change within a very short time. The MNO comment above states that berry picking locations are often established areas which reoccur from year to year and that those patches may also change from time to time. The chosen wording in the Executive Summary may be subjective, but it is not incorrect.
437	AC(1)-112	MNO	Environmental Impact Statement Executive Summary 9.4 Gathering Plants and Berries		**Information Request / Comment:** The EIS states that "Blueberries are one type of berry known to be of interest to First Nations and other Aboriginal people. No specific areas associated with the Project have been identified as areas from which blueberries have been gathered." This is inappropriate. Blueberries, while potentially representative of some berry types, cannot be used as a substitute for all berry types within the vicinity of the Project. MNO gathers many varieties of berries and their exclusion from consideration in the assessment highlights the deficiency of the report. **Response:** It was not Treasury Metals' intention to use blueberries as a substitute for all berry types in the Executive Summary of the original EIS. Section 9.4 of the EIS Executive Summary refers to all plants and berries utilized by First Nations and Aboriginal people. While blueberries are the only specific berry mentioned in this section, it is presented as an example, not as a surrogate for all plants and berries that may be used by First Nations and/or Aboriginal people. Lowbush cranberry, is another example species that may be harvested by Aboriginal peoples. Treasury Metals has made efforts to engage and elicit input from Aboriginal peoples regarding the Project. Although no Project-specific traditional knowledge and traditional land use studies were prepared for, or shared with, Treasury Metals; limited information was obtained about traditional land use areas during the engagement process, and was incorporated in the EIS. Information related to Aboriginal traditional knowledge or current land and resource use by MNO in the area of

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					the Project is limited; MNO did not share any Project-specific information or knowledge with Treasury Metals before the original EIS was filed. In a letter dated May 2015 from MNO to the Agency and Treasury Metals, it was noted that Wabigoon Lake is an area heavily used by MNO in the exercise of their Aboriginal rights and interests, with specific concerns related to surface and groundwater quality and fish and fish habitat. Treasury Metals will continue to discuss potential Project effects on traditional land use activities with potentially affected Aboriginal peoples throughout the life the Project. As additional information regarding an Aboriginal community's traditional land use and practices become available, Treasury Metals will review and consider it in the design of mitigation measures, follow-up monitoring and management plans for the Project, as appropriate.
438	AC(1)-113	MNO	Environmental Impact Statement Executive Summary 9.4 Gathering Plants and Berries		**Information Request / Comment:** It is interesting to note that while blueberries may change locales "within a very short time" they are specifically located within the Dryden Forest, of which the proponent suggests as an alternative locale for berry gathering very close to the Project. **Response:** Treasury Metals has prepared a revised EIS that sets out the assessment of effects and impacts associated with the Project in a clear and traceable manner. The information required to respond to this information request is set out in Section 6.15 Wetlands and Vegetation and in Section 6.21 Aboriginal Peoples.
439	AC(1)-114	MNO	Environmental Impact Statement Executive Summary 9.5 Flooding and Weather Related Disasters		**Information Request / Comment:** The EIS states that "Treasury does not have the expertise to comment on the causes of climate change and weather patterns." However, it is Treasury's responsibility to procure the necessary expertise to address all issues and concerns raised as part of the EIS application process. Not having the expertise does not remove the issue. **Response:** The comment highlighted by the reviewer may be taken out of context. The relevant sections of the Executive Summary to the original EIS referred to in the question are repeated below: *A concern has been raised relating to the potential contribution of the Project to once in a century flooding or weather-related disasters becoming more common because of human industrial activity.* *Treasury does not have the expertise to comment on the causes of climate change and weather patterns. However, the effects of climate change tend to be global in nature. Individual industrial projects do not generally have large impacts. As a result of the small size of the Project and the relatively short period over which the Project is expected to be*

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					in operation, it is extremely unlikely that the Project will have any significant impact on flooding or other weather related disasters. The concern noted in the above excerpt from the Executive Summary was raised during the engagement activities. The specific concern raised was about the potential contribution of the Project on the 1 in 100-year storm events in the future. Treasury Metals has retained the expertise necessary to evaluate the potential effects of the Project on the environment. With respect to the potential effects of the Project on future climate, Treasury Metals correctly pointed out that "…it is extremely unlikely that the Project will have any significant impact on flooding or other weather related disasters." This statement is supported by the current Federal guidance document (FPTCCCEA 2003) on incorporating climate change in environmental assessments. This guidance specifically states that "…unlike most project-related environmental effects, the contribution of an individual project to climate change cannot be measured." Although the Project is unlikely to cause any measurable change to the climate, Treasury Metals recognizes the wealth of knowledge available about how the climate is expected to change (Columbo et al., 2007; IPCC, 2007; IPCC, 2013; McDermid et al., 2015). However, as indicated in Section 4.4.5 of the EIS, the short duration of the Project means that "…the runoff and water regimes of the area are likely to remain close to the current levels." The potential effects of changing climate on the Project are also addressed in the response to TMI_263-EE(1)-06. *References Cited:* Colombo, S.J., D.W. McKenney, K.M. Lawrence and P.A. Gray, 2007. Climate Change Projections for Ontario: Practical Information for Policymakers and Planners. Ontario Ministry of Natural Resources. CCRR-05. FTPTCCCEA (The Federal-Provincial-Territorial Committee on Climate Change and Environmental Assessment), 2003. Incorporating Climate Change Considerations in Environmental Assessment: General Guidance for Practitioners. November. IPCC (Intergovernmental Panel on Climate Change), 2007. Summary for Policymakers. In: Climate Change 2007: The Physical Science Basis. Contribution of Working Group I to the Fourth Assessment Report of the Intergovernmental Panel on Climate Change. Cambridge University Press, Cambridge, United Kingdom and New York, NY, USA. IPCC, 2013: Summary for Policymakers. In: Climate Change 2013: The Physical Science Basis. Contribution of Working Group I to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change. Cambridge University Press, Cambridge, United Kingdom and New York, NY, USA McDermid, J., S. Fera and A. Hogg, 2015. Climate Change Projections for Ontario: An Updated

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					Synthesis for Policymakers and Planners. Ontario Ministry of Natural Resources and Forestry. CCRR-44.
440	AC(1)-115	MNO	Environmental Impact Statement Executive Summary 9.6 Cumulative Loss of Section 35 Harvesting Rights		**Information Request / Comment:** This section is largely cursory and does not delve into the specific aspects of section 35 rights. Aboriginal rights are varied and include a holistic approach to the environment which must be considered. Relating these rights only to the small amount of land impacted in the vicinity of the Project shows an impoverished view of these rights and minimizes them. **Response:** Treasury Metals will continue to complete the procedural aspects of the Crown's evolving engagement processes that have been delegated. Treasury Metals understands that the goal is to ensure MNO understands the Project, has identified impacts to their rights, and has had the opportunity to collaborate on mitigation measures and on the manner in which the mitigation measures are implemented. Treasury Metals has been engaged with Aboriginal peoples within the Project area, including MNO, for a number of years regarding the Project and this will continue for the life of the Project. This on-going engagement is described in the Aboriginal Engagement Report. Treasury Metals continues to be willing to undertake affordable independent technical reviews and TK/TLU studies with MNO. Measures and strategies to mitigate impacts to rights that are identified through the on-going engagement process will be integrated into the Project design.
441	AC(1)-116	MNO	Environmental Impact Statement Executive Summary 9.7 Access Restrictions		**Information Request / Comment**: As MNO has not completed a TLUS, the scope and extent of their trails and travelways cannot be quantified in the Project area. This section does not consider this or make provisions for the potential information. Overreaching **Response:** Treasury Metals has been engaged with Aboriginal peoples within the Project area, including MNO, for a number of years regarding the Project and this will continue for the life of the Project. This on-going engagement is described in the Aboriginal Engagement Report. Treasury Metals has attempted to negotiate agreements for sharing traditional knowledge and preparing traditional land use studies. Those attempts are described in the Aboriginal Engagement Report. Treasury Metals continues to be willing to provide reasonable financial support for independent technical reviews and TK/TLU studies with affected communities. Where available, TK/TLU information that has been collected has been integrated into the EIS. Any traditional knowledge shared by the communities in the future will be incorporated into the design of Project. Treasury Metals will continue to discuss potential Project effects on traditional land use activities

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					with the MNO throughout the life the Project. As additional information regarding the MNO's traditional land use and practices become available, Treasury Metals will review and consider it in the design of mitigation measures, follow-up monitoring and management plans for the Project, as appropriate. Information related to MNO traditional knowledge or current land and resource use by MNO in the area of the Project is limited; MNO did not share any Project-specific information or knowledge with Treasury Metals before the original EIS was filed and they have not provided any Project-specific information in this IR regarding their trails or travel ways.
442	AC(1)-117	MNO	Environmental Impact Statement Executive Summary 9.10 Mine Closure		**Information Request / Comment:** MNO requires involvement in the development and implementation of any Project closure plan developed by Treasury. **Response:** This is noted. Treasury Metals will file a closure plan that is certified in accordance with Ontario Regulation 240/00 (as amended) and compliant with the Mine Rehabilitation Code of Ontario. Treasury Metals intends to continue its efforts to engage MNO regarding the Project for the life of the Project, including the closure plan.
443	AC(1)-117b	MNO	Environmental Impact Statement Executive Summary 9.12 Potential Effects on Noise Quality, Air Quality, and Light Quality		**Information Request / Comment:** While this section references high level information on noise and air quality, it totally ignores light quality. Please provide a summary of the concerns raised by Aboriginal groups, information on the potential impacts and proposed mitigation for light quality. Further, information should be provided on the summary of concerns raised by Aboriginal groups related to air quality and noise as well. **Response:** Section 9.21 of the Executive Summary to the original EIS did provide a high level review of the concerns raised about noise, air quality and light. It also provided a summary of the measures to manage and reduce the noise and air quality effects. The potential effects of the Project on light were further described in Section 6.4.1.4 of the original EIS. The measures identified for managing the potential effects of light include: • limit Project lighting to areas required for safe operations; • orient Project lighting towards the interior of the Project area; and • where possible, use down-shaded lighting on Project buildings and infrastructure. Summaries of the potential concerns related to the Project raised with Treasury Metals by Aboriginal peoples were presented in Section 8 of the original EIS. Section 14 of the original EIS, specifically Table 14.0.3 provided a summary of the feedback regarding the Project that was provided to the Agency by Aboriginal peoples. There were no specific concerns raised by Aboriginal

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					peoples regarding light associated with the Project. At the request of the Agency and as part of the Round 1 IR process, Treasury Metals has prepared a revised EIS. Information about potential Project effects and mitigation measures related to light is provided in Section 6.5 of the revised EIS. Additional details regarding the Aboriginal engagement program were provided in Appendix DD to the original EIS. The Agency has requested that Treasury Metals provide an update to the record of the Aboriginal engagement activities for the Project as part of the Round 1 IRs. This update is provided as Appendix DD to the revised EIS, called the Aboriginal Engagement Report. One of the items requested by the Agency as part of the update is to provide a series tables showing the disaggregated issues and concerns raised by the Aboriginal peoples engaged as part of the EIS process.
444	AC(1)-118	MNO	Environmental Impact Statement Executive Summary 9.13 Visual Aesthetics		**Information Request / Comment**: This section is largely cursory and does not provide the necessary detail to understand the Aboriginal concerns related to visual aesthetics, the potential project impacts or information on mitigation. **Response:** Please see the response to TMI_229-HE(1)-36 for information regarding potential effects to visual aesthetics.
445	AC(1)-119	MNO	Environmental Impact Statement Executive Summary 10.0 Human Health and Ecological Risk Assessment		**Information Request / Comment**: The species listed as part of the SLRA were not consulted on with MNO and cannot be verified as species of importance to MNO. MNO requires engagement on the species included in the SLRA to ensure they capture a representative sample of species harvested by MNO in the exercise of their rights. **Response:** Treasury Metals has been engaged with Aboriginal peoples within the Project area, including MNO, for a number of years regarding the Project and this will continue for the life of the Project. This on-going engagement is described in the Aboriginal Engagement Report (Appendix DD to the revised EIS). Treasury Metals has attempted to negotiate agreements for sharing traditional knowledge and preparing traditional land use studies and those attempts are described in the Aboriginal Engagement Report also. Treasury Metals will continue to discuss potential Project effects on traditional land use activities with potentially affected Aboriginal peoples throughout the life the Project and Treasury Metals continues to be willing to undertake affordable independent technical reviews and TK/TLU studies with affected communities. As additional information regarding an Aboriginal community's traditional

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					land use and practices become available, Treasury Metals will review and consider it in the design of mitigation measures, follow-up monitoring and management plans for the Project, as appropriate. Information related to Aboriginal traditional knowledge or current land and resource use by MNO in the area of the Project is limited; MNO did not share any Project-specific information or knowledge with Treasury Metals before the original EIS was filed and have not identified, in this information request, any species of importance to them. An expanded evaluation of the effects of the Project and mitigation measures related to these effects can be located in Sections 6.12 (wildlife and wildlife habitat), 6.14 (fish and fish habitat), 6.16 (land use) and 6.21 (Aboriginal peoples) of the revised EIS.
446	AC(1)-120	MNO	Environmental Impact Statement Executive Summary 12.1 Effects Assessment Process	7.1.1 Valued Components	**Information Request / Comment:** The definition given for Valued Components in this section differs from the definition provided in the EIS Guidelines. Specifically, it does not mention Aboriginal peoples, which is of concern to MNO. **Response:** There are many different ways that valued components can be described. Regardless of the language used, there is a general understanding of their purpose and how they can be defined. In their "Practitioners Glossary for the Environmental Assessment of Designated Projects under the *Canadian Environmental Assessment Act, 2012*" (CEAA, 2015), the Agency defines valued components as follows: Valued components refer to environmental features that may be affected by a project and that have been identified to be of concern by the proponent, government agencies, Aboriginal peoples or the public. The value of a component not only relates to its role in the ecosystem, but also to the value people place on it. For example, it may have been identified as having scientific, social, cultural, economic, historical, archaeological or aesthetic importance. For the purposes of CEAA 2012, valued components are selected in relation to section 5 of CEAA 2012 and taking into account direction provided by the responsible authority, or in the case of an EA by review panel, by the Agency or the Minister. The definition used by the Agency does not differ dramatically from the following general definition of valued components provided in Section 12.1 of the Executive Summary to the original EIS: VCs are those aspects of the natural and socio-economic environment that are particularly notable or valued because of their ecological, scientific, resource, socio-economic, cultural, health, aesthetic, or spiritual importance, and which have a potential to be adversely affected by project development or have the potential to have an effect on the Project. Although the definition does not explicitly list all of the peoples who can contribute to the identification of valued components, it does not exclude or restrict any group or individual from

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					having input towards, or interests in identifying the VCs. The EIS Guidelines offer the following, similar definition of valued components: Valued Components (VCs) refer to attributes associated with the Project that have been identified to be of concern by the proponent, government agencies, Aboriginal peoples and/or the public. The value of a component not only relates to its role in the ecosystem, but also to the value placed on it by humans. The proponent will identify the VCs deemed appropriate to ensure the full consideration of the factors listed in subsection 19(1) of CEAA, 2012 as well as the 2012 amendment to section 79 of the *Species at Risk Act*. A list of minimum required VCs are provided in section 9.1 of this document. This list will be completed according to the evolution and design of the Project and reflect the knowledge acquired on the environment through public and Aboriginal engagements. The proponent will describe how other VCs were selected and what methods were used to predict and assess the adverse environmental effects of the Project on these components. The valued components used in the EIS were identified in Section 6.3 of the original EIS. To the extent information was shared with Treasury Metals during their engagement activities (summarized in Appendix DD: Aboriginal Engagement Report and Appendix V: Public Engagement), this was used in selecting the valued components used. Treasury Metals acknowledges that there are a number of questions from the Agency and other reviewers provided related to the approach used in the EIS for organizing and presenting information regarding the potential effects of the Project. In order to effectively address these issues, Treasury Metals has prepared a revised EIS that sets out the assessment of effects and impacts associated with the Project in a clear and traceable manner. The valued components are described more fully in Section 6.1.3 of the revised EIS (see also the responses to TMI_2- EA(1)-02 and TMI_3-EA(1)-03).
447	AC(1)-121	MNO	Environmental Impact Statement Executive Summary 12.2.2.5 Aboriginal Peoples		**Information Request / Comment:** This section is largely cursory and does not contain the necessary detail to evaluate the application. Specifically, this section contains no information on potential effects or mitigation. **Response:** The reviewer is referencing one sub-section of the Executive Summary to the EIS in their comment. The Executive Summary is, by design, a high level summary of the information presented in the body of the EIS. In many cases, the EIS presents a summary of the more detailed information presented in the appendices to the EIS (e.g., Appendix DD, the Aboriginal Engagement Report). For

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					additional details, please refer to pertinent sections of the EIS main text and its appendices.
448	AC(1)-122	MNO	Environmental Impact Statement 2.0 Assessment of Alternatives	8.0 Alternative Means of Carrying out the Project	**Information Request / Comment**: The proponent has not completed an identification of effects for each alternative means which takes into account potential or established Aboriginal and treaty rights. This shows the lack of consideration given to Aboriginal interests in the EIS and lack of information provided on this topic. **Response:** Alternative means to the Project and potential effects of each alternative means on potential or established Aboriginal rights and related interests were described within Section 2, Appendix D, and Appendix X to the original EIS. Further to this as stated in TMI_30-AA(1)-11 as part of the first round of Information Requests, additional information was requested and recommendations and areas of clarification were provided for the Alternatives Assessment by the Agency and stakeholders. To address these various information requests, an update to the alternatives assessment has been prepared by Treasury Metals (TMI_34-AA(1)-15_Attachment_1). Updates to Tables 4.1 through 4.9 are provided within TMI_34-AA(1)-15_Attachment_2. See also the responses to the following IRs: • TMI_32-AA(1)-13 • TMI_33-AA(1)-14 • TMI_34-AA(1)-15 • TMI_35-AA(1)-16 • TMI_36-AA(1)-17 • TMI_37-AA(1)-18 TMI_38-AA(1)-19At the request of the Agency and as part of the Round 1 IR process, Treasury Metals has prepared a revised EIS. Information about the updated alternatives assessment is provided in Section 2.0 and Appendix X to the revised EIS.
449	AC(1)-123	MNO	Environmental Impact Statement 2.3.1 Mining 2.3.2 Minewater Management 2.3.3 Mine Rock and Overburden Management 2.3.5 Process Effluent	8.0 Alternative Means of Carrying out the Project	**Information Request / Comment:** This alternative does not include information related to First Nation Reserves and Communities or Traditional Land Use as per the Environmental criteria for the alternative assessment. **Response:** Alternative means to the Project and potential effects of each alternative means on potential or established Aboriginal rights and related interests were described within Section 2, Appendix D, and Appendix X to the original EIS. Further to this as stated in TMI_30-AA(1)-11 as part of the first round of Information Requests, additional information was requested and recommendations and areas of clarification were provided for the Alternatives Assessment by the Agency and stakeholders. To address these various information requests, an update to the alternatives assessment has been

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
			Treatment 2.3.7 Water Supply 2.3.8 Water Discharge Location 2.3.9 Watercourse Realignments 2.3.10 Infrastructure and Buildings 2.3.12 Non-hazardous Solid Waste Management		prepared by Treasury Metals (TMI_34-AA(1)-15_Attachment_1). Updates to Tables 4.1 through 4.9 are provided within TMI_34-AA(1)-15_Attachment_2. See also the responses to the following IRs: • TMI_32-AA(1)-13 • TMI_33-AA(1)-14 • TMI_34-AA(1)-15 • TMI_35-AA(1)-16 • TMI_36-AA(1)-17 • TMI_37-AA(1)-18 At the request of the Agency and as part of the Round 1 IR process, Treasury Metals has prepared a revised EIS. Information about the updated alternatives assessment is provided in Section 2.0 and Appendix X to the revised EIS.
450	AC(1)-124	MNO	Environmental Impact Statement 2.3.5.4 In-Plant Cyanide Destruction Followed by Natural Degradation Followed by Effluent Treatment		**Information Request / Comment:** This section specifies that "This method ensures that wildlife, including waterfowl and aquatic life, are protected." But lacks the necessary detail to back up this conclusion. Please provide specific detail around how this method will ensure that wildlife and aquatic life are protected. **Response:** Section 2.3.5 of the EIS describes the various options considered for the treatment of process effluents, specifically the following four options were evaluated: • natural cyanide degradation and metals removal in the tailings storage facility (TSF); • in-plant cyanide destruction and metals removal followed by natural degradation; • natural degradation followed by effluent treatment; and • in-plant cyanide destruction followed by natural degradation followed by effluent treatment. The fourth option was the preferred option selected for use at the Project site. With this option, there are three stages of treatment. The first stage occurs within the plant, where the recovery and destruction of cyanide will reduce the concentration to less than 1 mg/L (Metal Mining Effluent Regulations [MMER] limit for discharge to the environment). The tailings will then be discharged to the TSF where natural degradation processes will further break down the remaining cyanide and other compounds. Finally, excess supernatant water from the TSF facility will be treated by a reverse osmosis process to concentrations that meet the Provincial Water Quality Objectives (PWQO) before being discharged to Blackwater Creek. By treating the tailings water within the plant to meet MMER discharge limits for cyanide means that

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					the supernatant water will not pose an acute risk to wildlife, including waterfowl, which may access the TSF and come in contact with the supernatant water. There will be additional treatment within the TSF through natural degradation. Prior to the supernatant water coming into contact with aquatic life in Blackwater Creek, it will be treated by reverse osmosis process to meet PWQO.
451	AC(1)-125	MNO	Environmental Impact Statement 2.3.8 Water Discharge Location		**Information Request / Comment:** The preferred water discharge location still presents a number of issues of concern to MNO which have not been reflected in the alternatives assessment. Specifically, the discharge into Blackwater Creek and eventually discharge into Wabigoon Lake, the source of drinking water for the City of Dryden. Wabigoon Lake is a key waterbody used by MNO in the exercise of their Aboriginal rights and interests. MNO lacks confidence in the proposed ongoing environmental impact monitoring proposed as well as other uncertainties outlined in this section. **Response:** Treasury Metals is aware of the importance of both Thunder Lake and Wabigoon Lake to the people of the area, including Aboriginal peoples. As stated in the EIS, Treasury Metals is committed (Table 10.0.1 of the EIS) to treat the effluent from the Project to concentrations that meet the Provincial Water Quality Objectives (PWQO) prior to entering Blackwater Creek. For compounds with no PWQO, effluent will meet the Canadian Environmental Quality Guidelines (CEQG) from the Canadian Council of Ministers of the Environment (CCME). Finally, concentrations of mercury in the effluent will meet concentrations that are equal to, or lower than baseline concentrations in Blackwater Creek. The technology selected for use in the Project has been demonstrated to be capable of achieving the committed to discharge levels. The proposed surface water quality monitoring program is discussed in Section 13.8.1 of the EIS. As stated in the EIS, the details of the surface water monitoring "… is subject to change upon finalization of the regulatory monitoring designated by applicable government agencies to allow for a single, harmonized monitoring program that encompasses all surface water quality monitoring. The follow-up and management plans on surface water quality are described in Sections 13.8 and 12.3, respectively, of the revised EIS.
452	AC(1)-126	MNO	Environmental Impact Statement 2.3.12 Non-hazardous Solid Waste	8.0 Alternative Means of Carrying out the Project	**Information Request / Comment:** This section contains no consideration of alternatives for non-hazardous solid waste management. Please provide alternatives assessment or remove from assessment altogether. **Response:** Section 2.3.12 of the EIS does describe the alternatives considered for the management of non-

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
			Management		hazardous solid waste, and the reasons for selecting the preferred option. Appendix X further delineates the alternatives (acquire an off-site landfill, develop an on-site landfill, truck waste to an existing off-site landfill). The preferred option is trucking the waste to an existing off-site landfill for non-hazardous solid waste management.
453	AC(1)-127	MNO	Environmental Impact Statement 2.3.13 Hazardous Solid Waste Management	8.0 Alternative Means of Carrying out the Project	**Information Request / Comment:** This section contains no consideration of alternatives for hazardous solid waste management. The justification that "…the potential negative effects on the physical, biological and human environment are unacceptable when compared to transporting the material to an existing licenced [sic] facility." Is inappropriate and clearly is at cross purposes with the intended outcome of an alternatives assessment. Instead the alternatives should have been outlined, including the potential negative effects to allow for a comparison of effects. Please provide an alternative assessment for hazardous waste management. **Response:** In identifying the potential options for disposing of hazardous solid waste, Treasury Metals did consider the options of disposing of the materials on-site, or transporting them to an existing licensed facility. Section 2.3.13 of the EIS clearly states that no "…site alternatives were considered acceptable or meet Treasury criteria for alternatives." Thus the transportation of the material to an existing licensed facility was identified as the preferred alternative. Further to this, all on-site storage of hazardous waste prior to delivery to an existing licensed facility will be stored accordingly to Ontario Environmental Protection Act, O. Reg. 347.
454	AC(1)-128	MNO	Environmental Impact Statement 2.3.13 Hazardous Solid Waste Management 2.3.14 Domestic Sewage Management 2.3.15 Explosives Storage Facility	8.0 Alternative Means of Carrying out the Project	**Information Request / Comment:** This alternative does not include information related to First Nation Reserves and Communities or Traditional Land Use as per the Environmental criteria for the alternative assessment. **Response:** The preferred alternatives for hazardous solid waste management and domestic sewage disposal was the trucking of waste to an licensed offsite disposal facility (see TMI_452-AC(1)-126 and TMI_453-AC(1)-127). Hazardous solid waste and its disposal on-site were not considered acceptable or meet Treasury Metals criteria for alternatives. Specifically, the potential negative effects on the physical, biological, and human environment were deemed unacceptable when compared to transporting the material to an existing licenced facility. Domestic sewage (black water) management was considered within the alternatives assessment as described in Appendix X. The selected preferred alternative is that of off-site treatment, which

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					provides no capacity constraints and, due to the variable domestic sewage needs presented though construction and initial operations, allows for certainty that all domestic sewage will be handled in the proper manner. Additionally, disposal at a licensed, established, off-site treatment facility presents no anticipated environmental impacts other than vehicular traffic. As a project optimization following the submission of the EIS, grey water will be pumped to the process plant and will be used as process water. Treasury Metals is currently engaging explosives suppliers and preliminary feedback suggests that a regular delivery of explosives from a regional storage site will be practical. Therefore, a relatively low volume of explosives would need to be stored on-site. This storage location has not been considered as part of the alternatives assessment as it is effectively dictated by the *Explosives Act* and the minimum permissible distance guidelines from Natural Resources Canada.
455	AC(1)-129	MNO	Environmental Impact Statement Multiple Sections within Section 2.3	8.0 Alternative Means of Carrying out the Project	**Information Request / Comment:** This section specifies that the "[p]ower supply will be taken directly from the existing 115 kV Hydro One M2D with an on-site substation … Treasury sees no benefits in creating a separate power source and no other options have been assessed." This misses the point of an alternatives assessment and does not fulfill the CEAA requirements of the EIS Guidelines. Further, there is no discussion of related piping and power infrastructure as part of the alternatives assessment. Please provide additional information related to these components.
					Response: Overall, neither wind nor solar electrical power generation provide a reliable source of power sufficient for the Project at a reasonable cost. Hydro One will supply the power to the Project. As part of the normal process, all power connections and approvals will be done through appropriate authorities within the regional system of power generation and distribution in Ontario including Hydro One, the Independent Electricity System Operator and the Ontario Energy Board. At the time of filing the EIS, Treasury Metals felt that there were no viable sources of power that would have been preferred to accessing the 115kV Hydro One power infrastructure that runs adjacent to the Project. Since the filing of the original EIS, Treasury Metals has commissioned an additional review of the options for providing power to the Project. This review is provided as an attachment to TMI_24-AA(1)-05 (TMI_24-AA(1)-05_Attachment_1_pdf). This review considers both the use of wind and solar power. At the request of the Agency and as part of the Round 1 IR process, Treasury Metals has prepared

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					a revised EIS. Information about alternatives related to power supply is provided in Section 2.3.16 and Appendix S to the revised EIS.
456	AC(1)-130	MNO	Environmental Impact Statement 2.4 Project Alternatives – Closure		**Information Request / Comment:** MNO requires confirmation that they will be consulted prior to the submission of a detailed certified Closure Plan as well as throughout the applicable comment period as no engagement on the conceptual closure plan has been undertaken to date. **Response:** In accordance with Ontario Regulation 240/00 (as amended) Treasury Metals will consult all parties as designated by the Ministry of Northern Development and Mines (MNDM) as part of the submission of the detailed certified closure plan including MNO.
457	AC(1)-131	MNO	Environmental Impact Statement 2.4.1 Open Pit Closure 2.4.2 Underground Closure 2.4.3 Waste Rock Storage Area Closure 2.4.4 Minewater Management System Closure 2.4.5 Tailings Storage Facility Closure 2.4.6 Buildings and Equipment Closure 2.4.7 Infrastructure Closure 2.4.8 Drainage Closure	8.0 Alternative Means of Carrying out the Project	**Information Request / Comment**: Sections 2.4.1 to 2.4.8 (EIS) outlines closure alternatives but do not include information related to First Nation Reserves and Communities or Traditional Land Use as per the Environmental criteria for the alternative assessment. **Response:** Alternative means to the Project and potential effects of each alternative means on potential or established Aboriginal rights and related interests were described within Section 2, Appendix D, and Appendix X to the original EIS. Further to this as stated in TMI_30-AA(1)-11 as part of the first round of Information Requests, additional information was requested and recommendations and areas of clarification were provided for the Alternatives Assessment by the Agency and stakeholders. To address these various information requests, an update to the alternatives assessment has been prepared by Treasury Metals (TMI_34-AA(1)-15_Attachment_1). Updates to Tables 4.1 through 4.9 are provided within TMI_34-AA(1)-15_Attachment_2. See also the responses to the following IRs: • TMI_32-AA(1)-13 • TMI_33-AA(1)-14 • TMI_34-AA(1)-15 • TMI_35-AA(1)-16 • TMI_36-AA(1)-17 • TMI_37-AA(1)-18

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					At the request of the Agency and as part of the Round 1 IR process, Treasury Metals has prepared a revised EIS. Information about potential Project effects of alternatives is provided in Section 2.0, Appendix D and Appendix X to the revised EIS.
458	AC(1)-132	MNO	Environmental Impact Statement 2.4.2 Underground Closure	8.0 Alternative Means of Carrying out the Project	**Information Request / Comment:** The EIS references Ontario Regulation 240/00, amended O. Reg. 307/12, and the Code of the Ontario Mining Act. Section 24(2) of the Regulation and indicated that "Due to the nature of these regulations, no alternatives were considered as part of the EIS. While these regulations guide the underground closure procedure, they do not offer specific direction on the process for mine closure. Therefore, reliance on the information in the Regulation should not preclude Treasury from conducting an assessment of alternatives. Please provide an assessment of alternatives. **Response:** Infrastructure associated with the Project will be managed in accordance with Ontario Regulation 240/00 (as amended) which in Subsection 24(2) of the Regulation states the following: *The proponent shall complete the following minimum rehabilitative measures in accordance with the applicable standards, procedures and requirements of the Code:* *1. All shafts, raises and stopes open to surface shall be secured.* *2. All portals of adits and declines shall be secured.* *3. All other mine openings to surface that create a mine hazard shall be stabilized and secured.* *4. All surface and subsurface mine workings shall be assessed by a qualified professional engineer to determine their stability, and any surface areas disturbed or likely to be disturbed by such workings shall be stabilized*. Therefore, the preferred alternative and only alternative to closure would be the removal of all underground equipment and associated infrastructure associated with the Project and cap and secure the portal and other underground accesses. However, if the post closure land use would utilize some or all of infrastructure, some may remain in place to support the post closure land use. This will be determined by the on-going engagement process and, in particular, during the engagement for the closure plan that is required pursuant to Ontario Regulation 240/00.
459	AC(1)-133	MNO	Environmental Impact Statement	8.0 Alternative Means of Carrying out the	**Information Request / Comment:** This section contains no assessment of alternatives for the waste rock storage area closure. Instead, it is just a description of the preferred method.

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
			2.4.3 Waste Rock Storage Area Closure	Project	Please provide an assessment of alternatives. **Response:** Infrastructure associated with the Project will be managed in accordance with Ontario Regulation 240/00 (as amended) which in Subsection 24(2) of the Regulation states the following: *The proponent shall complete the following minimum rehabilitative measures in accordance with the applicable standards, procedures and requirements of the Code:* *13. All soils in the vicinity of sites used for storing or transferring petroleum products, chemicals, ore, concentrates or waste during the life of the project shall be sampled and tested for contamination and, if contamination is found, a management plan consisting of a risk assessment and action plan for the contaminated soils shall be implemented.* *14. All tailings, rock piles, overburden piles and stockpiles shall be rehabilitated or treated to ensure permanent physical stability and effluent quality.* *15. All materials, or conditions created as a result of mining, that produce or may produce acid rock drainage or metal leaching shall be dealt with in accordance with the management plan referred to in section 59 of the Code.* There are limited options available to Treasury Metals in regards to closure of the waste rock storage area (WRSA) as co-disposal of waste rock in the pit has already been proposed and maximized. Therefore the preferred alternative and only alternative to closure would be covering of waste rock areas with a water shedding cover and the sufficient testing for confirmation of long term effectiveness of these methods. However, if the post closure land use would utilize some or all of infrastructure, some may remain in place to support the post closure land use. This will be determined by the on-going engagement process and, in particular, during the engagement for the closure plan that is required pursuant to Ontario Regulation 240/00.
460	AC(1)-134	MNO	Environmental Impact Statement 2.4.6 Buildings and Equipment Closure	8.0 Alternative Means of Carrying out the Project	**Information Request / Comment:** This section contains no assessment of alternatives for the Buildings and Equipment Closure. Instead, it is just a description of the preferred method. Please provide an assessment of alternatives. **Response:** Buildings associated with the Project will be managed in accordance with Ontario Regulation 240/00 (as amended) which states that buildings must be dismantled and removed. Subsection 24(2) of the Regulation states the following: *All buildings, power transmission lines, pipelines, waterlines, railways, airstrips*

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					and other structures shall be dismantled and removed from the site to an extent that is consistent with the specified future land use. Buildings were considered as part of the Alternatives Assessment in Appendix X. Infrastructure as referenced in Section 2.4.7 was also considered as part of the Alternatives Assessment in Appendix X. Furthermore as detailed in Section 2.4.7 and in accordance with, Ontario Regulation 240/00 (as amended) buildings must be dismantled and removed. Subsection 24(2) o*f the Regulation* states the following: *All buildings, power transmission lines, pipelines, waterlines, railways, airstrips and other structures shall be dismantled and removed from the site to an extent that is consistent with the specified future land use.* *All transportation corridors shall be closed off and revegetated to an extent that is consistent with the specified future use of the land.* *All machinery, equipment and storage tanks shall be removed from the site to an extent that is consistent with the specified future use of the land.* Therefore, the preferred alternative would be the removal of all buildings, equipment and associated infrastructure associated with the Project. However, if the post closure land use would utilize some or all of the buildings and infrastructure, some buildings may remain in place to support the post closure land use. This will be determined by the on-going engagement process and, in particular, during the engagement for the closure plan that is required pursuant to Ontario Regulation 240/00.
461	AC(1)-135	MNO	Environmental Impact Statement 2.5 Summary of Alternatives		**Information Request / Comment:** This table outlined project elements and whether they were assessed in the EA or not. All elements are indicated that they were assessed even when this is not the case. Specifically, the following elements were not assessed: • Buildings and Equipment Closure • Waste Rock Storage Area Closure • Underground Closure • Hazardous Solid Waste Management • Non-hazardous Solid Waste Management Please update the table to reflect the actual content of the EIS. **Response:** For further details in this IR please see responses to the following IRs: - TMI_454-AC(1)-126

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					- TMI_455-AC(1)-127 - TMI_456-AC(1)-128 - TMI_457-AC(1)-129 - TMI_458-AC(1)-132 - TMI_459-AC(1)-133 - TMI_460-AC(1)-134
462	AC(1)-136	MNO	Environmental Impact Statement	9.1.1 Methodology	**Information Request / Comment:** The existing environment's air quality does not take an ecosystem approach and consider traditional knowledge. In fact, the entire section related to air quality does not mention traditional knowledge at all. Please revise this section to include an ecosystem approach and include traditional knowledge of the MNO.
					Response: The environmental assessment for the Project was conducted pursuant to the *Canadian Environmental Assessment Act, 2012* (CEAA 2012), and followed the process set out in the EIS Guidelines for the Project. The environmental assessment framework established under CEAA 2012 is consistent with the guiding principles of the Convention on Biological Diversity (CBD) established by the United Nations Environment Program (UNEP). The "ecosystem approach" mentioned in the question refers to those CBD guiding principles. Therefore, the EIS was conducted in accordance with an "ecosystem approach". The approach used in the EIS for evaluating the effects of the Project on the environment was done in a manner that is consistent with accepted practices for similar projects assessed under CEAA 2012, as well as other similar assessments conducted in Ontario. The modelling approach was consistent with the guidance of the Ministry of the Environment and Climate Change (MOECC) in Ontario, and the results were compared to established, scientifically defensible air quality criteria. Treasury Metals has made efforts to engage and elicit input from Aboriginal peoples regarding the Project. Although, no Project-specific traditional knowledge and traditional land use studies were prepared for, or shared with, Treasury Metals; limited information was obtained about traditional land use areas during the engagement process, and was incorporated in the EIS. Treasury Metals will continue to discuss potential Project effects on traditional land use activities with potentially affected Aboriginal peoples throughout the life the Project. As additional information regarding an Aboriginal community's traditional land use and practices become available, Treasury Metals will review and consider it in the design of mitigation measures, follow-up monitoring and management plans for the Project, as appropriate.
463	AC(1)-137	MNO	Environmental Impact	9.1.2 Biophysical	**Information Request / Comment:** The existing baseline for ambient air quality was estimated using data from two MOE monitoring

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
			Statement	Environment	stations in Thunder Bay which cannot provide an accurate estimation of the current baseline conditions from which to assess potential effects. Instead, this would provide a higher level of air emissions from which the effects assessment would be conducted. The EIS states that the data would represent an overestimate of typical concentrations of contaminants of concern; however, this is not a positive outcome. In order to complete an accurate baseline assessment of air quality it would be more prudent to under estimate the concentrations of contaminants of concern instead. This only works if the proponent assesses air effects in an additive manner. MNO requires reassessment of air quality baseline with specific air quality receptors on the project site.
					Response: The air quality effects of the Project were considered in an additive manner. The conservative baseline values were added to the modelled results. The conservative baseline values mean that the EIS presented higher results than if local data were available for describing baseline.
464	AC(1)-138	MNO	Environmental Impact Statement 5.2.1.1 Study Area 5.3.1.1 Study Area 5.3.2.1 Study Area 5.8.4.1 Study Areas & Included Waterbodies	7.2.1 Spatial Boundaries	**Information Request / Comment**: The study area did not take into account Aboriginal traditional knowledge or current land and resource use by MNO. In fact, there is no mention of consideration of any traditional knowledge or current land and resource use by any Aboriginal group.
					Response: Treasury Metals has made efforts to engage and elicit input from Aboriginal peoples regarding the Project. No Project-specific traditional knowledge and traditional land use studies were prepared for, or shared with, Treasury Metals; limited information was obtained about traditional land use areas. Treasury Metals made efforts to incorporate information provided and to address comments and issues raised by Aboriginal peoples during the engagement process. A summary of the issues raised during the engagement process was provided in Section 8 and Appendix DD to the original EIS. As part of the Round 1 IRs, the Agency has requested that Treasury Metals expand and update the information presented in Appendix DD to the original EIS. This information is provided as an updated document called the Aboriginal Engagement Report, provided as Appendix DD to the revised EIS. The Aboriginal Engagement Report provides a listing of the disaggregated comments from Aboriginal peoples, and how those were addressed in the EIS. Treasury Metals will continue to discuss potential Project effects on traditional land use activities with potentially affected Aboriginal peoples throughout the life the Project and Treasury Metals continues to be willing to undertake affordable independent technical reviews and TK / TLU studies with affected communities. As additional information regarding an Aboriginal community's traditional

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					land use and practices become available, Treasury Metals will review and consider it in the design of mitigation measures, follow-up monitoring and management plans for the Project, as appropriate. Information related to Aboriginal traditional knowledge or current land and resource use by MNO in the area of the Project is limited; MNO did not share any Project-specific information or knowledge with Treasury Metals before the original EIS was filed and none was provided with this information request. Treasury Metals has prepared a revised EIS that sets out the assessment of effects and impacts associated with the Project, including a discussion and justification of selection of Study areas (Section 6.1.4), in a clear and traceable manner.
465	AC(1)-139	MNO	Environmental Impact Statement Table 5.2.1	9.1.2 Biophysical Environment	**Information Request / Comment:** This table does not display results for VOCs or ground level ozone. Please update to show information on VOCs and ground lev el ozone. **Response:** Table 5.2.1 of the original EIS does not provide any results for any compounds. Instead, Table 5.2.1 lists the relevant ambient air criteria for those compounds used in assessing the effects of the Project on air quality. Because neither ground level ozone (O_3) nor volatile organic compounds (VOCs) were used in assessing the effects of the Project on air quality, they were not listed in Table 5.2.1. While O_3 will not be emitted from the Project, it can form in the atmosphere through photochemical reactions with nitrogen oxides (NO_X) and VOC emissions, which can be associated with projects of this nature. However, the magnitude of these emissions from the Project is viewed as negligible from the perspective of O_3 formation (RWDI, 2014e; Section 2.1.1). Additional details are available in responses TMI_165-AE(1)-03 and TMI_529-AC(1)-203. At the request of the Agency and as part of the Round 1 IR process, Treasury Metals has prepared a revised EIS. Table 5.2.1 of the original EIS is now referred to as Table 5.2.2-1 in the revised EIS. *References Cited:* RWDI, 2014e. Goliath Gold Project: Environmental Air Quality Assessment, Final Report. Prepared for Treasury Metals Incorporated. Prepared by RWDI Air Inc., Guelph, Ontario. Included as part of Appendix J to the EIS.
466	AC(1)-140	MNO	Environmental Impact Statement 5.3.1.3 Existing Noise Levels	9.1.2 Biophysical Environment	**Information Request / Comment:** The baseline conditions do not include information on the geographic extent of noise levels. Please include. **Response:**

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					The baseline study conducted measurements at various locations to characterize the acoustic environment. The measured background conditions are representative of both the areas that they were measured in as well as similar acoustic environments. Baseline measurements were selected to compare to the predicted effects at specific receptor locations based on the acoustic environment.
467	AC(1)-141	MNO	Environmental Impact Statement 5.3.1 Baseline Noise Levels	9.1.1 Methodology	**Information Request / Comment:** The baseline noise quality section does not take an ecosystem approach and consider traditional knowledge. In fact, the entire section related to noise levels does not mention traditional knowledge at all. Please revise this section to include an ecosystem approach and include traditional knowledge of the MNO.
					Response: The "ecosystem approach" mentioned in the question refers to the guiding principles of the Convention on Biological Diversity (CBD) established by the United Nations Environment Program (UNEP). Those guiding principles are consistent with the environmental assessment framework established under CEAA 2012, which is the regulatory framework under which the potential effects of the Project are to be evaluated. The ecosystem approach to environmental assessments are described by UNEP as being "…based on the application of the appropriate scientific methodologies focused on the levels of biological organization, which encompass the essential structure, processes, functions and interactions among organisms and their environment." Treasury Metals has made efforts to engage and elicit input from Aboriginal peoples regarding the Project. No Project-specific traditional knowledge and traditional land use studies were prepared for, or shared with, Treasury Metals; limited information was obtained about traditional land use areas. Treasury Metals made efforts to incorporate information provided and to address comments and issues raised by Aboriginal peoples during the engagement process. A summary of the issues raised during the engagement process was provided in Section 8 and Appendix DD to the original EIS. As part of the Round 1 IRs, the Agency has requested that Treasury Metals expand and update the information presented in Appendix DD to the original EIS. This information is provided as an updated document called the Aboriginal Engagement Report, provided as Appendix DD to the revised EIS. The Aboriginal Engagement Report provides a listing of the disaggregate comments from Aboriginal peoples, and how those were addressed in the EIS. Treasury Metals will continue to discuss potential Project effects on traditional land use activities with potentially affected Aboriginal peoples throughout the life the Project. As additional information regarding an Aboriginal community's traditional land use and practices become available, Treasury Metals will review and consider it in the design of mitigation measures, follow-up monitoring and

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					management plans for the Project, as appropriate. An expanded evaluation of the effects of the Project on noise has been provided in Section 6.4 of the revised EIS. Revised EIS also addresses the potential effects of the Project on wildlife, including the potential effects of noise on wildlife and wildlife habitat. Finally, the revised EIS considers the potential effects of the Project on Aboriginal peoples, including direct effects through the loss of access to Crown lands taken up by the Project, as well as the effects of the Project on wildlife and resources that may be used for traditional purposes by Aboriginal peoples in areas surrounding the Project.
468	AC(1)-142	MNO	Environmental Impact Statement 5.3.2.3 Existing Light Levels	9.1.2 Biophysical Environment	**Information Request / Comment:** This section of the EIS does not contain a description of night-time illumination levels and does not contain information on how these light levels are affected by different weather conditions and seasons. Please provide. **Response:** Please refer to the response to TMI_179-AE(1)-17.
469	AC(1)-143	MNO	Environmental Impact Statement 5.3.1 Baseline Light Levels	9.1.1 Methodology	**Information Request / Comment:** The baseline light levels section does not take an ecosystem approach and consider traditional knowledge. In fact, the entire section related to light levels does not mention traditional knowledge at all. Please revise this section to include an ecosystem approach and include traditional knowledge of the MNO. **Response:** The "ecosystem approach" mentioned in the question refers to the guiding principles of the Convention on Biological Diversity (CBD) established by the United Nations Environment Program (UNEP). Those guiding principles are consistent with the environmental assessment framework established under CEAA 2012, which is the regulatory framework under which the potential effects of the Project were evaluated. Treasury Metals has made efforts to engage and elicit input from Aboriginal peoples regarding the Project. No Project-specific traditional knowledge and traditional land use studies were prepared for, or shared with, Treasury Metals; limited information was obtained about traditional land use areas. Treasury Metals made efforts to incorporate information provided and to address comments and issues raised by Aboriginal peoples during the engagement process. A summary of the issues raised during the engagement process was provided in Section 8 and Appendix DD to the original EIS. As part of the Round 1 IRs, the Agency has requested that Treasury Metals expand and update the information presented in Appendix DD to the original EIS. This information is provided as

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					an updated document called the Aboriginal Engagement Report, provided as Appendix DD to the revised EIS. The Aboriginal Engagement Report provides a listing of the disaggregate comments from Aboriginal peoples, and how those were addressed in the EIS. Treasury Metals will continue to discuss potential Project effects on traditional land use activities with potentially affected Aboriginal peoples throughout the life the Project. As additional information regarding an Aboriginal community's traditional land use and practices become available, Treasury Metals will review and consider it in the design of mitigation measures, follow-up monitoring and management plans for the Project, as appropriate. An expanded evaluation of the effects of the Project on light has been provided in Section 6.5 of the revised EIS. The revised EIS also addresses the potential effects of the Project on wildlife, including the potential effects light on wildlife and wildlife habitat. Finally, the revised EIS considers the potential effects of the Project on Aboriginal peoples, including direct effects through the loss of access to Crown lands taken up by the Project, as well as the effects of the Project on wildlife and resources that may be used for traditional purposes by Aboriginal peoples in areas surrounding the Project.
470	AC(1)-144	MNO	Environmental Impact Statement Figure 5.5.2, 5.8.2, 5.9.2, 5.9.3		**Information Request / Comment:** Why does the local study area on each of the referenced maps not encompass the entire property boundary? **Response:** The local study areas (LSA) and regional study areas (RSA) used in the EIS were established to capture the areas potentially affected by the Project. Generally, the LSA for each component was established so as to capture the direct effects of the Project, while the RSA for each component were established to include other effects that may be wider reaching. Figures 5.5.2-1-1, 5.8.2-1 and 5.12.5.1-2 of the EIS all include a line on the figure described as the property boundary. This line corresponds to the limits of claims and dispositions associated with the Goliath Gold Project, and is illustrated on Figure 1.2.3-1 of the EIS. However, these claims and dispositions do not correspond to the Project footprint, or the areas potentially affected by the Project. The Project footprint will cover an area of 188 ha with the entire footprint on private lands that are either patented or leased by Treasury Metals (Section 3.0 of the EIS). Arbitrarily increasing the size of the study areas for the various components to enclose the claims and dispositions would not have captured any additional Project effects, as effects were demonstrated to have been fully contained within the study areas used in the EIS. However, expanding the study areas would diminish the relative importance of the predicted effects as a much smaller percentage of the study areas would be affected. Additionally, Treasury Metals will only be restricting access for safety and security reasons to a relatively small portion of the claims and

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					dispositions illustrated on Figure 1.2.3-1 of the EIS. The remaining areas that are not private property will remain available to Aboriginal peoples for use in practicing traditional uses of the land. Additional details regarding the LSA and RSA are provided in Section 6.14 of the EIS. are
471	AC(1)-145	MNO	Environmental Impact Statement 5.8.4 Fish and Fish Habitat 5.8.4.2 Fish Presence	9.1.1 Methodology	**Information Request / Comment:** The baseline fish and fish habitat section does not take an ecosystem approach and consider traditional knowledge. In fact, the entire section related to fish and fish habitat does not mention traditional knowledge at all. This section specifies that "Appendix G and Appendix Q contain lists [sic] of all fish species identified within the Project area, including those identified in historical records and those caught in field surveys." However, there is no indication if the listing of fish species was influenced by traditional knowledge. MNO requires reevaluation of the listing of fish species to include traditional knowledge and revision of the EIS to state this explicitly. Please revise this section to include an ecosystem approach and include traditional knowledge of the MNO. **Response:** Treasury Metals has made efforts to engage and elicit input from Aboriginal peoples regarding the Project. No Project-specific traditional knowledge and traditional land use studies were prepared for, or shared with, Treasury Metals; limited information was obtained about traditional land use areas. Treasury Metals made efforts to incorporate information provided and to address comments and issues raised by Aboriginal peoples during the engagement process. A summary of the issues raised during the engagement process was provided in Section 8 and Appendix DD to the original EIS. As part of the Round 1 IRs, the Agency has requested that Treasury Metals expand and update the information presented in Appendix DD to the original EIS. This information is provided as an updated document called the Aboriginal Engagement Report, provided as Appendix DD to the revised EIS. The Aboriginal Engagement Report provides a listing of the disaggregated comments from Aboriginal peoples, and how those were addressed in the EIS. Treasury Metals will continue to discuss potential Project effects on traditional land use activities with potentially affected Aboriginal peoples throughout the life the Project and Treasury Metals continues to be willing to undertake affordable independent technical reviews and TK / TLU studies with affected communities. As additional information regarding an Aboriginal community's traditional land use and practices become available, Treasury Metals will review and consider it in the design of mitigation measures, follow-up monitoring and management plans for the Project, as appropriate. Treasury Metals has prepared a revised EIS that sets out the assessment of effects and impacts

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					associated with the Project, including a discussion of effects on fish and fish habitat (Section 6.14), in a clear and traceable manner.
472	AC(1)-146	MNO	Environmental Impact Statement 5.8.4 Fish and Fish Habitat	7.2.1 Spatial Boundaries	**Information Request / Comment:** No spatial boundary is identified for Fish and Fish Habitat in this section of the EIS. While a general spatial study area was defined in Appendix G, Environmental Baseline Study, it must be referenced and reiterated in this section of the EIS. Further, it must take into account Aboriginal traditional knowledge or current land and resource use by MNO. **Response:** The local study areas (LSA) and regional study areas (RSA) used in the original EIS for fish and fish habitat do correspond with the general study areas used in the early environmental baseline studies completed by Klohn Crippen Berger (2012). The LSA was retained for use in the original EIS for evaluating the effects of the Project on fish and fish habitat as it includes the: • watercourse potentially directly affected by discharges from the Project (i.e., Blackwater Creek); • main waterbody downstream from the Project (i.e., Wabigoon Lake); • watercourse potentially affected by water withdrawals from surface water (i.e., the Tree Nursery Ponds and Thunder Lake Tributary 3); • watercourses potentially affected by groundwater drawdown from dewatering the open pit and underground mines (i.e., Thunder Lake Tributary 1, Thunder Lake Tributary 2, Hoffstrom's Bay Tributary, and Little Creek); and • main waterbody downstream from those watercourses potentially affected by reduced water (i.e., Thunder Lake). The general RSA was retained in the EIS at it includes the watersheds upstream from the Project. As part of the Round 1 IRs, the Agency has requested that Treasury Metals prepare a revised EIS. Additional details regarding the LSA and RSA have been provided in Section 6.1.4 of the revised EIS. Section The study areas used in the EIS made use of the information available at the time they were prepared. However, additional information such as traditional knowledge, were it to be made available, would not have altered the study areas used for fish and fish habitat. As noted above, the current study areas include those watercourses and waterbodies that are potentially affected by discharges and withdrawals associated with the Project. Increasing the size of the study areas used for fish and fish habitat would not improve the EIS as the potential effects have been effectively captured in the study areas used.

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
473	AC(1)-147	MNO	Environmental Impact Statement 5.8.4.7 Habitat Rehabilitation Opportunities	9.1.2 Biophysical Environment	**Information Request / Comment:** More information is required in relation to the statement that "The Ontario Ministry of Natural Resources and Forestry has identified Crown shore stabilization on Wabigoon Lake as an effective way to benefit fish and fish habitat and offset potential losses from the Project development." As it is currently worded, it implies that the MNR has proposed a project offset. If this is the case, more information is required.
					Response: Treasury Metals will be required to file a fish habitat offset plan, however, no specific project offset has been proposed. The EIS Appendix II - DRAFT FISHERIES COMPENSATION STRATEGY AND PLANS, Section 5.0 (Impact to Offset Balance) states "No current locations for in-kind offset habitat locations have been selected due to non-finalized Project design, and lack of First Nation and public input into the design of the NNLP". EIS Appendix II - DRAFT FISHERIES COMPENSATION STRATEGY AND PLANS, Section 5.2.1 (Impact to Offset Balance – Section 35(2) NNLP- Watershed Based Enhancements) states "This approach [watershed based enhancements], suggested by the local Ministry of Natural Resources and Forestry (MNRF), would be focused on reversing long term impacts of slumping and sedimentation of Wabigoon Lake. The specific locations of these sites and where offset activities would be best placed will require engagement with MNRF, First Nations, and public stakeholders. Restoration techniques may include bank stabilization, and where appropriate, armoring. The proposed strategy would be designed to work with current FMP goals." EIS Appendix II - DRAFT FISHERIES COMPENSATION STRATEGY AND PLANS, Section 5.2.3 (Impact to Offset Balance – Blended Approach (Preferred)) states "As discussed though initial engagement with regulators, Treasury Metals believes that local interest is in seeing watershed based improvements (Wabigoon Lake). The feasibility of this approach will require engagement with Fisheries and Oceans Canada (DFO) to ensure that habitat replacement targets are met. In addition, watershed based improvement measures must reflect FMP goals, Aboriginal interests, and public stakeholder input. In addition to watershed based opportunities, there is opportunity within the Project property LSA to provide in-kind habitat development within the Blackwater Creek system. The combined effort of both these opportunities would provide the opportunities for an effective balance in support of local fisheries initiatives, and achieving the desired offset quantities under current DFO policies." Since the submission of the original EIS, Treasury Metals has been refining their understanding of fish and fish habitat impacts in the study area. As a result, potential offsetting requirements and measures will be re-examined. Treasury Metals as part of the continued engagement of the Goliath Project will engage DFO, Environment Canada (EC), and MNRF in defining the offsetting strategy as part of the Fish Management Plan and will engage with Aboriginal peoples regarding the offsetting plan.

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
474	AC(1)-148	MNO	Environmental Impact Statement 5.8.4.8 Species at Risk and Species of Management Concern	9.1.2 Biophysical Environment	**Information Request / Comment:** SARA, Relevant Government agencies, local naturalist and interest groups and Aboriginal groups and First Nations were not consulted in determining the presence of Species at Risk within the RSA. **Response:** Treasury Metals has been engaged with Aboriginal peoples within the Project area for a number of years regarding the Project and this will continue for the life of the Project. This on-going engagement is described in the Aboriginal Engagement Report. Treasury Metals has attempted to negotiate agreements for sharing traditional knowledge, which would include species at risk within the RSA that are important to these rights-bearing communities. Those attempts are described in the Aboriginal Engagement Report, Appendix DD to the EIS. Treasury Metals continues to be willing to engage with Aboriginal peoples and to undertake affordable independent technical reviews and TK / TLU studies with affected communities. Where available, TK / TLU information that has been collected has been integrated into the EIS. Any knowledge that is shared with Treasury Metals in the future will be incorporated into the design of the Project. Consistent with standard practice, a desktop study was completed prior to field work that included data collection from provincial and federal government agencies and databases as well as local naturalist and interest peoples. Below is an excerpt from Section 2.1 of the ***Summary Wildlife Baseline Report (2011-2016***), Appendix R to the EIS: 2.1 Pre-field Review of Existing Data The objective of the pre-field review was to collect available local and regional data on wildlife communities, species, habitat and known significant habitat features, and rare and SAR wildlife known to occur, or potentially occur within the LSA and RSA. Data were obtained from the following literature and web-based sources: • Species At Risk in Ontario List • Dryden Forest Management Company Forest Management Plan (2011-2021) • Ontario Breeding Bird Atlas • Natural Heritage Information Centre • Ontario Odonata Atlas • Ontario Reptile and Amphibian Atlas
475	AC(1)-149	MNO	Environmental Impact Statement 5.8.4.8 Species at Risk and Species of Management Concern	9.1.2 Biophysical Environment	**Information Request / Comment:** No detail is provided on the sources of information used to compile the Fish Species of Management Concern in the RSA. Please update this information. While this information is missing, it can be assumed from the MNO's current engagement records that no engagement occurred with MNO on species of conservation concern. Therefore the EIS is subsequently deficient. **Response:**

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					Treasury Metals has made efforts to engage and elicit input from Aboriginal peoples regarding the Project. No Project-specific traditional knowledge and traditional land use studies were prepared for, or shared with, Treasury Metals; limited information was obtained about traditional land use areas. Treasury Metals made efforts to incorporate information provided and to address comments and issues raised by Aboriginal peoples during the engagement process. A summary of the issues raised during the engagement process was provided in Section 8 and Appendix DD to the original EIS. As part of the Round 1 IRs, the Agency has requested that Treasury Metals expand and update the information presented in Appendix DD to the original EIS. This information is provided as an updated document called the Aboriginal Engagement Report, provided as Appendix DD to the revised EIS. The Aboriginal Engagement Report provides a listing of the disaggregate comments from Aboriginal peoples, and how those were addressed in the EIS. Treasury Metals will continue to discuss potential Project effects on traditional land use activities with potentially affected Aboriginal peoples throughout the life the Project and Treasury Metals continues to be willing to undertake affordable independent technical reviews and TK / TLU studies with affected communities. As additional information regarding an Aboriginal community's traditional land use and practices become available, Treasury Metals will review and consider it in the design of mitigation measures, follow-up monitoring and management plans for the Project, as appropriate. Information related to Aboriginal traditional knowledge or current land and resource use by MNO in the area of the Project is limited; MNO did not share any Project-specific information or knowledge with Treasury Metals before the original EIS was filed. In a letter dated May 2015 from MNO to the Agency and Treasury Metals, it was noted that Wabigoon Lake is an area heavily used by MNO in the exercise of their Aboriginal rights and interests, with specific concerns related to surface and groundwater quality and fish and fish habitat. Information about potential Project effects and mitigation measures related to these concerns can be located in Sections 6.14 (fish and fish habitat), 6.16 (land use) and 6.21 (Aboriginal peoples) of the revised EIS.
476	AC(1)-150	MNO	Environmental Impact Statement 5.9.2 Vegetation	7.2.1 Spatial Boundaries	**Information Request / Comment:** No spatial boundary is identified for Vegetation in this section of the EIS. While a general spatial study area was defined in Appendix G, Environmental Baseline Study, it must be referenced and reiterated in this section of the EIS. Further, it must take into account Aboriginal traditional knowledge or current land and resource use by MNO. The baseline vegetation section does not take an ecosystem approach and consider traditional knowledge. In fact, the entire section related to vegetation does not mention traditional knowledge at all. Please revise this section to include an ecosystem approach and include traditional knowledge of the MNO. **Response:**

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					The local study areas (LSA) and regional study areas (RSA) used in the original EIS for vegetation corresponded with the general study areas used in the early environmental baseline studies completed by Klohn Crippen Berger (2012). These existing study areas were kept for use during data collection between 2012 and 2014 so that the collected data would be comparable to previously collected data. In 2015, Treasury Metals retained KBM to conduct additional terrestrial biology studies to augment the work presented in the original EIS. When completing these studies, KBM chose to redefine the LSA and RSA to better represent the Project as it was then known, and to make them more ecologically meaningful. The LSA was redefined as the lands and waters of the watershed in which the proposed development footprint is located. The RSA was redefined as the Ministry of Natural Resources and Forestry (MNRF) identified Ecodistrict within which the LSA was located (see also the response to TMI_144- WL(1)-01). Treasury Metals has prepared a revised EIS that sets out the effects and impacts associated with the Project in a clear and traceable manner. The information responding the study areas for vegetation and wetlands can be located in Section 6.1.4.15 of the revised EIS. The "ecosystem approach" mentioned in the question refers to the guiding principles of the Convention on Biological Diversity established by the United Nations Environment Program. Those guiding principles are consistent with the environmental assessment framework established under CEAA 2012, which is the regulatory framework under which the potential effects of the Project are to be evaluated. Treasury Metals has made efforts to engage and elicit input from Aboriginal peoples regarding the Project. Although no Project-specific traditional knowledge studies were prepared for, or shared with, Treasury Metals, efforts were made by Treasury Metals to address comments and issues raised by Aboriginal peoples during the engagement process. A summary of the issues raised during the engagement process was provided in Section 8 and Appendix DD to the original EIS. As part of the Round 1 IRs, the Agency has requested that Treasury Metals expand and update the information presented in Appendix DD to the original EIS. This information is provided as an updated document called the Aboriginal Engagement Report, provided as Appendix DD to the revised EIS. The Aboriginal Engagement Report provides a listing of the disaggregate comments from Aboriginal peoples, and how those were addressed in the EIS. Treasury Metals will continue to discuss potential Project effects on traditional land use activities with potentially affected Aboriginal peoples throughout the life the Project. As additional information regarding an Aboriginal community's traditional practices become available, Treasury Metals will review and consider it in the design of mitigation measures, follow-up monitoring and management plans for the Project, as appropriate.
477	AC(1)-151	MNO	Environmental	9.2.1	**Information Request / Comment**:

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
			Impact Statement 5.9.2.2 Forest Compositions through to 5.9.2.4 Field Surveys	Biophysical Environment	There is no mention of species being selected to include those of importance to the current use of land and resources for traditional purposes by Aboriginal persons. Please amend this section to reflect the above mentioned information. **Response:** Treasury Metals has made efforts to engage and elicit input from Aboriginal peoples regarding the Project. No Project-specific traditional knowledge and traditional land use studies were prepared for, or shared with, Treasury Metals; limited information was obtained about traditional land use areas. Treasury Metals made efforts to incorporate information provided and to address comments and issues raised by Aboriginal peoples during the engagement process. A summary of the issues raised during the engagement process was provided in Section 8 and Appendix DD to the original EIS. As part of the Round 1 IRs, the Agency has requested that Treasury Metals expand and update the information presented in Appendix DD to the original EIS. This information is provided as an updated document called the Aboriginal Engagement Report, provided as Appendix DD to the revised EIS. The Aboriginal Engagement Report provides a listing of the disaggregated comments from Aboriginal peoples, and how those were addressed in the EIS. Treasury Metals has prepared a revised EIS that sets out the assessment of effects and impacts associated with the Project in a clear and traceable manner. The information required to respond to this information request is set out in Section 6.1.3 (selection of valued components) and the sections pertaining to effects of the Project: Sections 6.12 (wildlife and wildlife habitat), 6.16 (land use) and 6.21 (Aboriginal peoples).
478	AC(1)-152	MNO	Environmental Impact Statement 5.9.3 Wetlands	7.2.1 Spatial Boundaries	**Information Request / Comment:** No spatial boundary is identified for Wetlands in this section of the EIS. While a general spatial study area was defined in Appendix G, Environmental Baseline Study, it must be referenced and reiterated in this section of the EIS. Further, it must take into account Aboriginal traditional knowledge or current land and resource use by MNO. The baseline wetlands section does not take an ecosystem approach and consider traditional knowledge. In fact, the entire section related to wetlands does not mention traditional knowledge at all. Please revise this section to include an ecosystem approach and include traditional knowledge of the MNO. **Response:** Treasury Metals acknowledges that there were questions from the Agency and other reviewers related to organizing of information regarding the potential effects of the Project in the original EIS. In order to effectively address these issues, and to address issues raised through the responses to

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					Round 1 questions, Treasury Metals has prepared a revised EIS. The selection of study areas for wetlands and vegetation is described in Section 6.1.4.15 of the revised EIS. The environmental assessment for the Project was conducted pursuant to the *Canadian Environmental Assessment Act, 2012* (CEAA 2012), and followed the process set out in the EIS Guidelines for the Project. The environmental assessment framework established under CEAA 2012 is consistent with the guiding principles of the Convention on Biological Diversity (CBD) established by the United Nations Environment Program (UNEP). The "ecosystem approach" mentioned in the question refers to those CBD guiding principles. Therefore, the EIS was conducted in accordance with an "ecosystem approach". Treasury Metals has made efforts to engage and elicit input from Aboriginal peoples regarding the Project. Although no Project-specific traditional knowledge and traditional land use studies were prepared for, or shared with, Treasury Metals; limited information was obtained about traditional land use areas during the engagement process, and was incorporated in the EIS. Information related to Aboriginal traditional knowledge or current land and resource use by MNO in the area of the Project is limited; MNO did not share any Project-specific information or knowledge with Treasury Metals before the original EIS was filed. In a letter dated May 2015 from MNO to the Agency and Treasury Metals, it was noted that Wabigoon Lake is an area heavily used by MNO in the exercise of their Aboriginal rights and interests, with specific concerns related to surface and groundwater quality and fish and fish habitat. Treasury Metals will continue to discuss potential Project effects on traditional land use activities with potentially affected Aboriginal peoples throughout the life the Project. As additional information regarding an Aboriginal community's traditional land use and practices become available, Treasury Metals will review and consider it in the design of mitigation measures, follow-up monitoring and management plans for the Project, as appropriate.
479	AC(1)-153	MNO	Environmental Impact Statement 5.9.4 Mammals	7.2.1 Spatial Boundaries	**Information Request / Comment:** No spatial boundary is identified for mammals in this section of the EIS. While a general spatial study area was defined in Appendix G, Environmental Baseline Study, it must be referenced and reiterated in this section of the EIS. Further, it must take into account Aboriginal traditional knowledge or current land and resource use by MNO. There is no description in the baseline section for mammals of the distribution, populations, behavior and availability of wildlife in the important context of implications to current use of lands and resources by Aboriginal peoples. The baseline mammals section does not take an ecosystem approach and consider traditional knowledge. In fact, the entire section related to mammals does not mention traditional knowledge at all. Please revise this section to include an ecosystem approach and include traditional knowledge of the MNO.

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					Response: Treasury Metals acknowledges that there were questions from the Agency and other reviewers related to organizing of information regarding the potential effects of the Project in the original EIS. In order to effectively address these issues, and to address issues raised through the responses to Round 1 questions, Treasury Metals has prepared a revised EIS. The selection of study areas for wildlife and wildlife habitat is described in Section 6.1.4.12 of the revised EIS. The environmental assessment for the Project was conducted pursuant to the *Canadian Environmental Assessment Act, 2012* (CEAA 2012), and followed the process set out in the EIS Guidelines for the Project. The environmental assessment framework established under CEAA 2012 is consistent with the guiding principles of the Convention on Biological Diversity (CBD) established by the United Nations Environment Program (UNEP). The "ecosystem approach" mentioned in the question refers to those CBD guiding principles. Therefore, the EIS was conducted in accordance with an "ecosystem approach". Treasury Metals has made efforts to engage and elicit input from Aboriginal peoples regarding the Project. Although no Project-specific traditional knowledge and traditional land use studies were prepared for, or shared with, Treasury Metals; limited information was obtained about traditional land use areas during the engagement process, and was incorporated in the EIS. Information related to Aboriginal traditional knowledge or current land and resource use by MNO in the area of the Project is limited; MNO did not share any Project-specific information or knowledge with Treasury Metals before the original EIS was filed. In a letter dated May 2015 from MNO to the Agency and Treasury Metals, it was noted that Wabigoon Lake is an area heavily used by MNO in the exercise of their Aboriginal rights and interests, with specific concerns related to surface and groundwater quality and fish and fish habitat. Treasury Metals will continue to discuss potential Project effects on traditional land use activities with potentially affected Aboriginal peoples throughout the life the Project. As additional information regarding an Aboriginal community's traditional land use and practices become available, Treasury Metals will review and consider it in the design of mitigation measures, follow-up monitoring and management plans for the Project, as appropriate.
480	AC(1)-154	MNO	Environmental Impact Statement 5.9.5 Birds	7.2.1 Spatial Boundaries 9.1.1 Methodology	**Information Request / Comment:** No spatial boundary is identified for Birds in this section of the EIS. While a general spatial study area was defined in Appendix G, Environmental Baseline Study, it must be referenced and reiterated in this section of the EIS. Further, it must take into account Aboriginal traditional knowledge or current land and resource use by MNO. There is no description in the baseline section for birds of the distribution, populations, behavior and availability of birds in the important context of implications to current use of lands and resources by Aboriginal peoples. The baseline birds section does not take an ecosystem approach and consider traditional knowledge. In fact, the entire section related to birds does not mention traditional

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					knowledge at all. Please revise this section to include an ecosystem approach and include traditional knowledge of the MNO. **Response:** Treasury Metals acknowledges that there were questions from the Agency and other reviewers related to organizing of information regarding the potential effects of the Project in the EIS. In order to effectively address these issues, and to address issues raised through the responses to Round 1 questions, Treasury Metals has prepared a revised EIS. The selection of study areas for wildlife and wildlife habitat is described in Section 6.1.4.12 of the revised EIS. The selection of study areas for migratory birds is described in Section 6.1.4.14 of the revised EIS. The environmental assessment for the Project was conducted pursuant to the *Canadian Environmental Assessment Act, 2012* (CEAA 2012), and followed the process set out in the EIS Guidelines for the Project. The environmental assessment framework established under CEAA 2012 is consistent with the guiding principles of the Convention on Biological Diversity (CBD) established by the United Nations Environment Program (UNEP). The "ecosystem approach" mentioned in the question refers to those CBD guiding principles. Therefore, the EIS was conducted in accordance with an "ecosystem approach". Treasury Metals has made efforts to engage and elicit input from Aboriginal peoples regarding the Project. Although no Project-specific traditional knowledge and traditional land use studies were prepared for, or shared with, Treasury Metals; limited information was obtained about traditional land use areas during the engagement process, and was incorporated in the EIS. Information related to Aboriginal traditional knowledge or current land and resource use by MNO in the area of the Project is limited; MNO did not share any Project-specific information or knowledge with Treasury Metals before the original EIS was filed. In a letter dated May 2015 from MNO to the Agency and Treasury Metals, it was noted that Wabigoon Lake is an area heavily used by MNO in the exercise of their Aboriginal rights and interests, with specific concerns related to surface and groundwater quality and fish and fish habitat. Treasury Metals will continue to discuss potential Project effects on traditional land use activities with potentially affected Aboriginal peoples throughout the life the Project. As additional information regarding an Aboriginal community's traditional land use and practices become available, Treasury Metals will review and consider it in the design of mitigation measures, follow-up monitoring and management plans for the Project, as appropriate.
481	AC(1)-155	MNO	Environmental Impact Statement	7.2.1 Spatial Boundaries 9.1.1	**Information Request / Comment:** No spatial boundary is identified for Significant Wildlife Habitat in this section of the EIS. While a general spatial study area was defined in Appendix G, Environmental Baseline Study, it must be

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
			5.9.8 Significant Wildlife Habitat	Methodology	referenced and reiterated in this section of the EIS. Further, it must take into account Aboriginal traditional knowledge or current land and resource use by MNO. The baseline section for significant wildlife habitat does not take an ecosystem approach and consider traditional knowledge. In fact, the entire section does not mention traditional knowledge at all. Please revise this section to include an ecosystem approach and include traditional knowledge of the MNO.
					Response: Treasury Metals acknowledges that there were questions from the Agency and other reviewers related to organizing of information regarding the potential effects of the Project in the EIS. In order to effectively address these issues, and to address issues raised through the responses to Round 1 questions, Treasury Metals has prepared a revised EIS. The selection of study areas for wildlife and wildlife habitat is described in Section 6.1.4.12 of the revised EIS. The environmental assessment for the Project was conducted pursuant to the *Canadian Environmental Assessment Act, 2012* (CEAA 2012), and followed the process set out in the EIS Guidelines for the Project. The environmental assessment framework established under CEAA 2012 is consistent with the guiding principles of the Convention on Biological Diversity (CBD) established by the United Nations Environment Program (UNEP). The "ecosystem approach" mentioned in the question refers to those CBD guiding principles. Therefore, the EIS was conducted in accordance with an "ecosystem approach". Treasury Metals has made efforts to engage and elicit input from Aboriginal peoples regarding the Project. Although no Project-specific traditional knowledge and traditional land use studies were prepared for, or shared with, Treasury Metals; limited information was obtained about traditional land use areas during the engagement process, and was incorporated in the EIS. Information related to Aboriginal traditional knowledge or current land and resource use by MNO in the area of the Project is limited; MNO did not share any Project-specific information or knowledge with Treasury Metals before the original EIS was filed. In a letter dated May 2015 from MNO to the Agency and Treasury Metals, it was noted that Wabigoon Lake is an area heavily used by MNO in the exercise of their Aboriginal rights and interests, with specific concerns related to surface and groundwater quality and fish and fish habitat. Treasury Metals will continue to discuss potential Project effects on traditional land use activities with potentially affected Aboriginal peoples throughout the life the Project. As additional information regarding an Aboriginal community's traditional land use and practices become available, Treasury Metals will review and consider it in the design of mitigation measures, follow-up monitoring and management plans for the Project, as appropriate.
482	AC(1)-156	MNO	Environmental Impact		**Information Request / Comment:** Please identify how Section 10 of the EIS relates to Section 5.8.4.8 (Species at Risk and Species of

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
			Statement		Management Concern)
					Response: Section 5.8.4.8 of the original EIS presents fish species of management concern which were identified through background data research. No fish Species at Risk occur within the study area defined for this Project, or are likely to be affected by the Project. At the request of the Agency and as part of the Round 1 IR process, Treasury Metals has prepared a revised EIS. Information about species at risk is provided in Section 5.11 of the revised EIS. Section 11 of the revised EIS describes the overall benefits of the Project to Canadians. It also provides a listing of the Project components that were altered based on stakeholder and Aboriginal feedback, along with the benefit of those changes to the environment, Aboriginal people and the public.
483	AC(1)-157	MNO	Environmental Impact Statement 5.10.1 Definition	9.1.2 Biophysical Environment	**Information Request / Comment:** The definition given for SAR within the EIS references different information sources than those outlined in the EIS guidelines. While MNO does not object to additional information sources being added, the original listing should still be included. Specifically, relevant government agencies, local naturalist and interest groups and Aboriginal groups and First Nations.
					Response: An expanded listing of sources used in compiling the listing of potential SAR, including any Aboriginal peoples that chose to share information with Treasury Metals is provided in the revised EIS. Information about effects prediction methods can be located in Section 6.1 of the revised EIS.
484	AC(1)-158	MNO	Environmental Impact Statement 5.10 Species at Risk	7.2.1 Spatial Boundaries	**Information Request / Comment:** No spatial boundary is identified for Species at Risk in this section of the EIS. While a general spatial study area was defined in Appendix G, Environmental Baseline Study, it must be referenced and reiterated in this section of the EIS. Further, it must take into account Aboriginal traditional knowledge or current land and resource use by MNO. The baseline section for species at risk does not take an ecosystem approach and consider traditional knowledge. Please revise this section to include an ecosystem approach and include traditional knowledge of the MNO.
					Response:

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					Treasury Metals acknowledges that there were questions from the Agency and other reviewers related to organizing of information regarding the potential effects of the Project in the EIS. In order to effectively address these issues, and to address issues raised through the responses to Round 1 questions, Treasury Metals has prepared a revised EIS. The selection of study areas can be located in Sections 6.1.4.12 (wildlife and wildlife habitat, including SAR), 6.1.4.14 (fish and fish habitat, including SAR) and 6.1.4.15 (wetlands and vegetation, including SAR) of the revised EIS. The environmental assessment for the Project was conducted pursuant to the *Canadian Environmental Assessment Act, 2012* (CEAA 2012), and followed the process set out in the EIS Guidelines for the Project. The environmental assessment framework established under CEAA 2012 is consistent with the guiding principles of the Convention on Biological Diversity (CBD) established by the United Nations Environment Program (UNEP). The "ecosystem approach" mentioned in the question refers to those CBD guiding principles. Therefore, the EIS was conducted in accordance with an "ecosystem approach". Treasury Metals has made efforts to engage and elicit input from Aboriginal peoples regarding the Project. Although no Project-specific traditional knowledge and traditional land use studies were prepared for, or shared with, Treasury Metals; limited information was obtained about traditional land use areas during the engagement process, and was incorporated in the EIS. Information related to Aboriginal traditional knowledge or current land and resource use by MNO in the area of the Project is limited; MNO did not share any Project-specific information or knowledge with Treasury Metals before the original EIS was filed. In a letter dated May 2015 from MNO to the Agency and Treasury Metals, it was noted that Wabigoon Lake is an area heavily used by MNO in the exercise of their Aboriginal rights and interests, with specific concerns related to surface and groundwater quality and fish and fish habitat. Treasury Metals will continue to discuss potential Project effects on traditional land use activities with potentially affected Aboriginal peoples throughout the life the Project. As additional information regarding an Aboriginal community's traditional land use and practices become available, Treasury Metals will review and consider it in the design of mitigation measures, follow-up monitoring and management plans for the Project, as appropriate.
485	AC(1)-159	MNO	Environmental Impact Statement 5.10.3.1 Plants		**Information Request / Comment**: The EIS states that "Wild rice is a traditional food source for many First Nations." Firstly, this information is obviously anecdotal in nature as many plants are traditional food sources for Aboriginal groups but are not specifically mentioned. Secondly, the information is not sufficiently disaggregated to allow for an identification of which First Nation/Aboriginal group the information came from. CEAA has previously requested proponents provide disaggregated information for consideration. Specifically, as part of the correspondence in reference to the Pacific NorthWest LNG Ltd. Assessment (Reference Number 80032) CEAA specified that "Without the benefit of disaggregating

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					by each Aboriginal group, for each factor considered under 5(1)(c), including related baseline information, it is difficult for the Agency to determine if enough detail exists to effectively assess the potential for significant adverse environmental effect that could potentially impact Aboriginal peoples. In other words, the conclusions regarding impacts on 5(1)(c) and Aboriginal rights contained in the EIS cannot be confidently relied upon without the benefit of a thorough understanding of the information used to support the conclusion." Finally, there is no further information provided on traditional food sources for Aboriginal groups which is contrary to even the most basic of information MNO could provide through a TLUS.
					Response: Treasury Metals has made efforts to engage and elicit input from the MNO regarding the Project. No Project-specific traditional knowledge about traditional food sources and traditional land use studies were prepared for, or shared with, Treasury Metals; limited information was obtained about traditional land use areas. Treasury Metals made efforts to incorporate information provided and to address comments and issues raised by the MNO during the engagement process. A summary of the issues raised during the engagement process was provided in Section 8 and Appendix DD to the original EIS. As part of the Round 1 IRs, the Agency has requested that Treasury Metals expand and update the information presented in Appendix DD to the original EIS. This information is provided as an updated document called the Aboriginal Engagement Report, provided as Appendix DD to the revised EIS. The Aboriginal Engagement Report provides a listing of the disaggregate comments from Aboriginal peoples, and how those were addressed in the EIS. Treasury Metals will continue to discuss potential Project effects on traditional land use activities with the MNO throughout the life the Project. As additional information regarding the MNO's traditional land use and practices become available, Treasury Metals will review and consider it in the design of mitigation measures, follow-up monitoring and management plans for the Project, as appropriate. Information related to MNO traditional knowledge, traditional food sources or current land and resource use by MNO in the area of the Project is limited; MNO did not share any Project-specific information or knowledge with Treasury Metals before the original EIS was filed and has not provided any additional information in this IR.
486	AC(1)-160	MNO	Environmental Impact Statement 5.10.3.2 Animals	9.1.2 Biophysical Environment	**Information Request / Comment:** The EIS states that "…the selected survey methodology only allows for the determination of presence; it does not allow for the estimation of abundance, seasonal activity, or spatial distribution." This is contrary to the direction provided by the EIS guidelines and makes it impossible to include information on the importance to health and socio-economic conditions, cultural heritage, and the current use of land and resources for traditional purposes by Aboriginal persons.

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					Response: Based on the effects assessment presented in the original EIS, Treasury Metals was satisfied they had sufficient baseline information to understand and characterize the potential effects of the Project. Treasury Metals also acknowledges there are benefits in compiling additional baseline data for guiding the design of mitigation measures, follow-up monitoring and management plans for the Project. In 2016, additional bat surveys were completed, including a potential summer roost habitat analysis and exit surveys of high potential snags. Treasury Metals is committed to undertaking further baseline data collection, as required, prior to entering the site preparation and construction phase of the Project. At the request of the Agency and as part of the Round 1 IR process, Treasury Metals has prepared a revised EIS. A description of the planned wildlife monitoring is provided in Section 13.12 of the revised EIS.
487	AC(1)-161	MNO	Environmental Impact Statement 5.10.3.2 Animals		**Information Request / Comment:** Please provide additional rationale as to why evening surveys were selected even though "…evening surveys, though allowable in the protocol, will result in lower detection probability of target species."
					Response: This sentence in the EIS should read "…evening surveys, though allowable in the protocol, MAY result in lower detection probability of target species." Evening surveys for marshbirds are accepted and supported by Environment Canada. Additional marshbird surveys were conducted in 2016, as well as Least Bittern surveys. Based on the effects assessment presented in the original EIS, Treasury Metals was satisfied they had sufficient baseline information to understand and characterize the potential effects of the Project. Treasury Metals also acknowledges there are benefits in compiling additional baseline data for guiding the design of mitigation measures, follow-up monitoring and management plans for the Project. Treasury Metals is committed to undertaking further baseline data collection, as required, prior to entering the site preparation and construction phase of the Project. As part of the Round 1 IRs, the Agency has requested that Treasury Metals prepare a revised EIS. A description of the planned wildlife monitoring is provided in Section 13.12 of the revised EIS.

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
488	AC(1)-162	MNO	Environmental Impact Statement 5.11 Human Environment	7.2.1 Spatial Boundaries	**Information Request / Comment:** No spatial boundary is identified for the human environment in this section of the EIS. While a general spatial study area was defined in Appendix G, Environmental Baseline Study, it must be referenced and reiterated in this section of the EIS. Further, it must take into account Aboriginal traditional knowledge or current land and resource use by MNO.
					Response: The description of the various study area boundaries used for the human environment were included in the appendices to the original EIS. For example, the study areas for the socio-economics components were described in Appendix T to the EIS. Treasury Metals recognizes that the Agency and other technical reviewers identified a number of issues through the IR Round 1 questions with the approach used in the original EIS for organizing and presenting the relevant information regarding the potential effects of the Project. In order to effectively address these issues, Treasury Metals has prepared a revised EIS that sets out the assessment of effects and impacts associated with the Project, including a discussion and justification for component specific study areas, in a clear and traceable manner. The information required to respond to this information request about the spatial boundaries related to the Human Environment VCs can be located in 6.1.4 of the revised EIS. Information related to Aboriginal traditional knowledge or current land and resource use by MNO is limited; MNO did not provide any such information to Treasury Metals before the original EIS was filed. In a letter dated May 2015 from MNO to CEAA and Treasury Metals, it was noted that Wabigoon Lake is an area heavily used by MNO in the exercise of their Aboriginal rights and interests, with specific concerns related to surface and groundwater quality and fish and fish habitat. Information about potential Project effects and mitigation measures related to these concerns can be located in Sections 6.8 (surface water quality), 6.10 (groundwater quality), 6.14 (fish and fish habitat), 6.16 (land use) and 6.21 (Aboriginal peoples). Treasury Metals will continue to discuss potential Project effects on traditional land use activities with potentially affected Aboriginal, including MNO, communities throughout the life the Project. Should additional information regarding an Aboriginal community's traditional practices become available, Treasury Metals will review and consider any potential effects, and develop and implement necessary mitigation measures in Project plans and operations, as appropriate
489	AC(1)-163	MNO	Environmental Impact Statement 5.11.1 Land Use	9.1.3 Human Environment	**Information Request / Comment**: There is no description of Métis land use within this section of the report. This is despite their being a description of the First Nation reserves. Please amend the section to include specific details about Métis land use including Métis

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					demographics in the surrounding towns and communities. **Response:** Treasury Metals has made efforts to engage and elicit input from the MNO regarding the Project. No Project-specific traditional knowledge and traditional land use studies were prepared for, or shared with, Treasury Metals; limited information was obtained about traditional land use areas. Treasury Metals made efforts to incorporate information provided and to address comments and issues raised by the MNO during the engagement process. A summary of the issues raised during the engagement process was provided in Section 8 and Appendix DD to the original EIS. As part of the Round 1 IRs, the Agency has requested that Treasury Metals expand and update the information presented in Appendix DD to the original EIS. This information is provided as an updated document called the Aboriginal Engagement Report, Appendix DD to the revised EIS. The Aboriginal Engagement Report provides a listing of the disaggregate comments from Aboriginal peoples, and how those were addressed in the EIS. Treasury Metals will continue to discuss potential Project effects on traditional land use activities with the MNO throughout the life the Project. As additional information regarding the MNO's traditional land use and practices become available, Treasury Metals will review and consider it in the design of mitigation measures, follow-up monitoring and management plans for the Project, as appropriate. Information related to MNO traditional knowledge or current land and resource use by MNO in the area of the Project is limited; MNO did not share any Project-specific information or knowledge with Treasury Metals before the original EIS was filed and have not provided any additional information in this IR Further to this and in keeping with global best practices for monitoring and management of potential Project-related socio-economic effects, Treasury Metals is committed to undertaking an update of the socio-economic baseline presented in the EIS to establish a pre-construction baseline of the affected communities prior to commencing construction of the Project. Any updating of the socio-economic baseline should be delayed until the results of the 2016 Census are released by Statistics Canada, which are scheduled to be released between February and November 2017. The update will include primary research (i.e., in-community interviews) for the purposes of validating secondary information and developing a comprehensive profile of the socio-economic conditions within the community at that point in time. An update to the baseline prior to undertaking Project construction would allow for the inclusion of 2016 statistical information, providing a more current view of the Aboriginal and non-Aboriginal communities within the socio-economic study area. Further, the updated socio-economic baseline information will serve as the basis for future monitoring and management of socio-economic effects throughout the life of the Project. As part of this update, details regarding specific details about Métis land use including Métis demographics will be presented.
490	AC(1)-164	MNO	Environmental Impact	9.1.3 Human Environment	**Information Request / Comment:** This section of the EIS does not include specific details about the Métis population within the major

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
			Statement 5.11.2.1 Population		urban centres surrounding the Project. Further, this section does not include the median age for Métis in the region as well as other population demographics that are available. Please amend the section to include specific details around Métis population.
					Response: The information in Section 5.11.2.1 of the original EIS provided a high level summary about the study area communities based on comprehensive profiles and information presented in Appendix T (Socio-economic Baseline Study). Treasury Metals recognizes that the community profiles contained therein do not include specific information about the Métis population within the study area. Treasury Metals has come to understand that additional baseline information is available to characterize the Métis population in the study area. While it is not expected that the inclusion of this information would result in material changes to the assessment of potential social and economic effects presented in the EIS, Treasury Metals recognizes the importance of establishing comprehensive community baseline information to support future monitoring and management, including optimization, of potential Project-related effects. In keeping with global best practices for monitoring and management of potential Project-related socio-economic effects, Treasury Metals is committed to undertaking an update of the socio-economic baseline presented in the EIS to establish a pre-construction baseline of the affected communities prior to commencing construction of the Project. Any updating of the socio-economic baseline should be delayed until the results of the 2016 Census are released by Statistics Canada, which are scheduled to be released between February and November 2017. The update will include primary research (i.e., in-community interviews) for the purposes of validating secondary information and developing a comprehensive profile of the socio-economic conditions within the community at that point in time. An update to the baseline prior to undertaking Project construction would allow for the inclusion of 2016 statistical information, providing a more current view of the Aboriginal and non-Aboriginal communities within the socio-economic study area. Further, the updated socio-economic baseline information will serve as the basis for future monitoring and management of socio-economic effects throughout the life of the Project.
491	AC(1)-165	MNO	Environmental Impact Statement 5.11.2.2 Education	9.1.3 Human Environment	**Information Request / Comment:** This section of the EIS does not include specific details about the Métis education levels in the vicinity of the Project. Please amend the section to include specific details around Métis education.
					Response: In keeping with global best practices for monitoring and management of potential Project-related socio-economic effects, Treasury Metals is committed to undertaking an update of the socio-economic baseline presented in the EIS to establish a pre-construction baseline of the affected communities prior to commencing construction of the Project. Any updating of the socio-economic

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					baseline should be delayed until the results of the 2016 Census are released by Statistics Canada, which are scheduled to be released between February and November 2017. The update will include primary research (i.e., in-community interviews) for the purposes of validating secondary information and developing a comprehensive profile of the socio-economic conditions within the community at that point in time. An update to the baseline prior to undertaking Project construction would allow for the inclusion of 2016 statistical information, providing a more current view of the Aboriginal and non-Aboriginal communities within the socio-economic study area. Further, the updated socio-economic baseline information will serve as the basis for future monitoring and management of socio-economic effects throughout the life of the Project. As part of this update, details regarding Métis education will be presented.
492	AC(1)-166	MNO	Environmental Impact Statement 5.11.2.5 Crime and Justice	9.1.3 Human Environment	**Information Request / Comment:** The description of crime and justice is inadequate for the purposes of a baseline assessment and must be supplemented in order to accurately reflect the current conditions of the area immediately surrounding the Project. **Response:** In keeping with global best practices for monitoring and management of potential Project-related socio-economic effects, Treasury Metals is committed to undertaking an update of the socio-economic baseline presented in the EIS to establish a pre-construction baseline of the affected communities prior to commencing construction of the Project. Any updating of the socio-economic baseline should be delayed until the results of the 2016 Census are released by Statistics Canada, which are scheduled to be released between February and November 2017. The update will include primary research (i.e., in-community interviews) for the purposes of validating secondary information and developing a comprehensive profile of the socio-economic conditions within the community at that point in time. An update to the baseline prior to undertaking Project construction would allow for the inclusion of 2016 statistical information, providing a more current view of the Aboriginal and non-Aboriginal communities within the socio-economic study area. Further, the updated socio-economic baseline information will serve as the basis for future monitoring and management of socio-economic effects throughout the life of the Project. As part of this update details regarding of crime and justice will be presented.
493	AC(1)-167	MNO	Environmental Impact Statement 5.11.2.6 Poverty and Social Issues	9.1.3 Human Environment	**Information Request / Comment:** This section of the EIS does not include specific details about Métis poverty or social issues. Please amend the section to include specific details around Métis poverty and social issues. **Response:** Treasury Metals has been engaged with Aboriginal peoples within the Project area for a number of years regarding the Project and this will continue for the life of the Project. This on-going engagement is described in the Aboriginal Engagement Report, Appendix DD to the EIS. Treasury

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					Metals has attempted to negotiate agreements for sharing traditional knowledge. Those attempts are described in the Aboriginal Engagement Report. To date, no Project-specific traditional knowledge has been shared by MNO with Treasury Metals. It is believed that the effects predictions contained within the EIS capture a broad range of potential Project-related effects which may be experienced by members of the Métis Nation of Ontario residing throughout the socio-economic study area. In keeping with global best practices for monitoring and management of potential Project-related socio-economic effects, Treasury Metals is committed to undertaking an update of the socio-economic baseline presented in the EIS to establish a pre-construction baseline of the affected communities prior to commencing construction of the Project. Any updating of the socio-economic baseline should be delayed until the results of the 2016 Census are released by Statistics Canada, which are scheduled to be released between February and November 2017. The update will include primary research (i.e., in-community interviews) for the purposes of validating secondary information and developing a comprehensive profile of the socio-economic conditions within the community at that point in time. An update to the baseline prior to undertaking Project construction would allow for the inclusion of 2016 statistical information, providing a more current view of the Aboriginal and non-Aboriginal communities within the socio-economic study area. Further, the updated socio-economic baseline information will serve as the basis for future monitoring and management of socio-economic effects throughout the life of the Project.
494	AC(1)-168	MNO	Environmental Impact Statement 5.11.5 Aboriginal Peoples	7.2.1 Spatial Boundaries 9.1.1 Methodology	**Information Request / Comment:** No spatial boundary is identified for Aboriginal Peoples in this section of the EIS. While a general spatial study area was defined in Appendix G, Environmental Baseline Study, it must be referenced and reiterated in this section of the EIS. Further, it must take into account Aboriginal traditional knowledge or current land and resource use by MNO. The baseline section for Aboriginal Peoples does not take an ecosystem approach and consider traditional knowledge. Please revise this section to include an ecosystem approach and include traditional knowledge of the MNO. **Response:** Treasury Metals has been engaged with Aboriginal peoples within the Project area for a number of years regarding the Project and this will continue for the life of the Project. This on-going engagement is described in the Aboriginal Engagement Report, Appendix DD to the EIS. Treasury Metals has attempted to negotiate agreements for sharing traditional knowledge. Those attempts are described in the Aboriginal Engagement Report. To date, no Project-specific traditional knowledge has been shared by MNO with Treasury Metals. Treasury Metals continues to be willing to provide reasonable financial support for independent technical reviews and TK/TLU studies with

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					affected communities. Where available, TK/TLU information that has been collected has been integrated into the EIS. Any knowledge that is shared with Treasury Metals in the future will be incorporated into the design of the Project. The "ecosystem approach" mentioned in the question refers to the guiding principles of the Convention on Biological Diversity (CBD) established by the United Nations Environment Program (UNEP). Those guiding principles are consistent with the environmental assessment framework established under CEAA 2012, which is the regulatory framework under which the potential effects of the Project were evaluated. The ecosystem approach to environmental assessments are described by UNEP as being "…based on the application of the appropriate scientific methodologies focused on the levels of biological organization, which encompass the essential structure, processes, functions and interactions among organisms and their environment." As part of the Round 1 IRs, the Agency has requested that Treasury Metals prepare a revised EIS. An expanded evaluation of the potential effects of the Project on Aboriginal peoples has been provided in Sections 6.1.4.21 (study areas for Aboriginal peoples) and 6.21 (effects predictions for Aboriginal peoples) of the revised EIS.
495	AC(1)-169	MNO	Environmental Impact Statement 5.11.5 Aboriginal Peoples	9.2 Potential or established Aboriginal and Treaty rights and Related Interests	**Information Request / Comment**: The title of this section serves to minimize the information presented by Treasury and does not reflect the requirement of the EIS guideline to assess potential or established Aboriginal rights and related interests. **Response:** Treasury Metals has made efforts to engage and elicit input from Aboriginal peoples regarding the Project. Treasury Metals will continue to try to engage the Aboriginal peoples meaningfully with respect to the Project. The engagement activities prior to filing the EIS were summarized in Section 8, and more fully documented in Appendix DD to the original EIS. As part of the Round 1 IRs, the Agency has requested that Treasury Metals expand and update the information presented in Appendix DD to the original EIS. This information is provided as an updated document called the Aboriginal Engagement Report, Appendix DD to the revised EIS. The Aboriginal Engagement report provides a listing of the disaggregate comments from Aboriginal peoples, and how those were addressed in the Project design and EIS.
496	AC(1)-170	MNO	Environmental Impact Statement 5.11.5 Aboriginal Peoples	9.2 Potential or established Aboriginal and Treaty rights and Related Interests	**Information Request / Comment**: Firstly, this section is presented in a pan-Aboriginal format which is not sufficiently disaggregated in order to allow MNO to adequately assess the validity of the information provided. CEAA has previously requested proponents provide disaggregated information for consideration. Specifically, as part of the correspondence in reference to the Pacific NorthWest LNG Ltd. Assessment (Reference Number 80032) CEAA specified that "Without the benefit of disaggregating

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					by each Aboriginal group, for each factor considered under 5(1)(c), including related baseline information, it is difficult for the Agency to determine if enough detail exists to effectively assess the potential for significant adverse environmental effect that could potentially impact Aboriginal peoples. In other words, the conclusions regarding impacts on 5(1)(c) and Aboriginal rights contained in the EIS cannot be confidently relied upon without the benefit of a thorough understanding of the information used to support the conclusion." Secondly, no background information is provided in relation to the MNO specifically. There are significant levels of information publically available on the MNO's website. Therefore, there is no reason Treasury should have excluded this information. Even if the engagement process had been sufficiently stalled, the information was still available publically. Thirdly, there is no information provided on MNO's specific potential or established rights, including the geographic extent, nature, frequency and timing of these rights. Finally, there is no reference to the MNO's comments and concerns and how those comments and concerns were incorporated into the EIS. Overall, this section lacks the necessary detail for MNO to evaluate the EIS application.
					Response: Treasury Metals has made efforts to engage and elicit input from the MNO regarding the Project. MNO has stated that they have members who live in the study area that it is a rights-bearing community, however, MNO did not identify any specific rights that may be impacted by the Project before the EIS was filed and have not identified any in this IR. No Project-specific traditional knowledge and traditional land use studies were prepared for, or shared with, Treasury Metals; limited information was obtained about traditional land use areas. Treasury Metals made efforts to incorporate information provided and to address comments and issues raised by the MNO during the engagement process. A summary of the issues raised during the engagement process was provided in Section 8 and Appendix DD to the original EIS. As part of the Round 1 IRs, the Agency has requested that Treasury Metals expand and update the information presented in Appendix DD to the original EIS. This information is provided as an updated document called the Aboriginal Engagement Report, Appendix DD to the revised EIS. The Aboriginal Engagement Report provides a listing of the disaggregate comments from Aboriginal peoples, and how those were addressed in the EIS. • Section 4.7 of the Aboriginal Engagement Report provides disaggregated information regarding the engagement with MNO. • Section 5 of the Aboriginal Engagement Report summarizes the issues raised, broken down by Aboriginal community. Further to this and in keeping with global best practices for monitoring and management of potential Project-related socio-economic effects, Treasury Metals is committed to undertaking an update of the socio-economic baseline presented in the EIS to establish a pre-construction baseline of the

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					affected communities prior to commencing construction of the Project. Any updating of the socio-economic baseline should be delayed until the results of the 2016 Census are released by Statistics Canada, which are scheduled to be released between February and November 2017. The update will include primary research (i.e., in-community interviews) for the purposes of validating secondary information and developing a comprehensive profile of the socio-economic conditions within the community at that point in time. An update to the baseline prior to undertaking Project construction would allow for the inclusion of 2016 statistical information, providing a more current view of the Aboriginal and non-Aboriginal communities within the socio-economic study area. Further, the updated socio-economic baseline information will serve as the basis for future monitoring and management of socio-economic effects throughout the life of the Project. As part of this update, details regarding specific details about Métis land use including Métis demographics will be presented.
497	AC(1)-171	MNO	Environmental Impact Statement 5.11.5 Aboriginal Peoples		**Information Request / Comment:** This section does not contain information on all vegetation gathered, species hunted, trapped or fished by the MNO. Section must be updated following engagement with the MNO. **Response:** Treasury Metals has made efforts to engage and elicit input from the MNO regarding the Project. No Project-specific traditional knowledge and traditional land use studies were prepared for, or shared with, Treasury Metals; limited information was obtained about traditional land use areas. Treasury Metals made efforts to incorporate information provided and to address comments and issues raised by the MNO during the engagement process. A summary of the issues raised during the engagement process was provided in Section 8 and Appendix DD to the original EIS. As part of the Round 1 IRs, the Agency has requested that Treasury Metals expand and update the information presented in Appendix DD to the original EIS. This information is provided as an updated document called the Aboriginal Engagement Report, Appendix DD to the revised EIS. The Aboriginal Engagement Report provides a listing of the disaggregate comments from Aboriginal peoples, and how those were addressed in the EIS. Treasury Metals will continue to discuss potential Project effects on traditional land use activities with the MNO throughout the life the Project. As additional information regarding the MNO's traditional land use and practices become available, Treasury Metals will review and consider it in the design of mitigation measures, follow-up monitoring and management plans for the Project, as appropriate. Information related to MNO traditional knowledge or current land and resource use by MNO in the area of the Project is limited; MNO did not share any Project-specific information or knowledge with Treasury Metals before the original EIS was filed and has not provided any additional information in this IR.
498	AC(1)-172	MNO	Environmental Impact		**Information Request / Comment**: The statement that "First Nations communities and the public have not identified any specific plants

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			Statement 5.11.5.1 Vegetation		or berries which may be negatively affected by the development of the project, nor have any locations been identified within the Project area from which plants and berries are being gathered been identified." Is misleading. As MNO has yet to be sufficiently engaged by the proponent, of course this information has yet to be provided. An ineffective engagement program should not be used as a shield for the proponent. Nor should sweeping conclusions be based on a faulty engagement program.
					Response: Treasury Metals has made efforts to engage and elicit input from Aboriginal peoples and specifically the MNO regarding the Project. No Project-specific traditional knowledge and traditional land use studies were prepared for, or shared with, Treasury Metals; limited information was obtained about traditional land use areas. Treasury Metals made efforts to incorporate information provided and to address comments and issues raised by Aboriginal peoples during the engagement process. A summary of the issues raised during the engagement process was provided in Section 8 and Appendix DD to the original EIS. As part of the Round 1 IRs, the Agency has requested that Treasury Metals expand and update the information presented in Appendix DD to the original EIS. This information is provided as an updated document called the Aboriginal Engagement Report, Appendix DD to the revised EIS. The Aboriginal Engagement Report provides a listing of the disaggregate comments from Aboriginal peoples, and how those were addressed in the EIS. Treasury Metals will continue to discuss potential Project effects on traditional land use activities with potentially affected Aboriginal peoples throughout the life the Project. As additional information regarding an Aboriginal community's traditional land use and practices become available, Treasury Metals will review and consider it in the design of mitigation measures, follow-up monitoring and management plans for the Project, as appropriate. Information related to Aboriginal traditional knowledge or current land and resource use by MNO in the area of the Project is limited; MNO did not share any Project-specific information or knowledge with Treasury Metals before the original EIS was filed and has not provided any additional information in this IR.
499	AC(1)-173	MNO	Environmental Impact Statement 5.11.5.1 Vegetation		**Information Request / Comment**: The assumptions made in the section in relation to blueberries are largely incorrect. It is implied that blueberries are transient crops which are found in a variety of locales rather than in consistent spots. However, MNO Harvesting does use consistent berry locales. The 4-6 years suggested is approximate and berries can be available at locations longer. Additionally, berries can be available in certain locales for the duration of an MNO citizens picking lifetime. It is not clear why this point is being made in relation to blueberries and due to contradictory information held by the MNO, it is generally false and misleading. Please amend EIS section.
					Response:

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					Although Treasury Metals has made efforts to engage and elicit input from Aboriginal peoples and stakeholders regarding the Project, no Project-specific traditional knowledge and traditional land use studies were prepared for, or shared with, Treasury Metals. What limited information that was obtained about traditional land use areas during the engagement process was presented in the EIS. Specific information regarding a "Blueberry Camp", and its location relative to Project, has not yet been shared with Treasury Metals. A discussion regarding blueberry harvesting areas that is known to Treasury Metals through requests to access the site was presented in Appendix EE to the EIS. As itemized in Table 5.2 of Appendix EE to the EIS, the Project will directly affect 17.7 ha of known blueberry habitat. This area includes a block of land where the proposed plant site will be located, and a small area to be affected by the proposed open pit. Treasury Metals will continue to discuss potential Project effects on traditional land use activities with potentially affected Aboriginal peoples throughout the life the Project. As additional information regarding an Aboriginal community's traditional land use and practices become available, Treasury Metals will review and consider it in the design of mitigation measures, follow-up monitoring and management plans for the Project, as appropriate. Information related to Aboriginal traditional knowledge or current land and resource use by MNO in the area of the Project is limited; MNO did not share any Project-specific information or knowledge with Treasury Metals before the original EIS was filed. In a letter dated May 2015 from MNO to the Agency and Treasury Metals, it was noted that Wabigoon Lake is an area heavily used by MNO in the exercise of their Aboriginal rights and interests, with specific concerns related to surface and groundwater quality and fish and fish habitat. At the request of the Agency and as part of the Round 1 IR process, Treasury Metals has prepared a revised EIS. Additional information relating to the potential effects of the Project on Aboriginal peoples, including potential effects on traditional harvesting practices is provide in Section 6.0 of the revised EIS.
500	AC(1)-174	MNO	Environmental Impact Statement 5.11.5.1 Vegetation		**Information Request / Comment**: Blueberries, chanterelle mushrooms and wild rice do not constitute the entirety of plant species harvested by the MNO. MNO would be happy to provide Treasury with an amended listing of vegetation species preferred by the MNO to update this section of the EIS. **Response:** Treasury Metals has made efforts to engage and elicit input from Aboriginal peoples regarding the Project. While no Project-specific traditional knowledge and traditional land use studies were prepared for, or shared with, Treasury Metals; limited traditional knowledge and information about traditional land use areas was collected from by Aboriginal peoples during the engagement process.

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					Treasury Metals made efforts to incorporate the information shared and to address comments and issues raised in the EIS. Treasury Metals also recognizes that engagement does not stop with the filing of the EIS and will continue throughout the life of the Project. Treasury Metals will continue to try to engage the Aboriginal peoples meaningfully with respect to the Project. Treasury Metals will continue to discuss potential Project effects on traditional land use activities with potentially affected Aboriginal peoples throughout the life the Project. As additional information regarding an Aboriginal community's traditional land use and practices become available, Treasury Metals will review and consider it in the design of mitigation measures, follow-up monitoring and management plans for the Project, as appropriate.
501	AC(1)-175	MNO	Environmental Impact Statement Figure 5.11 Figure 5.11.2		**Information Request / Comment**: This figure presents an inaccurate picture of cultural foods and interests as MNO information is not presented. **Response:** Treasury Metals has made efforts to engage and elicit input from Aboriginal peoples regarding the Project. No Project-specific traditional knowledge and traditional land use studies were prepared for, or shared with, Treasury Metals; limited information was obtained about traditional land use areas. Treasury Metals made efforts to incorporate information provided and to address comments and issues raised by Aboriginal peoples during the engagement process. A summary of the issues raised during the engagement process was provided in Section 8 and Appendix DD to the original EIS. As part of the Round 1 IRs, the Agency has requested that Treasury Metals expand and update the information presented in Appendix DD to the original EIS. This information is provided as an updated document called the Aboriginal Engagement Report, Appendix DD to the revised EIS. The Aboriginal Engagement Report provides a listing of the disaggregate comments from Aboriginal peoples, and how those were addressed in the EIS. Treasury Metals will continue to discuss potential Project effects on traditional land use activities with potentially affected Aboriginal peoples throughout the life the Project. As additional information regarding an Aboriginal community's traditional land use and practices become available, Treasury Metals will review and consider it in the design of mitigation measures, follow-up monitoring and management plans for the Project, as appropriate. Information related to Aboriginal traditional knowledge or current land and resource use by MNO in the area of the Project is limited; MNO did not share any Project-specific information or knowledge with Treasury Metals before the original EIS was filed. Any traditional knowledge shared by the communities in the future will be incorporated into the design of Project mitigation, follow-up monitoring plans and environmental management plans, as appropriate.
502	AC(1)-176	MNO	Environmental Impact Statement	7.1.1 Valued Components	**Information Request / Comment:** This section specifies that the game species listed have been identified as valued components. However, these were developed without sufficient engagement with the MNO, contrary to direction

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			5.11.5.2 Hunting and Trapping		in the EIS guidelines. **Response:** Treasury Metals has made efforts to engage and elicit input from Aboriginal peoples regarding the Project. No Project-specific traditional knowledge and traditional land use studies were prepared for, or shared with, Treasury Metals; limited information was obtained about traditional land use areas. Treasury Metals made efforts to incorporate information provided and to address comments and issues raised by Aboriginal peoples during the engagement process. A summary of the issues raised during the engagement process was provided in Section 8 and Appendix DD to the original EIS. As part of the Round 1 IRs, the Agency has requested that Treasury Metals expand and update the information presented in Appendix DD to the original EIS. This information is provided as an updated document called the Aboriginal Engagement Report, Appendix DD to the revised EIS. The Aboriginal Engagement Report provides a listing of the disaggregate comments from Aboriginal peoples, and how those were addressed in the EIS. Information related to Aboriginal traditional knowledge or current land and resource use by MNO in the area of the Project is limited; MNO did not share any Project-specific information or knowledge with Treasury Metals before the original EIS was filed. In a letter dated May 2015 from MNO to the Agency and Treasury Metals, it was noted that Wabigoon Lake is an area heavily used by MNO in the exercise of their Aboriginal rights and interests, with specific concerns related to surface and groundwater quality and fish and fish habitat. Treasury Metals continues to be committed to working with Aboriginal peoples in the Project area collect traditional knowledge and land use (TK/TLU) information. That TK/TLU information could include information about physical, biological, and cultural heritage resources in the local study area. Treasury Metals also seeks to engage with the Project area Aboriginal peoples to discuss measures to minimize impacts on physical and cultural heritage resources. Should additional information be received from Aboriginal peoples regarding potential physical or cultural heritage resources within the local study area, Treasury Metals will review and consider any potential effects, and develop and implement necessary mitigation measures, as appropriate.
503	AC(1)-177	MNO	Environmental Impact Statement Table 5.11.8 Table 5.11.9		**Information Request / Comment:** This table does not include the estimated number of active Métis hunters which is held by the Captain of the Hunt. This shows a lack of engagement on the part of Treasury with the MNO. Further, MNO could have initiated a count of total harvest for a season, should Treasury have requested this information. This shows significant gaps in the engagement process whereby MNO information was not considered and information requested was largely superficial. **Response:** Treasury Metals has been engaged with Aboriginal peoples within the Project area, including MNO, for a number of years regarding the Project and this will continue for the life of the Project. This on-

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					going engagement is described in the Aboriginal Engagement Report, Appendix DD to the EIS. Treasury Metals has attempted to negotiate agreements for sharing traditional knowledge and preparing traditional land use studies and those attempts are also described in the Aboriginal Engagement Report. Treasury Metals will continue to discuss potential Project effects on traditional land use activities with potentially affected Aboriginal peoples throughout the life the Project. Treasury Metals continues to be willing to undertake affordable independent technical reviews and TK/TLU studies with affected communities. As additional information regarding an Aboriginal community's traditional land use and practices become available, Treasury Metals will review and consider it in the design of mitigation measures, follow-up monitoring and management plans for the Project, as appropriate. Information related to Aboriginal traditional knowledge or current land and resource use by MNO in the area of the Project is limited; MNO did not share any Project-specific information or knowledge with Treasury Metals before the original EIS was filed and not provided any information about active Metis hunters in this information request.
504	AC(1)-178	MNO	Environmental Impact Statement Table 5.11.8 and 5.11.9		**Information Request / Comment**: There are no similar tables presented for the other VCs listed, including waterfowl (which is not further broken out into species), furbearing species (which is not further broken out into specifics) and ruffed grouse. Please update EIS to include specific information and tables. **Response:** Tables 5.11.8 and 5.11.9 of the original EIS provided the available information for active hunters of white-tailed deer and moose, respectively. This information is more readily available than the comparable information for other game species. As part of the Round 1 IRs, the Agency has requested that Treasury Metals prepare a revised EIS. An expanded evaluation of the potential effects of the Project on hunting and fishing is included as part of the assessment for land use presented in Section 6.16 of the revised EIS.
505	AC(1)-179	MNO	Environmental Impact Statement 5.11.5.3 Fishing	7.1.1 Valued Components	**Information Request / Comment**: This section states that "The mouth of Nugget Creek at Wabigoon Lake is designated a Provincial Fish Sanctuary to protect spawning Walleye and fishing is prohibited in this area during the Walleye spawning season; therefore it is seen as a culturally important and relevant to country food harvesters as a valued component." More information is required to identify how this area was identified as relevant to country food harvesters and further designated as a valued component as MNO was not consulted in order to

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					reach these conclusions.
					Response: Treasury Metals has made efforts to engage and elicit input from the MNO regarding the Project. No Project-specific traditional knowledge about traditional food sources and traditional land use studies were prepared for, or shared with, Treasury Metals; limited information was obtained about traditional land use areas. Treasury Metals made efforts to incorporate information provided and to address comments and issues raised by the MNO during the engagement process. A summary of the issues raised during the engagement process was provided in Section 8 and Appendix DD to the original EIS. As part of the Round 1 IRs, the Agency has requested that Treasury Metals expand and update the information presented in Appendix DD to the original EIS. This information is provided as an updated document called the Aboriginal Engagement Report, Appendix DD to the revised EIS. The Aboriginal Engagement Report provides a listing of the disaggregate comments from Aboriginal peoples, and how those were addressed in the EIS. As part of the Round 1 IRs, the Agency has requested that Treasury Metals prepare a revised EIS. An expanded discussion regarding the potential effects of the Project on traditional harvesting of foods by Aboriginal peoples is provided in Section 6.21 of the revised EIS.
506	AC(1)-180	MNO	Environmental Impact Statement 6.1.1 Potential Effects and Valued Components	7.1.1 Valued Components	**Information Request / Comment:** The definition provided for valued components does not include the specific criteria outlined in the EIS guidelines. Please amend this section of the EIS to include the information outlined in the EIS guidelines.
					Response: Please see the response to TMI_446-AC(1)-120. Treasury Metals acknowledges that there are a number of questions from the Agency and other reviewers related to the approach used in the EIS for organizing and presenting information regarding the potential effects of the Project. In order to effectively address these issues, and to address issues raised through the responses to Round 1 questions, Treasury Metals has prepared a revised EIS. An expanded discussion regarding valued components is provided in Section 6.13 of the revised EIS.
507	AC(1)-181	MNO	Environmental Impact Statement 6.1.1 Potential Effects and Valued Components		**Information Request / Comment:** This section outlines information related to natural environment VCs and specifies criteria that the VC would have met; however, there is no information on socio-economic VC provided.
					Response: At the request of the Agency and as part of the Round 1 IR process, Treasury Metals has prepared a revised EIS. The revised EIS includes an expanded discussion on valued components (VCs) and their selection, mitigation measures to address predicted effects, and an expanded description of

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					potential Project-related effects. The identification of socio-economic VCs are located in Sections 6.1.3.15 (land use), 6.1.3.16 (social) and 6.1.3.17 (economic) of the revised EIS.
508	AC(1)-182	MNO	Environmental Impact Statement 6.1.2 Integration of Public and Aboriginal Considerations	7.1.1 Valued Components	**Information Request / Comment:** The listing in this section does not explicitly state that Aboriginal engagements were considered as undertakings for the assessment. Please clarify. **Response:** Treasury Metals has made efforts to engage and elicit input from Aboriginal peoples regarding the Project. No Project-specific traditional knowledge and traditional land use studies were prepared for, or shared with, Treasury Metals; limited information was obtained about traditional land use areas. Treasury Metals made efforts to incorporate information provided and to address comments and issues raised by Aboriginal peoples during the engagement process. A summary of the issues raised during the engagement process was provided in Section 8 and Appendix DD to the original EIS. As part of the Round 1 IRs, the Agency has requested that Treasury Metals expand and update the information presented in Appendix DD to the original EIS. This information is provided as and updated document called the Aboriginal Engagement Report, Appendix DD to the revised EIS. The Aboriginal Engagement Report provides a listing of the disaggregate comments from Aboriginal peoples, and how those were addressed in the EIS. Treasury Metals will continue to discuss potential Project effects on traditional land use activities with potentially affected Aboriginal peoples throughout the life the Project. As additional information regarding an Aboriginal community's traditional land use and practices become available, Treasury Metals will review and consider it in the design of mitigation measures, follow-up monitoring and management plans for the Project, as appropriate. Information related to Aboriginal traditional knowledge or current land and resource use by MNO in the area of the Project is limited; MNO did not share any Project-specific information or knowledge with Treasury Metals before the original EIS was filed and has not provided any additional information in this IR.
509	AC(1)-183	MNO	Environmental Impact Statement 6.1.2 Integration of Public and Aboriginal Considerations		**Information Request / Comment**: Collection of Traditional Knowledge is only one vehicle for contributing to the Project VCs. However, Treasury has completed an inefficient and ineffectual engagement process as well, limiting MNO's opportunity for meaningful input. Further, this section mischaracterizes the lack of TK information. Treasury has not offered MNO sufficient capacity to complete a TK study. As a number of "Aboriginal communities have alluded to traditional use in the general area of the Project…" Treasury should have made significant effort to obtain this information, rather than stagnant the process in meaningless negotiation.

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					Response: Treasury Metals has been engaged with MNO for a number of years regarding the Project and this will continue for the life of the Project. This on-going engagement is described in the Aboriginal Engagement Report, Appendix DD to the EIS. Treasury Metals has attempted to negotiate agreements for sharing traditional knowledge, which would include information about resources that are important to these rights bearing communities. Those attempts are described in the Aboriginal Engagement Report. Treasury Metals continues to be willing to undertake affordable independent technical reviews and TK/TLU studies with affected communities. Where available, TK/TLU information that has been collected has been integrated into the EIS, however, no Aboriginal person identified any specific use of resources for traditional purposes on the Project site. Any knowledge that is shared with Treasury Metals in the future will be incorporated into the design of the Project.
510	AC(1)-184	MNO	Environmental Impact Statement 6.1.2 Integration of Public and Aboriginal Considerations		**Information Request / Comment:** The statement that "The CEA Agency, in discussions with Aboriginal communities has also identified issues and concerns" mischaracterizes the process. MNO has yet to be engaged by CEA to date in the identification of their issues and concerns.
					Response: This comment is noted.
511	AC(1)-185	MNO	Environmental Impact Statement 6.1.2 Integration of Public and Aboriginal Considerations	9.1.1 Methodology	**Information Request / Comment**: The statement that "[a]side from an expressed desire to maintain Treaty and Aboriginal rights, the concerns raised by Aboriginal communities have been very similar to those concerns raised by the general public…" shows an impoverished view of Aboriginal rights and interests and their interconnectivity. Aboriginal concerns are intrinsically linked to their Aboriginal and treaty rights and require a holistic, ecosystems approach to be fully understood and realized.
					Response: Treasury Metals has been engaged with Aboriginal peoples within the Project area, including MNO, for a number of years regarding the Project and this will continue for the life of the Project. This on-going engagement is described in the Aboriginal Engagement Report, Appendix DD to the EIS. Treasury Metals has attempted to negotiate agreements for sharing traditional knowledge and preparing traditional land use studies and those attempts are described in the Aboriginal Engagement Report also. Treasury Metals continues to be willing to undertake affordable independent technical reviews and TK/TLU studies with affected communities. Where available, TK/TLU information that has been collected has been integrated into the EIS. Any traditional knowledge shared by the communities in the future will be incorporated into the design of Project. Treasury Metals will engage with MNO for the life of the Project with the goal of understanding and mitigating impacts and concerns related to the Project, including impacts to Aboriginal and treaty

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					rights.
512	AC(1)-186	MNO	Environmental Impact Statement 6.1.2 Integration of Public and Aboriginal Considerations		**Information Request / Comment**: Wabigoon Lake is an area heavily used by MNO in the exercise of their Aboriginal rights and interests. However, MNO is not listed in the examples provided of the raised concerns. Specifically, surface and groundwater quality and fish and fish habitat. This shows the lack of an adequate engagement process, to date. **Response:** Treasury Metals has been engaged with Aboriginal peoples within the Project area, including MNO, for a number of years regarding the Project and this will continue for the life of the Project. This on-going engagement is described in the Aboriginal Engagement Report, Appendix DD to the EIS. Treasury Metals has attempted to negotiate agreements for sharing traditional knowledge and preparing traditional land use studies and those attempts are described in the Aboriginal Engagement Report also. Treasury Metals will continue to discuss potential Project effects on traditional land use activities with potentially affected Aboriginal peoples throughout the life the Project and Treasury Metals continues to be willing to undertake affordable independent technical reviews and TK/TLU studies with affected communities. As additional information regarding an Aboriginal community's traditional land use and practices become available, Treasury Metals will review and consider it in the design of mitigation measures, follow-up monitoring and management plans for the Project, as appropriate. Information related to Aboriginal traditional knowledge or current land and resource use by MNO in the area of the Project is limited; MNO did not share any Project-specific information or knowledge with Treasury Metals before the original EIS was filed and has not provided any additional information in this IR. At the request of the Agency and as part of the Round 1 IR process, Treasury Metals has prepared a revised EIS. Information about potential Project effects and mitigation measures related to these concerns can be located in Sections 6.8 (surface water quality), 6.10 (ground water quality) and 6.14 (fish and fish habitat) of the revised EIS.
513	AC(1)-187	MNO	Environmental Impact Statement 6.1.2 Integration of Public and Aboriginal Considerations		**Information Request / Comment**: The EIS states that "engagement and engagement efforts by Treasury have not resulted in any formal Traditional Knowledge (TK) studies being conducted…" This is mainly due to the failings of Treasury. To date, Treasury has not come to agreement with MNO related to funding a TK Study as well as general capacity. Further, Treasury suggested that MNO complete a shared TK Study with another Aboriginal group. This shows an impoverished view of Aboriginal rights that assumes all groups share the same

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					interests.
					Response: Treasury Metals has been engaged with Aboriginal peoples within the Project area, including MNO, for a number of years regarding the Project and this will continue for the life of the Project. This on-going engagement is described in the Aboriginal Engagement Report, Appendix DD to the EIS. Treasury Metals has attempted to negotiate agreements for sharing traditional knowledge and preparing traditional land use studies. Those attempts are described in the Aboriginal Engagement Report. Treasury Metals continues to be willing to undertake affordable independent technical reviews and TK/TLU studies with affected communities. Where available, TK/TLU information that has been collected has been integrated into the EIS, however, no Aboriginal person identified any specific use of resources for traditional purposes on the Project site. Any traditional knowledge shared by the communities in the future will be incorporated into the design of Project.
514	AC(1)-188	MNO	Environmental Impact Statement 6.1.3 Residual Effects Characterization		**Information Request / Comment:** The EIS contains no specific information on the process of avoidance, minimization and mitigation. Please provide specific steps in the development of these aspects.
					Response: Treasury Metals acknowledges that there are a number of questions from the Agency and other reviewers related to the approach used in the EIS for organizing and presenting information regarding the potential effects of the Project. In order to effectively address these issues, and to address issues raised through the responses to Round 1 questions, Treasury Metals has prepared a revised EIS that sets out the assessment of effects and impacts associated with the Project in a clear and traceable manner. Information regarding avoidance and mitigation measures are provided in Section 6.0 for each component of the environment.
515	AC(1)-189	MNO	Environmental Impact Statement 6.2.1.3 Noise		**Information Request / Comment:** This section does not account for the ongoing noise from blasting activities proposed by the Project. Where will these effects be assessed?
					Response: The effects of noise from blasting was evaluated in the Section 7.3.1.2 of the Environmental Noise Assessment (included as part of Appendix H-4 to the EIS). At the request of the Agency and as part of the Round 1 IR process, Treasury Metals has prepared a revised EIS. Information about potential Project effects and mitigation measures related to noise from blasting is provided in Section 6.4 of the revised EIS.
516	AC(1)-190	MNO	Environmental Impact Statement		**Information Request / Comment:** This section appears to delve into the effects assessment portion of the EIS and does not properly identify the potential effects to surface water quality which would be considered as part of the

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			6.2.1.8 Surface Water Quantity		assessment. Please amend the EIS to accurately identify these considerations. **Response:** Treasury Metals acknowledges that there are a number of questions from the Agency and other reviewers related to the approach used in the EIS for organizing and presenting information regarding the potential effects of the Project. In order to effectively address these issues, and to address issues raised through the responses to IR Round 1 questions, Treasury Metals has prepared a revised EIS that sets out the assessment of effects and impacts associated with the Project in a clear and traceable manner. Information about potential Project effects and mitigation measures related to surface water quality is provided in Section 6.8 of the revised EIS. The determination of significance of residual effects on surface water quality is described in Section 8.9 of the revised EIS.
517	AC(1)-191	MNO	Environmental Impact Statement 6.2.1.11 Wildlife and Wildlife Habitat	7.1.1 Valued Components	**Information Request / Comment:** The identified potential effects do not reflect knowledge acquired on the environment through Aboriginal engagements; specifically, Métis engagement. **Response:** Treasury Metals has made efforts to engage and elicit input from Aboriginal peoples regarding the Project. Although no Project-specific traditional knowledge and traditional land use studies were prepared for, or shared with, Treasury Metals; limited information was obtained about traditional land use areas during the engagement process, and was incorporated in the EIS. Information related to Aboriginal traditional knowledge or current land and resource use by MNO in the area of the Project is limited; MNO did not share any Project-specific information or knowledge with Treasury Metals before the original EIS was filed. In a letter dated May 2015 from MNO to the Agency and Treasury Metals, it was noted that Wabigoon Lake is an area heavily used by MNO in the exercise of their Aboriginal rights and interests, with specific concerns related to surface and groundwater quality and fish and fish habitat. At the request of the Agency and as part of the Round 1 IR process, Treasury Metals has prepared a revised EIS. Information about potential Project effects and mitigation measures related to these concerns can be located in Sections 6.8 (surface water quality), 6.10 (ground water quality) and 6.14 (fish and fish habitat) of the revised EIS. Treasury Metals will continue to discuss potential Project effects on traditional land use activities with potentially affected Aboriginal peoples throughout the life the Project. As additional information regarding an Aboriginal community's traditional land use and practices become available, Treasury

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					Metals will review and consider it in the design of mitigation measures, follow-up monitoring and management plans for the Project, as appropriate.
518	AC(1)-192	MNO	Environmental Impact Statement 6.2.1.11 Wildlife and Wildlife Habitat		**Information Request / Comment:** The statement that "In total, it is expected that 242 ha of wildlife habitat will be lost due to Project activities for the duration of the Project life. Habitats are expected to recover over time following project closure" is inappropriately placed in this section. Conclusions of the effects assessment should be left to further sections in the EIS to maintain the illusion of an unbiased assessment. **Response:** Treasury Metals acknowledges that there are a number of questions from the Agency and other reviewers related to the approach used in the EIS for organizing and presenting information regarding the potential effects of the Project. In order to effectively address these issues, and to address issues raised through the responses to Round 1 questions, Treasury Metals has prepared a revised EIS that sets out the assessment of effects and impacts associated with the Project in a clear and traceable manner. Information about potential Project effects and mitigation measures related to wildlife and wildlife habitat is location in Section 6.12 of the revised EIS. The determination of significance of residual effects on wildlife and wildlife habitat is described in Section 8.12 of the revised EIS.
519	AC(1)-193	MNO	Environmental Impact Statement 6.2.1.12 Fish and Fish Habitat	7.1.1 Valued Components	**Information Request / Comment:** The identified potential effects do not reflect knowledge acquired on the environment through Aboriginal engagements; specifically, Métis engagement. **Response:** Treasury Metals has made efforts to engage and elicit input from Aboriginal peoples regarding the Project. No Project-specific traditional knowledge and traditional land use studies were prepared for, or shared with, Treasury Metals; limited information was obtained about traditional land use areas. Treasury Metals made efforts to incorporate information provided and to address comments and issues raised by Aboriginal peoples during the engagement process. A summary of the issues raised during the engagement process was provided in Section 8 and Appendix DD to the original EIS. As part of the Round 1 IRs, the Agency has requested that Treasury Metals expand and update the information presented in Appendix DD to the original EIS. This information is provided as an updated document called the Aboriginal Engagement Report, Appendix DD to the EIS. The Aboriginal Engagement Report provides a listing of the disaggregate comments from Aboriginal peoples, and how those were addressed in the EIS. Treasury Metals will continue to discuss potential Project effects on traditional land use activities

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					with potentially affected Aboriginal peoples throughout the life the Project. As additional information regarding an Aboriginal community's traditional land use and practices become available, Treasury Metals will review and consider it in the design of mitigation measures, follow-up monitoring and management plans for the Project, as appropriate. Information related to Aboriginal traditional knowledge or current land and resource use by MNO in the area of the Project is limited; MNO did not share any Project-specific information or knowledge with Treasury Metals before the original EIS was filed. However, in a letter dated May 2015 from MNO to the Agency and Treasury Metals, it was noted that Wabigoon Lake is an area heavily used by MNO in the exercise of their Aboriginal rights and interests, with specific concerns related to surface and groundwater quality and fish and fish habitat. Information about potential Project effects and mitigation measures related to these concerns can be located in Sections 6.8 (surface water quality), 6.10 (ground water quality) and 6.14 (fish and fish habitat) of the revised EIS.
520	AC(1)-194	MNO	Environmental Impact Statement 6.2.1.12 Fish and Fish Habitat		**Information Request / Comment:** This section of the EIS specifies that "[l]iquid discharges from the Project, including treated tailings water and site runoff, are expected to meet all regulatory requirements before it is released to the natural environment. Water discharges are expected to be directed into the Blackwater Creek systems, which ultimately flows into Wabigoon Lake." This information does not reflect MNO information and does not comment on the use of Wabigoon Lake by the MNO. Further, as this section is to outline the potential effects, assuming that the water will meet all regulatory requirements prior to the effects assessment is inappropriate.
					Response: The quotation from in Section 6.2.1.12 of the original EIS is a factual statement. Treasury Metals has committed (Table 10.0.1 of the revised EIS) that the effluent released for the Project during operations will be treated to levels that meet the Provincial Water Quality Objectives (PWQO) prior to being discharged to the environment. The discharge location for effluent from the Project will be in Blackwater Creek, which does flow into Wabigoon Lake. It is unclear why MNO feels these factual statements conflict with their information.
521	AC(1)-195	MNO	Environmental Impact Statement 6.2.1.13 Wetlands and Vegetation	7.1.1 Valued Components	**Information Request / Comment:** The identified potential effects do not reflect knowledge acquired on the environment through Aboriginal engagements; specifically, Métis engagement.
					Response: Treasury Metals has made efforts to engage and elicit input from Aboriginal peoples regarding the Project. Although no Project-specific traditional knowledge and traditional land use studies were prepared for, or shared with, Treasury Metals; limited information was obtained about traditional land use areas during the engagement process, and was incorporated in the EIS. Information related to Aboriginal traditional knowledge or current land and resource use by MNO in the area of the Project is limited; MNO did not share any Project-specific information or knowledge with

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					Treasury Metals before the original EIS was filed. In a letter dated May 2015 from MNO to the Agency and Treasury Metals, it was noted that Wabigoon Lake is an area heavily used by MNO in the exercise of their Aboriginal rights and interests, with specific concerns related to surface and groundwater quality and fish and fish habitat. At the request of the Agency and as part of the Round 1 IR process, Treasury Metals has prepared a revised EIS. Information about potential Project effects and mitigation measures related to these concerns can be located in Sections 6.8 (surface water quality), 6.10 (ground water quality) and 6.14 (fish and fish habitat) of the revised EIS. Treasury Metals will continue to discuss potential Project effects on traditional land use activities with potentially affected Aboriginal peoples throughout the life the Project. As additional information regarding an Aboriginal community's traditional land use and practices become available, Treasury Metals will review and consider it in the design of mitigation measures, follow-up monitoring and management plans for the Project, as appropriate.
522	AC(1)-196	MNO	Environmental Impact Statement 6.2.2.1 Land Use	7.1.1 Valued Components	**Information Request / Comment**: The identified potential effects do not reflect knowledge acquired on the environment through Aboriginal engagements; specifically, Métis engagement. Specifically, the primary effects identified as noise and visual disturbance may not be correct as potential effects to wildlife, fish and flora may be potential higher than those of noise and visual disturbance.
					Response: Treasury Metals has made efforts to engage and elicit input from Aboriginal peoples regarding the Project. No Project-specific traditional knowledge and traditional land use studies were prepared for, or shared with, Treasury Metals; limited information was obtained about traditional land use areas. Treasury Metals made efforts to incorporate information provided and to address comments and issues raised by Aboriginal peoples during the engagement process. A summary of the issues raised during the engagement process was provided in Section 8 and Appendix DD to the original EIS. As part of the Round 1 IRs, the Agency has requested that Treasury Metals expand and update the information presented in Appendix DD to the original EIS. This information is provided as an updated document called the Aboriginal Engagement Report, Appendix DD to the EIS. The Aboriginal Engagement Report provides a listing of the disaggregate comments from Aboriginal peoples, and how those were addressed in the EIS. Treasury Metals will continue to discuss potential Project effects on traditional land use activities with potentially affected Aboriginal peoples throughout the life the Project. As additional information regarding an Aboriginal community's traditional land use and practices become available, Treasury Metals will review and consider it in the design of mitigation measures, follow-up monitoring and

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					management plans for the Project, as appropriate. At the request of the Agency and as part of the Round 1 IR process, Treasury Metals has prepared a revised EIS. An expanded description of the environmental effects associated with the development of the Project is provided in the revised EIS. The revised EIS also considers the linkages between physical and biological effects of the Project, the effects on land use, and ultimately the effects on Aboriginal peoples in Sections 6.16 (land use) and 6.21 (Aboriginal peoples).
523	AC(1)-197	MNO	Environmental Impact Statement 6.2.2.1 Land Use		**Information Request / Comment**: The reference in this section to recreational and tourism activities exclude the exercise of Aboriginal rights. Please amend the EIS. **Response:** At the request of the Agency and as part of the Round 1 IR process, Treasury Metals has prepared a revised EIS. Information about potential Project effects and mitigation measures related to land use and Aboriginal peoples is provided in Sections 6.16 and 6.21 of the revised EIS. Information on management plans related to land use and their location in the revised EIS are provided below: Section 12.1 Environmental Management Plan Section 12.2 Water Management Plan Section 12.6 Noise Management Plan Section 12.7 Dust Best Management Practices Plan Section 12.12 Socio-economic Management Plan Section 12.15 Transportation and Access Management Plan Section 12.21 Communications Management Plan Management plans related to Aboriginal peoples and their location in the revised EIS are provided below: Section 12.1 Environmental Management Plan Section 12.6 Noise Management Plan Section 12.12 Socio-economic Management Plan Section 12.13 Emergency and Spill Response Management Plan Information on follow-up monitoring related to land use and Aboriginal peoples is described in Sections 13.16 and 13.21 of the revised EIS.
524	AC(1)-198	MNO	Environmental		**Information Request / Comment:**

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			Impact Statement 6.3 Valued Component Identification		This section does not include the most basic components that are present in most EIS' that allow for consideration of the scientific method and potential project effects. The section is missing: • Information on the establishment of assessment boundaries for each VC (spatial, temporal, technical and administrative) • Information on the scope of the assessment, including: o Selection of potential effects o Measurable parameters an significance thresholds o Traditional knowledge and traditional use information o Influence of engagement on the assessment
					Response: Treasury Metals acknowledges that there are a number of questions from the Agency and other reviewers related to the approach used in the EIS for organizing and presenting information regarding the potential effects of the Project. In order to effectively address these issues, and to address issues raised through the responses to Round 1 questions, Treasury Metals has prepared a revised EIS that sets out the assessment of effects and impacts associated with the Project in a clear and traceable manner. The methods used in the assessment of effects, including study areas, temporal boundaries and parameters for determining significance, are described in Section 6.1 of the revised EIS. Information about potential Project effects and mitigation measures are provided in Section 6.0 of the revised EIS. The engagement activities prior to filing the EIS were summarized in Section 8, and more fully documented in Appendix DD to the original EIS. As part of the Round 1 IRs, the Agency has requested that Treasury Metals expand and update the information presented in Appendix DD to the original EIS. This information is provided as an updated document titled the Aboriginal Engagement Report, Appendix DD to the revised EIS. The Aboriginal Engagement report provides a listing of the disaggregate comments from Aboriginal peoples, and how those were addressed in the Project design and the EIS. Treasury Metals has made efforts to engage and elicit input from Aboriginal peoples regarding the Project. While no Project-specific traditional knowledge and traditional land use studies were prepared for, or shared with, Treasury Metals; limited information was obtained through the Aboriginal engagement about traditional land use areas. The available information was used in the EIS. Treasury Metals will continue to discuss potential Project effects on traditional land use activities with potentially affected Aboriginal peoples throughout the life the Project. As additional information regarding an Aboriginal community's traditional land use and practices become available, Treasury Metals will review and consider it in the design of mitigation measures, follow-up monitoring and management plans for the Project, as appropriate.
525	AC(1)-199	MNO	Environmental Impact		**Information Request / Comment:** This section does not include a matrix which displays those VCs that were included/excluded from

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			Statement 6.3 Valued Component Identification		the assessment. Without this information there is no pathway shown by the proponent that rationalizes their assessment and selection of VCs. Additionally, there is no discussion of why specific VCs were included/excluded in the EIS. **Response:** Treasury Metals acknowledges that there are a number of questions from the Agency and other reviewers related to the approach used in the EIS for organizing and presenting information regarding the potential effects of the Project. In order to effectively address these issues, and to address issues raised through the responses to Round 1 questions, Treasury Metals has prepared a revised EIS that sets out the assessment of effects and impacts associated with the Project in a clear and traceable manner. The information required to respond to this information request is set out in Section 6.1.3 (selection of valued components) and 6.0 (description of project effects and linkages).
526	AC(1)-200	MNO	Environmental Impact Statement 6.3.1.3 Noise		**Information Request / Comment:** The two noise VCs that were identified for inclusion in the environmental assessment do not include a consideration of blasting noise. As this will be a continuous and disruptive source of noise throughout the Project's lifetime, it must be considered as a potential VC and not as an indicator under a VC. **Response:** Although not identified as a VC in the original EIS, blasting noise was evaluated as part of the technical appendices to support the noise assessment (Environmental Noise Assessment [RWDI, 2014c]). It should be noted that blasting will not be a continuous disturbance, it will only be an intermittent activity as indicated in the EIS. It is expected that "…it would be anticipated that blasting would occur five times per week" (Section 3.3.4). Treasury Metals acknowledges that there are a number of questions from the Agency and other reviewers related to the approach used in the EIS for organizing and presenting information regarding the potential effects of the Project. In order to effectively address these issues, and to address issues raised through the responses to Round 1 questions, Treasury Metals has prepared a revised EIS where blasting noise was considered as a separate VC in Section 6.4.

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527	AC(1)-201	MNO	Environmental Impact Statement 6.3.1.3 Noise 6.3.1.4 Light 6.3.1.5 Air Quality 6.3.1.11 Wildlife and Wildlife Habitat 6.3.1.13 Wetlands and Vegetation	2.3 Aboriginal Engagement	**Information Request / Comment:** At minimum, the noise assessment VCs should link back to effects on Aboriginal rights and interests. This has not been completed and there is no linkage between Aboriginal interests and noise. At minimum, the light assessment VCs should link back to effects on Aboriginal rights and interests. This has not been completed and there is no linkage between Aboriginal interests and light. At minimum, the air quality assessment VCs should link back to effects on Aboriginal rights and interests. This has not been completed and there is no linkage between Aboriginal interests and air quality. At minimum, the wildlife and wildlife habitat assessment VCs should link back to effects on Aboriginal rights and interests. This has not been completed and there is no linkage between Aboriginal interests and wildlife and wildlife habitat. At minimum, the wetland and vegetation assessment VCs should link back to effects on Aboriginal rights and interests. This has not been completed and there is no linkage between Aboriginal interests and wetlands and vegetation. **Response:** Treasury Metals acknowledges that there are a number of questions from the reviewers related to the approach used in the EIS for organizing and presenting information regarding the potential effects of the Project. In order to effectively address these issues, and to address issues raised through the responses to Round 1 questions, Treasury Metals has prepared a revised EIS that sets out the assessment of effects and impacts associated with the Project in a clear and traceable manner. The revised includes a discussions of the potential effects of the Project, including linkages to other components and VCs (including Aboriginal peoples), where applicable in Section 6.0.
528	AC(1)-202	MNO	Environmental Impact Statement 6.3.1.4 Light		**Information Request / Comment:** This section outlines the conclusions of the effects assessment and does not explicitly outline the project VCs or potential effects. Conclusions of the effects assessment should be left to further sections in the EIS to maintain the illusion of an unbiased assessment. **Response:** Treasury Metals acknowledges that there are a number of questions from the Agency and other reviewers related to the approach used in the EIS for organizing and presenting information regarding the potential effects of the Project. In order to effectively address these issues, and to

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					address issues raised through the responses to Round 1 questions, Treasury Metals has prepared revised EIS that sets out the assessment of effects and impacts associated with the Project in a clear and traceable manner. Information about potential Project effects and mitigation measures related to light is provided in Section 6.5 of the revised EIS. The determination of significance of residual effects on light is described in Section 8.5 of the revised EIS.
529	AC(1)-203	MNO	Environmental Impact Statement 6.3.1.5 Air Quality	9.1.2 Biophysical Environment	**Information Request / Comment:** The potential contaminants listed as the air quality VCs should be classified as indicators for change under the VC, not the VC itself. The VC should be an overarching component such as "Air Quality" or equivalent. Further, the listing of contaminants of concern does not include VOCs or ground level ozone, of which the EIS Guidelines require information on.
					Response: Whether the individual compounds are considered VCs or indicators will not change the conclusions presented in the EIS. However, Treasury Metals has addressed issues raised in the Round 1 IRs related to the approach and organizing in the EIS, as well as issues raised through the responses to Round 1 questions with a revised EIS. To address this comment, the revised EIS includes "air quality" as the VC. The individual compounds are identified as indicators for the VC. Neither ground level ozone (O_3) nor volatile organic compounds (VOCs) were used in assessing the effects of the Project on air quality. While O_3 will not be emitted from the Project, it can form in the atmosphere through photochemical reactions with nitrogen oxides (NO_X) and VOC emissions, which can be associated with projects of this nature. However, the magnitude of these emissions from the Project is viewed as negligible from the perspective of O_3 formation (RWDI, 2014e). Additional details are available in responses TMI_165-AE(1)-03 and TMI_465-AC(1)-139. *References Cited:* RWDI, 2014e. Goliath Gold Project: Environmental Air Quality Assessment, Final Report. Prepared for Treasury Metals Incorporated. Prepared by RWDI Air Inc., Guelph, Ontario. Included as part of Appendix J to the EIS.
530	AC(1)-204	MNO	Environmental Impact Statement 6.3.1.6 Climate		**Information Request / Comment:** The first sentence of this section contains a typo. Sentence states: "…Treasury included one climate CV…" should state "…Treasury included one climate VC…"
					Response:

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					Noted.
531	AC(1)-205	MNO	Environmental Impact Statement 6.3.1.9 Groundwater Quality		**Information Request / Comment:** This section of the EIS states "… Treasury considered the protection of water quality for future discharge … to be a VC … in order to ensure there are no adverse impacts to the surface water environment." Selection of water quality as a VC does not ensure there are no adverse impacts. Instead, a VC is used as a measure by which potential effects can be marked against. Please amend this section to reflect the accurate description of VCs.
					Response: The relevant sentence from the EIS could have been more clearly written to read: Therefore, Treasury considered the protection of groundwater quality to be a VC in order to ensure that potential effects to the surface water environment, or current or future groundwater resource development in populated areas, are identified, assessed and mitigated as appropriate. Treasury Metals acknowledges that there are a number of questions from the Agency and other reviewers related to the approach used in the EIS for organizing and presenting information regarding the potential effects of the Project. In order to effectively address these issues, and to address issues raised through the responses to Round 1 questions, Treasury Metals has prepared a revised EIS that sets out the assessment of effects and impacts associated with the Project in a clear and traceable manner. Information about valued components for groundwater quality is located in Section 6.1.3.9.
532	AC(1)-206	MNO	Environmental Impact Statement 6.3.1.11 Wildlife and Wildlife Habitat		**Information Request / Comment:** The VCs selected for inclusion in the environmental assessment do not include discussion of indicators or measurable parameters. Examples of effects for wildlife are: • Change in habitat • Change in mortality risk • Alternation of movement • Etc. These are not listed in this section. Please update the EIS to reflect standard EIS methodology.
					Response:

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					Treasury Metals acknowledges that there are a number of questions from the Agency and other reviewers related to the approach used in the EIS for organizing and presenting information regarding the potential effects of the Project. In order to effectively address these issues, and to address issues raised through the responses to Round 1 questions, Treasury Metals has prepared a revised EIS that sets out the assessment of effects and impacts associated with the Project in a clear and traceable manner, and describes indicators and measures for VCs. Information about valued components for wildlife and wildlife habitat is located in Section 6.1.3.11.
533	AC(1)-207	MNO	Environmental Impact Statement 6.3.1.12 Fish and Fish Habitat	2.3 Aboriginal Engagement	**Information Request / Comment:** The VCs selected for inclusion in the environmental assessment do not include discussion of indicators or measurable parameters. Examples of actual effects for fish and fish habitat include: • Change in sediment or water quality; • Change in fish habitat; • Direct mortality or physical injury to fish; or • Change in behavior of fish. These are not listed in this section. Please update the EIS to reflect standard EIS methodology.
					Response: Treasury Metals acknowledges that there are a number of questions from the Agency and other reviewers related to the approach used in the EIS for organizing and presenting information regarding the potential effects of the Project. In order to effectively address these issues, and to address issues raised through the responses to Round 1 questions, Treasury Metals has prepared a revised EIS that sets out the assessment of effects and impacts associated with the Project in a clear and traceable manner, and describes indicators and measures for VCs. Information about valued components for fish and fish habitat is located in Section 6.1.3.13.
534	AC(1)-208	MNO	Environmental Impact Statement 6.3.1.13 Wetlands and Vegetation		**Information Request / Comment:** The VCs identified for wetlands and vegetation are more statements of facts than identification of VCs. Please amend the EIS to reflect VCs for wetlands and vegetation that are not statements. This will ensure the assessment of effects can occur on items that are less broad and more reflective of the potential project effects.
					Response: Treasury Metals acknowledges that there are a number of questions from the reviewers related to the approach used in the EIS for organizing and presenting information regarding the potential effects of the Project. In order to effectively address these issues, and to address issues raised

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					through the responses to Round 1 questions, Treasury Metals has prepared a revised EIS that sets out the assessment of effects and impacts associated with the Project in a clear and traceable manner. Information about valued components for wetlands and vegetation is located in Section 6.1.3.14.
535	AC(1)-209	MNO	Environmental Impact Statement 6.3.2.1 Land Use		**Information Request / Comment:** The identification of Land and resource use as a VC for Land Use is inappropriate. The VC must represent a vulnerable component under Land and Resource Use instead of just repeating the section title. **Response:** Treasury Metals acknowledges that there are a number of questions from the Agency and other reviewers related to the approach used in the EIS for organizing and presenting information regarding the potential effects of the Project. In order to effectively address these issues, and to address issues raised through the responses to Round 1 questions, Treasury Metals has prepared a revised EIS that sets out the assessment of effects and impacts associated with the Project in a clear and traceable manner. Information about valued components for land use is located in Section 6.1.3.15.
536	AC(1)-210	MNO	Environmental Impact Statement 6.3.2.1 Land Use	2.3 Aboriginal Engagement "The proponent will make reasonable efforts to integrate "traditional Aboriginal knowledge" that will contribute to the assessment of environmental impacts."	**Information Request / Comment:** At minimum, the Land Use assessment VCs should link back to effects on Aboriginal rights and interests. This has not been completed and there is no linkage between Aboriginal interests and land use. **Response:** Treasury Metals acknowledges that there are a number of questions from the Agency and other reviewers related to the approach used in the EIS for organizing and presenting information regarding the potential effects of the Project. In order to effectively address these issues, and to address issues raised through the responses to Round 1 questions, Treasury Metals has prepared a revised EIS sets out the assessment of effects and impacts associated with the Project in a clear and traceable manner. Information about potential effects and linkages to other components for land use is located in Section 6.16.
537	AC(1)-211	MNO	Environmental Impact Statement		**Information Request / Comment:** The title of this section minimizes the duty of the proponent to assess potential effects on Aboriginal rights and interests.

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			6.3.2.5 Aboriginal Peoples		Suggest rewording the title to reflect the wording in the EIS guidelines: "Potential or established Aboriginal and Treaty rights and Related Interests" **Response:** Treasury Metals did not intend to minimize or diminish the importance of assessing the potential effects of the Project on the treaty rights or related interests for Aboriginal peoples. The section heading was used to indicate that all potential effects related to Aboriginal peoples were to have been captured.
538	AC(1)-212	MNO	Environmental Impact Statement 6.4 Effects Assessment		**Information Request / Comment:** This section does not include an interaction matrix of project activities during each phase and the VCs chosen for inclusion in the assessment. This would serve to rank the interactions, taking a conservative approach, and identify where the higher risk interactions occur and focus the assessment on these interactions. **Response:** Treasury Metals acknowledges that there are a number of questions from the Agency and other reviewers related to the approach used in the EIS for organizing and presenting information regarding the potential effects of the Project. In order to effectively address these issues, and to address issues raised through the responses to Round 1 questions, Treasury Metals has prepared a revised EIS that sets out the assessment of effects and impacts associated with the Project in a clear and traceable manner. For each component, a listing of the Project elements considered, the potential effects of the Project, and linkages to other components or VCs have been included as part of the revised EIS in Section 6.0.
539	AC(1)-213	MNO	Environmental Impact Statement 6.4.1.3 Noise 6.4.1.4 Light 6.4.1.5 Air Quality 6.4.1.6 Climate 6.4.1.7 Surface Water Quality 6.4.1.8 Surface		**Information Request / Comment:** This section is titled "Effects Assessment" however, there is no such effects assessment included. Typically, an effects assessment will include: • Definition of temporal boundaries (not present) • Definition of spatial boundaries including a PDA, LAA and RAA (not present) • A description of baseline conditions (included in another volume, not to the satisfaction of MNO) • A description of Analytical Methods • A description of assumptions and conservative approach • An outline of the potential effects • Details about potential mitigation • Characterization of residual effects, including a residual effects classification

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			Water Quantity 6.4.1.9 Groundwater Quality 6.4.1.10 Groundwater Quantity 6.4.1.13 Wetlands and Vegetation 6.4.2.1 Land Use 6.4.2.2 Social Factors 6.4.2.3 Economic Factors		• A determination of significance of residual effects • Details of confidence and risk • Outline of follow-up monitoring, if applicable This EIS does not follow these basic parameters for reporting the results. Instead, the noise including blasting, light, air quality, climate, surface water quality and quantity and the groundwater quality and quantity assessments jump straight to mitigation with cursory descriptions of the characterization of the residual effects and a superficial description of ongoing monitoring. The sections describing wetlands and vegetation, land use, social factors and economic factors contain cursory identification of effects with no explanation or detail. Then jumps directly into mitigation, a broad overview of residual effects characterization, etc. The lack of details is troubling and makes evaluating the results of the EIS impossible. This is inappropriate. Please update the effects assessment for noise including blasting, light, air quality, climate, surface water quality and quantity, groundwater quality and quantity, wetlands and vegetation, land use, social factors and economic factors to include an assessment of effects.
					Response: The reviewer is directed to Section 5 of the EIS, which provides a summary of the baseline conditions. The detailed supporting information about the baseline conditions was also included as appendices to the EIS. This approach is appropriate and standard practice in Canada when preparing environmental assessments. Treasury Metals acknowledges that there are a number of questions from the Agency and other reviewers related to the approach used in the EIS for organizing and presenting information regarding the potential effects of the Project. In order to effectively address these issues, and to address issues raised through the responses to Round 1 questions, Treasury Metals has prepared a revised EIS that sets out the assessment of effects and impacts associated with the Project in a clear and traceable manner. Information about potential Project effects and mitigation measures is provided in Section 6.0 of the revised EIS. The determination of significance of residual effects is described in Section 8.0. Management plans and follow-op monitoring programs are described in Sections 12.0 and 13.0, respectively.
540	AC(1)-214	MNO	Environmental Impact Statement 6.4.1.3 Noise 6.4.1.4 Light	2.3 Aboriginal Engagement	**Information Request / Comment:** At minimum, the noise assessment results should link back to effects on Aboriginal rights and interests. This has not been completed and there is no linkage between Aboriginal interests and noise. At minimum, the light assessment results should link back to effects on Aboriginal rights and

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
			6.4.1.5 Air Quality 6.4.1.11 Wildlife and Wildlife Habitat 6.4.1.12 Fish and Fish Habitat 6.4.1.13 Wetlands and Vegetation		interests. This has not been completed and there is no linkage between Aboriginal interests and light. At minimum, the air quality assessment results should link back to effects on Aboriginal rights and interests. This has not been completed and there is no linkage between Aboriginal interests and air quality. At minimum, the wildlife and wildlife habitat assessment results should link back to effects on Aboriginal rights and interests. This has not been completed and there is no linkage between Aboriginal interests and wildlife and wildlife habitat. At minimum, the fish and fish habitat assessment results should link back to effects on Aboriginal rights and interests. This has not been completed and there is no linkage between Aboriginal interests and fish and fish habitat. At minimum, the wetlands and vegetation assessment results should link back to effects on Aboriginal rights and interests. This has not been completed and there is no linkage between Aboriginal interests and wetlands and vegetation.
					Response: Treasury Metals acknowledges that there are a number of questions from the Agency and other reviewers related to the approach used in the EIS for organizing and presenting information regarding the potential effects of the Project. In order to effectively address these issues, and to address issues raised through the responses to Round 1 questions, Treasury Metals has prepared a revised EIS that sets out the assessment of effects and impacts associated with the Project in a clear and traceable manner in Section 6.0. The revised EIS clearly sets out how changes to the biophysical environment can link to effects on Aboriginal peoples. The effects of the Project on Aboriginal peoples, including their interests and rights, are described in Section 6.21 and 6.23.4 (see also the response to TMI_527-AC(1)-201).
541	AC(1)-215	MNO	Environmental Impact Statement 6.4.1.7 Surface Water Quality		**Information Request / Comment:** This section of the EIS states that "Wabigoon Lake would be affected for a very short period of time and the effect would be mostly localized to Kelpyn Bay" in the event of a catastrophic failure of the TSF. MNO requires additional information on this potential effect including a more comprehensive description of the effects including specific data related to the potential scenarios, information about potential mitigation measures, characterization of residual effects, determination of significance and information related to Treasury's confidence and risk.
					Response:

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					Section 7.12 of the EIS Guidelines state that the "…proponent will identify the probability of potential accidents and malfunctions related to the project, including an explanation of how those events were identified, potential consequences (including the environmental effects), the plausible worst case scenarios and the effects of these scenarios." A detailed evaluation of potential failure modes associated with the Project was provided in Appendix HH of the EIS, with the findings summarized in Section 4 of the EIS. A discussion related to the effects associated with a failure of the tailings storage facility (TSF) is presented in Section 4.3.2 of the EIS. This information relies on the TSF failure modelling, which is presented in Appendix GG of the EIS. As detailed in Section 4.3.2.2, the TSF will be designed in accordance with the following guidelines: • CDA Dam Safety Guidelines (2007); • The Ministry of Natural Resources and Forestry (MNRF) Best Management Practices (2011); and • Provincial Lakes and Rivers Improvement Act. Mitigation/design measures are proposed to reduce the potential for a failure. The TSF is required to be equipped with a spillway to release water from the impoundment in the event of a high water level. Treasury Metals has designed the spillway for each stage of the TSF so that the TSF would be able to hold the Environmental Design Storm (EDS) without releasing water. The EDS adopted for the Project is the 1 in 1,000 year, 24-hour storm (Section 4.3.2.1 of EIS). The embankment will also have a 1.5 m freeboard allowance above the spillway height to contain the Inflow Design Flood (IDF) without overtopping the embankment. In the extremely unlikely event of a failure of the TSF, Section 4.3.2.6 of the EIS describes that Treasury Metals will implement emergency response and contingency procedures which would include the development of a remediation plan to contain the released tailings, reconstruct the TSF, and excavate any released tailings and impacted soils for disposal in the reconstructed TSF. Section 7.12 of the EIS Guidelines also provides the expectations for evaluating accidents and malfunctions, indicating it will "…include an identification of the magnitude of an accident and/or malfunction, including the quantity, mechanism, rate, form and characteristics of the contaminants and other materials likely to be released into the environment during the accident and malfunction events." The EIS guidelines does not require the determination of significance for unlikely accidents and malfunctions (see also response TMI_243-AM(1)-01.
542	AC(1)-216	MNO	Environmental Impact Statement 6.4.1.11 Wildlife		**Information Request / Comment:** The VC selected for wildlife and wildlife habitat has not been assessed. Instead, the proponent relies on the delineation of terrestrial habitat to characterize effects (for SAR, ungulates, furbearers, upland birds, and wetland birds). Not only is this inappropriate methodologically, the habitat selected has not been identify or classified to a specific SAR, ungulate, furbearer, upland bird or

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
			and Wildlife Habitat		wetland bird and is therefore too general for assessment of effects. **Response:** Treasury Metals acknowledges that there are a number of questions from the Agency and other reviewers related to the approach used in the EIS for organizing and presenting information regarding the potential effects of the Project. In order to effectively address these issues, and to address issues raised through the responses to Round 1 questions, Treasury Metals has prepared a revised EIS that sets out the assessment of effects and impacts associated with the Project in a clear and traceable manner. Information about potential Project effects and mitigation measures related to wildlife and wildlife habitat is provided in Section 6.12 of the revised EIS.
543	AC(1)-217	MNO	Environmental Impact Statement 6.4.1.11 Wildlife and Wildlife Habitat		**Information Request / Comment:** This section outlines additional potential effects for SAR during construction that include "direct mortality as a result of human activity, mortality of roosting bats or nesting birds during habitat clearing activities, and vehicular collisions." However, these potential effects do not appear to be adequately assessed as they were not listed as valued components nor characterized as part of the effects assessment. Instead, the assessment jumps directly to potential mitigation for these potential effects, characterizes the residual effects in a cursory manner and defines a significance rating for them all in the space of 13 lines. The section related to SAR Operations and Closure, again, only contains a very sparse and cursory description of the potential effects before launching into potential mitigation for these potential effects, characterizes the residual effects in a cursory manner and defines a significance rating for them all in the space of 12 lines. This section outlines additional potential effects for ungulates during construction that include "direct mortality as a result of human activity (e.g. Vehicular collisions)." However, these potential effects do not appear to be adequately assessed as they were not listed as valued components nor characterized as part of the effects assessment. Instead, the assessment jumps directly to potential mitigation for these potential effects, characterizes the residual effects in a cursory manner and defines a significance rating for them all in the space of 11 lines. The section related to ungulate Operations and Closure, again, only contains a very sparse and cursory description of the potential effects before launching into potential mitigation for these potential effects, characterizes the residual effects in a cursory manner and defines a significance rating for them all in the space of 12 lines. **Response:** Treasury Metals acknowledges that there are a number of questions from the Agency and other reviewers related to the approach used in the EIS for organizing and presenting information regarding the potential effects of the Project. In order to effectively address these issues, and to

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					address issues raised through the responses to Round 1 questions, Treasury Metals has prepared a revised EIS that sets out the assessment of effects and impacts associated with the Project in a clear and traceable manner. Valued components for wildlife and wildlife habitat are described in Section 6.1.3.11 of the revised EIS. Information about potential Project effects and mitigation measures related to wildlife and wildlife habitat is provided in Section 6.12. The determination of significance of residual effects on wildlife and wildlife habitat is described in Section 8.12.
544	AC(1)-218	MNO	Environmental Impact Statement 6.4.1.11 Wildlife and Wildlife Habitat		**Information Request / Comment:** This section outlines additional potential effects for furbearers during construction that include "direct mortality as a result of human activity (e.g. Vehicular collisions)." However, these potential effects do not appear to be adequately assessed as they were not listed as valued components nor characterized as part of the effects assessment. Instead, the assessment jumps directly to potential mitigation for these potential effects, characterizes the residual effects in a cursory manner and defines a significance rating for them all in the space of 11 lines.
					Response: Treasury Metals acknowledges that there are a number of questions from the Agency and other reviewers related to the approach used in the EIS for organizing and presenting information regarding the potential effects of the Project. In order to effectively address these issues, and to address issues raised through the responses to Round 1 questions, Treasury Metals has prepared a revised EIS that sets out the assessment of effects and impacts associated with the Project in a clear and traceable manner. Valued components and indicators for wildlife and wildlife habitat are described in Section 6.1.3.11 of the revised EIS. Information about potential Project effects and mitigation measures related to wildlife and wildlife habitat is provided in Section 6.12. The determination of significance of residual effects on wildlife and wildlife habitat is described in Section 8.12.
545	AC(1)-219	MNO	Environmental Impact Statement 6.4.1.11 Wildlife and Wildlife Habitat		**Information Request / Comment:** The section related to furbearer Operations and Closure, again, only contains a very sparse and cursory description of the potential effects before launching into potential mitigation for these potential effects, characterizes the residual effects in a cursory manner and defines a significance rating for them all in the space of 12 lines.
					Response: Treasury Metals acknowledges that there are a number of questions from the Agency and other reviewers related to the approach used in the EIS for organizing and presenting information

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					regarding the potential effects of the Project. In order to effectively address these issues, and to address issues raised through the responses to Round 1 questions, Treasury Metals has prepared a revised EIS that sets out the assessment of effects and impacts associated with the Project in a clear and traceable manner. Valued components and indicators for wildlife and wildlife habitat are described in Section 6.1.3.11 of the revised EIS. Information about potential Project effects and mitigation measures related to wildlife and wildlife habitat is provided in Section 6.12. The determination of significance of residual effects on wildlife and wildlife habitat is described in Section 8.12.
546	AC(1)-220	MNO	Environmental Impact Statement 6.4.1.11 Wildlife and Wildlife Habitat		**Information Request / Comment:** This section outlines additional potential effects for upland birds during construction that include "direct mortality as a result of human activity, mortality of nesting birds during habitat clearing activities, and vehicular collisions" However, these potential effects do not appear to be adequately assessed as they were not listed as valued components nor characterized as part of the effects assessment. Instead, the assessment jumps directly to potential mitigation for these potential effects, characterizes the residual effects in a cursory manner and defines a significance rating for them all in the space of 13 lines.
					Response: Treasury Metals acknowledges that there are a number of questions from the Agency and other reviewers related to the approach used in the EIS for organizing and presenting information regarding the potential effects of the Project. In order to effectively address these issues, and to address issues raised through the responses to Round 1 questions, Treasury Metals has prepared a revised EIS that sets out the assessment of effects and impacts associated with the Project in a clear and traceable manner. Valued components and indicators for wildlife and wildlife habitat are described in Section 6.1.3.11 of the revised EIS. Information about potential Project effects and mitigation measures related to wildlife and wildlife habitat is provided in Section 6.12. The determination of significance of residual effects on wildlife and wildlife habitat is described in Section 8.12.
547	AC(1)-221	MNO	Environmental Impact Statement		**Information Request / Comment:** The section related to upland birds Operations and Closure, again, only contains a very sparse and cursory description of the potential effects before launching into potential mitigation for these potential effects, characterizes the residual effects in a cursory manner and defines a significance

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
			6.4.1.11 Wildlife and Wildlife Habitat		rating for them all in the space of 12 lines. **Response:** Treasury Metals acknowledges that there are a number of questions from the Agency and other reviewers related to the approach used in the EIS for organizing and presenting information regarding the potential effects of the Project. In order to effectively address these issues, and to address issues raised through the responses to Round 1 questions, Treasury Metals has prepared a revised EIS that sets out the assessment of effects and impacts associated with the Project in a clear and traceable manner. Valued components and indicators for wildlife and wildlife habitat are described in Section 6.1.3.11 of the revised EIS. Information about potential Project effects and mitigation measures related to wildlife and wildlife habitat is provided in Section 6.12. The determination of significance of residual effects on wildlife and wildlife habitat is described in Section 8.12.
548	AC(1)-222	MNO	Environmental Impact Statement 6.4.1.11 Wildlife and Wildlife Habitat		**Information Request / Comment:** This section outlines additional potential effects for wetland birds during construction that include "direct mortality as a result of human activity, mortality of nesting birds during habitat clearing activities, and vehicular collisions" However, these potential effects do not appear to be adequately assessed as they were not listed as valued components nor characterized as part of the effects assessment. Instead, the assessment jumps directly to potential mitigation for these potential effects, characterizes the residual effects in a cursory manner and defines a significance rating for them all in the space of 13 lines. **Response:** Treasury Metals acknowledges that there are a number of questions from the Agency and other reviewers related to the approach used in the EIS for organizing and presenting information regarding the potential effects of the Project. In order to effectively address these issues, and to address issues raised through the responses to Round 1 questions, Treasury Metals has prepared a revised EIS that sets out the assessment of effects and impacts associated with the Project in a clear and traceable manner. Valued components and indicators for wildlife and wildlife habitat are described in Section 6.1.3.11 of the revised EIS. Information about potential Project effects and mitigation measures related to wildlife and wildlife habitat is provided in Section 6.12. The determination of significance of residual effects on wildlife and wildlife habitat is described in Section 8.12.

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
549	AC(1)-223	MNO	Environmental Impact Statement 6.4.1.11 Wildlife and Wildlife Habitat		**Information Request / Comment:** The section related to wetland birds Operations and Closure, again, only contains a very sparse and cursory description of the potential effects before launching into potential mitigation for these potential effects, characterizes the residual effects in a cursory manner and defines a significance rating for them all in the space of 12 lines. **Response:** Treasury Metals acknowledges that there are a number of questions from the Agency and other reviewers related to the approach used in the EIS for organizing and presenting information regarding the potential effects of the Project. In order to effectively address these issues, and to address issues raised through the responses to Round 1 questions, Treasury Metals has prepared a revised EIS that sets out the assessment of effects and impacts associated with the Project in a clear and traceable manner. Valued components and indicators for wildlife and wildlife habitat are described in Section 6.1.3.11 of the revised EIS. Information about potential Project effects and mitigation measures related to wildlife and wildlife habitat is provided in Section 6.12. The determination of significance of residual effects on wildlife and wildlife habitat is described in Section 8.12.
550	AC(1)-224	MNO	Environmental Impact Statement 6.4.1.12 Fish and Fish Habitat		**Information Request / Comment:** The statement that "[t]he remaining potential effects to fish and fish habitat are considered not to be significant if appropriate mitigation measures are implemented" is problematic for a number of reasons. First, these remaining potential effects must be described in the EIS. Leaving them out is wholly inappropriate. Once outlined in the EIS, they must then have mitigation applied (which is described in the EIS), the residual effects characterized, and then, and only then can a significance determination be completed. The assurance of Treasury that this has all occurred is not sufficient and it must be displayed in the EIS. Particularly, as there will be habitat loss/degradation as part of the Project which can translate into a variety of effects to fish and fish habitat.

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					Response: The statement referenced in the request appears at the bottom of page 6-32 of the original EIS, and follows on from a high level discussions of the potential effects of the Project on fish and fish habitat. These identified potential effects included: • the loss of habitat within Blackwater Creek Tributary 1 that will be sacrificed to accommodate the placement of the tailings storage facility (TSF); • discharges from the site have the potential to affect fish and fish habitat by altering flow in Blackwater Creek particularly during low-flow periods of the year; and • discharges from the site have the potential to affect fish and fish habitat by altering water quality in Blackwater Creek; and • the potential resultant effects on fish species population abundance and/or distribution due to changes in habitat quality or availability. The original EIS then went on to indicate that, with the exception of the unavoidable loss of habitat associated with the TSF, appropriate avoidance, minimization, and mitigation measure should result in the remaining identified potential effects (i.e., changes in flow in Blackwater Creek, changes in quality in Blackwater Creek, and resulting effects on fish population and abundance) would not be significant. Additionally, pages 6-34 to 6-39 of the original EIS describe the potential effects of the Project on fish and fish habitat during each of the phases of the Project. The discussion explained the aspects incorporated into the design of the Project that will help to minimize or avoid effects on fish and fish habitat. Feedback from the Agency and other technical reviewers provided in the Round 1 IRs identified a number of issues related to organizing and approach used in the EIS for presenting the information regarding the potential effects of the Project. In order to effectively address these issues, Treasury Metals has prepared a revised EIS that sets out the assessment of effects and impacts associated with the Project, in a clear and traceable manner. Information about potential Project effects and mitigation measures related to fish and fish habitat is provided in Section 6.14 of the revised EIS. The determination of significance of residual effects on fish and fish habitat is described in Section 8.13. Cumulative effects are assessed in Section 7.0. Information on management plans and follow-up monitoring are provided in Sections 12.10 and 13.14, respectively.
551	AC(1)-225	MNO	Environmental Impact		**Information Request / Comment:** The identification of four potential effects to fish and fish habitat deviates from assessment

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			Statement 6.4.1.12 Fish and Fish Habitat		methodology. Further, if we accept the characterization of effects, the information provided in this section is largely cursory and includes the effect, the mitigation, the residual effect characterization and the significance and monitoring program in the space of a few lines. This does not contain the necessary detail to evaluate the results of the assessment. **Response:** As indicated in the response to TMI_550-AC(1)-224, Treasury Metals acknowledges a number of issues that have been raised by the Agency and other reviewers related to organizing and approach used in the EIS for presenting the information regarding the potential effects of the Project. In order to effectively address these issues, Treasury Metals has prepared a revised EIS that sets out the assessment of effects and impacts associated with the Project, in a clear and traceable manner. Information about potential Project effects and mitigation measures related to fish and fish habitat is provided in Section 6.14 of the revised EIS. The determination of significance of residual effects on fish and fish habitat is described in Section 8.13. Cumulative effects are assessed in Section 7.0. Information on management plans and follow-up monitoring are provided in Sections 12.10 and 13.14, respectively.
552	AC(1)-226	MNO	Environmental Impact Statement 6.4.1.12 Fish and Fish Habitat	11.2 Meaures to address impacts on Aboriginal rights	**Information Request / Comment:** This section of the EIS specifies that "[w]aterbodies identified as potential candidate sites for the implementation of habitat compensation prescriptions are Thunder Lake, Wabigoon Lake and Thunder Creek." However, this section contains no detail on engagement of Aboriginal groups in the development of these potential habitat compensation sites. As Wabigoon Lake is used by MNO, MNO requires engagement on the potential use of the lake as a habitat compensation locale. **Response:** As described in Section 6.4.1.12 of the EIS, the Project will result in approximately 6 ha of fish habitat loss due to the unavoidable elimination of the unnamed tributary watercourses in the vicinity of the open pit excavation (Blackwater Creek Tributary 1) and tailings storage facility (TSF) (Blackwater Creek Tributary 2). The lengths of watercourses affected, as well as the area of watercourses affected are tabulated in Section 3 of Appendix II to the EIS (Draft Fisheries Compensation Strategies and Plan). It should be noted that under the amended Fisheries Act, compensation is now referred to as "offsetting". The elimination of fish habitat will require an Authorization under Subsection 35(2) of the *Fisheries Act*, which typically includes a requirement for

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					habitat offsetting. In addition, the EIS noted that Section 27.1 of the MMER also requires habitat compensation to offset losses of fish habitat. As stated in Section 5 of Appendix II to the EIS "no current locations for in-kind offset habitat locations have been selected due to non-finalized Project design, and lack of First Nation and public input into the design of the [plan]". Treasury Metals has engaged in preliminary discussions with the Ontario Ministry of Natural Resources and Forestry (MNRF), and Fisheries and Oceans Canada (DFO). During these discussions, the MNRF recommended a plan focused "…on reversing long term impacts of slumping and sedimentation of Wabigoon Lake." Before any plan for compensation plan/offsetting is finalized, a engagement program including DFO, MNRF, First Nations, Aboriginal peoples and public stakeholders will need to occur. As the MNO has identified themselves as interested Aboriginal peoples in the region, efforts will be made to engage the MNO in this process. However, the process for finalizing the "offsetting of fish habitat" is a permitting process that occurs outside of the EA process.
553	AC(1)-227	MNO	Environmental Impact Statement 6.4.1.12 Fish and Fish Habitat		**Information Request / Comment:** While the catastrophic failure of the TSF is a "highly improbable event", it does not preclude this item from a fulsome assessment. Particularly as Wabigoon Lake is extensively used by MNO in the exercise of their Aboriginal rights and interests and the effects must be adequately quantified. **Response:** The potential for a failure of the tailings storage facility (TSF), and the resulting effects on the environment was evaluated extensively in the EIS, in the following locations: • Section 6.4.1.12 of the original EIS referenced in the question provided a summary of the potential effects of the Project on fish and fish habitat, and includes a discussion of the effects of a tailings breach (this section is referenced as 6.14 in the revised EIS). • The effects of a tailings breach on the environment were also discussed in section on accidents and malfunctions, specifically in Section 4.3.2 of the EIS. • Appendix GG to the EIS (TSF Failure Modelling) was dedicated to quantifying the potential downstream effects resulting from a dam breach of the TSF.
554	AC(1)-228	MNO	Environmental Impact Statement 6.4.2.1 Land Use	2.3 Aboriginal Engagement 10.1.3 Effects of Changes to the Environment	**Information Request / Comment**: At minimum, the land use assessment results should link back to effects on Aboriginal rights and interests. This has not been completed and there is no linkage between Aboriginal interests and land use. **Response:** At the request of the Agency and as part of the Round 1 IR process, Treasury Metals has prepared a revised EIS. An expanded assessment of the potential effects of the Project has been provided in the revised EIS, which sets out the assessment of effects and impacts associated with the Project in

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					a clear and traceable manner. The revised EIS clear linkages that have been considered between physical and biological effects of the Project, the effects on land use, and ultimately the effects on Aboriginal peoples in Sections 6.16 and 6.21.
555	AC(1)-229	MNO	Environmental Impact Statement 6.4.2.4 Heritage Resources		**Information Request / Comment:** This section does not even characterize effects and instead jumps directly to "potential direct residual effects". The assumption that, based on a flawed engagement process, no sites of interest or importance exist within the project area is faulty. **Response:** Treasury Metals acknowledges that there are questions from the Agency and other reviewers related to the approach used in the EIS for organizing and presenting information regarding the potential effects of the Project. In order to effectively address these issues, and to address issues raised through the responses to Round 1 questions, Treasury Metals has prepared revised EIS. Information about potential Project effects and mitigation measures related to heritage resources is provided in Section 6.20 of the revised EIS. We note that the greatest potential for disturbance is within the development area, where construction, operation and decommissioning activities may cause site or soil disturbance in the development area. It is important to note that Treasury Metals' legal obligations under the *Ontario Heritage Act*, *Coroners Act* and the *Funeral, Burial and Cremation Services Act* continue to apply throughout the duration of Treasury Metals' activities at the property. Additional detail on Treasury Metals' objectives in mitigating archaeological and cultural heritage site impacts during the life of the Project will be set out in the Archaeological and Cultural Heritage Resource Management Plan. A key element of the proposed management plan is ongoing engagement. The proposed management plan will include direction for active involvement of local Aboriginal communities when archaeological or cultural heritage resources are discovered. We note that engagement of local Aboriginal communities is mandatory when human remains of a possible Aboriginal origin are discovered. The Archaeological and Cultural Heritage Resources Management Plan will set out the process for notification and engagement of Aboriginal community members in archaeological assessment in areas of archaeological potential, and the management of accidental discoveries. The management plan and the follow-up monitoring program relating to heritage resources are described in Sections 12.11 and 13.20, respectively. The comment from MNO indicates the assumption that no sites of interest or importance exist within the Project area is faulty because MNO feel the engagement process was flawed. Treasury Metals note that as a result of the archaeological assessments completed, the development area was evaluated as holding low archaeological potential for the identification of archaeological resources. The Stage 1 report was submitted for review by MTCS and the recommendations of the report were

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					accepted. Further, the EIS includes a record of Aboriginal engagement carried out by Treasury Metals with the Metis Nation of Ontario to 17 Feb 2015 (Appendix DD.7.8 to the original EIS). This information has been updated and included in the Aboriginal Engagement Report, Appendix DD to the revised EIS. The engagement log shows that discussions have been ongoing through this period concerning the Project impacts, and that planning for a traditional knowledge (TK) study was progressing. Treasury Metals is committed to continuing this relationship, and as new information comes available regarding archaeology and cultural heritage resources, the information will be reviewed and appropriate mitigation measures put in place for any sites that are identified. It is important to note that some cultural heritage values may overlap with other values for which mitigation planning is underway, such as vegetation or wildlife management studies, and may also include consideration of contemporary use by Aboriginal populations.
556	AC(1)-230	MNO	Environmental Impact Statement 6.4.2.5 Aboriginal Peoples		**Information Request / Comment:** Specific detail is required in relation to exceedances of deleterious substances including the type of substance, the levels anticipated of each substance, the predicted effects of the substances on the environment and, finally, the effects of the substances on Aboriginal peoples. Without this necessary detail it is impossible to properly quantify the potential adverse effects and therefore impossible to apply mitigation.
					Response: As indicated in the EIS, Treasury Metals is committed to ensuring that the effluent discharged from the Project during operations will meet the Provincial Water Quality Objectives (PWQO). The Project will also be required to obtain an Environmental Compliance Approval (ECA) for its effluent discharges that the Project will comply with. There would be no water "exceedances" associated with the Project. The Project will also be required to obtain ECAs to cover the air quality and noise releases from the Project. Although Treasury Metals has not entered into the ECA process, the calculations to support the process were included in the Acoustic Assessment Report (included as part of Appendix H-3 to the EIS) and the Emissions Summary and Dispersion Modelling Report (included as part of Appendix J-3 to the EIS). Both of these studies show the regulatory limits as defined in the ECA process would not be exceeded. The screening level human health risk assessment (Appendix W) summarizes the contaminants that would be released to the different media and the potential health risk associated with those releases. The risk assessment concluded that as unacceptable risk was not identified, there was no need for mitigation.
557	AC(1)-231	MNO	Environmental Impact Statement		**Information Request / Comment:** This section of the EIS refers to the lead exposure of grouse and indicates that "[t]he HQ falls below the risk threshold when the assumption is made that grouse obtain one third rather than one half of their food from plants and soil invertebrates living on the tailings." However, no justification is

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			6.4.2.5 Aboriginal Peoples		provided that allows for this adjustment of the data. On what basis was the grouses' diet reduced?
					Response: The purpose of the statement was to illustrate the sensitivity of the analysis undertaken. Section 5.5.2 of the EIS provides additional discussion on the reasonableness of the assumptions used in evaluating potential exposure to grouse. The risk to grouse is driven by the assumption that a portion of its diet is comprised on soil invertebrates living within the tailings. Considering the lack of organic matter within the tailings material needed to support soil invertebrates this is considered a very conservative assumption. Similarly, the degree of human activity within the Project site and tailings area during the operations phase would be expected to discourage grouse from foraging in the area, certainly much less than the 50% assumed by the SLRA.
558	AC(1)-232	MNO	Environmental Impact Statement 6.4.2.5 Aboriginal Peoples		**Information Request / Comment:** This section states that "Aboriginal communities have identified the potential impacts of the Project on water as a concern." However, this statement is pan-Aboriginal and does not specify which group(s) has made this statement. To be used as a valued component for study, it should have been a consistent concern, raised by multiple groups and this cannot be evaluated without disaggregation of the information.
					Response: As part of the Round 1 IRs, the Agency has requested that Treasury Metals expand and update the Aboriginal Engagement Report (provided originally as Appendix DD to the original EIS). An updated Aboriginal Engagement Report is provided as Appendix DD to the revised EIS. One of the items requested by the Agency as part of the update is to provide a series tables showing the disaggregated issues and concerns raised by the Aboriginal peoples engaged as part of the EIS process. This information is provided in the updated Aboriginal Engagement Report.
559	AC(1)-233	MNO	Environmental Impact Statement 6.4.2.5 Aboriginal Peoples		**Information Request / Comment:** The statement in the EIS that "…it is anticipated that the Project will not impact the lake level of Wabigoon Lake or Thunder Lake" requires additional detail to be sufficient as part of the effects assessment, including: • Definition of temporal boundaries • Definition of spatial boundaries including a PDA, LAA and RAA • A description of Analytical Methods • A description of assumptions and conservative approach

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					• An outline of the potential effects • Details about potential mitigation • Characterization of residual effects, including a residual effects classification • A determination of significance of residual effects • Details of confidence and risk • Outline of follow-up monitoring, if applicable
					Response: While most of the information requested in the information request was provided in the EIS and supporting appendices, Treasury Metals acknowledges that the approach used in the EIS for organizing and presenting information regarding the potential effects of the Project has resulted in a number of questions from the Agency and other reviewers. In order to effectively address these issues, and to address issues raised through the responses to Round 1 questions, Treasury Metals has prepared a revised EIS that sets out the assessment of effects and impacts associated with the Project in a clear and traceable manner. The methods used in the assessment of effects, including selection of study areas and temporal boundaries, are provided in Section 6.1 of the revised EIS. Information about potential Project effects and mitigation measures related to surface water quality is provided in Section 6.8. The determination of significance of residual effects on surface water quality is described in Section 8.9 of the revised EIS. Information regarding the management plan and follow-up monitoring program for surface water quality is provided in Sections 12.3 and 13.8, respectively.
560	AC(1)-234	MNO	Environmental Impact Statement 6.4.2.5 Aboriginal Peoples	10.1.3 Effects of Changes to the Environment	**Information Request / Comment:** This section largely just repeats conclusions from other sections of the EIS and does not endeavor to actually relate the information to Aboriginal peoples.
					Response: Section 6.4.2.5 of the original EIS looked at how the combined, identified potential effects of the Project on components of the environment could potentially affect Aboriginal peoples. However, Treasury Metals acknowledges that the Round 1 IRs identified a number of issues related to organizing and approach used in the EIS for presenting the information regarding the potential effects of the Project. In order to effectively address these issues, Treasury Metals has prepared a revised EIS that sets out the assessment of effects and impacts associated with the Project, in a clear and traceable manner. Effects of the Project on Aboriginal peoples can be located in the following revised EIS sections: Section 6.21 Effects assessment relating to Aboriginal peoples (predicted effects, mitigation and

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					residual effects) 6.23.4 Effects of changes to the environment on Aboriginal people 7.0 Cumulative effects 8.20 Determination of the significance of residual effects on Aboriginal peoples 8.21.4 Determination of the significance of changes to the environment on Aboriginal peoples 12.0 Management plans to minimize the potential Project effects 13.21 Follow-up monitoring plans pertaining to Aboriginal peoples
561	AC(1)-235	MNO	Environmental Impact Statement 6.4.2.5 Aboriginal Peoples		**Information Request / Comment:** This section states that "Aboriginal communities have expressed concern that the Project could adversely impact their ability to gather plants and berries." However, this statement is pan-Aboriginal and does not specify which group(s) has made this claim. To be used as a valued component for study, it should have been a consistent concern, raised by multiple groups and this cannot be evaluated without disaggregation of the information.
					Response: Treasury Metals made efforts to incorporate information provided and to address comments and issues raised by Aboriginal peoples during the engagement process. A summary of the issues raised during the engagement process was provided in Section 8 and Appendix DD to the original EIS. As part of the Round 1 IRs, the Agency has requested that Treasury Metals expand and update the information presented in Appendix DD to the original EIS. This information is provided as an updated document called the Aboriginal Engagement Report, Appendix DD to the revised EIS. The Aboriginal Engagement Report provides a listing of the disaggregate comments from Aboriginal peoples, and how those were addressed in the EIS.
562	AC(1)-236	MNO	Environmental Impact Statement 6.4.2.5 Aboriginal Peoples		**Information Request / Comment**: The continued focus on three plant species for consideration in the EIS is inappropriate and does not take into account the specific species used by MNO in the exercise of their rights.
					Response: In preparing the EIS, Treasury Metals used the identified plant species to help understand the potential effects of the Project on the range of species that could be harvested for traditional uses. Treasury Metals will continue to discuss potential Project effects on traditional land use activities with potentially affected Aboriginal peoples throughout the life the Project. As additional information regarding an Aboriginal community's traditional land use and practices become available, Treasury Metals will review and consider it in the design of mitigation measures, follow-up monitoring and management plans for the Project, as appropriate. Information related to Aboriginal traditional knowledge or current land and resource use by MNO in the area of the Project is limited; MNO did not share any Project-specific information or knowledge with Treasury Metals before the EIS was

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					filed. As part of the Round 1 IRs, the Agency has requested that Treasury Metals prepare a revised EIS. An expanded evaluation of the potential effects of the Project on Aboriginal people and their traditional uses of the land has been provided in the revised EIS. Information about potential Project effects and mitigation measures related to these concerns can be located in Sections 6.15 (wetlands and vegetation), 6.16 (land use) and 6.21 (Aboriginal peoples) of the revised EIS.
563	AC(1)-237	MNO	Environmental Impact Statement 6.4.2.5 Aboriginal Peoples		**Information Request / Comment**: The statement that "Upon closure of the Project this site will be available to the public and First Nation communities" does not alleviate any potential adverse impact to chanterelle picking. As project closure is set to occur in the far future, there will still be generational effects to MNO gathering in the region that must be considered.
					Response: Treasury Metals acknowledges that access to the ~300 hectare Project site will be eliminated for the life of the mine due to the safety concerns associated with uncontrolled access to an active mining site. It should be noted that the life of the mine is approximately 15 years, considering the site preparation and construction phase, operations phase, and closure phase. Treasury Metals also notes the lack of public access during the life of the mine is effectively equivalent to the current status of the Project site because it is private land. At the request of the Agency and as part of the Round 1 IR process, Treasury Metals has prepared a revised EIS. An expanded discussion of the potential effects of the Project on use of the lands for the gathering foods by Aboriginal and non-Aboriginal people is presented in the revised EIS. Information about potential Project effects and mitigation measures related to these concerns can be located in Sections 6.16 (land use) and 6.21 (Aboriginal peoples) of the revised EIS.
564	AC(1)-238	MNO	Environmental Impact Statement 6.4.2.5 Aboriginal Peoples		**Information Request / Comment**: This section states that "Potential impacts to hunting, trapping and fishing that could result from the Project have been identified by Aboriginal communities as a concern" However, this statement is pan-Aboriginal and does not specify which group(s) has made this claim. To be used as a valued component for study, it should have been a consistent concern, raised by multiple groups and this cannot be evaluated without disaggregation of the information.
					Response: The engagement activities prior to filing the original EIS were summarized in Section 8, and more fully documented in Appendix DD to the original EIS. As part of the Round 1 IRs, the Agency has requested that Treasury Metals expand and update the information presented in Appendix DD to the EIS. This information is provided as an updated document called the Aboriginal Engagement Report, Appendix DD to the revised EIS. The Aboriginal Engagement Report provides a listing of

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					the disaggregate comments from Aboriginal peoples, and how those were addressed in the Project design and EIS. Information related to Aboriginal traditional knowledge or current land and resource use by MNO in the area of the Project is limited; MNO did not share any Project-specific information or knowledge with Treasury Metals before the EIS was filed. Treasury Metals will continue to discuss potential Project effects on traditional land use activities with potentially affected Aboriginal peoples throughout the life the Project. As additional information regarding an Aboriginal community's traditional land use and practices become available, Treasury Metals will review and consider it in the design of mitigation measures, follow-up monitoring and management plans for the Project, as appropriate. At the request of the Agency and as part of the Round 1 IR process, Treasury Metals has prepared a revised EIS. An expanded assessment of the potential effects of the Project on the environment has been provided in the revised EIS. Based on the guidance from the Agency, and knowledge from past assessments in the region, "potential impacts on hunting trapping and fishing" was relatively obvious issue to identify as being important to consider in the assessment. Additionally, the Agency specifically identified the need to describe how changes in the environment could affect Aboriginal peoples and their use of the lands. Information about potential Project effects and mitigation measures related to hunting, trapping and fishing can be located in Sections 6.4 (noise, including impacts on wildlife), 6.12 (wildlife and wildlife habitat), 6.14 (fish and fish habitat), 6.16 (land use) and 6.21 (Aboriginal peoples) of the revised EIS.
565	AC(1)-239	MNO	Environmental Impact Statement 6.4.2.5 Aboriginal Peoples	10.1.3 Effects of Changes to the Environment	**Information Request / Comment:** Effects to hunting and trapping have not been described or characterized beyond the availability of Crown land. This does not take into account the particulars of the experience of hunting such as air quality, noise, light, etc. Further, no mitigation has been proposed and the application of criteria on this threadbare assessment is wholly inappropriate. **Response:** The assessment of potential effect of the Project on Aboriginal peoples did include hunting trapping and fishing as a VC. The EIS did consider the potential effects of the Project on noise, light and air quality, as well as the effects of those changes on other components of the environment. Access to, and availability of Crown lands was one of the factors considered when evaluating the effects of the Project on ability of Aboriginal peoples to hunt, trap and fish. The approach used for identifying mitigation measures in the EIS is tied to the effects predicted. In general, the EIS looks at mitigating effects to the physical environment first (e.g., noise, light, air quality, surface water quality). The EIS then considers mitigation effects to the biological environment (e.g., wildlife and wildlife habitat) caused either by the Project directly or as a result of

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					changes in the physical environment. Finally, the EIS looks at the effects on the human environment, which would include effects to hunting and trapping, caused directly by the Project (i.e., reduced access to Crown Land), or as a result of changes to the physical environment and biological environment. Treasury Metals acknowledges that the Round 1 IRs identified a number of issues related to organizing and approach used in the EIS for presenting the information regarding the potential effects of the Project. In order to effectively address these issues, Treasury Metals has prepared a revised EIS that sets out the assessment of effects and impacts associated with the Project, in a clear and traceable manner. Effects of the Project on Aboriginal peoples can be located in the following revised EIS sections: Section 6.21 Effects assessment relating to Aboriginal peoples (predicted effects, mitigation and residual effects) 6.23.4 Effects of changes to the environment on Aboriginal people 7.0 Cumulative effects 8.20 Determination of the significance of residual effects on Aboriginal peoples 8.21.4 Determination of the significance of changes to the environment on Aboriginal peoples 12.0 Management plans to minimize the potential Project effects 13.21 Follow-up monitoring plans pertaining to Aboriginal peoples Information about potential Project effects and mitigation measures related to hunting, trapping and fishing can be located in Sections 6.4 (noise, including impacts on wildlife), 6.12 (wildlife and wildlife habitat), 6.14 (fish and fish habitat), 6.16 (land use) and 6.21 (Aboriginal peoples) of the revised EIS.
566	AC(1)-240	MNO	Environmental Impact Statement 6.4.2.5 Aboriginal Peoples	10.1.3 Effects of Changes to the Environment	**Information Request / Comment:** The assessment of fishing wholly relies on previously assessed criteria and does not take into account the actual activity of fishing and the potential impacts of the same. **Response:** It is reasonable to assume that the effects of the Project on fishing opportunities would be primarily related to the effects of the Project on surface water quality and surface water quantity, as well as the predicted effects on fish and fish habitat. However, the importance of changes in fishing opportunities to Aboriginal and non-Aboriginal people will incorporate an understanding of the existing fishing activities. Treasury Metals has made efforts to engage and elicit input from Aboriginal peoples regarding the

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					Project. Treasury Metals also recognizes that engagement does not stop with the filing of the EIS and will continue throughout the life of the Project. Treasury Metals will continue to try to engage the Aboriginal peoples meaningfully with respect to the Project. Treasury Metals will continue to discuss potential Project effects on traditional land use activities with potentially affected Aboriginal peoples throughout the life the Project. As additional information regarding an Aboriginal community's traditional land use and practices become available, Treasury Metals will review and consider it in the design of mitigation measures, follow-up monitoring and management plans for the Project, as appropriate. At the request of the Agency and as part of the Round 1 IR process, Treasury Metals has prepared a revised EIS. An expanded evaluation of the effects of the Project on fishing has been provided in the revised EIS. Information about potential Project effects and mitigation measures related to these concerns can be located in Sections 6.8 (surface water quality), 6.9 (surface water quantity), 6.14 (fish and fish habitat), 6.16 (land use, including recreational fishing) and 6.21 (Aboriginal peoples) of the revised EIS.
567	AC(1)-241	MNO		10.2 Adverse Impacts on Aboriginal and Treaty Rights and Related Interests	**Information Request / Comment:** There is no assessment completed of the potential adverse impacts of each of the project components and physical activities. Further, the impact matrix was not adapted for this purpose.
					Response: Each of the Project works and activities were incorporated in, and considered part of the EIS. It is not appropriate or effective to evaluate each of the Project works and activities individually, as suggested in the question, as many individual works and activities would have effects that are not measurable on their own. The EIS evaluated the combined effects of each of the Project works and activities on the environment throughout the life of the Project. Residual adverse effects that remain once mitigation measures are implemented are carried forward to the cumulative effects assessment where the residual adverse effects of the Project are considered in combination with other past, present and reasonably foreseeable projects in the region.
568	AC(1)-242	MNO	Environmental Impact Statement 7.2.1 Spatial and Temporal Scale	7.2.1 Spatial Boundaries	**Information Request / Comment:** While this section references a LSA and RSA for the cumulative effects assessment, it is not specifically described, nor is a figure present which represents this.
					Response: Except for those disciplines where a specific LSA and RSA were identified, a common, general LSA and RSA was used in the EIS (Figure 1.1 of Appendix G to the original EIS). The general LSA and

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					RSA were retained in the cumulative effects assessment, which also used a third, larger study area (40 km radius, centred on the open pit). Treasury Metals has acknowledged that the Round 1 IRs identified a number of issues related to organizing and approach used in the EIS for presenting the information regarding the potential effects of the Project. In order to effectively address these issues, Treasury Metals has prepared a revised EIS that sets out the assessment of effects and impacts associated with the Project, in a clear and traceable manner. The selection of study areas for the assessment of potential effects of the Project is described in Section 6.1.4. The spatial boundaries used for the assessment of cumulative effects is described in Section 7.2.2.
569	AC(1)-243	MNO	8.0 Aboriginal and Public Engagement	9.2 Potential or established Aboriginal or treaty rights and Related Interests	**Information Request / Comment:** Section 8.0 of the EIS contains none of this information in relation to the MNO or any other Aboriginal group. Appendix DD: Aboriginal Engagement Report contains some of these required details with regards to the MNO. However information on: Background information and a map of the group's traditional territory, and Information on each group's potential or established rights (including geographical extent, nature, frequency, timing) including maps and data sets (e.g. fish catch numbers) when this information is provided to the proponent is not included.
					Response: Treasury Metals has made efforts to engage and elicit input from Aboriginal peoples regarding the Project. No Project-specific traditional knowledge and traditional land use studies were prepared for, or shared with, Treasury Metals; limited information was obtained about traditional land use areas. Treasury Metals made efforts to incorporate information provided and to address comments and issues raised by Aboriginal peoples during the engagement process. A summary of the issues raised during the engagement process was provided in Section 8 and Appendix DD to the original EIS. As part of the Round 1 IRs, the Agency has requested that Treasury Metals expand and update the information presented in Appendix DD to the original EIS. This information is provided as an updated document called the Aboriginal Engagement Report, Appendix DD to the revised EIS. The Aboriginal Engagement Report provides a listing of the disaggregate comments from Aboriginal peoples, and how those were addressed in the EIS. Treasury Metals will continue to discuss potential Project effects on traditional land use activities with potentially affected Aboriginal peoples throughout the life the Project. As additional information regarding an Aboriginal community's traditional land use and practices become available, Treasury Metals will review and consider it in the design of mitigation measures, follow-up monitoring and management plans for the Project, as appropriate. Information related to Aboriginal traditional

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					knowledge or current land and resource use by MNO in the area of the Project is limited; MNO did not share any Project-specific information or knowledge with Treasury Metals before the original EIS was filed.
570	AC(1)-244	MNO	8.0 Aboriginal and Public Engagement		**Information Request / Comment:** The layout of the section is confusing as it jumps between Aboriginal and public engagement and concerns throughout. The requirements for engagement and the rights held by Aboriginal groups are separate and unique and should have a different treatment in the EIS than the general public.
					Response: As described in the response to AC(1)-232, the Agency has requested that Treasury Metals expand and update the Aboriginal Engagement Report (provided originally as Appendix DD to the EIS). One of the items requested by the Agency as part of the update is to provide a separate summary of the issues and concerns raised by the Aboriginal peoples engaged as part of the EIS process. The requested information is presented in the updated Aboriginal Engagement Report, which is included as Appendix DD to the revised EIS.
571	AC(1)-245	MNO	8.0 Aboriginal and Public Engagement 8.1 Introduction	2.3 Aboriginal engagement	**Information Request / Comment:** The EIS states that "A key challenge and opportunity in the Aboriginal and public participation process is the timing around when and what type of information is provided…..providing information that is incomplete, too detailed, or presenting of options that are impractical or unrealistic may result in confusion." This paragraph reads like Treasury is attempting to excuse a poor engagement process by indicating that it's difficult. A meaningful engagement process begins early, even when a proponent is in planning stages and may only have "incomplete information," this allows time for stakeholders and Aboriginal groups to have input and influence the project planning and design.
					Response: Treasury Metals has made efforts to engage and elicit input from Aboriginal peoples regarding the Project. Treasury Metals started its engagement with Aboriginal peoples early in its planning process. The following lists the chronology of engagement with Aboriginal peoples potentially affected by the Project: • Wabigoon Lake Ojibway Nation: 2008; • Eagle Lake First Nation: 2009; • Metis Nation of Ontario: 2009; • Lac Seul First Nation: 2012; • Wabauskang First Nation: 2012;

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					• Naotkamegwanning (Whitefish Bay) First Nation: 2012; and • Grassy Narrow First Nation: 2013. Although, no Project-specific traditional knowledge and traditional land use studies were prepared for, or shared with, Treasury Metals; limited information was obtained about traditional land use areas during the engagement process. Information that was shared by Aboriginal peoples with Treasury Metals has been incorporated in the design of the Project and used in preparing the EIS. As part of the Round 1 IRs, the Agency has requested that Treasury Metals expand and update the Aboriginal Engagement Report (provided originally as Appendix DD to the EIS). The revised Aboriginal Engagement Report (provided as Appendix DD to the revised EIS) describes the efforts made by Treasury Metals at the time of responding to the Round 1 IRs. The Aboriginal Engagement Report also identifies the specific issues and concerns raised by the Aboriginal peoples engaged as part of the EIS process, and how these concerns were incorporated into the Project, addressed in the EIS, or addressed as part of the Round 1 IR responses. Treasury Metals will continue to discuss potential Project effects on traditional land use activities with potentially affected Aboriginal peoples throughout the life the Project. As additional information regarding an Aboriginal community's traditional land use and practices become available, Treasury Metals will review and consider it in the design of mitigation measures, follow-up monitoring and management plans for the Project, as appropriate.
572	AC(1)-246	MNO	8.0 Aboriginal and Public Engagement 8.1 Introduction		**Information Request / Comment:** The EIS states that "Treasury anticipates that with the submission of this EIS, virtually all of the outstanding questions that were raised at public meetings and other events in the years previously noted have now been answered." MNO has not been meaningfully engaged by Treasury on this project. This is due to the lack of agreement by Treasury to fund the activities (e.g. a TLKUS) necessary for MNO to gather and understand the questions, issues and concerns that MNO citizens have about the proposed Project. Therefore, MNO has many outstanding concerns about the Project. Many of these concerns are reflected in the comments on the EIS; however the EIS comments are not the totality of MNO concerns. **Response:** As part of the process of preparing the EIS, Treasury Metals has made extensive efforts to engage and elicit input from Aboriginal peoples. The EIS was prepared using the best available information available, and incorporated input and comments from Aboriginal peoples received through the engagement activities. The efforts to engage Aboriginal peoples were documented in Appendix DD to the original EIS. Where issues were raised during the engagement process, Treasury Metals has addressed them either through modifications to the Project design, explicitly in the original EIS, and

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					through unique responses. To demonstrate this, Treasury Metals has expanded and updated the Aboriginal Engagement Report (provided as Appendix DD to the revised EIS). Treasury Metals realizes that the engagement process with Aboriginal peoples will continue, and will extend through the life of the Project. Treasury Metals remains committed to participating in the Aboriginal engagement process on an on-going basis, and looks forward to being able to respond to specific issues and concerns raised by MNO. Additionally, Treasury Metals is taking particular note of the issues and concerns raised by Aboriginal peoples as part of the Round 1 IR process. In responding to these issues Treasury Metals hopes to demonstrate its willingness to address issues that will also arise from the ongoing engagement process.
573	AC(1)-247	MNO	8.0 Aboriginal and Public Engagement 8.3.3 Aboriginal Communities	9.2 Potential or established Aboriginal or treaty rights and Related Interests	**Information Request / Comment:** The EIS states "There are a number of Aboriginal communities that have expressed an interest in the Project." MNO has not just expressed an interest in the Project, MNO has Aboriginal rights in the area where the Project is proposed and the Crown (both CEAA and MNDM) have directed Treasury to consult with the MNO.
					Response: The point of the reviewer is noted. To clarify, Treasury Metals intended to indicate that there are a number of Aboriginal peoples whose "established Aboriginal rights and Treaty rights and related interests may be affected by the project" (EIS Guidelines, Appendix Y to the EIS). The reviewer is correct in noting that both the Agency and the Ministry of Northern Development and Mines (MNDM) identified MNO as one of the Aboriginal peoples to be engaged by Treasury Metals.
574	AC(1)-248	MNO	8.0 Aboriginal and Public Engagement 8.3.3 Aboriginal Communities		**Information Request / Comment:** There is an error in the sentence "Treasury's efforts to consult with Aboriginal communities are presented in Appendix V…." Appendix V is the Public Engagement report.
					Response: Noted, the correct reference should have been to Appendix DD to the EIS (Aboriginal Engagement Report).
575	AC(1)-249	MNO	8.0 Aboriginal and Public Engagement 8.5 Aboriginal Engagement	3.3 Integration of EA, Aboriginal and public engagement information	**Information Request / Comment:** This section of the EIS outlines comments and questions received from Aboriginal groups about the Project. These were presented in an aggregated format. MNO requires disaggregated information in order to adequately assess whether MNO involvement was adequate. CEAA has previously requested proponents provide disaggregated information for consideration.

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
			Information		Specifically, as part of the correspondence in reference to the Pacific NorthWest LNG Ltd. Assessment (Reference Number 80032) CEAA specified that "Without the benefit of disaggregating by each Aboriginal group, for each factor considered under 5(1)(c), including related baseline information, it is difficult for the Agency to determine if enough detail exists to effectively assess the potential for significant adverse environmental effect that could potentially impact Aboriginal peoples. In other words, the conclusions regarding impacts on 5(1)(c) and Aboriginal rights contained in the EIS cannot be confidently relied upon without the benefit of a thorough understanding of the information used to support the conclusion."
					Response: The engagement activities prior to filing the EIS were summarized in Section 8, and more fully documented in Appendix DD to the original EIS. As part of the Round 1 IRs, the Agency has requested that Treasury Metals expand and update the information presented in Appendix DD to the original EIS. This information is provided as an updated document called the Aboriginal Engagement Report, Appendix DD to the revised EIS. The Aboriginal Engagement Report provides a listing of the disaggregate comments from Aboriginal peoples, and how those were addressed in the Project design and EIS.
576	AC(1)-250	MNO	8.0 Aboriginal and Public Engagement 8.5 Aboriginal Engagement Information	3.3 Integration of EA, Aboriginal and public engagement information	**Information Request / Comment:** The EIS indicated "Baseline studies relating to all of the above noted concerns have been completed. Measures contemplated to address these concerns are included as part of this EIS." Please provide a reference to which baselines studies are related to which concerns. Additionally, provide reference to which measures address the noted concerns.
					Response: As noted in the responses to TMI_558-AC(1)-232 and TMI_575-AC(1)-249, the Agency has requested that Treasury Metals expand and update the Aboriginal Engagement Report (provided originally as Appendix DD to the EIS). Part of the Agency's request is to provide a series of tables showing the disaggregated issues and concerns raised by the Aboriginal peoples engaged as part of the EIS process, along with information on how those issues and concerns were addressed. The updated Aboriginal Engagement Report is provided as Appendix DD to the revised EIS.
577	AC(1)-251	MNO	8.0 Aboriginal and Public Engagement 8.6 Participants in the Environmental Assessment	3.3 Integration of EA, Aboriginal and public engagement information	**Information Request / Comment:** This section of the EIS does not describe "Participants in the Environmental Assessment" rather; it merely provides a listing of public communities and events where the Project was discussed. Please provide a description of how engagement influenced the design and execution of the EIS.
					Response: Treasury Metals conducted numerous meetings with public stakeholder and Aboriginal peoples prior

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					to EIS submission, and has incorporated the comments within the design and operational standards of the Project. Treasury Metals also recognizes that engagement does not stop with the filing of the EIS and will continue throughout the life of the Project including both public stakeholders and Aboriginal peoples meaningfully with respect to the Project. Please refer to refer to TMI_13-PC(1)-01 for further comment on how the incorporation of feedback input gathered during the engagement process influenced design parameters.
578	AC(1)-252	MNO	8.0 Aboriginal and Public Engagement 8.9 Aboriginal Concerns	3.3 Integration of EA, Aboriginal and public engagement information	**Information Request / Comment:** Again, this section of the EIS is not specific to any Aboriginal group. It lists aggregated concerns making it very difficult, if not impossible, to determine what concerns were collected from MNO. MNO requires disaggregated information in order to adequately assess whether MNO involvement was adequate. CEAA has previously requested proponents provide disaggregated information for consideration. Specifically, as part of the correspondence in reference to the Pacific NorthWest LNG Ltd. Assessment (Reference Number 80032) CEAA specified that "Without the benefit of disaggregating by each Aboriginal group, for each factor considered under 5(1)(c), including related baseline information, it is difficult for the Agency to determine if enough detail exists to effectively assess the potential for significant adverse environmental effect that could potentially impact Aboriginal peoples. In other words, the conclusions regarding impacts on 5(1)(c) and Aboriginal rights contained in the EIS cannot be confidently relied upon without the benefit of a thorough understanding of the information used to support the conclusion."
					Response: The engagement activities prior to filing the EIS were summarized in Section 8, and more fully documented in Appendix DD to the original EIS. As part of the Round 1 IRs, the Agency has requested that Treasury Metals expand and update the information presented in Appendix DD to the original EIS. This information is provided as an updated document called the Aboriginal Engagement Report, Appendix DD to the revised EIS. The Aboriginal Engagement Report provides a listing of the disaggregate comments from Aboriginal peoples, and how those were addressed in the Project design and EIS.
579	AC(1)-253	MNO	8.0 Aboriginal and Public Engagement	3.3 Integration of EA, Aboriginal and public	**Information Request / Comment:** The EIS states that "The detail as to how Aboriginal concerns are to be addressed is included throughout the EIS." Please provide a reference as to where in the EIS this detail is located. Without this information MNO cannot assess whether concerns are addressed in the EIS.

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
			8.9.1 Measures to Address Aboriginal Concerns	engagement information	**Response:** Treasury Metals has made efforts to engage and elicit input from Aboriginal peoples, and specifically the MNO, regarding the Project. No Project-specific traditional knowledge and traditional land use studies were prepared for, or shared with, Treasury Metals; limited information was obtained about traditional land use areas. Treasury Metals made efforts to incorporate information provided and to address comments and issues raised by Aboriginal peoples during the engagement process. A summary of the issues raised during the engagement process was provided in Section 8 and Appendix DD to the original EIS. As part of the Round 1 IRs, the Agency has requested that Treasury Metals expand and update the information presented in Appendix DD to the original EIS. This information is provided as an updated document called the Aboriginal Engagement Report, Appendix DD to the revised EIS. The Aboriginal Engagement Report provides a listing of the disaggregated comments from Aboriginal peoples, and how those were addressed in the EIS.
580	AC(1)-254	MNO	8.0 Aboriginal and Public Engagement 8.9.1 Measures to Address Aboriginal Concerns		**Information Request / Comment:** In relation to Treasury's commitment to installing a monitoring plan for groundwater resources, the EIS indicates that "Termination of the program will be expected following full review of data collection by regulatory authorities." If this project proceeds, MNO requires ongoing monitoring of groundwater resources throughout the life of the Project.
					Response: Details on the groundwater monitoring program is provided in Section 13.6 of the original EIS. As noted in Section 13.6.5 of the original EIS, the groundwater quality monitoring program would be continued until both the tailings storage facility (TSF) and waste rock storage area (WRSA) are capped. For clarification, termination of the program would be expected following a satisfactory review of the monitoring data collected during mine operation and after closure of the mine. Further, the termination of the monitoring program would not occur until the regulatory agencies have reviewed the results of the monitoring and determined that such monitoring is no longer required. At the request of the Agency and as part of the Round 1 IR process, Treasury Metals has prepared a revised EIS. Information on ground water quality and quantity monitoring are described in Sections 13.10 and 13.11, respectively.
581	AC(1)-255	MNO	8.0 Aboriginal and Public Engagement 8.9.1 Measures to Address	3.4.2 Community knowledge and Aboriginal traditional knowledge	**Information Request / Comment:** In response to concerns about "potential impacts on land use such as hunting, trapping, and other traditional land uses: the EIS states that "The development of the Project is not anticipated to adversely impact the rights of Aboriginal peoples to hunt within the project area." Please provide a reference to the section of the EIS where this assessment and conclusions are

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<tr><td></td><td></td><td></td><td>Aboriginal Concerns</td><td></td><td>located. What information from MNO was used in the determination?

<u>Response:</u>
The EIS evaluated the potential effects of the Project on Aboriginal peoples using the following VCs (Section 6.3.2.5 of the EIS):

• Health effects;
• Gathering of country foods and traditional plant materials; and
• Hunting, trapping, and fishing conditions.

The details to support the conclusions were presented in the Country Foods Assessment (included as Appendix EE to the EIS).

Treasury Metals acknowledges a number of issues that have been raised by the Agency and other reviewers related to organizing and approach used in the EIS for presenting the information regarding the potential effects of the Project. In order to effectively address these issues, Treasury Metals has prepared a revised EIS that sets out the assessment of effects and impacts associated with the Project, in a clear and traceable manner.

Table 1 provides a concordance showing precisely where in the revised EIS the information regarding the potential effects of the Project on traditional uses of the land can be located.

Table 1: Relevant Sections of Revised EIS
IR Part | Requested Information | Location in revised EIS
— | Valued components and indicators related to Aboriginal peoples | Section 6.1.3.20
— | Predicted effects of the Project on Aboriginal peoples | Section 6.21
— | Effects of changes in the environment on Aboriginal peoples | Section 6.23.3
— | Cumulative effects on Aboriginal peoples | Section 7.0
— | Determination of the significance of effects on Aboriginal peoples. | Section 8.20

Treasury Metals has made extensive efforts to engage Aboriginal peoples to provide input to, and feedback on, the Project. A summary of these efforts is provided in Section 9 and detailed in Appendix DD to the EIS. Treasury Metals has tried, and will continue to try to engage Aboriginal peoples meaningfully with respect to the Project.</td></tr>
<tr><td>582</td><td>AC(1)-256</td><td>MNO</td><td>8.0 Aboriginal and Public Engagement

8.9.1 Measures to Address</td><td></td><td><u>Information Request / Comment:</u>
In response to concerns about “potential impacts on land use such as hunting, trapping, and other traditional land uses:, the EIS states that “Treasury has made concerted effort to place mine infrastructure...on private properties and thereby reduce potential impacts to Crown lands.”

Locating the Project partially on private lands does not negate the requirement to assess the</td></tr>
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TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
			Aboriginal Concerns		impacts on the exercise of Aboriginal rights. MNO requires an assessment of Project impacts on Métis rights in within a Regional Study Area as well as information on how much previously unoccupied Crown land will be taken up by the proposed Project.
					Response: Although siting the Project primarily on private land helps to minimize the amount of Crown land taken up by the Project, the EIS recognized, and evaluated the potential effects of the Project on Aboriginal people, including their ability for Aboriginal peoples to hunt, trap, fish, and practice other traditional uses on the land. Section 6.4.2.5 of the original EIS summarizes the predicted effects and associated impacts of the Project to Aboriginal peoples, including "gathering of country foods and traditional plant materials" as well as 'hunting, trapping and fishing". Additional information regarding the areal extents of land taken up by the Project, specifically the areas within the LSA identified for traditional harvesting that will become unavailable as a result of the Project, are presented in Appendix EE to the EIS (Country Foods Assessment). Treasury Metals acknowledges that the Round 1 IRs identified a number of issues related to the organizing and approach used in the EIS for presenting information regarding the potential effects of the Project. In order to effectively address these issues, Treasury Metals has prepared a revised EIS that sets out the assessment of effects and impacts associated with the Project, including effects on Aboriginal peoples, in a clear and traceable manner. Effects of the Project on Aboriginal peoples can be located in the following revised EIS sections: Section 6.21 Effects assessment relating to Aboriginal peoples (predicted effects, mitigation and residual effects) 6.23.4 Effects of changes to the environment on Aboriginal people 7.0 Cumulative effects 8.20 Determination of the significance of residual effects on Aboriginal peoples 8.21.4 Determination of the significance of changes to the environment on Aboriginal peoples 12.0 Management plans to minimize the potential Project effects 13.21 Follow-up monitoring plans pertaining to Aboriginal peoples Information about potential Project effects and mitigation measures related to hunting, trapping and fishing can be located in Sections 6.4 (noise, including impacts on wildlife), 6.12 (wildlife and wildlife habitat), 6.14 (fish and fish habitat), 6.16 (land use) and 6.21 (Aboriginal peoples) of the revised EIS.
583	AC(1)-257	MNO	8.0 Aboriginal and Public	3.4.2 Community	**Information Request / Comment:** Additional detail is required to support the claim that "Trapping on Crown lands in the vicinity of the

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
			Engagement 8.9.1 Measures to Address Aboriginal Concerns	knowledge and Aboriginal traditional knowledge	Project site will not be altered as a result of the development of the Goliath Gold Mine." What assessment was undertaken to reach this conclusion? What information from MNO was used in the determination?
					Response: The EIS evaluated the potential effects of the Project on Aboriginal people, including the ability for Aboriginal people to continue to hunt, trap, fish, and practice other traditional uses of the land. Section 6.4.2.5 of the original EIS summarizes the predicted effects and associated impacts of the Project to Aboriginal peoples, including "gathering of country foods and traditional plant materials" as well as 'hunting, trapping and fishing". Additional information regarding the areal extents of land taken up by the Project, specifically the areas within the LSA identified for traditional harvesting that will become unavailable as a result of the Project, are presented in Appendix EE (Country Foods Assessment). Treasury Metals acknowledges that the Round 1 IRs identified a number of issues related to the organizing and approach used in the EIS for presenting information regarding the potential effects of the Project. In order to effectively address these issues, Treasury Metals has prepared a revised EIS that sets out the assessment of effects and impacts associated with the Project, including effects on Aboriginal peoples, in a clear and traceable manner. Effects of the Project on Aboriginal peoples can be located in the following revised EIS sections: Section 6.21 Effects assessment relating to Aboriginal peoples (predicted effects, mitigation and residual effects) 6.23.4 Effects of changes to the environment on Aboriginal people 7.0 Cumulative effects 8.20 Determination of the significance of residual effects on Aboriginal peoples 8.21.4 Determination of the significance of changes to the environment on Aboriginal peoples 12.0 Management plans to minimize the potential Project effects 13.21 Follow-up monitoring plans pertaining to Aboriginal peoples Information about potential Project effects and mitigation measures related to hunting trapping and fishing can be located in Sections 6.4 (noise, including impacts on wildlife), 6.12 (wildlife and wildlife habitat), 6.14 (fish and fish habitat), 6.16 (land use) and 6.21 (Aboriginal peoples) of the revised EIS. Throughout the EIS process, Treasury Metals has made extensive efforts to engage and elicit input from Aboriginal peoples. These efforts were documented in Appendix DD to the original EIS. A summary of these engagement activities was provided in Section 8 of the original EIS and has been updated in Section 9.0 of the revised EIS. Although the EIS was filed in 2015, Treasury Metals has

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					engaged, and will continue to engage the Aboriginal peoples meaningfully with respect to the Project. As part of the Round 1 IRs, the Agency has requested that Treasury Metals expand and update the Aboriginal Engagement Report. The revised Aboriginal Engagement Report, provided as Appendix DD to the revised EIS, describes: the efforts made by Treasury Metals, identifies the specific issues and concerns raised by the Aboriginal peoples engaged as part of the EIS process, and describes how those issues were address by Treasury Metals. The issues and concerns raised by the MNO to date through the engagement process can be found in the Aboriginal Engagement Report.
584	AC(1)-258	MNO	8.0 Aboriginal and Public Engagement 8.9.1 Measures to Address Aboriginal Concerns	3.4.2 Community knowledge and Aboriginal traditional knowledge	**Information Request / Comment:** In response to concerns about "potential impacts on land use such as hunting, trapping, and other traditional land uses:, the EIS states that "Concerns have been identified relating to the provision outlined in section 35 of the Constitution Act (1982), which provides for the protection of Aboriginal rights. The opportunity to practice section 35 harvesting rights in the general area of the Project will continue." Please provide a reference to the section of the EIS where this assessment and conclusions are located. What information from MNO was used in the determination? Additionally, even if the exercise of rights may continue in the project vicinity, this does not negate the fact that the exercise of rights will no longer be possible on new areas of previously unoccupied Crown lands that will be taken up by the Project.
					Response: The EIS evaluated the potential effects of the Project on Aboriginal people, including the ability for Aboriginal people to hunt, trap, fish, and practice other traditional uses of the land. Section 6.4.2.5 of the original EIS summarizes the predicted effects and associated potential impacts of the Project to Aboriginal peoples, including "gathering of country foods and traditional plant materials" as well as 'hunting, trapping and fishing". Additional information regarding the areal extents of land taken up by the Project, specifically the areas within the LSA identified for traditional harvesting that will become unavailable as a result of the Project, is presented in Appendix EE (Country Foods Assessment). Treasury Metals acknowledges that the Round 1 IRs identified a number of issues related to organizing and approach used in the EIS for presenting the information regarding the potential effects of the Project. In order to effectively address these issues, Treasury Metals has prepared a revised EIS that sets out the assessment of effects and impacts associated with the Project, including effects on Aboriginal people, in a clear and traceable manner.

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					Effects of the Project on Aboriginal peoples can be located in the following revised EIS sections: Section 6.21 Effects assessment relating to Aboriginal peoples (predicted effects, mitigation and residual effects) 6.23.4 Effects of changes to the environment on Aboriginal people 7.0 Cumulative effects 8.20 Determination of the significance of residual effects on Aboriginal peoples 8.21.4 Determination of the significance of changes to the environment on Aboriginal peoples 12.0 Management plans to minimize the potential Project effects 13.21 Follow-up monitoring plans pertaining to Aboriginal peoples Information about potential Project effects and mitigation measures related to hunting, trapping and fishing can be located in Sections 6.4 (noise, including impacts on wildlife), 6.12 (wildlife and wildlife habitat), 6.14 (fish and fish habitat), 6.16 (land use) and 6.21 (Aboriginal peoples) of the revised EIS. Through the EIS process, Treasury Metals has made extensive efforts to engage and elicit input from Aboriginal peoples. These efforts were documented in Appendix DD to the original EIS. A summary of these engagement activities was provided in Section 8 of the original EIS. Although the EIS was filed in 2015, Treasury Metals has engaged, and will continue to try to engage the Aboriginal peoples meaningfully with respect to the Project. As part of the Round 1 IRs, the Agency has requested that Treasury Metals expand and update the Aboriginal Engagement Report (provided originally as Appendix DD to the EIS). The revised Aboriginal Engagement Report, provided as Appendix DD to the revised EIS, describes the efforts made by Treasury Metals: identifies the specific issues and concerns raised by the Aboriginal peoples engaged as part of the EIS process, and describes how those issues were address by Treasury Metals.
585	AC(1)-259	MNO	8.0 Aboriginal and Public Engagement 8.9.1 Measures to Address Aboriginal Concerns	3.4.2 Community knowledge and Aboriginal traditional knowledge	**Information Request / Comment:** In response to the concerns about "Potential impacts on gathering plants and berries", the EIS states that "Blueberries are one type of berry known to be of interest to First Nations and other Aboriginal people. No specific areas associated with the Project have been identified as areas from which blueberries have been gathered." MNO objects to the characterization that no areas have been identified in the project vicinity, this conclusion is premature. MNO has, on numerous occasions, requested capacity to document information related to the exercise of Métis rights, to no avail. Treasury has willfully and knowingly proceeded with its project development without the collection of MNO TLUS and has proceeded with the Project application without fulsome engagement with the

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					MNO. Blueberries, while potentially representative of some berry types, cannot be used as a substitute for all berry types within the vicinity of the Project. MNO gathers many varieties of berries and their exclusion from consideration in the assessment highlights the deficiency of the report.
					Response: Treasury Metals has made extensive efforts to engage and elicit input from Aboriginal peoples. A summary of these engagement activities were provided in Section 8 of the original EIS and were provided in detail in Appendix DD to the original EIS. Treasury Metals has tried, and will continue to try to engage the Aboriginal peoples meaningfully with respect to the Project. Treasury Metals initially made contact with Aboriginal peoples in the area early in the development process, starting in 2008 with its closest potential neighbor, and in 2009 with the Métis Nation of Ontario. The information presented in the EIS represents the information that was available to Treasury Metals at the time the original EIS was filed. However, the EA process for the Project is ongoing. Information which is made available following completion of the EIS will be incorporated into the EA process and will help guide the design of the Project, mitigation measures, and follow-up monitoring programs. At the time of filing the original EIS, Aboriginal peoples had identified to Treasury Metals "[n]o specific areas associated with the Project have been identified as areas from which blueberries have been gathered." That said, Treasury Metals did identify areas where berry harvesting, and the gathering of other country foods could occur in the Country Foods Assessment (included as Appendix EE to the EIS). That study focused on those country foods identified to Treasury Metals as being important during engagement activities with Aboriginal peoples. Treasury Metals is committed to continuing its engagement efforts with Aboriginal peoples. As new information is made available, Treasury Metals will consider it in the design of the Project, mitigations measures, or follow-up monitoring. As part of the Round 1 IRs, the Agency has requested that Treasury Metals expand and update the Aboriginal Engagement Report (provided originally as Appendix DD to the EIS). The revised Aboriginal Engagement Report, provided as Appendix DD to the revised EIS, describes the efforts made by Treasury Metals at the time of responding to the Round 1 IRs, as well as identifying the specific issues and concerns raised by the Aboriginal peoples engaged as part of the EIS process.
586	AC(1)-260	MNO	8.0 Aboriginal and Public Engagement 8.9.1 Measures		**Information Request / Comment:** In relation to a concern about "Potential impact from flooding and weather related disasters" the EIS states that "Treasury does not have the expertise to comment on the causes of climate change and weather patterns." However, it is Treasury's responsibility to procure the necessary expertise to address all issues and concerns raised as part of the EIS application process.

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
			to Address Aboriginal Concerns		Not having the expertise does not remove the issue. **Response:** The cited statement in Section 8.9.1 of the original EIS indicates that Treasury Metals did not feel they had the expertise to comment on what was the "cause" of climate change, but Treasury Metals did evaluate the potential effects natural hazards, including extreme floods, in Section 4.4 of the EIS. Contingencies to protect against extreme weather, including extreme weather that could arise as a result of climate change, have been built into the Project design. Additional information describing the potential effects of climate change on the Project can be found in the response to TMI_263-EE(1)-06 and Section 6.7 of the revised EIS. With respect to the potential effects of the Project on climate change, the current Federal guidance document (FTPTCCCEA, 2003) states that "…unlike most project-related environmental effects, the contribution of an individual project to climate change cannot be measured." *References Cited:* FTPTCCCEA (The Federal-Provincial-Territorial Committee on Climate Change and Environmental Assessment), 2003. Incorporating Climate Change Considerations in Environmental Assessment: General Guidance for Practitioners. November.
587	AC(1)-261	MNO	8.0 Aboriginal and Public Engagement 8.9.1 Measures to Address Aboriginal Concerns		**Information Request / Comment:** In the response to concerns about "Potential access restrictions" the EIS states that: "…the impact on access to Treaty 3 lands will be small." Please provide a reference to the section of the EIS where this assessment and conclusions are located. As MNO has not completed a TLUS, the scope and extent of their trails and travelways cannot be quantified in the Project area. This section does not consider this or make provisions for the potential information. **Response:** Section 8.9.1 of the original EIS states that "access to the Project site will be restricted and gated as required", for safety and security reasons. This section goes on to point out that the "…Project is located near the end of existing roads that do not provide access to any locations beyond the Project site". Additionally, the Section 8.9.1 of the original EIS notes that Treasury Metals have "…made a concerted effort to place mine infrastructure including the processing plant, other mine buildings, and the tailings storage facility (TSF) on private properties and thereby reduce potential impacts to Crown Lands." This means that much of the areas where access will be restricted during the life of the mine was previously also unavailable for access.

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					Treasury Metals has made efforts to engage and elicit input from Aboriginal peoples regarding the Project. No Project-specific traditional knowledge and traditional land use studies were prepared for, or shared with, Treasury Metals; limited information was obtained about traditional land use areas. Treasury Metals made efforts to incorporate information provided and to address comments and issues raised by Aboriginal peoples during the engagement process. A summary of the issues raised during the engagement process was provided in Section 8 and Appendix DD to the original EIS. As part of the Round 1 IRs, the Agency has requested that Treasury Metals expand and update the information presented in Appendix DD to the original EIS. This information is provided as an updated document called the Aboriginal Engagement Report, Appendix DD to the revised EIS. The Aboriginal Engagement Report provides a listing of the disaggregate comments from Aboriginal peoples, and how those were addressed in the EIS. Treasury Metals will continue to discuss potential Project effects on traditional land use activities with potentially affected Aboriginal peoples throughout the life the Project. As additional information regarding an Aboriginal community's traditional land use and practices become available, Treasury Metals will review and consider it in the design of mitigation measures, follow-up monitoring and management plans for the Project, as appropriate. Information related to Aboriginal traditional knowledge or current land and resource use by MNO in the area of the Project is limited; MNO did not share any Project-specific information or knowledge with Treasury Metals before the original EIS was filed. In a letter dated May 2015 from MNO to the Agency and Treasury Metals, it was noted that Wabigoon Lake is an area heavily used by MNO in the exercise of their Aboriginal rights and interests, with specific concerns related to surface and groundwater quality and fish and fish habitat. At the request of the Agency and as part of the Round 1 IR process, Treasury Metals has prepared a revised EIS. Information about potential Project effects and mitigation measures related to these concerns can be located in Sections 6.8 and 6.9 (surface water); 6.10 and 6.11 (ground water); 6.14 (fish and fish habitat); and 6.21 (Aboriginal peoples) of the revised EIS
588	AC(1)-262	MNO	8.0 Aboriginal and Public Engagement 8.9.1 Measures to Address Aboriginal Concerns	3.4.2 Community knowledge and Aboriginal traditional knowledge	**<u>Information Request / Comment:</u>** In response to concerns about "Potential impacts from noise associated with the Project site" the EIS indicates that mitigation measures may include "timing of blasting in open pit to limit noise and vibration to home owners" as well as "Blasting undertaken at the mine site will be conducted in a manner that will not result in impacts to private properties…" These mitigation measures are focused on property owners rather than Aboriginal rights holders. It fails to consider the potential impacts of Project noise on Aboriginal harvesters who may be in the project vicinity. The EIS also fails entirely in considering the effect of blasting on the exercise of

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					rights, and on the wildlife that harvesters depend on, within the regional study area. **Response:** As noted in Section 8.9.1 of the original EIS, "access to the Project site will be restricted and gated as required", for safety and security reasons. This means that there would be no access for practicing traditional uses within the Project site. Therefore, there would not be access to the areas where noise from the Project and blasting effects would be most notable. Additionally, the assessment did identify noise effects of wildlife as a VC and evaluated the potential effects. Treasury Metals acknowledges a number of issues that have been raised by the Agency and other reviewers related to organizing and approach used in the EIS for presenting the information regarding the potential effects of the Project. In order to effectively address these issues, Treasury Metals has prepared a revised EIS that sets out the assessment of effects and impacts associated with the Project, in a clear and traceable manner. Specifically, the revised EIS assesses the effects of noise and vibration on people accessing areas near the Project site for traditional uses, and assesses the effects of noise on wildlife that harvesters depend on in Section 6.4. Information about potential Project effects and mitigation measures related to Aboriginal peoples is provided in Section 6.21.
589	AC(1)-263	MNO	8.0 Aboriginal and Public Engagement 8.9.1 Measures to Address Aboriginal Concerns		**Information Request / Comment:** In response to concerns about mine closure plans, the EIS states that "Treasury has assured Aboriginal communities that the closure plan details will be vetted by Provincial representatives and qualified engagement firms will provide details in clear and transparent fashion." This assurance is not enough; MNO requires engagement on the development and implementation of any Project closure plan developed by Treasury. **Response:** Although the Project is currently in the early stages of the approval process, Treasury Metals has developed a conceptual closure plan, which was presented in Section 3.14 of the EIS. Prior to construction commencing, Treasury Metals proposes to file a certified closure plan to, and post financial assurances with, the Ministry of Northern Development and Mines (MNDM). This is a requirement under Party VII of the *Ontario Mining Act*. Engagement with Aboriginal communities prior to submission of a certified closure plan is a requirement under Ontario Regulation 240/00. The certified plan is expected to be a refinement of the conceptual closure plan presented in the EIS, structured in the format preferred by the MNDM. Treasury Metals has made extensive efforts to engage and elicit input from Aboriginal peoples

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					regarding the EIS and the Project, including the conceptual closure plan. These efforts were documented in Appendix DD to the EIS. Treasury Metals will continue its efforts to engage the Aboriginal peoples meaningfully with respect to the Project.
590	AC(1)-264	MNO	8.0 Aboriginal and Public Engagement 8.9.1 Measures to Address Aboriginal Concerns	3.4.2 Community knowledge and Aboriginal traditional knowledge	**Information Request / Comment:** In response to the concerns regarding "Potential impacts to property values in the vicinity of the mine" the EIS indicates that the changes to property values will be minimal. Please provide a reference to the section of the EIS where this assessment and conclusions are located. What information from MNO was used in the determination? For example, are MNO Citizens homeowners or renters in the Project vicinity and how the Project will impact those citizens?
					Response: Treasury Metals recognizes that there may be a potential Project-related effect on real estate pricing within the study area, which may vary (positive or negative) by community and be influenced by factors including, but not limited to: Project phase (site preparation and construction, operations, closure, and post-closure), location, availability of housing, personal decision-making, population changes and location of origin of members of the workforce. Through its commitment to ongoing engagement with stakeholders and Indigenous communities throughout the life of the Project, Treasury Metals will work with potentially affected stakeholders and Indigenous communities to develop a socio-economic management plan designed to address potential Project-related socio-economic effects identified through the environmental assessment process and/or at later stages of the Project. At the request of the Agency and as part of the Round 1 IR process, Treasury Metals has prepared a revised EIS. The issue of property values is addressed more fully in the revised EIS. Information about potential Project effects and mitigation measures related to social factors, including property values, is provided in Section 6.17 of the revised EIS. Information on management plans and follow-up monitoring is provided in sections 12.12 and 13.17, respectively.
591	AC(1)-265	MNO	8.0 Aboriginal and Public Engagement 8.9.2 Proponent		**Information Request / Comment:** This section has 2 commitments listed then refers to additional commitments in the Commitment Registry. At a minimum, this section should describe any commitments made is response to the Concerns

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
			Commitments		from Aboriginal Groups.
					Response: As part of the Round 1 IRs, the Agency has requested that Treasury Metals expand and update the Aboriginal Engagement Report (provided originally as Appendix DD to the original EIS). The revised Aboriginal Engagement Report, provided as Appendix DD to the revised EIS, describes the efforts made by Treasury Metals at the time of responding to the Round 1 IRs, as well as identifying the specific issues and concerns raised by the Aboriginal peoples engaged as part of the EIS process, and describes how those issues have been addressed by Treasury Metals. Treasury Metals acknowledges a number of issues that have been raised by the Agency and other reviewers related to organizing and approach used in the EIS for presenting the information regarding the potential effects of the Project. In order to effectively address these issues, Treasury Metals has prepared a revised EIS that sets out the assessment of effects and impacts associated with the Project, in a clear and traceable manner. Information about potential Project effects and mitigation measures related to Aboriginal peoples is provided in Section 6.21 of the revised EIS. Information on management plans and follow-up monitoring is provided in sections 12.0 and 13.21, respectively. Section 10.0 lists key commitments for the Project.
592	AC(1)-266	MNO	8.0 Aboriginal and Public Engagement 8.9.3 Outstanding Aboriginal and Public Concerns	3.3 Integration of EA, Aboriginal and public engagement information	**Information Request / Comment:** MNO has not been meaningfully engaged by Treasury on this project. This is due to the lack of agreement by Treasury to fund the activities (e.g. a TLKUS) necessary for MNO to gather and understand the questions, issues and concerns that MNO citizens have about the proposed Project. Therefore, MNO has many outstanding concerns about the Project. Many of these concerns are reflected in the comments on the EIS; however the EIS comments are not the totality of MNO concerns.
					Response: As part of the process of preparing the EIS, Treasury Metals has made efforts to engage and elicit input from Aboriginal peoples. Although, no Project-specific traditional knowledge and traditional land use studies were prepared for, or shared with, Treasury Metals; limited information was obtained about traditional land use areas during the engagement process, and was incorporated in the EIS. The EIS was prepared using the best available information available, and incorporated input and comments from Aboriginal peoples received through the engagement activities. The efforts to engage Aboriginal peoples were documented in Appendix DD to the original EIS. Where issued were raised during the engagement process, Treasury Metals has addressed them either through modifications to the Project design or explicitly in the original EIS. To demonstrate this,

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					Treasury Metals has expanded and updated the Aboriginal Engagement Report (provided as Appendix DD to the revised EIS). Treasury Metals will continue to discuss potential Project effects on traditional land use activities with potentially affected Aboriginal peoples throughout the life the Project. As additional information regarding an Aboriginal community's traditional land use and practices become available, Treasury Metals will review and consider it in the design of mitigation measures, follow-up monitoring and management plans for the Project, as appropriate. Treasury Metals remains committed to participating in the Aboriginal engagement process, and looks forward to being able to respond to specific issues and concerns raised by MNO. Additionally, Treasury Metals is taking particular note of the issues and concerns raised by Aboriginal peoples as part of the Round 1 IR process. In responding to these issues Treasury Metals hope to demonstrate its willingness to address issues that will also arise from the ongoing engagement process. Please also see responses to TMI_572-AC(1)-246 and TMI_602-AC(1)-275).
593	AC(1)-267	MNO	Environmental Impact Statement Table 10.1.1 Changes to the Project Since Initially Proposed		**Information Request / Comment:** Please provide additional detail on the thresholds used to reach the conclusions that there would be reduced potential effects to Aboriginal rights by placing the freshwater make-up system on more private versus crown land. What is the threshold of impact? **Response:** Table 3.15-1 of the revised EIS sets out the changes in the Project since the original proposal. The table does not set out specific thresholds of impacts, but describes what the changes were to the Project and how those changes could benefit the various stakeholders, including Aboriginal peoples, or the environment. In numerous cases, the changes noted were in response to comments received through either the Aboriginal engagement program (summarized in Appendix DD to the EIS), the public engagement program (summarized in Appendix V to the EIS), or both.
594	AC(1)-268	MNO	Appendix DD: Aboriginal Engagement Report DD.2 Project Details		**Information Request / Comment:** This section indicates that the Ministry of Northern Development and Mines has delegated procedural aspect of engagement to Treasury in relation to the requirements of a Mine Closure Plan as outlined in Regulation 240-00. Has the Ministry of the Environment and Climate Change provided any similar direction with regards to the provincial Environmental Assessment process? **Response:** Section 1.5 of the EIS describes the regulatory framework under which the Project must operate. As stated in Section 1.5.2, the "…Ontario Government does not require an EA specific to a Mining Project." As there is no provincial EA process, no specific directions are required from the Ministry

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					of the Environment and Climate Change. Engagement and engagement pertaining to Provincial permitting requirements will be determined with Provincial regulators as the Project progresses to the permitting phase.
595	AC(1)-269	MNO	Appendix DD: Aboriginal Engagement Report DD.2 Project Details		**Information Request / Comment:** The EIS indicates that "An Aboriginal Engagement Plan related to Treasury's Goliath Gold Project was submitted to the Ministry of Northern Development and Mines on July 3, 2013." Additionally, "…an 'Interim' Aboriginal Engagement report was prepared and submitted to the Ontario Ministry of Northern Development and Mines on May 12, 2014." MNO requests copies of the plan and the interim report as well as any further Aboriginal engagement reports that are filed by Treasury.
					Response: The interim report provided to the Ministry of Northern Development and Mines (MNDM) for comment was essentially an unedited version of Appendix DD to the original EIS, which documents the engagement activities prior to filing the EIS. Treasury Metals believes it is more appropriate to share the fully edited version of the document that was provided as part of the original EIS package. Similarly, the engagement plan was a confidential communication with MNDM regarding Treasury Metals' engagement activities that was submitted for their review and input to ensure Treasury Metals was meeting the provincial requirements for aboriginal community engagement, not for public distribution. As part of the Round 1 IRs, the Agency has requested that Treasury Metals expand and update the information presented in Appendix DD to the original EIS. This information is provided as an updated document called the Aboriginal Engagement Report, Appendix DD to the revised EIS. This document is being made available to all interested parties. Treasury Metals has made efforts to engage and elicit input from Aboriginal peoples regarding the Project, including engaging with MNO. Treasury Metals remains committed to engagement with MNO as the Project moves forward.
596	AC(1)-270	MNO	Appendix DD: Aboriginal Engagement Report DD.2 Project Details		**Information Request / Comment:** The EIS states "Treasury analysis indicated that the Goliath Gold Project will provide substantial benefits to the people of Northwestern Ontario, including First Nations and Aboriginal communities in the immediate area of the project…" Please provide a reference to where this analysis can be found in the EIS. MNO also requests additional detail about what the specific benefits will be for MNO citizens.
					Response: As part of the Round 1 responses, Treasury Metals has prepared a revised EIS, to efficiently address issues raised regarding the organization of information in the EIS, as well as issues raised through the responses to Round 1 questions. Expanded evaluations of the socio-economic benefits

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					of the Project in the region, as well as the potential benefits to Aboriginal peoples are provided in the Section 11.0 of the revised EIS.
597	AC(1)-271	MNO	Appendix DD: Aboriginal Engagement Report DD.2.1 History of the Goliath Gold Project		**Information Request / Comment:** This sections notes that "there are only a few small parcels of Crown land associated with the Goliath Project." The EIS repeatedly relies on the location of the proposed Project as being partially on private lands to minimize the requirement to assess the impacts on the exercise of Aboriginal rights. MNO requires an assessment of Project impacts on Métis rights within a Regional Study Area as well as information on how much previously unoccupied Crown land will be taken up by the proposed Project.
					Response: The EIS does evaluate the potential effects of the Project on Aboriginal rights. One of the factors that lessens the potential effects on the Project on the use of the lands for traditional purposes is that the "…majority of the site has been under private ownership since the early 1900s". Treasury Metals does indicate that there will be a portion (55 ha) of Crown lands rendered unavailable by the Project. This information is provided in Section DD.5.1.2.3 of Appendix DD to the EIS, as well as in Appendix EE (Country Foods Assessment).
598	AC(1)-263	MNO	Appendix DD: Aboriginal Engagement Report DD.2.1 History of the Goliath Gold Project	3.4.2 Community knowledge and Aboriginal traditional knowledge	**Information Request / Comment:** This section states "Treasury Metals does recognize that potential adverse impacts from mine development may not be limited specifically to the actual mine site. Potential adverse impacts to water and air quality away from the mine site and which may in turn have adverse impacts on Aboriginal and Treaty Rights have been raised as a concern." MNO shares this concern that there may be regional effects on the exercise of Métis rights. Please provide a reference to where this is assessed in the EIS. Additionally, this concern about regional effects is not just limited to water and air quality. The potential for regional effects to wildlife and Métis harvesters from Project noise (e.g. blasting on a near daily basis) is also a concern.
					Response: The EIS evaluated the effects of the Project on the physical (e.g., noise), biological (e.g., wildlife) and human (e.g., Aboriginal peoples) components of the environment. To the extent they were identified, the linkages between components were also evaluated. For example, the screening level risk assessment explored not only the potential health effects on Aboriginal peoples from changes in water quality and air quality, but also the potential effects on health from the consumption of

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					country foods and wildlife potentially affected by the Project. Treasury Metals acknowledges a number of issues that have been raised by the Agency and other reviewers related to organizing and approach used in the EIS for presenting the information regarding the potential effects of the Project. In order to effectively address these issues, Treasury Metals has prepared a revised EIS that sets out the assessment of effects and impacts associated with the Project, in a clear and traceable manner. One area where the revised EIS expands on the information presented in the original EIS is with respect to the description of the potential effects of the Project on Aboriginal peoples. The revised EIS describes more fully how the potential effects were identified, evaluated and mitigated. Effects of the Project on Aboriginal peoples can be located in the following revised EIS sections: Section 6.21 Effects assessment relating to Aboriginal peoples (predicted effects, mitigation and residual effects) 6.23.4 Effects of changes to the environment on Aboriginal people 7.0 Cumulative effects 8.20 Determination of the significance of residual effects on Aboriginal peoples 8.21.4 Determination of the significance of changes to the environment on Aboriginal peoples 12.0 Management plans to minimize the potential Project effects 13.21 Follow-up monitoring plans pertaining to Aboriginal peoples
599	AC(1)-272	MNO	Appendix DD: Aboriginal Engagement Report DD.2.1 History of the Goliath Gold Project		**Information Request / Comment:** In reference to the private lands on which the Project is located, this section states "….any impacts to Aboriginal and Treaty rights associated with their removal from the Treaty 3 land base would have been experienced at time of their original removal. Developing a mine on these privately owned properties does not present a new impact to Aboriginal and Treaty Rights. The few parcels of Crown land that are associated with the Project are by and large small in size and surrounded by private properties." Firstly, there are new Crown lands taken up for the purposes of the is Project that Treasury continually minimizes and has not provided detailed information about how much Crown land the Project will take up. Secondly, the land use and associated regional environmental effects of a mine is different than the current use of this private land (e.g. tree farm and homes) and therefore the conclusion that there are no new effects is premature and not based on sound environmental assessment methodology.

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					Response: The original EIS (Section DD.2.1) is correct in noting that one of the factors that lessen the potential effects on the Project on the use of the lands for traditional purposes is that the "…majority of the site has been under private ownership since the early 1900s". The original EIS also notes that there will be a portion (55 ha) of Crown lands rendered otherwise unavailable by the Project. This information is provided in Section DD.5.1.2.3 of Appendix DD to the EIS. The EIS evaluated the effects of the Project on the physical (e.g., noise), biological (e.g., wildlife) and human (e.g., Aboriginal peoples) components of the environment. To the extent they were identified, the linkages between components were also evaluated. For example, the screening level risk assessment explored not only the potential health effects on Aboriginal peoples from changes in water quality and air quality, but also the potential effects on health from the consumption of country foods and wildlife potentially affected by the Project. Treasury Metals acknowledges a number of issues that have been raised by reviewers related to organizing and approach used in the EIS for presenting the information regarding the potential effects of the Project. In order to effectively address these issues, Treasury Metals has prepared a revised EIS that sets out the assessment of effects and impacts associated with the Project, in a clear and traceable manner. One area where the revised EIS expands on the information presented in the original EIS is with respect to the description of the potential effects of the Project on Aboriginal peoples. The revised EIS describes more fully how the potential effects were identified, evaluated and mitigated. Effects of the Project on Aboriginal peoples can be located in the following revised EIS sections: Section 6.21 Effects assessment relating to Aboriginal peoples (predicted effects, mitigation and residual effects) 6.23.4 Effects of changes to the environment on Aboriginal people 7.0 Cumulative effects 8.20 Determination of the significance of residual effects on Aboriginal peoples 8.21.4 Determination of the significance of changes to the environment on Aboriginal peoples 12.0 Management plans to minimize the potential Project effects 13.21 Follow-up monitoring plans pertaining to Aboriginal peoples
600	AC(1)-273	MNO	Appendix DD: Aboriginal Engagement Report		**Information Request / Comment:** The section makes the following assumption: "As the traditional means of travel by Aboriginal peoples was along waterways it is logical that most sites that are of significance to Aboriginal people are to be found in close proximity to lakes, rivers or navigable streams. The Goliath site is not immediately adjacent to such water bodies."

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			DD.2.1 History of the Goliath Gold Project		While, many sites may be located in proximity to water bodies it is faulty logic to assume that there are no sites of importance to Aboriginal peoples if there is no water. Additionally, the assumption ignores the fact the Aboriginal and treaty rights are exercised today and harvesters use many different modes of travel including cars, trucks and ATVs. **Response:** The reviewer's point is noted. In assessing the potential effects of the Project on Aboriginal peoples, consideration was given to the amount of Crown lands that will be unavailable as a result of the Project, regardless whether that land is adjacent to, or near water. Section 2.1 of Appendix DD states that the "…majority of the site has been under private ownership since the early 1900s". This point is likely the more relevant portion of the discussion in Section 2.1, as it notes that Treaty rights have not been available over the majority of the Project site for close to 100 years.
601	AC(1)-274	MNO	Appendix DD: Aboriginal Engagement Report DD.2.1 History of the Goliath Gold Project		**Information Request / Comment:** Please provide a reference to the section of the EIS that supports the following conclusion: "…it is a reasonable assumption that any significant adverse impacts to Aboriginal rights in the area would have been experienced through these various project developments. On-site Impacts to Aboriginal and treaty rights resulting from the development of the Goliath Gold Mine are expected to be low." **Response:** Section 2.1 of Appendix DD points out that the "…majority of the site has been under private ownership since the early 1900s". It then goes on to describe a list of past developments that have occurred at the location of the Project, including the development of highways and roads, logging, the power transmission corridor, and the Ministry of Natural Resources and Forestry (MNRF) tree nursery. This information shows that the area where the Project is proposed in not pristine, but has a long history of development. Additionally, the majority of the area has been in private ownership for about 100 years. With the exception of those areas of Crown land which will become unavailable as a result of the Project (55 ha, which is identified in Appendix EE), it does appear reasonable to assume that the majority of effects on Aboriginal rights would have occurred in the past when land was privatized, or past developments would have occurred. Treasury Metals acknowledges that there are a number of questions from the Agency and other reviewers related to the approach used in the EIS for organizing and presenting information regarding the potential effects of the Project. In order to effectively address these issues, and to address issues raised through the responses to Round 1 questions, Treasury Metals has prepared a revised EIS that sets out the assessment of effects and impacts associated with the Project in a clear and traceable manner. An expanded evaluation of the potential effects of the Project and effects of changes to the environment on Aboriginal peoples has been provided in Sections 6.21 and 6.23.4 of the revised EIS.

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602	AC(1)-275	MNO	Appendix DD: Aboriginal Engagement Report DD.5.7.3 Concerns identified by the Métis Nation of Ontario	3.3 Integration of EA, Aboriginal and public engagement information	**Information Request / Comment:** MNO has more concerns with the Project than was is documented in this section; however, due to lack of capacity the MNO has not been able to meaningfully engage MNO citizens to fully understand Project-related issues and concerns. This is due to the lack of agreement by Treasury to fund the activities (e.g. a TLKUS) necessary for MNO to gather and understand the questions, issues and concerns that MNO citizens have about the proposed Project. Therefore, MNO has many outstanding concerns about the Project. Many of these concerns are reflected in the comments on the EIS; however the EIS comments are not the totality of MNO concerns. **Response:** As part of the process of preparing the EIS, Treasury Metals has made extensive efforts to engage and elicit input from Aboriginal peoples. The EIS was prepared using the best available information available, and incorporated input and comments from Aboriginal peoples received through the engagement activities. The efforts to engage Aboriginal peoples were documented in Appendix DD to the original EIS. Where issues were raised during the engagement process, Treasury Metals has addressed them either through modifications to the Project design or explicitly in the original EIS. To demonstrate this, Treasury Metals has expanded and updated the Aboriginal Engagement Report (Appendix DD to the revised EIS). Treasury Metals realizes that the engagement process with Aboriginal peoples will continue, and will extend through the life of the Project. Treasury Metals remains committed to participating in the Aboriginal engagement process, and looks forward to being able to respond to specific issues and concerns raised by MNO. Additionally, Treasury Metals is taking particular note of the issues and concerns raised by Aboriginal peoples as part of the Round 1 IR process. In responding to these issues, Treasury Metals hopes to demonstrate its willingness to address issues that will also arise from the ongoing engagement process (see also responses to AC(1)-246 and AC(1)-266).
603	AC(1)-276	MNO	Appendix DD: Aboriginal Engagement Report DD.6 Next Steps in Aboriginal Engagement	3.4.2 Community knowledge and Aboriginal traditional knowledge	**Information Request / Comment:** This section indicates that one next step is to "Implement Traditional Knowledge Studies with the Métis Nation of Ontario…" MNO agrees that this is an important step in the engagement process; however, please provide more information on how the information contained in the TKLUS will be used to identify potential impacts on MNO citizens since the EIS has been completed and filed with the regulator? **Response:** As part of the process of preparing the EIS, Treasury Metals has made extensive efforts to engage and elicit input from Aboriginal peoples. The EIS was prepared using the best available information available, and incorporated input and comments from Aboriginal peoples received through the

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					engagement activities. The efforts to engage Aboriginal peoples were documented in Appendix DD to the EIS. Where issues were raised during the engagement process, Treasury Metals has addressed them either through modifications to the Project design or explicitly in the EIS. To illustrate this, Treasury Metals has expanded and updated the Aboriginal Engagement Report. Treasury Metals remains committed to participating in the Aboriginal engagement process through the life of the Project, and looks forward to being able to respond to specific issues and concerns raised by MNO. Additionally, Treasury Metals is taking particular note of the issues and concerns raised by Aboriginal peoples as part of the Round 1 IR process. In responding to these issues Treasury Metals hopes to demonstrate its willingness to address issues that will also arise from the ongoing engagement process. As new information is made available, Treasury Metals will consider it in the design of the Project, mitigation measures, or follow-up monitoring (see also response to TMI_585-AC(1)-259).
604	AC(1)-277	MNO	Appendix DD: Aboriginal Engagement Report DD.6 Next Steps in Aboriginal Engagement		**Information Request / Comment:** This section states that next steps also include "Continue to pursue mutually beneficial long-term agreements with interested First Nations and Aboriginal communities" and "Keep First Nations and Aboriginal Communities informed of potential employment and business opportunities." Please provide additional details on how Treasury will implement these next steps specifically with the MNO. **Response:** Treasury Metals has encouraged and continues to encourage open communication between the MNO (and other Aboriginal peoples) and the Company. Treasury Metals welcomes further input from all peoples as to how this communication can be improved. As part of the ongoing nature of mine development and operation, the Company will continue to solicit input from the MNO as to means for creating a mutually beneficial long-term relationship.
605	AC(1)-278	MNO	Environmental Impact Statement Appendix G Environmental Baseline Study	3.2 Study Strategy and methodology	**Information Request / Comment:** There is no mention of traditional and local knowledge in the description of methods for any of the baseline studies, including: • Climate • Hydrology • Surface water quality • Hydrogeology • Soils • Geochemistry • Wildlife • Vegetation • Fish and Aquatic resources

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					• Sediment **Response:** Treasury Metals has made efforts to engage and elicit input from Aboriginal peoples regarding the Project. No Project-specific traditional knowledge and traditional land use studies were prepared for, or shared with, Treasury Metals. Accordingly, the baseline studies provide information based on an accepted scientific methodology. A limited amount of information was obtained about traditional land use areas. Treasury Metals made efforts to incorporate information provided and to address comments and issues raised by Aboriginal peoples during the engagement process. A summary of the issues raised during the engagement process was provided in Section 8 and Appendix DD to the original EIS. As part of the Round 1 IRs, the Agency has requested that Treasury Metals expand and update the information presented in Appendix DD to the original EIS. This information is provided as an updated document called the Aboriginal Engagement Report, Appendix DD to the revised EIS. The Aboriginal Engagement Report provides a listing of the disaggregate comments from Aboriginal peoples, and how those were addressed in the EIS. Treasury Metals will continue to discuss potential Project effects on traditional land use activities with potentially affected Aboriginal peoples throughout the life of the Project. As additional information regarding traditional land use and practices become available, Treasury Metals will review and consider it in the design of mitigation measures, follow-up monitoring and management plans for the Project, as appropriate.
606	AC(1)-279	MNO	Environmental Impact Statement Appendix G Environmental Baseline Study	3.4.2 Community Knowledge and Aboriginal Traditional Knowledge	**Information Request / Comment:** As the baseline environment study was completed prior to engagement with the MNO, no opportunity was provided for MNO to provide information for incorporation into this study. **Response:** Appendix G to the original EIS presented an initial environmental baseline study completed by Klohn Crippen Berger (2012). The study summarizes the baseline information compiled by the firm between November 2010 and November 2011. However, this was only the first of a series of environmental baseline studies commissioned by Treasury Metals. At the request of the Agency and as part of the Round 1 IR process, Treasury Metals has prepared a revised EIS. The revised EIS removes Appendix G as the information has either been replaced with more current and relevant information or has been incorporated into other sections and appendices. The following baseline work is presented in the appendices to the revised EIS and summarized in Section 5.0: • Traffic: Appendix-E; • Noise levels: Appendix-H; • Light levels: Appendix-I;

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					• Stream flows: Appendix-N; • Water quality: Appendix-P; • Fish and fish habitat: Appendix-Q; • Wildlife: Appendix-R; • Wetlands and vegetation: Appendix-S; and • Socio-economics: Appendix-T. Treasury Metals started its engagement with Aboriginal peoples early in its planning process. The following lists the chronology of engagement with Aboriginal peoples potentially affected by the Project: • Wabigoon Lake Ojibway Nation: 2008; • Eagle Lake First Nation: 2009; • Métis Nation of Ontario: 2009; • Lac Seul First Nation: 2012; • Wabauskang First Nation: 2012; • Naotkamegwanning (Whitefish Bay) First Nation: 2012; and • Grassy Narrows First Nation: 2013. Information that was shared by Aboriginal peoples with Treasury Metals has been incorporated in the baseline programs, the design of the Project and used in preparing the original EIS. As part of the Round 1 IRs, the Agency has requested that Treasury Metals expand and update the Aboriginal Engagement Report (provided originally as Appendix DD to the original EIS). The revised Aboriginal Engagement Report, provided as Appendix DD to the revised EIS, describes the efforts made by Treasury Metals at the time of responding to the Round 1 IRs. The Aboriginal Engagement Report also identifies the specific information, issues and concerns shared by the Aboriginal peoples engaged as part of the EIS process. Treasury Metals has made extensive efforts to engage and elicit input from Aboriginal peoples. Treasury Metals realizes that the engagement process with Aboriginal peoples will continue, and will extend through the life of the Project. Treasury Metals remains committed to participating in the Aboriginal engagement process, and looks forward to being able to incorporate specific information, issues or concerns shared by MNO. Additionally, Treasury Metals is taking particular note of the issues and concerns raised by Aboriginal peoples as part of the Round 1 IR process. In responding to these issues Treasury Metals hope to demonstrate its willingness to address issues that will also arise from the ongoing engagement process.
607	AC(1)-280	Eagle Lake First Nation	Aboriginal engagement		**Information Request / Comment:** The proposed Goliath Gold Mine Project has the potential to infringe on Treaty Rights. The contact with First Nations upon whose traditional land where the mine is anticipated to be built, is described

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					in the EIS Summary in Chapter 9.0 Aboriginal Engagement in the full EIS in Chapter 9.0 Aboriginal and Public Engagement and in Appendix DD and Appendix V. In Appendix DD Treasury Metals Inc. States that, "Developing a mine on these privately owned properties does not present a new impact to Aboriginal and Treaty rights… The proponent then goes on to state "Treasury Metals does recognize that potential adverse impacts from mine development may not be limited specifically to the actual mine site. Potential adverse impacts to water and air quality away from the mine site and which may in turn have adverse impacts on Aboriginal and Treaty rights have been raised as a concern. Section 35 of the Canadian Constitution Act (1982) recognizes and affirms existing " Aboriginal and treaty rights" It is firmly entrenched in case law that governments have a duty "to consult and accommodate" indigenous peoples whenever they take a decision that could infringe on their rights. In 2010 Canada endorsed the United Nations Declaration on the Rights of Indigenous Peoples (UNDRIP, 2007). The United Nations Declaration on the Rights of Indigenous Peoples states: a. Indigenous peoples have the right to the conservation and protection of the environment and the productive capacity of their lands or territories and resources (Article 29(1)); and b. Indigenous peoples have the right to determine and develop priorities and strategies for the development or use of their lands or territories and other resources (Article 32(1)); To have informed consent indigenous peoples must receive adequate information in order to fully understand the positives and negatives consequences of pending decisions and must be able make decisions according to their own processes. ELFN is concerned that Grand Council Treaty #3 has not been directly involved early enough in the process; i.e., at the prospecting stage of this project. Eagle Lake FN subscribes to the Great Earth Law (Manito Aki Inakonigaawin) and has developed Principles for Engagement for the People of Migisi Sahgaigan (2011). ELFN's engagement policy was developed as a result responding to advanced exploration projects and abandoned mines on their lands. When a proponent enters Treaty #3 Territory they must come to an agreement with the Grand Council. In turn, the proponent must negotiate with the Grand Council and in turn the Grand Council Will determine the communities to be consulted. ELFN explains its engagement process on their official website and sets out the terms on which consent might be based (ELFN, 2015). "The following Principles of Engagement are mandatory for meaningful engagement based on

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					Anishinaabe traditions and practices: • Give direction to achieve a wise result and healing through informed consent • Everyone's views are listened to, consequences (costs) have been considered and a decision is made based on consensus • Be careful in our decision making, our actions, interactions, and to consider everyone, everything, past, present and future • We will have a clear understanding of all facts, impacts and future costs • There is a procedure to make things right as part of decision making • There is an order or way of doing things • See things clearly, to be transparent, an openness of procedures, actions and decisions • Show respect to those who have knowledge i.e. Elder General Principles for Meaningful Engagement with the people of Eagle Lake: • The Declaration will be understood and respected • Government is required to consult with and accommodate our community in good faith with clear intent of the proposed activities • Engagement procedures will be guided by mutually acceptable protocols, plans and timelines and the objectives and scope clearly laid out to our community before engagement begins and before decisions are made • Adequate financial, human and expert resources will be made available to our community through the Government or the proponent • Engagements will strengthen our people to state the value of the land and decisions will be based on consensus • We will be informed as to what changes will take place • Engagements will meaningfully support our land use plan and provide adequate time to consider all objectives and questions and will be conducted through mutual respect • Where there are disagreements, the proponent will be responsible, or through third party mediation if deemed necessary. The proponent is still responsible for the costs." The community of Eagle Lake has yet to give its consent to this project and the engagement protocol developed by Eagle Lake First Nation has yet to be implemented in regards to this project. **Response:** Treasury Metals has made efforts to engage and elicit input from Aboriginal peoples regarding the Project. Treasury Metals made efforts to incorporate information provided and to address comments and issues raised by Aboriginal peoples during the engagement process. A summary of the issues

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					raised during the engagement process was provided in Section 8 and Appendix DD of the original EIS (Section 9.0 and Appendix DD in the revised EIS). The requirement to engage Aboriginal peoples a part of the assessment process was also set out in Section 2.3 of the EIS Guidelines, with the Agency identifying the following eight Aboriginal peoples in Section 9.2 of the EIS Guidelines: • Wabigoon Lake Ojibway Nation; • Eagle Lake First Nation; • Métis Nation of Ontario; • Aboriginal People of Wabigoon; • Wabauskang First Nation; • Lac Seul First Nation; • Whitefish Bay (Naotkamegwanning) First Nation; and • Grassy Narrows First Nation. Although Grand Council Treaty #3 was not identified by the Agency as a group that Treasury Metals should engage as part of the EIS process, Treasury Metals has reached out to the Grand Council Treaty #3 in response to a request from the Eagle Lake First Nation. In November 2014, a letter was sent by Treasury Metals to Grand Council Treaty #3 providing information regarding the Project and engagement activities. Treasury Metals also requested clarification regarding the role that Grand Council Treaty #3 would be playing in the engagement process. To date, no response has been provided to Treasury Metals. However, a representative from Grand Council Treaty #3 was present at the community meeting held by the Agency with the Eagle Lake First Nation regarding the EIS. Notes from the meeting indicate that the representative did not provide any comments during the meeting. Treasury Metals will continue to discuss potential Project effects on traditional land use activities with potentially affected Aboriginal peoples throughout the life of the Project. As additional information regarding any Aboriginal community's traditional land use and practices become available, Treasury Metals will review and consider this information it received in the design of mitigation measures, follow-up monitoring and management plans for the Project, as appropriate.
608	AC(1)-281	Eagle Lake First Nation	Aboriginal engagement		**Information Request / Comment:** On May 3rd 2015, ICA Associates Inc. completed a community workshop to identify and outline the concerns that have not yet been addressed by Treasury Metals according to community members. There were 18 community members present ranging from the age of 16 to 70. There were several Elders and youth present at the workshop. The following table is documentation from the community workshop. **Response:**

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					The documentation noted in the comment was provided to Treasury Metals as a series of information requests (IRs) from the Agency. The following list describes responses to documentation / requests from the community workshop: • concern that the engagement process was limited: TMI_609-AC(1)-282; • environmental monitoring and assessment: TMI_610-AC(1)-283; • impact on people and the community: TMI_611-AC(1)-284; • concern about the closure plan: TMI_612-AC(1)-285; • impact on fresh water and fish: TMI_613-AC(1)-286; • concern about management of the mine: TMI_614-AC(1)-287; • site preparation, wildlife and fish habitat: TMI_615-AC(1)-288; • key messages for Treasury Metals and the Agency: TMI_616-AC(1)-289; and • key questions for Treasury Metals and the Agency: TMI_617-AC(1)-290.
609	AC(1)-282	Eagle Lake First Nation	Aboriginal engagement		**Information Request / Comment:** Concerned that the engagement process was limited The duty to consult process overlooked Medicines will be contaminated. ELFN has not provided any traditional knowledge to Treasury Metals. Concerned that that Treasury Metals has not consulted Grand Council Treaty #3 Are they going to listen to us? Concerned that engagement doesn't matter
					Response: Although the "duty to consult" with Aboriginal peoples resides with the Crown, the Agency has instructed Treasury Metals to "…engages with Aboriginal peoples and people that may be affected by the Project, or that have potential or established Aboriginal and Treaty rights and related interests in the Project area, as early as possible in the Project planning process" (EIS Guidelines, Section 2.3). In total, the following eight Aboriginal peoples were identified by the Agency in the EIS Guidelines (Section 9.2): • Wabigoon Lake Ojibway Nation; • Eagle Lake First Nation; • Métis Nation of Ontario; • Aboriginal People of Wabigoon; • Wabauskang First Nation; • Lac Seul First Nation; • Whitefish Bay (Naotkamegwanning) First Nation; and

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					• Grassy Narrows First Nation. As described in Appendix DD, Treasury Metals has been involved in engagement activities regarding the Project with the Eagle Lake First Nation since 2009. Although Grand Council Treaty #3 was not identified by the Agency as a group that Treasury Metals should engage as part of the EIS process, Treasury Metals has reached out to the Grand Council Treaty #3 in response to a request from the Eagle Lake First Nation. In November 2014, a letter was sent by Treasury Metals to Grand Council Treaty #3 providing information regarding the Project and engagement activities. Treasury Metals also requested clarification regarding the role that Grand Council Treaty #3 would be playing in the engagement process. To date, no response has been received by Treasury Metals; however, a representative from Grand Council Treaty #3 was present at the community meeting held by the Agency with the Eagle Lake First Nation regarding the EIS. Notes from the meeting indicate that the representative did not provide any comments during the meeting. Treasury Metals has made efforts to engage and elicit input from Aboriginal peoples, including Eagle Lake First Nation, regarding the Project. No Project-specific traditional knowledge and traditional land use studies were prepared for, or shared with, Treasury Metals; limited information was obtained about traditional land use areas. Treasury Metals made efforts to incorporate information provided and to address comments and issues raised by Aboriginal peoples during the engagement process. A summary of the issues raised during the engagement process was provided in Section 8 and Appendix DD of the original EIS. As part of the Round 1 IRs, the Agency has requested that Treasury Metals expand and update the information presented in Appendix DD of the original EIS. This information is provided in an updated document called the Aboriginal Engagement Report, appendix DD to the revised EIS. The Aboriginal Engagement Report provides a list of the disaggregate comments from Aboriginal peoples, and how those were addressed in the EIS. Treasury Metals will continue to discuss potential Project effects on traditional land use activities with potentially affected Aboriginal peoples throughout the life of the Project. As additional information regarding any Aboriginal community's traditional land use and practices become available, Treasury Metals will review and consider this information it received in the design of mitigation measures, follow-up monitoring and management plans for the Project, as appropriate.
610	AC(1)-283	Eagle Lake First Nation	Accidents and Malfunctions Fish and Fish Habitat Alternatives Assessment Aboriginal Health and		**Information Request / Comment:** Environmental Monitoring and Assessment Environmental monitoring should be around seepage areas, concerned it is not being completed Concerned that environmental testing by the industry should done be an outside body Concerned about back-up plans Policies should be written down, we are concerned about the (emergency) procedures If CDA standards failed before, why use something that has failed? (Mt. Polley) Monitoring of the Tailing ponds, concerned about who will monitor over the next 10-100 years

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			Socio-economic Conditions Current Use of Lands and Resources for Traditional Purposes		**Response:** The baseline environmental monitoring program completed to support the EIS focused on those aspects of the environment that were determined to be most important for predicting the potential effects of the Project. A framework and outline of the follow-up monitoring programs proposed to support the environmental management plans was provided in Section 12 of the EIS, while Section 13 provided the outline of the environmental monitoring suggested by the predicted effects of the Project. Treasury Metals expects that the details of the monitoring programs for the Project will be finalized as part of the permitting process, and will involve input from federal and provincial regulatory agencies, Aboriginal peoples and interested stakeholders. For the most part, the responsibility for monitoring will fall to Treasury Metals. The actual monitoring will likely be completed partially by Treasury Metals staff, and partially by independent firms hired to complete specialized monitoring at the site and subsequent laboratory analysis. All monitoring programs will be reviewed by the appropriate regulatory bodies. Treasury Metals will be developing detailed policies and procedures for managing the Project, and to provide instructions to personnel about the appropriate actions to be taken in various situations. The primary mechanism for this will be the environmental management plan (EMP), which is described in Section 12 of the EIS. Additional plans to be prepared will include, but are not limited to, the following: health and safety plan, emergency response plan, and spill response plan. The primary objective for Treasury Metals in the design of the tailings storage facility (TSF) is its safe operation throughout then life of the Project and the post-closure phase. The engineering of the dam will rely on a number of engineering guides including the Canadian Dam Association (CDA) guidelines and the Ministry of Natural Resources and Forests (MNRF) Best Management Practices. With all engineering designs, there is always a potential that unforeseen circumstances can result in a possible failure. To counteract these, project engineering will evolve and improve as we learn from past incidents, and can compensate for unforeseen conditions through a better understanding of geotechnical conditions, improved design and operation, and safety factors. Following the end of operations at the Project, there will be a period of active closure when the Project infrastructure is decommissioned, the site features are reclaimed in accordance with the certified closure plan (which will be based on the conceptual plan described in Section 3.14 of the EIS), and the filing of the open pit and underground mine. As part of the closure activities, the supernatant water on the TSF will be withdrawn, treated and used to help fill the open pit. The tailings will then be covered with a granular layer to physically isolate the tailings and make the surface trafficable. The tailings will then be isolated from oxygen to prevent acid rock drainage (ARD). This will be achieved using a low-permeability dry cover or a water cover using non-process water. Following these closure activities, there will be a period when the site remains in the care and control of Treasury Metals and monitoring is continued to demonstrate that the closure of the site has achieved the long-term objectives as a functioning component of the environment. Treasury Metals will be responsible for monitoring the site until the appropriate agencies determine the

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					closure objectives are achieved. With respect to the tailings pond specifically, as noted above, there will be no tailings pond to monitor following the active closure phase. As part of the closure activities, the tailings supernatant water will be withdrawn from the TSF, treated and used to help fill the open pit. The TSF will then be covered to physically isolate the tailings, and capped to isolate the tailings from oxygen. The cap will consist of a low-permeability dry cover or a liquid cover using non-process water.
611	AC(1)-284	Eagle Lake First Nation	Aboriginal Health and Socio-Economic Conditions Accidents and Malfunctions		**Information Request / Comment:** Impact on People and the Community What is the plan in the event of human health concerns? What are the guarantees of no damage? Concerned about outside people from Toronto not realizing the needs of our community Concerned with air quality Concerned that they may come closer to the community Mine cannot ensure that people will be compensated if something happens
					Response: *Human Health* The EIS included a conservative human health risks assessment that concluded there would be no significant adverse effects on human health from the Project. Additionally, Treasury Metal will undertake a comprehensive monitoring plan through its follow-up program to verify the predications of the EIS. Treasury Metals will also be required to conduct extensive monitoring as part of its Provincial discharge permits (Environmental Compliance Approvals; ECAs for water and air emissions). Treasury Metals will remain in contact through Aboriginal stakeholders throughout the life of the Project, potentially through a working group such as a technical advisory committee. Should concerns arise during the Project, Treasury Metals will hold discussions on appropriate follow-up actions. *Property Damage* Although the EIS demonstrated that the Project would not cause damages to adjacent properties, Treasury Metals recognizes that there may be concerns regarding damages for stakeholders over the life of the Project. Through its commitment to ongoing engagement with stakeholders and Indigenous communities throughout the life of the Project, Treasury Metals will work with potentially affected stakeholders and Indigenous community members to develop a socio-economic management plan designed to address potential negative Project-related socio-economic effects. *Understanding Local Needs* The EIS completed for the Project was done using a series of reputable and qualified professional consulting firms that are experienced in predicting the effects of developments like the Project at

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					locations across Ontario and across Canada. These firms are qualified to evaluate the potential effects of the Project, and all have experience in working in similar areas, on similar projects. Some of the firms that prepared the EIS are based in the same region as the Project, while others are located in larger urban areas. *Air Quality* A thorough evaluation of potential air quality effects was presented in the EIS, with additional details provided in Appendix J to the EIS. The results of the modelling demonstrates that the conservative predictions at the sensitive receptor locations around the Project would all meet the relevant ambient criteria established to provide protection to humans, vegetation and wildlife. *Proximity to Community* The location of the Project is set out in the EIS, and is defined by the location of the ore deposit. The location of the open pit cannot materially change from the location presented in the EIS. While it is possible that the location of surface structures could be optimized, they would not be appreciable closer to the community. *Adaptive Management and Responding to Community Concerns* Treasury Metals has designed the Project to minimize effects. To confirm the success of the design, an EIS was completed to determine the effects of the Project on the environment. Where warranted, feedback was provided to the design team and the design was adjusted accordingly. An environmental management plan will be implemented for the Project that will include monitoring to determine possible changes as a result of the Project. These monitoring results will be used as part of adaptive management to modify operations as appropriate. Through its commitment to ongoing engagement with stakeholders and Indigenous communities throughout the life of the Project, Treasury Metals will work with potentially affected stakeholders and Indigenous community members to develop a socio-economic management plan designed to address potential Project-related socio-economic effects.
612	AC(1)-285	Eagle Lake First Nation	Current Use of Lands and Resources for Traditional Purposes Accidents and Malfunctions		**Information Request / Comment:** Concerned about closure plan Concerned that there will be hazardous waste impacting the land Concerned government vs. Goliath clean up standard the same or better? Concerned that they will not have enough money to clean it up Smaller mines need to be watched more because they may not have the resources Need more information from provincial and federal government **Response:** Prior to construction commencing, Treasury Metals is required to and will file a certified closure plan

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					and post financial assurances with the Ministry of Northern Development and Mines (MNDM). This is a requirement under Part VII of the *Ontario Mining Act*. The financial assurances ensure there are funds available at closure to enact the certified closure plan. The certified closure plan will need to meet the standards expected by the government prior to being accepted by the MNDM. Although the Project is currently in the early stages of the approval process, Treasury Metals has developed a conceptual closure plan, which is presented in Section 3.14 of the EIS. The certified closure plan is expected to be a refinement of the conceptual closure plan presented in the EIS, structured in the format preferred by the MNDM. Engagement with Aboriginal communities prior to submission of a certified closure plan is also a requirement under Ontario Regulation 240/00. Any hazardous waste generated as part of the Project will be safely transported off site by licensed contractors for disposal at an existing licensed management facility.
613	AC(1)-286	Eagle Lake First Nation	Fish and Fish Habitat Aboriginal Health and Socio-Economic Conditions Project Description		**Information Request / Comment:** Impact on Freshwater and Fish Mine closure and potential effects on water management Freshwater coming out of the plant, my great grandchildren will be drinking that water for 100 years Concerned about how you developed the baseline for fish Concerned that the site is close to water, should move the processing plant. **Response:** As described in Section 6.4.1.12 of the EIS, the Project will result in approximately 6 ha of fish habitat loss due to the unavoidable elimination of the unnamed tributary watercourses in the vicinity of the open pit excavation (Blackwater Creek Tributary 1) and the tailings storage facility (TSF) (Blackwater Creek Tributary 2). The lengths of watercourses affected, as well as the area of watercourses affected are tabulated in Section 3 of Appendix II to the EIS (Draft Fisheries Compensation Strategies and Plan). It should be noted that under the amended *Fisheries Act*, compensation is now referred to as "offsetting". The elimination and subsequent offsetting of fish habitat will require an Authorization under Subsection 35(2) of the *Fisheries Act*. In addition, the EIS noted that Section 27.1 of the Metal Mining Effluent Regulations (MMER) also requires habitat compensation to offset losses of fish habitat. These are the primary effects to fish and fish habitat as a result of the Project. Once operations at the Project cease, a period of active closure will begin. The objective of the conceptual closure plan (Section 3.14 of the EIS) is to return the site to a naturally functioning system. At closure, the portions of the waste rock storage area (WRSA) containing potentially acid generating (PAG) materials will be covered with a low-permeability dry cover to reduce infiltration and seepage, and to isolate the materials from oxygen to prevent acid rock drainage (ARD). The portions of the WRSA with non-PAG materials will be covered and re-vegetated. Runoff from the WRSA will be directed to the open pit, and should be comparable to the pre-development runoff

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					quality. At closure, the water on the TSF will be withdrawn, treated and used to help fill the open pit. The tailings will be covered with a granular layer to physically isolate them. Finally, the TSF will be capped to isolate the tailings from oxygen and prevent ARD. The cap will be either a low-permeability dry cover, or a water cover using non-process water. At closure, the open pit mine will be flooded with water. This will isolate the waste rock and exposed faces of the mine from oxygen and prevent ARD. The quality of the water in the open pit was described in Appendix F to the EIS, and is described more fully in Appendix JJ Water Report. The Water Report provides information regarding the water predictions associated with the Project that reflect the engineering refinements to the Project since filing the original EIS. Treasury Metals has made a commitment that all of the effluent discharged during operations will be treated to levels that meet the Provincial Water Quality Objectives (PWQO). The PWQO are established to protect sensitive aquatic receptors and are more stringent than the standards in Ontario for drinking water. The environmental monitoring programs to support the EIS were designed to help predict the potential effects of the Project on the environment. The baseline field program for fisheries was considered appropriate given the design of the Project (e.g., no direct discharges to Thunder Lake, discharges to Blackwater Creek will meet PWQO) and the potential effects to the environment from that design. Treasury Metals has designed a Project with a compact footprint, which tries to maximize the use of private lands to avoid, to the extent possible, affecting Crown lands. The proposed location of the processing plant is adjacent to the existing Hydro One transmission line, which will be relied on to provide power to the Project. The footprint of the Project site is also contained almost exclusively within the catchment of Blackwater Creek, meaning there will be few if any direct effects on Thunder Lake. While the plant site is located within the Blackwater Creek Tributary 2 basin (the tributary will need to be diverted around the plant site), the majority of the upstream sections of Blackwater Creek Tributary 2 will be displaced by the TSF. Treasury Metals has identified an alternative location for the plant site (Section 2.3.10 of the EIS), which could have reduced environmental effects, especially with respect to fish and fish habitat as the alternative location avoids the need for the diversion of Blackwater Creek tributary #2 around the plant site. At this time, Treasury Metals continues to advance the Project using the location presented in the EIS as they feel it represents a conservative assessment of the Project effects. Should feedback during the permitting process indicate a preference to re-locate the plant site to the his alternative location, Treasury Metals recognizes there would be the need to update the air and noise modelling required to support the Environmental Compliance Approval (ECA) process.
614	AC(1)-287	Eagle Lake First Nation	Cumulative effects		**Information Request / Comment:** Concerned about Management of Mine

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			Project Description Accidents and Malfunctions		The cost – how much so far has been spent? 144 million isn't enough to clean up the mess Concerned about a possible connection to Energy East Concerned about the mill, same situation and impact. The same individual that ran the mill is managing this project.
					Response: *Expenditures:* At the time the EIS was filed in 2014, Treasury Metals had "…spent more than $4 million in the Dryden area, as they prepared for a mine" (KenoraOnline, 2017: website). Expenditures have continued since the filing of the EIS, including the preparation of responses to the Round 1 information requests from the Agency, collection of additional baseline environmental data, additional data collection to support engineering design, and ongoing engineering work. *Costs for Closure:* Prior to construction of the Project commencing, Treasury Metals is required to and will file a certified closure plan and post financial assurances equivalent to the reclamation cost estimate with the Ministry of Northern Development and Mines (MNDM). The financial assurance filed with MNDM will ensure there is sufficient money to close the mine site once operations cease, under any circumstance. *Energy East:* Treasury Metals has no connection to the Energy East pipeline project, nor does the Project make use of oil, which is will be transported by the Energy East pipeline should the pipeline project proceed. *Similarities Between the Project and the Mill* Treasure Metals has assumed in its response that the author is referencing the Dryden Pulp Mill, in regards to the "mill". There are few similarities between the Dryden Pulp Mill and the Project, other than they would both be operating within the same region. The Dryden Pulp Mill was originally constructed in the early 1900s on the banks of the Wabigoon River, within the City of Dryden. The mill has been operating at this location for more than 100 years. The mill is currently owned by Domtar, who acquired the mill in 2007. The Pulp Mill in Dryden has been linked with mercury contamination downstream of Dryden as a result of mercury contamination from a chemical plant which operated on the site during the 1960s and 1970s. In contrast, the Project includes a new gold mine and processing plant. Although the Project will not utilize or produce mercury, there is the potential that from the processing of gold, the potentially acid generating (PAG) nature from some of the rock material that will be mined could liberate mercury naturally present in the rocks. To prevent any effects associated with mercury in the waters downstream of the Project, Treasury Metals has committed (Table 10.0.1 of the EIS) to treat the

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					effluent from the Project such that the mercury concentrations are at, or below, the natural background concentrations of mercury in Blackwater Creek. To minimize the potential for acid rock drainage and resulting metals leaching (ARD/ML), Treasury Metals has developed a conceptual closure plan (Section 3.14 of the EIS) that will isolate the PAG material in the waste rock, walls of the open pit, underground mine, and tailings from oxygen so as to prevent the formation of ARD/ML. Websites Cites KenoraOnline. 2016. Treasury Metals responds to Treaty 3 concerns. Published March 17, 2016. https://www.kenoraonline.com/local/treasury-metals-responds-to-treaty-3-concerns
615	AC(1)-288	Eagle Lake First Nation	Fish and Fish Habitat Current Use of Lands and Resources for Traditional Purposes		**Information Request / Comment:** Site preparation, wildlife and fish habitat Construction phase environmental concerns Nothing to preserve the wildlife in the area Nature reserve bordering the property Impact on wildlife
					Response: *Construction phase environmental concerns* The EIS considered the potential effects of the Project on the environment during the site preparation and construction phase, operations phase, closure phase, and during post-closure. *Nothing to preserve the wildlife in the area* The EIS evaluated the potential effects of the Project on wildlife and wildlife habitat. The EIS identified mitigation measures to lessen or avoid effects on wildlife and wildlife habitat. These measures will be incorporated into the environmental management plan during the life of the Project. *Nature reserve bordering the property* The EIS considered the potential effects of the Project, within both the local and regional study areas. These study areas did overlap with Lola Lake Provincial Park; however the EIS identified that the Project would not impact Lola Lake Provincial Park. The park is upstream of the Project; therefore, no effluent discharges will affect the Park. Groundwater modelling showed the drawdown cone caused by dewatering would not extend into the park. Furthermore, there a no withdrawals of water from the park. Withdrawals are proposed from the irrigation ponds in the former Ministry of Natural Resources and Forestry (MNRF) tree nursery, which are downstream of Lola Lake Provincial Park. Environment Canada identifies potential effects of noise on birds as being restricted to areas with predicted noise levels above 50 dBA, which is restricted to areas within the immediate vicinity of the Project and does not extend into Lola Lake Provincial Park.

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					Impact on wildlife Information about potential Project effects and mitigation measures related to wildlife and wildlife habitat is provided in Section 6.12 of the revised EIS.
616	AC(1)-289	Eagle Lake First Nation	Aboriginal Engagement Current Use of Lands and Resources for Traditional Purposes Aboriginal Health and Socio-Economic Conditions		**Information Request / Comment**: Key Messages for Treasury Metal Inc. and CEAA Air, water and oxygen are life We hold the knowledge of the land We are keepers of the land We have a duty to take care of the lands and waters Quality of peace Our water is priceless Preserve, protect and persevere Protectors of 10 000 years The government needs to follow the MAI and the Grand Council of Treaty 3 Before entering Treaty #3 Territory Grand Council must give consent to those affected and must advise what is intended. Consent should be required not engagement I can trust the water but not your mine We want our water not your money
					Response: At the request of the Agency, Treasury Metals has prepared the Aboriginal Engagement Report, Appendix DD to the EIS. The Aboriginal Engagement Report provides a detailed record of contacts with Aboriginal peoples, identifies concerns and questions raised by each Aboriginal person, a detailed list of concerns and how they were addressed in the EIS. The Aboriginal Engagement Report show Treasury Metals' efforts to provide relevant Project-related information and efforts to solicit information and concerns from the Aboriginal peoples. Treasury Metals also recognizes that engagement does not stop with the filing of the EIS and will continue throughout the life of the Project. Treasury Metals will continue to try to engage the Aboriginal peoples meaningfully with respect to the Project. Treasury Metals will continue to discuss potential Project effects on traditional land use activities with potentially affected Aboriginal peoples throughout the life the Project. As additional information regarding an Aboriginal community's traditional land use and practices become available, Treasury Metals will review and consider it in the design of mitigation measures, follow-up monitoring and management plans for the Project, as appropriate.
617	AC(1)-290	Eagle Lake First Nation	Aboriginal Engagement		**Information Request / Comment:** Key Questions for Treasury Metals Inc. and CEA Agency

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			Current Use of Lands and Resources for Traditional Purposes Aboriginal Health and Socio-Economic Conditions, Current Use of Lands and Resources for Traditional Purposes		What has been the history of mining to date (land, water) with First Nations? What is the history of this the leadership with Aboriginal communities? Why is there only a 30 days to review an EIS? How many First Nations have been involved in reviews of EIS? Is this process working and for who? Have they considered traditional knowledge and knowledge of the land? Why is the revenue for the Project only 144 million dollars? How can you guarantee that the groundwater and lake won't be affected? What are you going to do? Why are First Nations not involved in the development of The Mining Act policies? How will this impact our environment in the past, present and future? If the company goes bankrupt, who will pay? Are the First Nation people the only people standing in the way of the mine? How much money do you have for closure? Where is it? What is the risk of long and short-term health issues? What is the benefit for the community after you are gone in 10 years? Why do you consider this a engagement rather than a visit? Why are you consulting us? Where are you taking our concerns? Are you providing references of other similar projects? Why are we being consulted on this Project? Why are you asking our opinion? The community of ELFN including Elders, youth, management have yet to have their concerns adequately addressed by Treasury Metals Inc. and CEA Agency. The concerns, questions and messages documented in the community workshop indicate that there has not been effective dialogue between the proponent and community members.
					Response: Relationships between First Nations and Mining Mining has been an important part of the development of Ontario, especially in the northern portions of the province. Over the years, experience has been gained regarding the best ways to develop mining in a manner that can be beneficial to all partied involved, the proponent, the government and the Aboriginal communities. Treasury Metals are committed to developing relationships with the Aboriginal communities potentially affected by the Project. Treasury Metals have tried to engage the communities identified as being potentially affected for several years and will continue to engage those communities meaningfully throughout the life of the Project.

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					Reason for 30 day Review Period The EIS for the Project is being completed under the requirements of the Canadian Environmental Assessment Act, 2012 (the Act). The Act sets out the overall requirements of the parties involved, as well as establishing overall timelines for the process. As with all regulations in Canada, the process is supposed to be fair and equitable to all parties, and having known timeframes established under the Act means that companies can have a degree of confidence that they will have a decision as to whether their proposed project will be allowed to proceed or not. Section 27(2) of the Act highlights that a decision regarding the EIS must "…be made no later than 365 days after the day on which the notice of the commencement of the environmental assessment". The Act further stipulates that the "…365-day time limit does not include the period taken by the proponent, in the Agency's opinion, to collect information or undertake studies necessary" (Section 27(6)). Within the 365 days specified under the Act, there are several intermediate steps involved. To help guide the process, the Canadian Environmental Assessment Agency (the Agency) has prepared an Operational Policy Statement for Information Requests and Timelines (CEAA, 2016) which provides additional information regarding timelines, including the 30 day review period. Information of the environmental assessment process is available at : https://www.canada.ca/en/environmental-assessment-agency/services/policy-guidance.html#ceaa2012 The opinions and input from First Nations and Aboriginal peoples are important to the environmental assessment process in Canada. The Aboriginal peoples and First Nations to be engaged, at a minimum, as part of the environmental assessment process for the Project were set out in the EIS Guidelines, and includes the following: • Wabigoon Lake Ojibway Nation; • Eagle Lake First Nation; • Métis Nation of Ontario; • Aboriginal People of Wabigoon; • Wabauskang First Nation; • Lac Seul First Nation • Whitefish Bay (Naotkamegwanning) First Nation; and • Grassy Narrows First Nation. In addition, Treasury Metals and the Agency have made efforts to engage with Grand Council Treaty #3 with respect to the Project and their participation in the process. Finally, in December of 2016, the Agency sent a letter to Lac des Mille Lacs First Nation about available funding for participation in the process. *Traditional Knowledge* Treasury Metals has made efforts to engage and elicit input from Aboriginal peoples regarding the Project. While no Project-specific traditional knowledge and traditional land use studies were

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					prepared for, or shared with, Treasury Metals; limited information was obtained about traditional land use areas through the Aboriginal engagement process. Treasury Metals made efforts to incorporate information provided and to address comments and issues raised by Aboriginal peoples during the engagement process. Treasury Metals will continue to discuss potential Project effects on traditional land use activities with potentially affected Aboriginal peoples throughout the life the Project. As additional information regarding an Aboriginal community's traditional land use and practices become available, Treasury Metals will review and consider it in the design of mitigation measures, follow-up monitoring and management plans for the Project, as appropriate. <u>Project Revenue</u> The value referred to in the question represents the Projected profit, in present day value, as detailed in the 2012 Preliminary Economic Assessment. Prior to development of the Project, the Company will be undertaking more detailed studies to evaluate the economic potential of the Project as a whole and will only be proceeding with the construction and operation of the Project if there is sufficient economic justification to do so. <u>Protection of Groundwater</u> During operations, dewatering activity will be required to keep both the open pit and underground mine workings free of water and to provide a safe working environment. As described in the EIS (Section 5.3, Appendix M), these dewatering activities will lower the groundwater table around the perimeter of the open pit and mine workings, creating what is referred to as a drawdown cone. During operations, seepage from any on-site mine structures not collected by perimeter collection ditches will be captured within the drawdown cone caused by dewatering and will ultimately report to the open pit. During post-closure, a portion of seepage from the waste rock storage area (WRSA) will report to Thunder Lake and no seepage from on-site mine structures will report directly to Wabigoon Lake. Since the submission of the EIS, Treasury Metals has been advancing their engineering for the Project, including the refinement of the water balance for the site. This refined water balance will modify some of the water related predictions, which includes the surface water quality of Thunder Lake and Wabigoon Lake during the operations and post-closure phases. The updated surface water quality model is provided in Section 6 of the Water Report, Appendix JJ to the EIS. <u>*Opportunities to Participate in Mining Act*</u> This question is best posed to the Ministry of Northern Development and Mines (MNDM) who administer the Mining Act. <u>*Impacts on Environment*</u>

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					How the Project might affect the environment in the future, should the Project proceed, is described in the EIS. As the Project has yet to be constructed it will have had no effect on the environment in the past or present, beyond the limited exploration activities. <u>Assurances in the Event of Bankruptcy</u> Prior to construction commencing, Treasury Metals is required to and will file a certified closure plan with the MNDM. In addition to filing a closure plan, Treasury Metals is also required to and will submit financial assurance to the Province administered by MNDM sufficient to pay for final reclamation of the Project site. These are requirements under Part VII of the *Ontario Mining Act*. Engagement with Aboriginal communities prior to submission of a certified closure plan is also a requirement under Ontario Regulation 240/00. Although the Project is currently in the early stages of the approval process, Treasury Metals has developed a conceptual closure plan, which was presented in Section 3.14 of the EIS. The certified closure plan is expected to be a refinement of the conceptual closure plan presented in the EIS, structured in the format preferred by the MNDM. <u>*Environmental Assessment Process*</u> The environmental assessment process in Canada is not designed to be confrontational, rather the process is one where all parties are invited to ask questions so as to improve the understanding of what the potential environmental and social effects of the Project might be. Ultimately, the Minister is responsible for issuing a decision as to whether the Project should proceed, with that decision guided by the EIS and information filed by Treasury Metals, including the responses prepared by Treasury Metals in response to questions from all parties. Currently, Treasury Metals is responding to information requests from the Agency, other government agencies, from Aboriginal peoples and members of the public. Treasury Metals are confident that they can respond to all of the requests from interested parties. <u>Funding for Closure</u> As noted above, Treasury Metals is required to and will file a certified closure plan with the MNDM prior to starting construction. In addition to filing a closure plan, Treasury Metals is also required to and will submit financial assurance to the Province for sufficient reclamation of the site. These are requirements under Part VII of the *Ontario Mining Act*. Engagement with Aboriginal communities prior to submission of a certified closure plan is also a requirement under Ontario Regulation 240/00. Although the Project is currently in the early stages of the approval process, Treasury Metals has developed a conceptual closure plan, which was presented in Section 3.14 of the EIS. The certified closure plan is expected to be a refinement of the conceptual closure plan presented in the EIS, structured in the format preferred by the MNDM.

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					Potential Health Issues Appendix W to the EIS provided an evaluation of the health risks, both short-term and long-term associated with the Project. The health risks are further evaluated in Section 6.19. *Potential Benefits Post-Closure* Treasury Metals has made commitments to implement a local hiring policy, as well as a policy to encourage the purchase of local goods and services (Table 10.0.1 of the EIS). Treasury Metals believes that skills developed locally over the life of the Project in this and similar manners, will provide benefits to individuals in the region beyond the Project life. Discussions of the socio-economic benefits of the Project in the region during the life if the Project, and beyond, are provided in Section 11.0 of the EIS. Description of Engagement Activities The EIS Guidelines for the Project (Section 2.3) establishes the requirement that Treasury Metals "…engages with Aboriginal peoples and people that may be affected by the project". In that regard, Treasury Metals have made efforts to engage with Eagle Lake First nation regarding their interest in, and concerns regarding the Project. Treasury Metals do not have a formal responsibility to undertake engagement with First Nations or Aboriginal peoples. Such responsibilities rest with the Crown. Reasons for Engagement with Eagle Lake First Nation Under the EIS Guidelines (Section 2.3), the Agency has instructed Treasury Metals to "…engages with Aboriginal peoples and people that may be affected by the project, or that have potential or established Aboriginal and Treaty rights and related interests in the project area, as early as possible in the project planning process". In total, the following eight Aboriginal peoples were identified by the Agency in the EIS Guidelines (Section 9.2): • Wabigoon Lake Ojibway Nation; • Eagle Lake First Nation; • Métis Nation of Ontario; • Aboriginal People of Wabigoon; • Wabauskang First Nation; • Lac Seul First Nation; • Whitefish Bay (Naotkamegwanning) First Nation; and • Grassy Narrows First Nation.

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					Examples of Similar Projects The CEAA website (www.ceaa-acee.gc.ca) has a registry of projects which indicates the status of the environmental assessment as being either completed, in progress or terminated. The following text below are excerpts from the CEAA website which summarizes the proposal of two mining projects that have completed the environmental assessment process: 1) Côté Gold Mine Project and 2) Rainy River Project. • Côté Gold Mine Project: IAMGOLD Corporation is proposing the construction, operation, decommissioning and abandonment of the Côté Gold Mine Project, which includes an open-pit gold mine, an on-site metal mill and four structures for diverting water, located 20 kilometres southwest of the community of Gogama in northeastern Ontario. • Rainy River Project: New Gold Inc. is proposing the construction, operation, decommissioning and abandonment of an open-pit and underground gold mine and on-site metal mill, located approximately 65 kilometres northwest of Fort Frances in the Township of Chapple, Ontario. Mining is proposed to occur for 15 to 20 years, with an ore production capacity of 27,000 tonnes per day. Reasons for Engagement with Eagle Lake First Nation As discussed above, the EIS Guidelines (Section 2.3), the Agency has instructed Treasury Metals to "…engages with Aboriginal peoples and people that may be affected by the Project, or that have potential or established Aboriginal and Treaty rights and related interests in the Project area, as early as possible in the project planning process". In total, the following eight Aboriginal peoples were identified by the Agency in the EIS Guidelines (Section 9.2): • Wabigoon Lake Ojibway Nation; • Eagle Lake First Nation; • Métis Nation of Ontario; • Aboriginal People of Wabigoon; • Wabauskang First Nation; • Lac Seul First Nation; • Whitefish Bay (Naotkamegwanning) First Nation; and • Grassy Narrows First Nation.
618	AC(1)-291	Eagle Lake First Nation	Aboriginal Engagement Current Use of Lands and		**Information Request / Comment:** "Engagement and engagement efforts by Treasury have not resulted in any formal Traditional Knowledge (TK) studies being conducted that are specific to the Project." (Chapter 3.0) The greatest concern of the community was the lack of consent for this project and lack of

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			Resources for Traditional Purposes Structure, site, or thing of historical, archaeological, paleontological or architectural significance to Aboriginal groups		documentation of Traditional Knowledge. The community was concerned that Treasury Metals Inc. records informational events and phone calls as part of the engagement log and records interactions without the approval of Eagle Lake First Nation. There have been no engagement sessions that have resulted in meaningful participation with the community in regards to the development of baseline studies or environmental monitoring programs. In Appendix DD, Treasury recognizes that there is wild rice harvesting sites near the location of the mine (pg, 23Q24 in Appendix DD). "These wild rice harvesting areas have not been confirmed with WLON. Regardless of these areas being confirmed. Treasury is aware of the presence of wild rice in the areas identified and will take measures to ensure that these sites remain suitable for wild rice growth. Eagle Lake, as well as the other First Nations with which Treasury is obliged to consult, was sent a letter by Treasury on January 28, 2014 requesting information related to Aboriginal values associated with wetlands. Information relating to wetlands which may have been used for wild rice harvesting was specifically requested. No responses were received." Treasury has not confirmed these sites with WLON and Eagle Lake FN. Treasury also claims there are no sites of archaeological significance. Rather than relying on the expertise of an archaeological firm and MNRF data, the Company must engage with the communities in a comprehensive manner. In Appendix DD and in the Conclusion (Chapter 13) outlines Eagle Lake First Nation concerns. Table 2.1 in the fifth column records the community's response to the concerns presented to CEAA by Eagle Lake First Nation. For example, a key concern from an Elder in the community was the impact of the Project on Lola Nature Reserve. Treasury indicates that there will be no impact on the Lola' Nature Reserve because it is situated 2 km upstream from the site. This is a conclusion that was not made in engagement with Aboriginal people and dismisses a traditional and holistic understanding. **Response:** Treasury Metals has made efforts to engage and elicit input from the Aboriginal peoples regarding the Project. No Project-specific traditional knowledge and traditional land use studies were prepared for, or shared with, Treasury Metals; limited information was obtained about traditional land use areas. Treasury Metals made efforts to incorporate information provided and to address comments and issues raised by Aboriginal peoples during the engagement process. A summary of the issues raised during the engagement process was provided in Section 8 and Appendix DD to the original EIS. As part of the Round 1 IRs, the Agency has requested that Treasury Metals expand and update the information presented in Appendix DD to the original EIS. This information is provided as an updated document called the Aboriginal Engagement Report, Appendix DD to the revised EIS.

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					The Aboriginal Engagement Report provides a listing of the disaggregate comments from Aboriginal peoples, and how those were addressed in the EIS. Treasury Metals has been engaged with Treaty 3 First Nations, including Eagle Lake First Nation, within the Project area for a number of years regarding the Project and this will continue for the life of the Project. Any traditional knowledge or mitigation measures to identified concerns will be incorporated into the design of Project. Treasury Metals will continue to attempt to engage Eagle Lake First Nation in an effort to ensure the community understands the Project, identifies their concerns and jointly develops mitigation measures for the identified concerns including, but not limited to, the concerns noted above.
619	AC(1)-292	Eagle Lake First Nation	Fish and Fish Habitat Migratory Birds Current Use of Lands and Resources for Traditional Purposes Aboriginal Health and Socio-Economic Conditions Aboriginal Physical and Cultural Heritage Effect that is directly linked or necessarily incidental to a federal authority's exercise of a power or a performance of a duty or function Accidents and Malfunctions		**Information Request / Comment:** Refer to Table 2.1 Community Response to "Table DD.7.9 "Feedback from Aboriginal Communities provided by the CEA Agency to Treasury" (pg 119-121 in Appendix DD). Eagle Lake has provided feedback to responses provided by Treasury, including: • "Concerned about the impact seepage of the TSF into groundwater and surface water flowing to Wabigoon Lake." • ELFN has traditionally used this area for wild rice harvesting and blueberry harvesting. We have a camp. We have seen many robins in that area. We believe that Wabigoon FN has sites of significance in the area. This response is disrespectful of traditional knowledge and teachings. Archaeological assessment needs to be in engagement with First Nation. • There will be an impact on the nature reserve. Concerned about the Project impacting Mavis and Ghost lake where there is a sacred site called The Serpent (7 km away) , concerned about the impact on the overall landscape. • The community is concerned about how the baseline for fish was established. Walleye uses this stream in June. This needs to be assessed with traditional knowledge. • Will TM be applying for HADD, Fisheries Compensation Agreement, and Fisheries Act Authorization through the Federal government? (Page 157 PD • We have been going to this blueberry camp for centuries. Concerned about the impact on the fox and the bear. • "Its disrespectful for the community to think about mitigation because you can't off set an impact on something." Community was not involved in providing information related to mitigation measures which is another example for the need of a comprehensive community engagement strategy • How do we know if those regulations will be safe? There needs to be an independent monitoring panel to ensure safety. Community members have never seen a TSF, it may be beneficial to provide a site tour to an operating gold mine such as Detour etc. First Nations are visual people. • The community needs to be able to see the closure plan. What happens in 100 years? There was an effort made by MNDM in the Treaty #9 area to involve First Nations in a comprehensive review

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					of the Closure Plan while in draft stages. Premier Gold Mines and MNDM jointly worked with the communities to discuss both the Draft CP and the Final CP before the commenting period to allow for comprehensive community involvement that resulted in detailed comments and mitigation measures being identified by the communities. Engaging communities can be interactive and hands on and can be innovative as opposed to being confined to commenting periods. • We need an independent monitoring panel of both the tailing storage facility and groundwater. First Nations Need to be involved in monitoring, environmental effects and monitoring plan Success story on APTN regarding community environmental monitors on at an advanced exploration site that are directly involved in capacity building such as OBBN, sampling protocols, waste management inspections, hazardous waste inspections, facility inspections etc. The community environmental monitors are directly involved in the permitting and approvals process and provide community assurance and are involved at comprehensive community engagement activities.
					Response: Treasury Metals has made efforts to engage and elicit input from Aboriginal peoples regarding the Project including Eagle Lake First Nation (ELFN). No Project-specific traditional knowledge and traditional land use studies were prepared for, or shared with, Treasury Metals; limited information was obtained about traditional land use areas. Treasury Metals made efforts to incorporate information provided and to address comments and issues raised by Aboriginal peoples during the engagement process. A summary of the issues raised during the engagement process was provided in Section 8 and Appendix DD to the original EIS. As part of the Round 1 IRs, the Agency has requested that Treasury Metals expand and update the information presented in Appendix DD to the original EIS. This information is provided as an updated document called the Aboriginal Engagement Report, Appendix DD to the revised EIS. The Aboriginal Engagement Report provides a listing of the disaggregate comments from Aboriginal peoples, and how those were addressed in the EIS. Treasury Metals will continue to discuss potential Project effects on traditional land use activities with potentially affected Aboriginal peoples throughout the life the Project. As additional information regarding an Aboriginal community's traditional land use and practices become available, Treasury Metals will review and consider it in the design of mitigation measures, follow-up monitoring and management plans for the Project, as appropriate. Information related to Aboriginal traditional knowledge or current land and resource use by ELFN in the area of the Project is limited; ELFN did not share any Project-specific information or knowledge with Treasury Metals before the EIS was filed. An expanded discussion of the potential effects of the Project, including a discussion and justification for VCs and VC / discipline specific assessment criteria, in a clear and traceable manner is provided in Section 6.0 of the revised EIS. Treasury Metals will be working with the appropriate authorities in the preparation of a fish habitat

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					offsetting plan. Please refer to TMI_125-FH(1)-04 for more detailed information regarding fish habitat offsetting. As part of the provincial permitting process Treasury Metals will file a closure plan that is certified in accordance with Ontario Regulation 240/00 (as amended) and compliant with the Mine Rehabilitation Code of Ontario ("Code"). The Code is prescriptive and states the rehabilitation requirements for the various components of a mine development. This closure plan will outline the short-term measures to prevent unauthorized access prior to mine openings being sealed and safety hazards being eliminated. Measures will include but note be limited to site security & surveillance, locked buildings and fencing. The requirements of the closure plan will ensure the rehabilitation of all components of the Project including pit lake water quality and limiting access to prevent accidents until such a time as the Project is closed out (defined in Part VII of the Mining Act, this term means that the final stage of closure has been reached and that all the requirements of a closure plan have been complied with) It should also be noted that the filing of the closure plan will require the provision of financial assurance of the Ministry of Northern Development and Mines (MNDM) for the full costs to close out the site should Treasury Metals not be able complete this work. The financial assurance will not be returned until Treasury Metals can demonstrate that the site has been closed out in accordance with the requirements of the closure plan. Treasury Metals is interested to discuss the possibility to arrange a site tour of an operating mine. There are several operating mines in the immediate vicinity such as in the town of Red Lake. Treasury Metals is interested to initiate discussions on the implementation of community inclusion in the monitoring of ground water and tailings storage facility (TSF). Information about potential Project effects and mitigation measures related to the concerns in this IR can be located in Sections 6.8 (surface water quality, including Wabigoon Lake), 6.12 (wildlife and wildlife habitat), 6.15 (wetlands and vegetation), 6.20 (heritage resources) and 6.21 (Aboriginal peoples).
620	AC(1)-293	Eagle Lake First Nation	Cumulative effects Aboriginal engagement Alternatives assessment Aboriginal health and socio-economic		**Information Request / Comment:** The Cumulative Effects Assessment is included in Chapter 6.0 of the Environmental Impact Statement with methodological considerations found in Appendix W (Human Health). The decision process to which significance is determined (Figure 6.1.1 Decision Tree for the Determination of Significance for Residual Effects) does not incorporate traditional indigenous knowledge and understanding. Table 14.1.1 in Appendix DD sets of the summary of concerns and accommodation measures. These measures were not made in engagement with the Aboriginal communities. The accommodation measures rely on a number of "management plans" that currently rely on the permitting process and a developed monitoring plan.

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			conditions		The cumulative effects do not consider long term ecosystem impacts. For instance to understand the long term impact of mercury in fish, it is important to assess current levels in Wabigoon Lake with the levels that could be released from a potential failure. This was not a part of Treasury s analysis and the company has not provided a scenario for increased mercury levels human health assessment. In Appendix W, The current risk estimates for humans are based solely on dust exposure from soil. Due to the toxicological properties of mercury it is important to derive a comprehensive exposure that includes all sources for humans. Therefore the risk estimates for mercury likely underestimate the potential risk for humans. The elders from ELFN community are concerned by the impact of the mine on overall health of the landscape and watershed, and impact of sites of cultural significance. The proponent needs to assess the cumulative effects on specific VCs that are important for the Aboriginal community. For example, in order to understand the impact of this project on fish population we need to understand both the fishery habitat lost in this project, current levels of contaminants in fish and the impact of recreational fishing on fish habitat and spawning. (Duinker and Greig, 2006). "The mitigation measures to be applied to this project have been integrated into the Project design; consequently, it is only the residual effects of the Project which require significance assessment." (Chapter 3.0, Environmental Impact Statement). Treasury has focused on potential cumulative effects on the existing environmental and socioeconomic baseline relative to identified projects and activities that are predicted to occur (or are reasonably foreseeable) in the next 10 years. It is difficult for the community assess risk when there are no scenarios for cumulative effects that consider design failure or possible failure. Chapter 2.0 in the EIS considers the Alternative Assessment. "Three economic factors VCs were identified and retained during the socioeconomic assessment: All three VCs Employment; Income; and Economic Development have been evaluated in recent mining EAs and are key areas of interest for regulators and Aboriginal and local communities". Treasury claims to incorporate Aboriginal values into VCs and significant criteria but the community has had no direct involvement in their development. "The information from local stakeholder groups remains invaluable as it provides an opportunity to assign relative importance of contributing factors from these stakeholder groups". Treasury uses the following criteria in Environmental Account; Technical Account; Project Economic Account; and Socio-Economic Account Chapter 2.0 pg,22). An alternative assessment that is helpful in decision-making is one that considers all social, cultural and environmental effects in relation to the life of the mine. Highlighted Concerns and Omissions • No traditional knowledge studies or confirmation with Aboriginal communities in any of the EIS. • Engagement log was limited in its summary of engagement with potentially affected Aboriginal groups, no current details on how the information was obtained during the engagement or how these concerns were taken into consideration in the preparation and updating the plan.

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					• Valued Components and Significance Criteria not developed in engagement with Aboriginal communities. • Alternatives are assessed using simplified criteria. According to the Mt. Polley Independent Review Panel "safety attributes should be evaluated separately from economics, and cost should not be the determining factor" • Human health from dissolved Mercury (Hg) in fish not yet considered in the Human Health Risk Assessment. Conclusion Treasury Metals Inc has not adequately addressed the concerns of the Eagle Lake First Nation. The "engagement" to date and the conduct of the EA has not yet allowed for productive dialogue between the community and the proponent. The mine does not have the consent of the Eagle Lake First Nation to proceed with current proposal.
					Response: Please find the following responses to the specific highlighted concerns and omissions: • Treasury Metals has made efforts to engage and elicit input from Aboriginal peoples, including Eagle Lake First Nation, regarding the Project. While no Project-specific traditional knowledge and traditional land use studies were prepared for, or shared with, Treasury Metals; limited information was obtained about traditional land use areas through the engagement process with Aboriginal peoples. Treasury Metals made efforts to incorporate information provided and to address comments and issues raised by Aboriginal peoples during the engagement process. Treasury Metals will continue to discuss potential Project effects on traditional land use activities with potentially affected Aboriginal peoples throughout the life the Project. As additional information regarding an Aboriginal community's traditional land use and practices become available, Treasury Metals will review and consider it in the design of mitigation measures, follow-up monitoring and management plans for the Project, as appropriate. • Treasury Metals has made efforts to engage and elicit input from Aboriginal peoples, including Eagle Lake First Nation, regarding the Project. A summary of the issues raised during the engagement process was provided in Section 8 and Appendix DD to the original EIS. As part of the Round 1 IRs, the Agency has requested that Treasury Metals expand and update the information presented in Appendix DD to the original EIS. This information is provided as an updated document called the Aboriginal Engagement Report, Appendix DD to the revised EIS. The Aboriginal Engagement Report provides a listing of the disaggregate comments from Aboriginal peoples, and how those were addressed in the EIS. • As noted previously, Treasury Metals has made efforts to engage and elicit input from Aboriginal peoples, including Eagle Lake First Nation, regarding the Project. No specific input was provided to Treasury Metals prior to filing the EIS regarding either valued components or significance criteria. As part of the Round 1 information requests, Treasury Metals has received feedback from regulators and stakeholders, including Aboriginal peoples, regarding the approach used in

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					the EIS for organizing and presenting information regarding the potential effects of the Project. In order to effectively address these issues, and to address issues raised through the responses to Round 1 questions, Treasury Metals has prepared a revised EIS that sets out the assessment of effects and impacts associated with the Project in a clear and traceable manner. • The EIS included an extensive review of alternatives which was completed as part of the Project design process. A summary of this alternatives assessment is provided in Section 2 of the EIS, with additional details provided in Appendix X. Additional information regarding the alternatives assessment has been provided in response to specific questions from regulators and stakeholders, and can be located in TMI_34-AA(1)-15_Attachment_1 and TMI_34-AA(1)-15_Attachment_2. • Mercury was considered as part of the screening level risk assessment presented in Appendix W to the EIS. When sampling mercury levels in water, either total mercury or dissolved mercury can be reported, with total mercury being greater than, or equal to the concentration of dissolved mercury. Both total and dissolved mercury can be present in an inorganic or organic form, with the organic form of mercury being the component that will be taken up, and accumulate in the tissue of animals such as fish. For exposure to mercury in fish, the evaluation was conducted assuming both 100% inorganic form as well as 100% organic form; refer to TMI_203-HE(1)-10 for more information.
621	AC(1)-294	Eagle Lake First Nation			**Information Request / Comment:** A detailed analysis on water quality and methodological concern of the technical review are included in Maclean Environmental Consulting report. A few concerns are highlighted below. **Response:** The Maclean Environmental Consulting Report noted in the comment was provided to Treasury Metals in a series of IRs from the Agency. Responses to IRs regarding the Maclean Environmental Consulting Report include: • TMI_622-AC(1)-295 • TMI_623-AC(1)-296; • TMI_624-AC(1)-297; • TMI_625-AC(1)-298; • TMI_626-AC(1)-299; • TMI_627-AC(1)-300; • TMI_628-AC(1)-301; • TMI_629-AC(1)-302; • TMI_630-AC(1)-303; • TMI_631-AC(1)-304; • TMI_632-AC(1)-305; • TMI_633-AC(1)-306;

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					• TMI_634-AC(1)-307; • TMI_635-AC(1)-308; • TMI_636-AC(1)-309; • TMI_637-AC(1)-310; • TMI_638-AC(1)-311; • TMI_639-AC(1)-312; • TMI_640-AC(1)-313; and • TMI_641-AC(1)-314.
622	AC(1)-295	Eagle Lake First Nation	Aboriginal Health and Socio-Economic Conditions Fish and Fish Habitat		**Information Request / Comment:** Acid Rock Drainage Maclean Environmental Consulting reported that: • Segregation or separation of PAG and non-PAG mine rock is NOT POSSIBLE, because all rock types have high potential to be acid –generating. How will Treasury build tailings structures and other mine structure without using this rock fill? • In Appendix F in the EIS recommend that the "potential generation of acidic generating material required additional model simulations". In Appendix D, the Tailing Storage Facility design is dependent on acid rock drainage testing being completed " Confirmation of the acid potential of the mine waste rocks should be determined before proceeding with the design" The alternatives for Tailing Storage Facility presented by Treasury are incomplete due to an incomplete analysis of acid rock drainage.
					Response: The preferred alternative for aggregate construction material identified in the Alternatives Assessment (EIS Section 2.3.11.4) was commercial off-site aggregate that will be non-potentially acid generating. This avoids the concerns regarding segregation of non-PAG rock for construction of the tailings storage facility (TSF). The engineering for the Project will continue to be refined through the permitting process for the Project. To date, the focus of the analyses of acid generating potential has been on the mineralized zone. Further tests on these materials remote from the mineralized zones may identify suitable non-PAG materials that will reduce the need for commercial off-site aggregate material (see also response to TMI_46-MW(1)-08).
623	AC(1)-296	Eagle Lake First Nation	Alternatives assessment		**Information Request / Comment:** Tailing Storage Facility (TSF) – Best Available Technology The Goliath Gold Mine proposal is one of the first mines to undergo environmental assessment since the findings of the Mount Polley Expert Review Panel have been released in January 2015. It is an opportunity for CEAA and the Ontario Ministry of the Environment, Ontario Ministry of Mines

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					and Northern Affairs to implement their significant recommendations. Some of the key recommendations pertinent to the Goliath Gold proposal include best available technology. Some pertinent quotes are included below: "The goal of BAT [Best Available Technology] for tailings management is to assure physical stability of the tailings deposit. This is achieved by preventing release of impoundment contents, independent of the integrity of any containment structures. In accomplishing this objective, BAT has three components that derive from first principles of soil mechanics: 1. Eliminate surface water from the impoundment. 2. Promote unsaturated conditions in the tailings with drainage provisions. 3. Achieve dilatant conditions throughout the tailings deposit by compaction. The Panel recognizes that eliminating water from the tailings deposit will not eliminate the need for storage of mine and processing water elsewhere. But Mount Polley has shown the intrinsic hazards associated with dual-purpose impoundments storing both water and tailings. The Panel considers that security can be more readily assured for conventional water dams that are designed and constructed for their own purpose and that preventing tailings release is the overriding imperative..." Best Available Technology Mt. Polley panel recommends: "For new tailings facilities. BAT should be actively encouraged for new tailings facilities at existing and proposed mine. Safety attributes should be evaluated separately from economic considerations, and cost should not be the determining factor. "For closure BAT principles should be applied to closure of active impoundments so that they are progressively removed from the inventory by attrition. Where applicable, alternatives to water covers should be aggressively pursued." The company has not addressed the concerns outlined the Mt. Polley Review Panel. It is clear that the TSF design for Goliath Project does not meet any of the Panel s BAT recommendations: the tailings will be saturated with water, will depend on a water cover to prevent Acid Mine Drainage, and will have to be maintained in that condition in perpetuity. Mt. Polley Review Panel Report outlines that observational monitoring of the tailing storage facility cannot predict the unpredictable impact of slope failure. In the ESI Appendix D pg 34) refers to an observation approach Peck 1969) to safety. The Mt. Polley Independent Review also recommended that Canadian Dam Guidelines to be adapted to the slurry of tailings material rather than for water. No filtered or dry tailings analysis has been presented, as the proponent argues that the process would make the mine uneconomic and not be suitable. The proponent s proposal fails to meet the safety design criteria recommended in the Mount Polley s Expert Panel report. The best practices recommended on the site including dry stack tailings and tailing impoundment areas, rather than tailing storage facilities. Highlighted Concerns and Omissions

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					• Outstanding concerns about water quality (refer to Maclean Environmental Consulting Report). • Current design considerations do not take in account the Independent Review. Safety attributes should be evaluated separately from economics, and cost should not be the determining factor. • Using an observational approach and building the TSF overtime is not considered the best approach. • The only alternatives they have considered are "readily available technology" Chapter 7.0, page 22) The Best Available Technology (including tailings impoundment areas) have not been considered and due to economic factors.
					Response: Please find the following responses to the specific questions: • The Maclean Environmental Consulting Report has not been provided to Treasury Metals by either Eagle Lake First Nation or the Agency as part of the IR process. Treasury Metals believes the Agency has prepared IR questions based on the Maclean Environmental Consulting Report. Responses have been provided to all of the questions provide to Treasury Metals by the Agency. • The current design and engineering for the tailings storage facility (TSF) has been completed to a level suitable for supporting the assessment of effects. This engineering work will continue to be refined as Treasury Metals advance the Project through the various approval stages, up to and including permitting. • The process proposed for developing the TSF is one that has been demonstrated to be safe and reliable on developments in Ontario. The design and implementation of the TSF will be done by professional engineers licensed in the Province of Ontario, and in accordance with the standards established for the industry. These standards would include consideration of the current understanding of the science and design requirements in Canada, and would reflect lessons learned from a range of information sources. • The EIS included an extensive review of alternatives which was completed as part of the Project design process. A summary of this alternatives assessment is provided in Section 2 of the EIS, with additional details provided in Appendix X. Additional information regarding the alternatives assessment have been provided to respond to specific questions from regulators and stakeholders, and can be located in TMI_34-AA(1)-15_Attachment_1 and TMI_34-AA(1)-15_Attachment_2.
624	AC(1)-297	Eagle Lake First Nation	Aboriginal engagement Accidents and malfunctions Fish and Fish Habitat		**Information Request / Comment:** Environmental Monitoring Plans (EMP) Currently EMP is limited to Chapter 13.0 in the Environmental Impact Statement and Chapter 9.0 in the Environmental Impact Statement Summary, "The monitoring program will be finalized through discussions with Environment Canada and the Technical Advisory Committee TAC). It is anticipated that the sampling locations will be finalized prior to construction so that concurrent baseline data

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			Aboriginal Health and Socio-Economic Conditions		can collected prior to effluent discharge." (Chapter 13) It is difficult to comment on the EMP plan as it is yet to be developed in detail and a throughout review of the EMP is beyond the scope of reviewing this ESI at this time. Currently Treasury plans to test tailing composition annually Chapter 13). An independent monitoring panel could include a multi-stakeholder group with key recommendations from each stakeholder group. A review of the environmental monitoring program should be developed with the Aboriginal community and should be subjected to an external review and compared with best practices. Potential Recommendations for Effective Monitoring • Review of the permitting process with community stakeholders and Aboriginal groups • Provisions for robust and independent monitoring and develop mechanisms for on-going dialogue and dispute resolution. Develop an independent monitoring panel with adequate Aboriginal representation • Methods to monitor the effectiveness of reclamation including comparison to baseline and regional reference data • Detailed annual report including frequent monitoring and testing of tailings material. • Ongoing monitoring of cumulative effects, which would include Traditional Ecological Knowledge and involving First Nations, groups in regional planning. • The emergency response outlined in Appendix F to include specific details on how to prevent the contaminants from entering Wabigoon Lake.
					Response: To clarify, the Environmental Management Plan (EMP) for the Project is described in Section 12 of the EIS, with additional details of environmental monitoring programs to be conducted under the plan described in Section 13 of the EIS. There does not appear to be a specific question from the reviewer, rather the text is a statement of the reviewers understanding of the plans for environmental monitoring, and recommendations from the reviewer regarding that monitoring. Treasury Metals believes the level of detail presented in the EIS regarding follow-up monitoring was suitable at the assessment stage of the process purposes. Treasury Metals recognizes that as the Project advances and moves into the permitting stages, additional details regarding monitoring plans will be developed, which will involve input from regulators and stakeholders. Treasury Metals will consider the recommendations provided by the reviewer in refining and finalizing the prosed environmental monitoring plans for the Project.
625	AC(1)-298	Eagle Lake First Nation	Aboriginal engagement Fish and Fish Habitat		**Information Request / Comment:** Closure Plans Monitoring of the closed facility will consist of annual Dam Safety Inspections of the closed facility as well as Dam Safety Reviews for a period of five years following closure (Chapter 11, ESI) The

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			Aboriginal Health and Socio-Economic Conditions		closure plan is anticipated for a 5 year period yet this site needs to have ongoing monitoring. There is no provision for the costs of long term care of the mine site. Since the tailings will be acid generating, they will have to be monitored in perpetuity with an emergency plan and financial bonds in place. Such a monitoring program after closure and perpetual care of the site has yet to be recognized by Treasury. Highlighted Concerns and Omissions • Closure plans and financials should be made public and available to review • Long term water management is the most serious issue at closed mine sites • Water supply spillways and other engineered features need to be monitored and maintained in perpetuity. • Need clarity on how tailings, as well as underground mine will react with groundwater flowing under the surface.
					Response: Please find the following responses to the specific questions: • Prior to construction commencing, Treasury Metals is required to and will file a certified closure plan and submit financial assurance to the Ministry of Northern Development and Mines (MNDM). This is a requirement under Part VII of the Ontario Mining Act. Engagement with Aboriginal communities prior to submission of a certified closure plan is also a requirement under Ontario Regulation 240/00. Although the Project is currently in the early stages of the approval process, Treasury Metals has developed a conceptual closure plan, which was presented in Section 3.14 of the EIS. The certified closure plan is expected to be a refinement of the conceptual closure plan presented in the EIS, structured in the format preferred by the MNDM. • Treasury Metals recognizes the importance of designing the closure plan to ensure the successful management of water in the long-term. A conceptual closure plan was provided as part of the EIS (Section 3.14). The current plans for the post-closure management of water at the Project is illustrated in Figure 3.0-1D in the EIS. • As part of the closure activities, the engineered features that are designed to remain will be constructed so as to operate in a natural functioning manner. One such feature will be the overflow spillway that will allow the excess water in the open pit to release to the environment along the course of Blackwater Creek Tributary 1. This is illustrated in Figure 3.0-1D in the EIS. • Appendix M to the EIS provided a detailed analysis of the groundwater behavior during the operations phase, as well as during the post-closure phase of the Project. During operations, there will be seepage of water on the tailings storage facility (TSF) that will be largely collected by the perimeter ditches and drainage collection system to be returned to the TSF. The seepage that escapes the seepage collection systems will be captured by the drawdown cone produced by the dewatering of the open pit and underground mine and will eventually be collected in the open pit. It will then be incorporated as part of the water management system and used within

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					the process, or ultimately treated and discharged to Blackwater Creek. Following closure, the TSF will be covered by either a low-permeability dry cover, or a cover of non-process water. What seepage from the TSF that occurs during post-closure will report to the open pit, or surface watercourses as described in Appendix M to the EIS. During operations, groundwater will enter the underground mine, and will need to be removed as part of the dewatering program described in Section 3.8.2 of the EIS. Following the closure of the mine, the underground will fill with water.
626	AC(1)-299	Eagle Lake First Nation	Aboriginal Health and Socio-Economic Conditions		**Information Request / Comment:** Financials and social-economic baseline A detailed economic review of the mine was not in the scope of this review of the ESI. In Chapter 14.0 of the Environmental Impact Statement, Treasury Metals Inc. reports " Based on the results of the environmental assessment presented in this EIS for the Project including all mitigation strategies and all supporting technical studies), Treasury concludes that: "the Project will provide an economic net benefit to the local, Aboriginal, regional, and provincial economies and will not result in adverse impacts to Aboriginal and Treaty Rights or related interests Table 14.0.1 and Table 14.0.3) or other public concerns Table 14.0.2);"
					Response: At the request of the Agency and as part of the Round 1 IR process, Treasury Metals has prepared a revised EIS that sets out the assessment of effects and impacts associated with the Project, including a discussion social and economic effects of the Project, in a clear and traceable manner. Information about potential Project effects and mitigation measures related to these concerns can be located in Sections 6.17 (social), 6.18 (economic) and 6.21 (Aboriginal peoples) of the revised EIS.
627	AC(1)-300	Eagle Lake First Nation	Aboriginal Health and Socio-Economic Conditions		**Information Request / Comment:** Social-economic assessment This project has the potential to have significant social-economic impacts for the community of ELFN. In ESI, Appendix T outlines a social-economic baseline study and Appendix CC outlines the person hours that will be required for the Project. The information in this social-economic baseline was based on 2006 and 2011 census data. In Appendix CC, on page 98, the proponent outlines the type of jobs and number of person hours that will be potentially available a Goliath gold mine. Many of the jobs generated at the site are for highly specialized fields and not been explained in details. The community has identified that job creation is not a major community consideration, despite

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					claims by Treasury Metals Inc. that ELFN will benefit from job creation at the site. Speculating the impact on ELFN is based on social-economic data not specific to this project in Appendix T. The mining company has not yet expanded on the potential benefit of the mine to ELFN to include relevant social-economic opportunities for the community.
					Response: At the request of the Agency and as part of the Round 1 IR process, Treasury Metals has prepared a revised EIS that sets out the assessment of effects and impacts associated with the Project, including a discussion social and economic effects of the Project, in a clear and traceable manner. Information about potential Project effects and mitigation measures related to these concerns can be located in Sections 6.17 (social), 6.18 (economic) and 6.21 (Aboriginal peoples) of the revised EIS.
628	AC(1)-301	Eagle Lake First Nation	Aboriginal Health and Socio-Economic Conditions		**Information Request / Comment:** Financial concerns According to Appendix F, "The potentially mineable portion of the mineral resources in the Goliath mine area is presented in has been estimated using a gold price of US$1,350/ounce and a silver price of US$22/ounce. All mineralized blocks that are above the marginal cut-off grades of 0.43 grams gold per tonne of open pit rock and 2.50 grams gold per tonne of underground rock. " The economics of the mine are likely to result in "boom and bust" economics. The company needs to ensure that there is significant budget for emergency conditions and long term perpetual care of the site. In 2005, The Auditor General has expressed concerns about the financial assurance provisions at operating the mines and about the Ministry's relationship with First Nations. Mining Watch Canada, 2015 has expressed concerns to the Auditor General that "The Mineral Development Strategy in Ontario" continues to rely economic impact model with no debit column (input out), that externalizes risk including environmental, cultural, and social costs.. The use of GDP and an Input-Output model to measure economic consideration does not take in account the full risks to the community and hidden costs"(Mining Watch Canada, 2015). Table 2.2 – Table 22.1 in Appendix BB – Capital Costs of the Goliath Project According to Appendix BB (Table 22.1) Summary Net Cash Flow, , the capital cost for closure is 950,000 dollars. "Closer & Restorage (net of Salvage) $950,000, $0.11 per tonne ore milled" The

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					closure cost seems to be low according to the cash flow predictions. Within the capital cost, there is no specific category associated with ongoing monitoring of the site after closure. On May 19, 2015 the financial profile of the company currently is at 38 cents a share (TSX) and with 29 million market capitalization. There is 144 million net profit is expected (NPV discounted) from this project, based on project of similar nature does not allow for implementation of a long-term reclamation plan and monitoring plan or on-going investment in best available technology. Conclusion Maclean Environmental Consulting indicates that all rock from the mining site will have ADR potential at some point in the future. This unpredicted and thus unexpected ADR would require treatment and containment of contaminated water, sealing of waste-rock piles, prevention of overspill from pond. Such large costs for long-term care of the mining site should be estimated in advance of mining, and financial security should be scheduled into the operation as an on-going cost rather than a capital expense.
					Response: Prior to the commencement of construction, a closure plan would be filed with the Ministry of Northern Development and Mines (MNDM), in accordance with the Mine Rehabilitation Code of Ontario ("Code"), as presented in Ontario Regulation 240/00. The Code requires rehabilitation for a physically and chemically stable site at close out. Closure plans describe the rehabilitation of each Project component in accordance with the relevant requirements of the Code, as well as financial assurance (cash, surety bond or letter of credit) to implement the closure plan in the event that the proponent becomes insolvent. The Project would provide taxation revenue to all three (3) levels of government as well as employment and training opportunities described in Section 11 of the EIS.
629	AC(1)-302	Eagle Lake First Nation			**Information Request / Comment:** Introduction Maclean-Environmental Consulting was asked to provide a review of Treasury Metal's EIS for the proposed Goliath mine. More specifically, this review will focus on the water quality sections of the EIS, with respect to certain community concerns as identified by Kaitlin Almack of ICA Associates Inc., on behalf of the Eagle Lake First Nation. The following concerns will be addressed where feasible: • What is the process by which Acid Rock Drainage (ADR) water will be separated from non-ADR water?

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					• What will be the water quality of the pit lake, which in turn will be released to the environment? • Is the process for collecting run off water at the site sufficient? • Is the model used to predict contaminants sufficient? Further areas of major concern were identified by Ugo Lapointe of Mining Watch Canada and will be considered in this report where feasible. They include: • Mining effluent quality and impacts on the receiving waters; • Risks for underground water contamination; and, • Risks of dam breach and tailings spill in receiving environment, and potential impacts related to toxicity of tailing material. With respect to the above concerns as presented by the First Nation and Mining Watch Canada, this report will describe aspects of the EIS related to: • Water management; • Groundwater flow and quality; • Water quality; and, • Predictions of the EIS modeled water quality. Finally, the report will also point out any errors or omissions in the EIS, as it relates to the CEAA EIS guidelines.
					Response: This is a statement of the objectives of the Maclean-Environmental Consulting Report and no response is requested.
630	AC(1)-303	Eagle Lake First Nation	Fish and Fish Habitat Aboriginal Health and Socio-Economic Conditions		**Information Request / Comment:** Water Management The site requires multiple water management structures and considerations. Treasury Metals (TM) proposes to create a Tailings Storage Facility (TSF), a polishing pond, and numerous collection ponds. TM also proposes to build pipelines to receive water and to discharge water. Principle discharge pipelines will be to the TSF from the collection ponds, and from the TSF to an Effluent Treatment Plant. Intake pipelines appear to connect the Tree Nursery Ponds with the Effluent Treatment Plant. Other structures on site pre-exist. For example, Section 3.1.6 M Dams and Impoundments, states, "The unnamed tributaries passing through the former tree nursery were historically impounded by OMNRF to provide water for the tree nursery. The structures and impoundments remain in place and functional." The ponds are part of the Thunder Lake Tributary #3. To meet the needs of the mine, 26% of the flow of this creek will be needed. The processing plant will consume an estimated average 600 m3/d of fresh water during operation. Final treated water will be discharged to the Blackwater Creek. Blackwater Creek will also be realigned.

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					Physical diversions of creeks and dewatering of existing natural waterways is expected, as is the creation of ditches and berms to control run off. Section 3.3.2 Surface and Mine Water Management, states, "runoff will be prevented from entering the open pit by means of a small berm or ditch." TM does not define to what depth, height, or standard any of these features will be built. Collected water from these ditches into collection ponds) will be pumped via pipeline to the TSF. A more thorough review of site grading and geo-engineering was not undertaken in this report. Plans to keep run off from the open pit as well as the environment are not well defined. Section 3.2 of the EIS defines Project Phases and Schedule. The management of the mine is divided into 4 phases. Within these, water management priorities are outlined as follows: • Site Preparation Phase M Dewater ponds and wetlands and build surface draining diversion structures, establish water management and flood protection; • Construction Phase –site drainage works including pipelines and construction of the TSF; • Operations Phase – none given • Closure Phase – none given With respect to the community concern about control of runoff, Section 3.3.2 M Surface and Mine Water Management, defines, "The topography of the Project site is generally flat which allows the mine water management to consist mainly of surface water runoff redirection or collection". Management of water on the site will involve control of drainage from creeks and other tributaries, and precipitation and "the system will be designed to handle the average annual precipitation and will also include provisions for functionality under all climatic conditions". Precipitation is estimated, and taken from historical records. Section 5.1.4. defines this: "Based on historical observations at Dryden, mean annual precipitation at the Project site is 705 mm, of which, between 20% to 24% falls as snow. Precipitation recorded at Dryden is considered as representative of the LSA due to the proximity and the lack of significant elevation differences or orographic features. Slightly higher precipitation totals and a higher percentage of precipitation falling at snow at Sioux Lookout may suggest that precipitation is less homogeneous through the RSA." No consideration of changes to precipitation as a result of climate change are provided. Further to collection of runoff concerns, Section 3.3.3 -Open Pit Design, describes, "An in-pit sump will be used to collect mine water resulting from groundwater inflows and surface runoff. Perimeter wells or drainage holes in the pit walls may be installed to aid in the mine water management as mining progresses." As well the Project will use ditching and seepage collection around the edges of the stockpile to

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					collect and direct surface water runoff and seepage. This water will likely be acidic. This runoff will be piped to the treatment plant, tested and then released. The mine water management system may also include directing run-off water into the completed open pits after closure and to facilitate pit flooding.
					Response: There does not appear to be a specific question from the reviewer, rather the text is a statement of the reviewers understanding of the water management plans for the site. The engineering for the Project presented in the EIS was of a level suitable to support the assessment of effects, but was not yet advanced to a level of detail where specific dimensions for ditched and water conveyance structures were finalized. However, the primary objectives of the water management system were established, which was to collect and manage water to allow operations to proceed safely, and to protect the environment. The water management structures and facilities will be constructed during the site preparation and construction phase, and will continue throughout operations. During closure, there will be some modification to the drainage structures to make them suitable over the long-term. The physical ditches and drainage infrastructure will effectively remain in place during the post-closure phase of the Project. Since the submission of the original EIS, Treasury Metals has been advancing their engineering for the Project, including updating the water balances and design for the water management system. The updated water management system will effectively direct all of the runoff through ditches to the open pit, where it will be withdrawn as part of the dewatering activities. The updated design of the water management system considers a range of climatic conditions, including consideration of water management needs for wet years, dry years and average years. The precipitation data used in the analysis comes from the long-term climate record for Dryden, which is considered the most appropriate for use in the evaluations. The updated water balance and refined engineering for the Project since the submission of the original EIS has been provided in Appendix JJ to the revised EIS. The potential effects of climate change on the water management systems was discussed in the EIS, and addressed more fully in the response to TMI_263-EE(1)-06. Generally, climate change would not be considered an issue during the site preparation and construction phase, the operations phase, or the closure phase of the Project. The reason is that these phases of the Project would last about 15 years from beginning to end. Over this short of a time period, the climate in the region is expected to remain similar to the conditions experienced today. It will be over the longer-term, extending into the post-closure phase, when changes in climate need to be considered. As described in TMI_263-EE(1)-06, future climate in the region is projected (McDermid et al, 2015) as one of warming annual, summer and winter temperatures. The annual and winter precipitation projections show increasing precipitation, while the projections for summer precipitation show decreases. The increase in annual precipitation could mean that the open pit may fill faster slightly than expected, which would in no way adversely affect the environment. The long-term site water

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					budget should not be affected significantly as the increasing temperatures and annual precipitation rates will tend to offset each other, meaning the water levels remain sufficient in the open pit mine to maintain a water cover for both the pit walls and waste rock. As part of the water management system, there will be perimeter ditches around the various stockpiles and work areas to ensure the capture of runoff, which will be directed to the water management system where it will be used to the extent possible in the process, treated and ultimately discharged to Blackwater Creek. At closure, the low-grade ore stockpile will be decommissioned and any material not yet processed returned to the open pit. The waste rock storage area (WRSA) will be covered at closure with a low-permeability cover to isolate the potentially acid generating (PAG) material from oxygen and prevent acid rock drainage (ARD). The overburden stockpile will largely be used in the closure and rehabilitation of the site. The drainage systems will remain in place at closure to divert the runoff from the covered and rehabilitated site to the open pit, which will ultimately drain through a spillway into Blackwater Creek.
631	AC(1)-304	Eagle Lake First Nation	Fish and Fish Habitat Aboriginal Health and Socio-Economic Conditions		**Information Request / Comment:** Acid Rock Drainage While this report does not examine the technical science behind the ARD predictions, it does describe the potential risks associated with managing run-off that is potentially acidic. From 3.5.1 Mine Rock Stockpile, approximately 23 million tonnes of waste rock will be produced during the open pit mine life with an additional 2 million tonnes being generated and stored on surface from underground mining. 13 million will be stored and 12 million backfilled. Also, "the pits will be developed and mined in series from west to east. As a result, approximately 40 or 12 million tonnes) of the total open pit waste rock can be used to backfill the pits and minimize the volume and footprint of the waste rock stockpile north of the pit. The waste rock stockpile will have a footprint of 37 ha, a height of 30 m above grade Section 5.4.3.4 M Materials and Characterization and Management Studies, indicates that there are 4 mine rock types – all were classified as Potentially Acid Generating (PAG). Given that the materials have what is known as a "very low NPR ratio" Price, 2009), this indicates rock material having a high potential to be acid generating. This means that ALL runoff has the potential to generate acid. Current predictions see acid generating potential in all materials stored past conservatively 20 M40 weeks). 3.5.1 Mine rock stockpile states, "during production, waste rock will be classified and separated according to acid generation potential. The placement of these stockpiles will fall under a management plan for mine rock management that will detail the methods for classifying rock type

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					for acid generating potential through appropriate testing in order to direct this rock to the appropriate stockpile location. A management plan of this type is standard industry practice for rock that has the potential for acid generation. This plan is not defined and contradicts the earlier statements in the EIS that all waste rock is potentially acid generating. Where possible, potentially acid generating (PAG) rock will be placed within the completed open pits to provide a long term water cover in order to mitigate potential acid generation. Management will also include treatment of water run-off from the permanent waste rock storage pile and the low grade stockpile. The low grade ore stockpile will have temporarily the potential to generate acid runoff while being stockpiled, however, at the end of mining operations, the LGO will be depleted and no material will be left behind. Yet, "Treasury understands that conditions may change over the life of the mine. For this reason, a contingency plan is presented in Section 3.14.3 to address potential for a low-grade stockpile at closure. Section 3.14.3 was not reviewed in this report however requires consideration as a potential risk. What will be the long term plan to control this ARD should a stockpile remain at closure? Control of runoff is essential as all runoff has the potential to be acid generating. This means runoff may contain from 5.4.3.4 Materials and characterization and management studies) sulphates, antimony, cadmium, zinc, aluminum, copper, and lead. These same contaminants will be those of concern should any large spills, accidents or persistent leaks occur at the site. Highlighted Concerns and Omissions • Section 5.4.3.5 describes that all (100%) mined materials, including waste rock, tailings, and lowMgrade ore, have been classified as Potentially Acid Generating (PAG). • The EIS states, "If segregation of PAG and nonMPAG mine rock is completed, any material used for construction purposes should be evaluated for acid generation potential and metal leaching prior to use." Segregation or separation of PAG and nonMPAG mine rock is NOT POSSIBLE, because all rock types have high potential to be acid –generating. How will Treasury build tailings structures and other mine structure without using this rock fill? • No consideration of climate change has been given. • No consideration of Traditional Knowledge has been given.
					Response: Amount of PAG Material The statement in Section 5.4.3.5 describing that "All (100%) of mined materials, including waste rock, tailings, and low-grade ore, have been classified as PAG." is a generalized statement related

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					to consideration of management needs for these materials. All of these materials have been considered as PAG in terms of material management requirements for the purposes of the EIS. However, the source rock for the future ore and waste rock is expected to have variable neutralization potential and acid potential such that a large portion of the rock will be PAG, but localized zones within the rock mass may be non-PAG. Investigations to date have confirmed the predominance of PAG material, but have not been sufficient to quantitatively define the amount or continuity of non-PAG materials within either the future ore or waste rock zones to be developed. <u>Potential Segregation of PAG</u> The potential to segregate PAG and non-PAG waste rock during mining operations has not yet been confirmed and the high proportion of PAG materials identified in project rock resulted in selection of off-site aggregate sources as the preferred alternative for construction aggregate materials (EIS Section 2.3.11.3). In the event suitable non-PAG waste rock materials can be identified and segregated during mining within the future open pit, these could be considered for use as aggregate in construction. Identification of such materials would be supported by additional testing and characterization studies. The potential for segregation of PAG and non-PAG waste rock for construction materials is discussed in more detail in TMI_46-MW(1)-08. <u>Climate Change Consideration</u> The implications of climate change for the Project are discussed in Section 4.4.5 of the EIS. Due to the relatively short life of the Project (less than 17 years), climate change is not expected to have any measurable effect on the Project during the site preparation and construction phase, the operations phase, or the closure phase. A more fulsome evaluation of the potential effects of climate change on the Project during the post-closure phase are provided in response TMI_263-EE(1)-06. <u>Consideration of Traditional Knowledge</u> Treasury Metals has made efforts to engage and elicit input from Aboriginal peoples regarding the Project. No Project-specific traditional knowledge and traditional land use studies were prepared for, or shared with, Treasury Metals; limited information was obtained about traditional land use areas. Treasury Metals made efforts to incorporate information provided and to address comments and issues raised by Aboriginal peoples during the engagement process. A summary of the issues raised during the engagement process was provided in Section 8 and Appendix DD to the original EIS. As part of the Round 1 IRs, the Agency has requested that Treasury Metals expand and update the information presented in Appendix DD to the original EIS. This information is provided as an updated document called the Aboriginal Engagement Report, Appendix DD to the revised EIS. The Aboriginal Engagement Report provides a listing of the disaggregate comments from Aboriginal peoples, and how those were addressed in the EIS. Treasury Metals will continue to discuss potential Project effects on traditional land use activities with potentially affected Aboriginal peoples throughout the life the Project. As additional information regarding an Aboriginal community's traditional land use and practices become available, Treasury

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					Metals will review and consider it in the design of mitigation measures, follow-up monitoring and management plans for the Project, as appropriate.
632	AC(1)-305	Eagle Lake First Nation	Fish and Fish Habitat Aboriginal Health and Socio-Economic Conditions		**Information Request / Comment:** Groundwater Flow and Quality Groundwater was studied for the EIS over a short period of time in 2013 and 2014. The study looked at two types of flow; flow in the surface to bedrock region and flow in the bedrock itself. Groundwater studied for the flow in the surface to bedrock layer, discussed in the EIS section 5.6.2.3 Groundwater Flow, indicates that flow was only studied for an 8 month period, June 2013 - Jan 2014 .No spring freshette evaluation was considered where highest flows would be expected. Over the short 8 months evaluation period, the water table seems quite variable. Water table depth varied from 14cm deep to almost 2 m. The resulting hydraulic conductivity values seem generally representative of silty and sandy conditions. This will mean considerable possibility for movement of runoff, or TSF leaks/accidents into groundwater. Groundwater flow is described in the EIS as having a SW direction, towards Wabigoon Lake. For the studies on flow in the bedrock itself (Section 5.6.3.3 Groundwater Flow), studies were undertaken for 5 months in 2013, and indicated “a groundwater elevation rise following the spring freshet, followed by a gradual decline through to the winter of 2013/2014”. Total water level fluctuations in these wells was reported to be between 1.0 m and 1.5 m. Water table levels fluctuate and rise with the spring freshette. This fluctuation suggests an active groundwater flow area. To truly understand the potential consequences of this, the speed of flow to the SW needs better consideration, especially given that any potential seepage from the tailings facility may acidify local wells. Some consideration is given to this below. The movement of groundwater in the bedrock shows an outward radial flow to the east and SW and might discharge to the Blackwater Creek. How quickly TSF waters could leach or leak into the aquifer/ groundwater depends on citing of the TSF and measured rate of flow. The TSF is located in the NE corner of the mining property and as such is situated furthest from Wabigoon Lake, (as the property will allow) given the direction of groundwater flow (SW). Section 5.6.2.2. of the EIS states surface to bedrock groundwater movements at 1EM 06 m/s and bedrock groundwater movement at 1E M07 1EM09m/s flow. This translates into 31.5 meters per

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					year at the fastest groundwater movement or would take 63 years to reach the nearest well. This report did not comprehensively assess these findings and should only be taken as a superficial consideration of hydrological processes. For example, the studies taken to determine groundflow were undertaken only over a five month period. This may not be sufficient. Section 5.6.5 also describes where the TSF is cited as having being a "sand clay/silt-sand unit consisting mainly of silty sand overlying a mainly continuous silty clay above the basal sand unit. This unit is mainly found in the northwestern portion of the Blackwater Creek Watershed (near the top of Blackwater Tributary #2). This silty sand does provide some groundwater flow to Blackwater Creek and likely has a hydraulic conductivity similar to the basal sand. " Figure 1 below shows that the TSF is situated over what appears to be a highly porous substrate. This would seem to imply greater potential for migration of TSF waters and contaminants into the groundwater. This report did review the tailings structure in any detail, however section 2.3.6 of the EIS needs to be reviewed in context to other geological and physical data to fully understand the potential risk to groundwater contamination. Highlighted Concerns and Omissions • From Section 5.6.5 Conceptual Hydrogeological Model suggests that "based on data collected during 2012 to 2014, it appears that there is limited groundwater flow that provides a minimal contribution to creeks in the vicinity of the project site and across much of the project area". The reviewer noted only one sample taken in January of 2014 and no record of sampling in 2012, suggesting that the above statement is in error and misrepresents the duration of effort put into studying groundwater • The above statement that suggests, "it appears that there is limited groundwater flow that provides a minimal contribution to creeks in the vicinity of the project site and across much of the project area" is directly contradicted by the dry year of 2013 below year 30 average precipitation) where the creeks had continuous flow. • Contradictory information is given, which furthers the argument above, "Monitoring of stream flows in Blackwater and Little Creek during the regional dry/low precipitation year of 2011 found that these creeks had no flow or not enough flow for accurate measurement beyond the spring freshet. This was considered to be an indication that there was no significant groundwater discharge to these creeks, as otherwise some base flow could be expected during very dry conditions. In 2012 and 2013, precipitation was again below the 30 year average, but near continuous flow was noted in both of these creeks, which was then assumed to account for part of the recharge to the overburden aquifer system. The above rationale makes no sense and is contradictory. What is the true answer? Does groundwater significantly contribute to creek flow or not? • The nearest wells are less than 2 KM away.

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					• Already at the monitoring wells (background) there are exceedances of aluminum, arsenic, chromium, cobalt, copper, iron, tungsten, vanadium and zinc. • Groundwater samples have not been collected from any of the bedrock exploration wells for laboratory analysis so no information is available relating to water quality in the bedrock unit at the site. How then can we determine if groundwater is being contaminated if we do not know what it is to begin with? • The area with the greatest groundwater flow appears to be where the tailings structure will be situated. A sand and gravel unit consisting of coarse glacial deposits located on the northern and northeastern edge of the project area (where the TSF is located). This unit provides the most groundwater flow to the unnamed tributaries leading to Thunder Lake. • No traditional Knowledge about the area was considered, and therefore no discussion about observational changes over long term was provided. Five to eight months of research on groundwater to surface observations is very weak data on which to make predictions.
					Response: We have separated the response under a number of headings for clarity. Length of groundwater monitoring and Groundwater Level Fluctuations The groundwater level monitoring started in 2012 and continue to be monitored by Treasury Metals. The groundwater level fluctuations are mostly up to 2 m or less (Table 4, Appendix M of the EIS), which are typical for groundwater bearing units in the shield of Northern Ontario. Groundwater velocities and movement of water The author(s) of the Information Request confuse hydraulic conductivity (i.e., the ability of the soils / rock to transmit water per unit thickness, also known as the permeability) with groundwater velocities. The groundwater will travel fastest through the shallow bedrock and the discontinuous basal sand that lies between the clay and the shallow bedrock. The calculation of travel times in these strata requires the estimation of the kinematic porosity (the connected void space of the rock through which groundwater flows) of the shallow bedrock and the basal sands as well as the hydraulic conductivity and the hydraulic gradient (related to the spatial difference in water levels). Although the kinematic porosity can be estimated based on laboratory experiments and small-scale tests, it is extremely difficult to estimate for large rock masses, particularly the fractured bedrock. Nevertheless, approximate estimates of the groundwater travel times to private wells can be made, which are expected be of the order of decades. Significance of groundwater discharge to Blackwater Creek That the Blackwater Creek ran dry in 2011 shows that groundwater discharge is small component of the total flow of Blackwater Creek and flow in this creek is runoff dominated. In other years the dry weather flows are not a high proportion of the total flows again indicating that groundwater

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					discharge to Blackwater Creek is very limited. Groundwater quality of the bedrock The main water bearing horizon is the shallow bedrock and the discontinuous sand at the base of the overburden in the area of the Goliath Gold Project. This is the horizon from which most private wells will source their water. Treasury Metals' monitoring wells BH1A, BH2A and BH4A all sample this flow horizon. Groundwater quality continues to be measured in the present wells and the groundwater monitoring program will be expanded as outlined in Section 13.10 of the EIS. The exceedances of metals noted above in the Information Request concern dissolved metal concentrations primarily being above the Provincial Water Quality Objectives (PWQO) and / or the Canadian Environmental Quality Guidelines (CEQG). Such exceedances for metals are natural and a common occurrence in shield groundwater across Northern Ontario. The only exceedances of the Ontario Drinking Water Standards (ODWS) are for aluminum, iron, manganese and alkalinity; likewise this is natural and a common occurrence in shield groundwater across Northern Ontario. Siting of the tailings storage facility (TSF) and impact from the TSF The TSF is largely located on a sand over clay / silt over sand sequence as shown of Figures 4, 5 and 6 of Appendix M of the EIS. The sand and gravel indicated in the Information Request above lies to the north of the TSF (Glaciofluvial Outwash indicated on Figure 4 of Appendix M of the EIS) in watersheds that drain to Thunder Lake. The TSF lies within the Blackwater Creek watershed. During operation of the mine any contamination in groundwater that may leak from the TSF will be captured by the dewatering of the open pit and underground mine, The predicted effects of the TSF upon cessation mining and closure are further discussed in Section 3 of the Water Report (Appendix JJ to the EIS). Traditional knowledge Although Treasury Metals has made efforts to engage and elicit input from Aboriginal peoples regarding the Project, no Project-specific traditional knowledge and traditional land use studies were prepared for, or shared with, Treasury Metals. The limited information that was obtained during the engagement process was incorporated into the EIS. Regardless, Treasury Metals are confident that the geology and available data support the predictions and conclusions presented in the EIS. Treasury Metals will continue to discuss potential Project effects with potentially affected Aboriginal peoples throughout the life the Project. As additional information become available, Treasury Metals will review and consider it in the design of mitigation measures, follow-up monitoring and management plans for the Project, as appropriate.
633	AC(1)-306	Eagle Lake First Nation	Fish and Fish Habitat Aboriginal Health and		**Information Request / Comment:** Water Quality Water from the decant TSF will be treated by the filtration system. This appears to be a catch all solution to any water concerns on site. Two main features of this are the Cyanide

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			Socio-Economic Conditions		Detoxification/Destruction Unit and the Effluent Treatment Plant. Each are assessed for their "best practices" below. Cyanide Detoxification Section 3.6.6.3 - Cyanide Detoxification, defines the process as the following: The cyanide detoxification circuit will consist of two stirred reactors with air sparging as well as copper sulphate, sodium metabisulphite, and lime addition. Piping arrangements will allow the reactors to be operated in a series, parallel, or bypass configuration. The detoxification circuit will receive CIL tails and discharge treated slurry to the tailings hopper. Movement of slurry through the detoxification circuit will be by gravity. The cyanide detoxification circuit is intended to be designed to destroy cyanide to 1 mg/L total cyanide, which is the current Metal Mining Effluent Regulations (MMER) limit for maximum authorized monthly mean concentration. Further natural cyanide degradation will take place in the tailings facility prior to discharge to the environment. Further to this, Section 3.8.7 of the EIS M Final Effluent Discharge, states "by destroying cyanide prior to discharging the tailings to the storage facility, potential cyanide contamination situations such as dam seepage or tailings facility overflow during extreme storm events late in the project life are eliminated". The Inco SO2- Air process has been selected as the preferred method for in plant cyanide destruction. Inco SO2-Air process Most cyanide destruction processes operate on the principle of converting cyanide into a less toxic compound through an oxidation reaction. The INCO SO2M Air process was developed by INCO in the 1980 s and is in operation at over thirty sites in the world http://www.infomine.com/publications/docs/Botz1999.pdf Table 1 represents a simplified summary, by Michael Botz regarding comparable cyanide treatment processes and may be used as a screening tool. The INCO SO2 Air Process ranks well. http://chemistry.mdma.ch/hiveboard/rhodium/pdf/cyanide.destruction.overview.pdf Table 1. Preliminary Selection Guide for Cyanide treatment Processes Table 2 details the advantages and disadvantages of the INCO So2 -Air Process. Table 2. Advantages and Disadvantages of the INCO So2 -Air Process Advantages 1 The process has been proven in numerous full0scale applications to yield low effluent and metal concentrations 2 The process is effective in treating slurries as well as solutions 3 The process is suitable for batch and continuous treatment 4 All forms of cyanide are removed from solution, including the stable iron cyanide complexes 5 Capital and operating costs are comparable with other chemical treatment processes

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					Disadvantages 1 If treating high levels of cyanide, the costs for reagents and electrical power can be high 2 Cyanide is not recovered 3 Undesirable levels of sulphate in the treated solution can result 4 Additional treatment may be necessary for the removal of iron cyanide, thiicyanate, cyanate, ammonia, nitrate and/or metals for solutions to be discharged to the environment, (Mudder et al, 2008). The process chosen to deal with cyanide seems appropriate. Cyanide destruction through the INCO SO2 – Air process will deliver water into the TSF with levels of cyanide below the levels acceptable to the MMER and PWQO standards. Furthermore, his method ensures that "wildlife, including waterfowl and aquatic life, are protected, that cyanide consumption is minimized, and that contingency is in place to prevent the inadvertent release of cyanide into the environment". TSF will also undergo treatment at the Effluent Treatment Plant.
					Response: As described in Section 2.3.5, the alternative selected for managing the cyanide in the process effluent has multiple levels of protection, with "[i]n-plant cyanide destruction followed by natural degradation followed by effluent treatment." With the proposed approach, the discharged process effluent entering the tailings storage facility (TSF) would already meet the Metal Mining Effluent Regulations (MMER) limits for environmental safety. In this way, Treasury Metals can help "ensure that wildlife, including waterfowl and aquatic life, are protected". Treasury Metals concurs with the reviewer's position that the process selected to deal with cyanide was appropriate.
634	AC(1)-307	Eagle Lake First Nation	Fish and Fish Habitat Aboriginal Health and Socio-Economic Conditions Alternatives Assessment		**Information Request / Comment:** Effluent Treatment Plant Tailings storage facility decants will be pumped to the effluent treatment plant for treatment prior to discharge to the polishing pond and ultimately Blackwater Creek. According to the EIS, tailings pond decant water will be treated in three distinct process steps including an advanced oxidation process for residual cyanide destruction, multimedia filtration, and reverse osmosis membrane filtration. TSF decant water will be pumped from a transfer tank to a three chamber multimedia filtration system, operating in parallel, via three multimedia filter feed pumps. This is consistent with literature, which suggests the use of filtration, preferably nano filtration, prior to reverse osmosis (RO) to avoid RO membrane clogging, fouling or damage, (EPA, 2014). Filtration is to a nominal 1.0 micron range. Filtration media will consist of a combination of anthracite, silica sand, and garnet. The Effluent Treatment Plant will require additions of both sulphuric acid and sodium bisulphite prior

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					to the multimedia filtration step to lower pH and sodium bisulphite consume any excess oxidants respectively. A polymer or coagulant addition will also be included as a flocculation agent. No description of the coagulant is given. Potential risks are associated with the storage of these additives. Treasury claims that when the system is functioning well that the RO can operate at recoveries as high as 90%. Treasury identifies scaling as a risk to the correct functioning of the RO system, suggesting, "scaling calculations will indicate the upper limits on recovery and efficiency. Overall the RO should rejection "greater than 98% of all contaminants including: in-organics, organics [greater than 200 nominal molecular weight limit (NMWL)], bacteria and suspended solids as small as 0.003 microns depending upon their shape and strength. The EIS then describes that the RO treated water will be stored in the permeate storage tank, from where it is returned to the process or discharged to the environment via the polishing pond. If permeate quality is out of specification (through monitoring) it can be diverted to the transfer tank for retreatment. **Response:** Since the submission of the EIS, Treasury Metals has been advancing their engineering for the Project. A summary of the refinements to the Project since the completion of the EIS are presented in Section 3.16. A summary of the treatment of the tailings pond decant water and operation of the Effluent Treatment Plant are included therein.
635	AC(1)-308	Eagle Lake First Nation	Fish and Fish Habitat Aboriginal Health and Socio-Economic Conditions		**Information Request / Comment:** Sediment quality A cursory review of sediments was given to attempt to tie any potential pathways of contamination across media (Table 3). For example, do certain metals in water also persist in sediments and wind up in wildlife and fish? Sediment samples from each location were analyzed for twenty-four PAHs. Benzo[b]fluoranthene and naphthalene were detected at the outlet of Blackwater Creek at Wabigoon Lake. Benzo[k]fluoranthene was detected at all locations. Sediments were also tested for metals and exceedances were found for chromium, copper, manganese, nickel, and zinc, iron and also phosphorus. Manganese in particular was the only parameter to exceed the SEL at site JCTa, where levels were observed at 1260 µg/g, or 160 µg/g over the SEL. **Response:**

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					Existing sediment quality is one possible indication of contaminant levels within the ecosystem. A summary of the baseline sediment monitoring program to support the original EIS was presented in Section 5.8.2, with detailed results presented in Appendices G and P. Sampling for metals in sediments was completed in 1997 and 2011 (Appendix G to the original EIS). Only one of these sediment samples exceeded the severe effects level (SEL) set out in the Provincial Sediment Quality Guidelines (PSQG), and had a concentration of 1,260 µg/g for manganese at the JCTa sampling location. The SEL are described by the Ministry of the Environment and Climate Change MOECC (2008: website) as indicating "…a level of contamination that is expected to be detrimental to the majority of sediment-dwelling organisms." There were baseline concentrations of chromium, copper, iron, nickel and zinc measured in excess of the LEL PSQG. The LEL are described by the MOECC (2008: website) as indicating "…a level of contamination that can be tolerated by the majority of sediment-dwelling organisms." The baseline sediment concentrations for arsenic, cadmium and lead were all below the LEL PSQG. Sampling for polycyclic aromatic hydrocarbon (PAH) compounds in sediments showed that the majority of the samples had recorded concentrations that were below the laboratory detection limits. None of the samples showed concentrations that exceeded the LEL PSQGs. A single PAH concentration of 0.25 mg/kg of benzo[k]fluoranthene at sampling site BC exceeded the corresponding LEL of 0.24 mg/kg. It was also noted that several of the other PAH compounds had LEL PSQG that were below the laboratory detection limits, indicating it was possible there were other baseline PAH values above the LEL PSQG. However, it should be kept in mind that LEL are described by MOECC (2008: website) as indicating "…a level of contamination that can be tolerated by the majority of sediment-dwelling organisms." At the request of the Agency and as part of the Round 1 IR process, Treasury Metals has prepared a revised EIS. The revised EIS removes Appendix G as the information has either been replaced with more current and relevant information or has been incorporated into other sections and appendices. The following baseline work is presented in the appendices to the revised EIS and summarized in Section 5.0: • Traffic: Appendix-E; • Noise levels: Appendix-H; • Light levels: Appendix-I; • Stream flows: Appendix-N; • Water quality: Appendix-P; • Fish and fish habitat: Appendix-Q; • Wildlife: Appendix-R; • Wetlands and vegetation: Appendix-S; and

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					• Socio-economics: Appendix-T. We are unable to provide any specific comments regarding "Table 3" as the Agency did not share a copy of this table as part of the Round 1 information requests. **Websites Cited** Ministry of the Environment and Climate Change (MOECC). 2008. Guidelines for Identifying, Assessing and Managing Contaminated Sediments in Ontario. https://www.ontario.ca/document/guidelines-identifying-assessing-and-managing-contaminated-sediments-ontario#
636	AC(1)-309	Eagle Lake First Nation	Fish and Fish Habitat Aboriginal Health and Socio-Economic Conditions		**Information Request / Comment:** Background water quality Background water samples were taken at 16 sites over two years. Exceedances of the Province of Ontario's Water Quality Guidelines for pH occurred at 3 sites, cobalt at 10 sites, copper at two sites, iron at all sites except SW8, lead at one site, selenium at one site, silver at one site, vanadium at one site and zinc at 6 sites. Table 3. Consideration of Contaminants Across Media Of the metals that appear to be across more than one media, Aluminum, arsenic, copper, lead, mercury, and zinc are considered to increase with the development of the mine (while discharged water is predicted to meet MMER standards these are not the same as POWQ or CCME standards).
					Response: Treasury Metals has made a commitment (Table 10.0.1) that the effluent discharged from the Project will meet the Provincial Water Quality Objectives (PWQO). For compounds with no PWQO, the effluent will meet the Canadian Environmental Quality Guidelines (CEQG) from the Canadian Council of Ministers of the Environment (CCME). Finally, Treasury Metals has committed to discharge mercury in effluent at concentrations that are at, or below the existing baseline concentrations in Blackwater Creek. In the commentary, the reviewer appears to refer to the comparison of baseline water quality sample results compared to PWQO levels (Table 5.8.1.3-1 of the EIS), with an emphasis on the baseline measurements that exceed PWQOs. Although Treasury Metals acknowledges that existing baseline water quality in the area will sometimes exceed the PWQO, Treasury Metals remains committed to treat the operations effluent from the Project to meet PWQO prior to discharge into Blackwater Creek (Table 10.0.1 of the EIS). It is not possible to provide a specific response regarding "Table 3. Consideration of Contaminants Across Media" discussed in the comment section, as the table was not included in the Round 1

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					questions issued by the Agency.
637	AC(1)-310	Eagle Lake First Nation	Fish and Fish Habitat Aboriginal Health and Socio-Economic Conditions Current Use of Lands and Resources for Traditional Purposes		**Information Request / Comment:** Benthic Invertebrates Some of the EIS Assumptions are unjustified. Section 5.8.3.2 - Benthic Invertebrate Results, in Table 5.8.10 shows that two different companies DST and KCB) did two different studies with no overlap in project sites and with different methodologies, KCB sampled at 4 sites using ponar grabs in 2011. DTS collected at 19 completely different sites, using the kick net method in 2012, in two riffles and one pool per site). Description of the sample years in the EIS is misleading also. Table 5.8.10 states samples were collected in 2010/2011 and 2012/2013 when in fact were only collected over a total of 4 days (Oct 16 and 17, 2011 by KCB and Oct 22 and 23, 2012 by DST). Conclusions about water quality from this research are extremely vague, such as "In general, the benthic invertebrate community reflects general conditions at the Site." This type of information does not help decision makers. Furthermore conclusions about water quality in the EIS above 5.8.3.2 indicating general – read good, conditions) differ from those in Appendix P, which indicates poor water quality and that "samples from Wabigoon Lake (SB12-22, SB12-23, and SB12M24) in 2012 were dominated by Diptera (ranging from 52.3% to 80.1%), again suggesting poor water quality". The conclusions from section 5.8.3.2 cannot be made because studies are not comparable, with different sites and methodologies. This section concludes that "results of benthic invertebrate sampling from Blackwater Creek in 2012 were somewhat similar to 2011 in that a higher percentage of EPT families were observed in downstream samples compared to upstream samples. Simpson s index, which ranged from 0.4 to 0.9 further suggests moderate to high species diversity in Blackwater Creek. This above conclusion is directly contradicted in Section 10.4.5. -Benthic, which concludes, that "In general, percentages of EPT taxa in Blackwater Creek were extremely low, reflecting the slow moving, turbid, and soft bottomed nature of the stream". In fact, generally invertebrate samples dominated by only two species or that have percentage of Diptera greater than 40% are indicative of poor water quality. Low EPT also suggests dominance by species better able to tolerate a low oxygen environment. This may have considerations for habitat, as this will be the creek receiving the processed mine waters to MMER standards only), though many still above the CCME guidelines, possibly including phosphorus. This may further limit oxygen

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					and worsen habitat. There was no effort to cross examine nutrient data with contaminant data or background water chemistry to consider the conclusions of this work? Low EPT values can be explained by low oxygen in slow moving creeks, but not in the more open lakes. This was not considered, nor was the ultimate impacts the mine might pose benthic life in general.
					Response: The benthic invertebrate sampling programs are described in greater detail in Appendix G Environmental Baseline Study 2010/2011 and Appendix P – Aquatic Baseline Study 2012/2013 to the original EIS. The Sample Year column headings in Table 5.8.10 reflect the titles of those two appendices but should be 2010 and 2012 to reflect the actual years the samples were collected. In 2010 samples consisting of composited triplicate Ponar grabs were collected at five locations, four in Blackwater Creek proper and one at the outlet of Blackwater Creek into Wabigoon Lake. In 2012 samples consisting of composited triplicate Ponar grabs were collected in Wabigoon Lake (5 locations) and Thunder Lake (4 locations). Kick and sweep samples consisting of two riffle and one pool sample per site were collected in Blackwater Creek (6 locations) and an unnamed tributary to Thunder Lake (4 locations). Both kick and sweep sampling and Ponar grabs are accepted methods of collecting benthic invertebrate samples. The method of sampling is typically selected based on the nature of the habitats being sampled. Updated benthic invertebrate information can be found in Appendix Q Summary Fisheries Baseline Report (2011 – 2016) to the revised EIS.
638	AC(1)-311	Eagle Lake First Nation	Fish and Fish Habitat Aboriginal Health and Socio-Economic Conditions		**Information Request / Comment:** Fish Fish health was examined in this report to understand what potential contaminants were already of concern and to see if further mine water releases might impact these fish. From the Fisheries - Appendix Q section 3.1.2 Tissue Sampling, Thunder Lake was studied, however only 11 fish were used for tissue sampling and ageing. This is insufficient given that all of the Walleye sampled were two years of age or less." Mercury results for the largest and smallest fish in the sample were 0.143 mg/kg and 0.331 mg/kg respectively. Mercury levels ranged from a low of 0.102 mg/kg to a high of .503 mg/kg. Four fish sampled from Thunder Lake exceeded the minimum levels advised for sensitive populations of 0.26.mg/kg. The EIS must include a better age class range to get a true sense of the Hg problem and potential for a rights infringement by further influencing this population with Hg.

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					Sampling effort was better in Wabigoon Lake, with a total of 28 Walleye and one Sauger caught and retained for tissue sampling and ageing. Age range was from 1 year to 10 years. "Mercury results for the largest and smallest fish by weight in the sample were 0.245 mg/kg and 0.114 mg/kg respectively. Mercury levels ranged from a low of 0.0865 mg/kg to a high of .473 mg/kg." Three fish sampled from Wabigoon Lake exceeded the minimum levels advised for sensitive populations of 0.26.mg/kg M .52 mg/kg. Highlighted Concerns and Omissions • No consideration of dissolved versus total metals. If the metals are mostly dissolved this is more problematic as dissolved metals are more readily accessible to aquatic life. • Given that the fisheries report in section 3.1.2 already identifies consumption guidelines for mercury a better age class assessment of mercury in fish important to the First Nations needs to be undertaken. The current studies for Thunder Lake are on walleye that are all one year old (with one exception on a 2 year old fish). Many First Nations will prefer larger fish where more mercury concerns exist. How Hg will increase in the lakes is unclear from the EIS. • No contaminants data on benthic invertebrates is considered. This limits the ability to determine pathways from water to sediments through benthic inverts to fish. • Would be nice to see the consideration of pathways in order to consider if MMER are sufficient to prevent negative impacts on aquatic life. • A further assessment should consider the proposed influence from predicted CCME exceedances of pH, ammonia, Aluminum, arsenic, cadmium, copper, lead, mercury, thallium and zinc. • PAHs were only tested for sediment, however not for water.
					Response: The Project design presented in Section 3 of the EIS represents the understanding of the Project at the time of filing. Since the submission of the EIS, Treasury Metals has been advancing their engineering for the Project, and refined a number of aspects of the Project design. A summary of these refinements to the Project are presented Section 3.16. Mercury was considered as part of the screening level risk assessment presented in Appendix W to the EIS. When sampling mercury levels in water, either total mercury or dissolved mercury can be reported, with total mercury being greater than, or equal to the concentration of dissolved mercury. Both total and dissolved mercury can be present in an inorganic or organic form, with the organic form of mercury being the component that will be taken up, and accumulate in the tissue of animals such as fish. For exposure to mercury in fish, the evaluation was conducted assuming both 100% inorganic form as well as 100% organic form; refer to TMI_203-HE(1)-10 for more information. There will be no effluent discharged from the Project to Thunder Lake or its tributaries. The only point of discharge from the Project will be into Blackwater Creek. Treasury Metals are aware of concerns regarding mercury, and have therefore committed in the EIS that during operations the discharges of mercury from the Project to Blackwater Creek would meet the current background

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					levels of 0.00002 mg/L, which is ten times more stringent that the Provincial Water Quality Objectives (PWQO) of 0.0002 mg/L. At the request of the Agency and as part of the Round 1 IR process, Treasury Metals has prepared a revised EIS that sets out the assessment of effects and impacts associated with the Project, in a clear and traceable manner. Information about potential Project effects and mitigation measures related to these concerns can be located in Sections 6.8 (surface water quality), 6.14 (fish and fish habitat), 6.16 (land use), 6.19 (human health) and 6.21 (Aboriginal peoples).
639	AC(1)-312	Eagle Lake First Nation	Fish and Fish Habitat Aboriginal Health and Socio-Economic Conditions		**Information Request / Comment:** Predictions of the EIS P Modeled Water Quality The supernatant (surface water in the TSF) has modeled CCME exceedances of pH, ammonia, Aluminum, arsenic, cadmium, copper, lead, mercury, thallium and zinc. Seven of these are identified by the US EPA as pollutants of priority out of 13 listed Kelly et al., 2010). Treasury proposes that all water with the exception of lead will meet MMER standard. Furthermore, the TSF supernatant waters will go through a filtration system before being released to Blackwater Creek. Nonetheless, these are only modeled predictions and this is discussed further below. In Appendix F, of the Water Management Plan, a description of modeled water quality in the TSF is given, based on use of the PHREEQCi geochemical modeling computer code from Terra Tech. Models require goof initial data in order to make accurate predictions. Data to populate the model came from the analysis of laboratory results from Humidity Test Cell (HTC) and field cell studies, which examined chemical changes to weathering mine rock. Results of the modeling are provided in Table 3.8.3 in the project description yet it remains unclear why total metals were used as opposed to dissolved metals. Table 3 demonstrates the percentage of dissolve to total metals (from the EIS modeled data). Total metals were likely used, as these are what the current CMME and POWQ guidelines reference. Nonetheless, an assessment of the percentage of these metals that are dissolved needs to be undertaken, as the dissolved metals are those that are more likely to influence the aquatic life surrounding the project. There appear to be methodological problems in determining dissolved concentrations versus total concentration of metals (as Table 4 demonstrates) in the ultimate fate of TFS waters. Separate experimental field cell studies were developed for total and dissolved metal analysis. With the results as posted many are not comparable. As dissolved concentrations are far more likely to be a

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					problem to aquatic life this a major concern in assessing potential impacts. Should total and dissolved metals be run from the same batch we could get a better percentage of the dissolved potential of certain metals – especially those known to ARD environments. Table 4. Percentage of Metals that are Dissolved. It was furthermore not clear why the EIS reported (Section 3), only on intermediate values and not long-term values. A long-term assessment would be more useful and more appropriate. The reason might be a result of incomplete long-term analysis, and discussed further below. Also it remains unclear why only field cell results were considered and not Humidity Test Cell (HTC) studies given their difference. Section 5.1.2. "Model scenarios based on the dissolved metal concentrations in the field cell leachate were notably different from the HTC leachate- derived scenarios". Given the differences in the HTC and the field cell, it is unclear why only field cell results have been presented in the body of the EIS report? How come the differences are not discussed with implications for water management and ultimate treatment options? A cursory analysis (Table 5) shows how some of the variables are indeed quite different. Table 5. Goliath Mine EA Model Outputs Appendix F HTC vs. field cell The biggest concern to the effectiveness of the modeled numbers is that the studies were incomplete. Section 5.1.2 states, "Although the field cells have operated for approximately the same length of time as the HTCs, differences in particle size, flushing volumes, and temperature-dependent reaction rates results in a delay in the onset of acid-generating conditions. As such, the field tests were not yet acid generating at the time of this modeling effort. " This would indicate that that no laboratory data exists on a modeled ARD scenario to populate a model to derive long term TSF values. Furthermore, Section 5.1.2 states, "Regression analysis of cumulative elemental concentrations for each element and humidity cell sample was attempted in order to assess rates of element (i.e. metal and sulphur) release after closure. However, as of April 1, 2014, the humidity cells in operation show evidence of the onset of acid generating conditions and significant decreases in the leachate pH with coincident increases in dissolved metal concentrations. Because the pH and metal concentrations have not yet attained a steady-state, the curves fitted to the data suggest an exponential dependence of pH or elemental concentration on time. This over-estimates the

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					projected long term water quality. Therefore, the average of the data collected from weeks 60 through 80 were used to represent long-term water quality. " This contains a whole host of assumptions. Then, the EIS describes the incomplete nature of the research, "After week 63, operations of two of the three HTCs of each rock type was discontinued. Beyond week 63, only a single HTC of each rock type remained in operation. " Does this indicate that Treasury is estimating the long term water quality and ARD impacts based on TWO incomplete samples? Highlighted Concerns and Omissions • Lead levels will increase to roughly 6Mtimes the MMER limit of 0.2 mg/L, after acid generating conditions are established (modeled). HTC data indicates that these metal concentrations, as well as sulphate, will continue to rise as pH decreases. Will treatment be effective in removing this lead prior to release to Blackwater Creek? • Section 5.1 from Appendix F, from the HTC tests expects cadmium and lead levels to increase over project lifetime and beyond. The same data indicates that metal concentrations as well as sulphate will rise as pH decreases. This is not considered in the main text of the EIS, as only the field test data is used. • The report goes on to suggest that "Multiple data gaps were identified while reviewing the available data. In an effort to address those gaps, a series of assumptions were made". • Too many large assumptions are made, such as in section 4.0, "The material composition of the waste rock and pit walls is assumed to remain constant over time. However, this is not likely the case and may be updated in future modeling efforts". Statements like these indicate that actual conditions at the mine where the acid rock potential of mine waste is concerned are very poorly understood. • Section 4.0 of Appendix F indicates that modeled long- term water quality generated from exposed materials (WRSF, LGO stockpile, pit wall, underground slopes) after the onset of acid generating conditions (weeks 60-80) is based on two incomplete samples. Therefore the confidence in the modeled predictions is understandably quite low.
					Response: Since the submission of the EIS, Treasury Metals has been advancing their engineering for the Project, including refining of the water balance for the site. This refined water balance will modify some of the water related predictions. To capture these changes, and to reflect changes suggested by the responses to the Round 1 IRs, Treasury Metals has prepared Appendix JJ Water Report to the revised EIS. The updated water balance, including discussions regarding the effluent treatment system, is

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					provided in Section 2 of the Water Report. Updated information regarding the geochemistry, which addresses many of the issues raised in the above discussions, can be found in Section 5 of the Water Report.
640	AC(1)-313	Eagle Lake First Nation	Fish and Fish Habitat Aboriginal Health and Socio-Economic Conditions		**Information Request / Comment:** EIS Errors and Inconsistencies • In table 3.8.3 chromium value should be .001 not .0001 • Section 3.2.4 Closure Plan Environmental Monitoring and "potential effluent quality management" will occur during this passive period of reclamation Why potential? This monitoring should be mandatory. • Management of ARD is never a walk away solution. Will require some form of management in perpetuity to prevent acid generated runoff from occurring and contaminating the surrounding environment. • In 3.2 Project Phases and Schedule it is listed that Closure and Post-Closure Phase will take 6 years, whereas Table 3.2.1 indicates that closure phase will take 2 years. Again in section 3.2.4 Closure Phase refers to a two-year active closure period. Which is it? • From 3.3.2. Surface and Mine Water Management "There are no permanent ponds or lakes that require dewatering". Yet the 4 mine phases 3.2.1 -Site Preparation Phase, has "dewatering ponds" within footprint as an activity. • 5.8.2.2 Copper concentrations from sediments collected in 2011 from TL2, TL3 and BC were above the LEL of 16 µg/g but below the "LEL" of 110 µg/g. (this should be SEL, not LEL). • The concentration of zinc collected from BC was above the LEL of 120 µg/g. (this should read SEL not LEL). This mistake downplays impacts as it exceeds the Severe Effect Level not the Lowest Effect Level. • Related to cumulative impacts from Section 3.4 M Underground Mine states "It should be noted that the resource is "open at depth"; meaning that there is a possibility that it could extend to further depths with continued underground drilling and exploration. Difficult to address impacts without a full understanding of project scope. This needs to comprehensively addressed in the cumulative impacts section. Page numbers in the TOC would help for a 979 page document (Appendix G) **Response:** *Table 3.8.3:* Noted. The predicted supernatant concentration for chromium should be 0.001 mg/L, as per Table 4.3 of Appendix F of the EIS.

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					Section 3.2.4: The relevant paragraph referred to in Section 3.2.4 states: *Treasury expects the active closure period of the Project will take approximately two years after operations cease. Until such time that the final pit is fully flooded, Treasury will hold the site in care and maintenance. Environmental monitoring and potential effluent quality management will occur during this passive period of reclamation. Once the pit is flooded, an additional period of active reclamation may occur to remove remaining project infrastructure that was retained to facilitate the maintenance, monitoring, and final closure activities. A conceptual closure plan is provided in Section 11, and described in Section 3.14.* During the passive reclamation period when the pit is being filled with water, monitoring will be conducted as stated in the EIS. However, the need for managing the quality of the effluent will not be known until monitoring is completed during the passive reclamation period. Preliminary modelling of pit lake water quality indicates that the lake will have water quality proportional to its sources. If effluent will be released, environmental monitoring will occur consistent with any regulated requirements. *Management of ARD:* Treasury Metals is aware of the challenges associated with acid rock drainage (ARD). The conceptual closure plan presented in Section 3.14 of the EIS includes a number of measures to minimize the risk of ARD following the closure of the mine site. The waste rock will be segregated, to the extent possible, with potentially acid generating (PAG) material stored separately from non-PAG materials. The volume of waste rock stored at the surface will be minimized as practically possible, with waste rock being stored in the mined out sections of the open pit. The surface waste rock storage area (WRSA) will be covered with a low-permeability cover following operations to isolate the rock from oxygen, thus preventing the oxidation required to support ARD. The open pit will be flooded following operations to isolate the waste rock and exposed mine surfaces from oxygen, thus reducing the potential for ARD. Finally, the water cover on the tailings storage facility (TSF) will be withdrawn once operations are finished, treated in the effluent treatment facility, and then used to help fill the open pit. The TSF will then be covered with a granular layer of non-PAG materials to physically isolate the tailings and make the surface trafficable. The tailings will be isolated from oxygen necessary to support ARD by constructing a low-permeability dry cover, or using a wet cover of non-process water. Following the completion of the closure activities, there will be a period when the mine remains in the care and control of Treasury Metals. During this phase of the Project, monitoring will continue to demonstrate the success of the closure operations. This period of care and control will continue until the regulators are fully satisfied that Treasury Metals has rehabilitated the mine and that no further impacts to the environment are likely.

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					Closure Time Frames: The EIS consistently identified an active closure phase for the Project of two years. During this phase, the bulk of the facilities and infrastructure would be decommissioned, the WRSA capped to isolate the tailings from oxygen, and the tailings storage area reclaimed. This would involve draining the supernatant water, treating the water and using it to help fill the pit, placing a granular layer to physically isolate the tailings and make the surface trafficable, and covering the tailings to isolate them from oxygen. The cover could be a low-permeability dry cover or a cover of non-process water. The post-closure phase will begin once closure activities cease, and will include the filling of the pit and a period of maintenance and care. The exact length of time to fill the open pit is variable, as the filling of the pit partially relies on precipitation. The six-year period referenced in the question applied to the time to fill the open pit should filling commence immediately after finishing mining operations in the open pit. The final plan for the filling the open pit would need to reflect operational and safety considerations. *Dewatering of Ponds:* Section 3.3.2 of the EIS is correct in stating that there are no permanent ponds or lakes that require dewatering. However, the footprint of the open pit mine does overlay the upper reaches of Blackwater Creek Tributary 1. From time to time, beavers will dam this tributary forming a temporary beaver pond that will need to be dewatered as part of the site preparation and construction activities. *Copper in Sediment:* Noted. The text regarding copper in sediments provided in Section 5.8.2.2 of the EIS should have read: "Copper concentrations from sediments collected in 2011 from TL2, TL3 and BC were above the LEL of 16 µg/g but below the SEL of 110 µg/g." *Concentration of Zinc in Sediment:* The text in the report is correct. The measured concentration of zinc in the sediments at BC was 268 µg/g (Table 5.8.9 of the EIS), which is above the Lowest Effects Level (LEL) PSQG of 120 µg/g. The Severe Effects LELE (SEL) PSQG for zinc is 820 µg/g. The sediment concentration measured at BC of 268 µg/g (Table 5.8.9 of the EIS) does not exceed the SEL as suggested by the reviewer. *Potential Expansion of Mine:* The current resource is defined as part of the National Instrument (NI) 43-101 process, which is a

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					regulatory framework of the Ontario Securities Commission that must be strictly adhered to. There is no reasonable or justifiable method to estimate whether there are future gold resources for this Project. *Appendix G:* The environmental baseline studies completed by Klohn Crippen Berger were presented in Appendix G to the original EIS. The main body of the report includes 339 numbered pages, which are cross referenced in the Table of Contents in Appendix G. Appendix G also includes a series of detailed supporting appendices, the majority of which have the pages numbered. At the request of the Agency and as part of the Round 1 IR process, Treasury Metals has prepared a revised EIS. The revised EIS removes Appendix G as the information has either been replaced with more current and relevant information or has been incorporated into other sections and appendices. The following baseline work is presented in the appendices to the revised EIS and summarized in Section 5.0: • Traffic: Appendix-E; • Noise levels: Appendix-H; • Light levels: Appendix-I; • Stream flows: Appendix-N; • Water quality: Appendix-P; • Fish and fish habitat: Appendix-Q; • Wildlife: Appendix-R; • Wetlands and vegetation: Appendix-S; and • Socio-economics: Appendix-T.
641	AC(1)-314	Eagle Lake First Nation	Fish and Fish Habitat Aboriginal Health and Socio-Economic Conditions Project description Effects of the Environment on the Project Aboriginal		**Information Request / Comment:** Other Potential Research Questions • How does the Ontario Mining Act (for closure) relate to CEAA rules for closure and follow-up? • What are the flocculants used in TSF? Polishing pond? • How effectively is the Effluent Treatment Plant able to deal with the modeled levels of contaminants? Can this be tested with actual Goliath Project waste rock • What is the water quality of waste rock leachate after 60-80 weeks? • What changes occur seasonally in water quality? • What is the potential for climate change to impact water management and risk management plans? • Can isotopic tracing in the groundwater be used to determine flow rates?

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			engagement Alternatives Assessment		• Can modeling be done to determine groundwater to surface and surface to groundwater interactions more completely • How does Traditional Knowledge of the First Nation and Métis communities compare to the science about potential impacts.
					Response: Please find the following responses to the specific questions: • The closure/reclamation of mines and mine sites in Ontario is governed by the strict requirements of the Mining Act and its related regulations. There are no specific requirements for closure and follow up associated with the Canadian Environmental Assessment Act, 2012. A summary of the proposed approach to closure has been provided in Section 3.14 of the EIS in order that the readers can understand the overall approach which is currently being proposed. Prior to construction commencing, Treasury Metals is required to and will file a certified closure plan and submit financial assurance to the Ministry of Northern Development and Mines (MNDM). This is a requirement under Part VII of the Ontario Mining Act. Engagement with Aboriginal communities prior to submission of a certified closure plan is also a requirement under Ontario Regulation 240/00. Although the Project is currently in the early stages of the approval process, Treasury Metals has developed a conceptual closure plan, which was presented in Section 3.14 of the EIS. The certified closure plan is expected to be a refinement of the conceptual closure plan presented in the EIS, structured in the format preferred by the MNDM. • Since the filing of the EIS, Treasury Metals has been advancing the Project engineering, which has led to refinements in the proposed design of the mine. These refinements are presented in Section 3.16. The current plan for the Project makes use of a minewater pond to help manage water within the site. There would be no polishing pond. In the event that total suspended solids (TSS) do not readily drop out of suspension in the minewater pond, making the water unsuitable for re-use in the underground mine, a metal based coagulant (e.g., aluminum sulphate, ferric sulphate) would be added to the mine water from the underground mine as it is pumped to surface for mixing within the pipe before the water enters the minewater pond. This will ensure TSS readily drop out of suspension so that the water in the minewater pond is suitable for re-use in the underground workings (e.g., backfill plant). While this approach is a common practice, the use of coagulants would be contingent on the need (i.e., part of adaptive management). In addition to enhancing the removal of TSS, metal based coagulants will precipitate phosphorus, thereby mitigating the risk of algal blooms in the minewater pond that create operational challenges for the effluent treatment plant. A similar approach to managing TSS in the tailings storage facility (TSF) would be employed as a

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contingency, adaptive management measure.

- As part of the Project design, Treasury Metals has selected reverse osmosis technology as part of their effluent treatment process. This technology is well understood and has an extensive track record of similar applications to the Project. There is nothing unique about the process and materials at the Project that would make the effluent appreciably different than at other similar projects where this technology has been applied.
- Laboratory testing of waste rock indicated a decline in pH and sometimes increasing metal concentrations in several humidity cells that continued to operate after 60 weeks. If unmitigated, this suggests that site waste rock drainage quality could decline at some point in the future. Under site conditions, this decline in pH is likely to take a longer time to evolve than observed in the laboratory. The previous study suggested such conditions may take over 10 years to develop and mitigation strategies would adequately minimize this decline in water quality. Since the filing of the EIS, Treasury Metals continues to refine their design of the Project and understanding of aspects such as geochemistry and its effect on long-term water quality estimates. These analyses are provided in Section 5 of the Water Report, Appendix JJ to the EIS, which provides refined analysis related to water quantities and qualities based on the current understanding of the Project conditions.
- The baseline water sampling program to support the EIS (Appendix P to the EIS) included samples from 15 locations, as shown in Figure 5.8.1-1 of the EIS. The sampling covered a two year period, and included concentrations for all seasons. The number of samples varied between watercourse, with Blackwater Creek having the greatest number of sample locations (SW-TL1a, SW-TL2, SW-TL3, SW-JCTa, SW11), and thus the greatest number of values. The following table shows the variability in background (based on the 50th percentile of the data) for each of the seasons in Blackwater Creek.

Table 1: Seasonal Variability in Background Surface Water Quality

Parameter (Total Metals)	Blackwater Creek (mg/L)			
	Winter	Spring	Summer	Fall
Aluminum	0.4615	0.3310	0.1590	0.2430
Antimony	0.0006	0.0006	0.0006	0.0006
Arsenic	0.0010	0.0010	0.0010	0.0010
Beryllium	0.0010	0.0010	0.0010	0.0010
Boron	0.0500	0.0500	0.0500	0.0500
Cadmium	0.0000	0.0000	0.0000	0.0000
Chloride	2.5500	0.6100	0.3200	1.3700
Chromium	0.0012	0.0013	0.0010	0.0010
Cobalt	0.0009	0.0005	0.0005	0.0010
Copper	0.0014	0.0016	0.0010	0.0013

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Cyanide	0.0020	0.0020	0.0020	0.0020
Iron	3.3800	0.7350	1.1200	1.4800
Lead	0.0010	0.0010	0.0010	0.0010
Mercury	0.0000	0.0000	0.0000	0.0000
Molybdenum	0.0010	0.0010	0.0010	0.0010
Nickel	0.0020	0.0020	0.0020	0.0020
Nitrate	0.0560	0.0300	0.0300	0.0630
Phosphorus	0.0437	0.0300	0.0233	0.0245
Selenium	0.0010	0.0010	0.0010	0.0010
Silver	0.0001	0.0001	0.0001	0.0001
Thallium	0.0003	0.0003	0.0003	0.0003
Uranium	0.0050	0.0050	0.0050	0.0050
Vanadium	0.0019	0.0013	0.0010	0.0012
Zinc	0.0054	0.0031	0.0030	0.0059

- The site preparation and construction phase of the Project is expected to last approximately three years, and would occur under the climatic conditions similar to those experienced today. The operating life of the mine will follow the site preparation and construction phase and will last approximately ten years. It is expected that the climatic conditions during operations will also be similar to the current conditions. In the longer-term, it is predicted that the region will experience increases to both the temperature and precipitation (McDermid et al, 2015). However, the post-closure landscape of the mine site following closure should be unaffected by these changes. Following closure, the waste rock storage area (WRSA) will be covered with a low-permeability cover to isolate potentially acid generating (PAG) materials from oxygen and thus prevent acid rock drainage (ARD). Following closure, the WRSA area will be unaffected by the changing climate. The open pit and underground mine will be flooded at closure. The predicted increased precipitation in the long-term will help ensure the open pit and underground mine remain flooded. This water cover will isolate the PAG rock in the open pit and underground mine from oxygen and thus prevent ARD (see additional details in TMI_263-EE(1)-06).
- The use of artificial tracers can be used in certain environments (e.g., karst geology) to determine flow velocities in field tests. However, this would not be applicable for the Project, which is located in Shield bedrock.
- An extensive and thorough evaluation of the groundwater flow regimes in the areas were undertaken as part of the EIS, with the detailed results presented in Appendix M to the EIS. The evaluation made use of the evidence collected as part of the baseline studies, as well as the extensive knowledge available regarding the local geology.
- Although Treasury Metals has made efforts to engage and elicit input from Aboriginal peoples regarding the Project, no Project-specific traditional knowledge and traditional land use studies were prepared for, or shared with, Treasury Metals. The limited information obtained about

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					traditional land use areas during the engagement process were incorporate in the EIS. Treasury Metals will continue to discuss potential Project effects on traditional land use activities with potentially affected Aboriginal peoples throughout the life the Project. As additional information regarding an Aboriginal community's traditional land use and practices become available, Treasury Metals will review and consider it in the design of mitigation measures, follow-up monitoring and management plans for the Project, as appropriate. *References Cited:* McDermid, J., S. Fera and A. Hogg, 2015. Climate Change Projections for Ontario: An Updated Synthesis for Policymakers and Planners. Ontario Ministry of Natural Resources and Forestry. CCRR-44.
642	AC(1)-315	Naotkamegwanning First Nation	Aboriginal Engagement Aboriginal and Treaty Rights		**Information Request / Comment:** NFN has not been provided adequate funding from either the Proponent or the Canadian Environmental Assessment Agency ("CEA Agency") to conduct a more detailed assessment of the EIS to date. Our initial review has been enough to identify, however, that the Project as proposed has a strong potential for adverse effects of an as-yet unknown (but potentially significant) nature on our aboriginal and treaty rights and the resources they rely upon in the Project-affected area.
					Response: It is Treasury Metal's understanding that Intervenor funding was available through the Agency and accessed by NFN as part of the EA process. Treasury Metals remains committed to continued engagement with NFN to identify ways they can participate in the process. A comprehensive review of the potential adverse effects of the Project on the environment is provided in the EIS. At the request of the Agency and as part of the Round 1 IR process, Treasury Metals has prepared a revised EIS. The revised EIS includes sections focused on the potential effects of the Project on the environment and the resulting effects on Aboriginal peoples.
643	AC(1)-316	Naotkamegwanning First Nation	Aboriginal engagement Aboriginal and Treaty Rights Aboriginal Physical and Cultural Heritage Aboriginal Health and Socio-economic Conditions		**Information Request / Comment:** NFN General Comments on the EIS Our initial reading finds the EIS deficient in fundamental ways, particularly in its inadequate assessment of effects related to NFN. It is difficult to see how the EIS could be accepted as meeting the requirements of CEAA 2012, as it does not provide sufficient information to meet the requirements in the EISG that pertain to impacts on NFN's treaty rights and socio-economic well-being, health, traditional land use and cultural heritage. The critical parameters of the effects assessment in the EA, included in the identification of Valued Components (VCs), Key Indicators (KIs), VC thresholds of significance, essential considerations when designing baseline and effects studies, appear to have been developed largely independently from any Aboriginal community's input or engagement. The deficiencies are so

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			Current Use of Lands and Resources for Traditional Purposes		readily evident that, in our view, the EIS should not have been allowed by the CEA Agency to pass through the screening phase into the current technical review phase of the EA. The current stage of the EA under the federal process is the EIS technical review. This is the most critical stage for ensuring that adverse effects of the Project are properly characterized and any necessary measures for avoiding and mitigating adverse effects are clearly identified. Therefore, the CEA Agency and the Proponent must use this opportunity to address gaps and deficiencies that place NFN's treaty rights and interests at risk. Given capacity constraints NFN has been able to highlight these at a high level only to date but passes this information on faithfully to the Agency. **Response:** The original EIS prepared by Treasury Metals was filed with the Agency in April 2015, and was determined by the Agency to have met the requirements of the EIS guidelines in the same month. Treasury Metals acknowledges that there are a number of questions from the Agency and other reviewers related to the approach used in the EIS for organizing and presenting information regarding the potential effects of the Project. In order to effectively address these issues, and to address issues raised through the responses to Round 1 questions, Treasury Metals has prepared a revised EIS that sets out the assessment of effects and impacts associated with the Project in a clear and traceable manner.
644	AC(1)-317	Naotkamegwanning First Nation	Migratory Birds Wildlife		**Information Request / Comment:** Key Potential Adverse Effects: From a preliminary analysis of the Project Description contained in the EIS, the following non-exclusive potential adverse effects on NFN's rights, interests and well being have been identified: • Adverse effects on hunting of migratory birds due to alienation of wetlands by mining development; **Response:** At the request of the Agency and as part of the Round 1 IR process, Treasury Metals has prepared a revised EIS. An expanded assessment of the effects of the Project has been provided in the revised EIS. The revised EIS sets out the assessment of effects and impacts associated with the Project in a clear and traceable manner. The revised EIS considers the linkages between effects, such as the following linked effects: • potentially alienation of areas to birds due to the noise from the Project (Section 6.4); • the effects of the Project on birds, including potential alienation due to noise from the Project (Section 6.12 and 6.13); • the effects of the Project on hunting (under the land use component, Section 6.16), including the effects of noise and other aspects of the Project on wildlife (Section 6.4); and • the effects of the Project on Aboriginal peoples, including the effects of the Project on

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					hunting, wildlife alienation due to noise and other Project effects on wildlife (Section 6.12, 6.16, 6.21,).
645	AC(1)-318	Naotkamegwanning First Nation	Current Use of Lands and Resources for Traditional Purposes Wildlife		**Information Request / Comment**: • Adverse effects on hunting of moose, deer and other ungulates due to alienation of lands and loss of access to mining development; **Response:** An expanded assessment of the effects of the Project has been provided in the revised EIS that sets out the assessment of effects and impacts associated with the Project in a clear and traceable manner. The revised EIS considers the linkages between effects, such as the following linked effects: • potential alienation of areas due to the noise from the Project (Section 6.4); • the effects of the Project on wildlife and wildlife habitat, including potential alienation due to noise from the Project (Section 6.12); • the effects of the Project on hunting (under the land use component, Section 6.16), including the effects of noise and other aspects of the Project on wildlife (Section 6.12); and • the effects of the Project on Aboriginal peoples, including the effects of the Project on hunting, wildlife alienation due to noise and other Project effects on wildlife (Section 6.4, 6.16, 6.21). The effects of the Project on hunting by Aboriginal peoples (Section 6.21) and non-Aboriginal people (Section 6.16) includes considerations of the reduced access to the areas occupied by the Project for a period of approximately 15 years (considering the site preparation and construction phase, operations phase, and closure phase).
646	AC(1)-319	Naotkamegwanning First Nation	Current Use of Lands and Resources for Traditional Purposes Wildlife		**Information Request / Comment**: • Adverse effects on trapping of furbearers due to alienation and loss of access to lands to mining development; **Response:** An expanded assessment of the effects of the Project has been provided in the revised EIS that sets out the assessment of effects and impacts associated with the Project in a clear and traceable manner. The revised EIS considers the linkages between effects, such as the following linked effects: • potential alienation of areas due to the noise from the Project (Section 6.4); • the effects of the Project on wildlife and wildlife habitat, including potential alienation due to noise from the Project (Section 6.12); • the effects of the Project on commercial trapping (under the land use component, Section 6.16), including the effects of noise and other aspects of the Project on wildlife (Section 6.12); and • the effects of the Project on Aboriginal peoples, including the effects of the Project on trapping,

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					wildlife alienation due to noise and other Project effects on wildlife (Section 6.12, 6.21). The effects of the Project on hunting by Aboriginal peoples (Section 6.21) and non-Aboriginal people (Section 6.16) includes considerations of the reduced access to the areas occupied by the Project for a period of approximately 15 years (considering the site preparation and construction phase, operations phase, and closure phase).
647	AC(1)-320	Naotkamegwanning First Nation	Fish and Fish Habitat Current Use of Lands and Resources for Traditional Purposes		**Information Request / Comment**: • Adverse effects on fishing due potential changes to Thunder Lake water quality and composition; **Response:** The Project is described in Section 3 of the EIS. There will be no discharges from the Project to Thunder Lake or its tributaries. The operations area for the Project will be surrounded by a perimeter ditch. All of the runoff from the operations area will be intercepted by the perimeter ditch and the collected water incorporated into the water management system. The water will be ultimately be treated to ensure it meets the Provincial Water Quality Objectives (PWQO) prior to discharge into Blackwater Creek. The sources of process water for the Project will include the irrigation ponds at the former Ministry of Natural Resources and Forestry (MNRF) tree nursery located on Thunder Lake Tributary 2 and Thunder Lake Tributary 3. Withdrawals from these ponds will vary during the year, and will be no more than of 5% of average flow per month. Since less than 5% of the average monthly flows will be withdrawn from Thunder Lake Tributary 2 and Thunder Lake Tributary 3, no impacts to fish and fish habitat are expected. As a result, neither the irrigation ponds nor the tributaries on which they reside are expected to require consideration within the offsetting plans. Treasury Metals will continue to consult with the relevant agencies and stakeholders to develop the final offsetting plans. At the request of the Agency and as part of the Round 1 IR process, Treasury Metals has prepared a revised EIS. An expanded assessment of the potential effects of the Project on fishing has been provided in the revised EIS. Information about potential Project effects and mitigation measures related to these concerns can be located in Sections 6.8 and 6.9 (surface water); 6.14 (fish and fish habitat); 6.16 (land use); and 6.21 (Aboriginal peoples). Information on management plans and follow-up monitoring related to fish and fish habitat is located in Sections 12.10 and 13.14.
648	AC(1)-321	Naotkamegwanning First Nation	Fish and Fish Habita Current Use of Lands and Resources for		**Information Request / Comment**: • Adverse effects on fishing due to "re-location" of fish-bearing segment of Blackwater Creek tributary;

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			Traditional Purposes t		
649	AC(1)-322	Naotkamegwanning First Nation	Fish and Fish Habitat Current Use of Lands and Resources for Traditional Purposes		**Information Request / Comment:** • Adverse effects on fishing due to downstream contamination effects on Blackwater creek and Wabigoon Lake; **Response:** The Project has been designed with consideration for protecting downstream watercourses. The Project and refinements to the Project since the completion of the EIS is described are Section 3 of the EIS. The operations area for the Project will be surrounded by a perimeter ditch. All of the runoff from the operations area will be intercepted by the perimeter ditch and the collected water incorporated into the water management system. The water will be ultimately be treated to ensure it meets the Provincial Water Quality Objectives (PWQO) prior to discharge into Blackwater Creek. At the request of the Agency and as part of the Round 1 IR process, Treasury Metals has prepared a revised EIS. An expanded assessment of the potential effects of the Project on fishing, including commercial and recreational fishing) and Aboriginal peoples has been provided in the revised EIS. Information about potential Project effects and mitigation measures related to these concerns can be located in Sections 6.8 (surface water quality), 6.14 (fish and fish habitat), 6.16 (land use), and 6.21 (Aboriginal peoples).
650	AC(1)-323	Naotkamegwanning First Nation	Fish and Fish Habitat Current Use of Lands and Resources for Traditional Purposes Aboriginal health and socio-economic conditions		**Information Request / Comment**: • Adverse effects on fishing due to increased perception of risk related to potential contamination of Blackwater creek and Wabigoon Lake; **Response:** An expanded assessment of the effects of the Project has been provided in the revised EIS that sets out the assessment of effects and impacts associated with the Project in a clear and traceable manner. The revised EIS considers the potential effects on fish and fishing in the following sections: • the effects of the Project on surface water quality (Section 6.8); • the effects of the Project on groundwater quality (Section 6.10); • the effects of the Project on fish and fish habitat(Section 6.14); • the effects of the Project on human health (6.19); and • the effects of the Project on Aboriginal peoples, including the effects of the Project on fishing (Section 6.21). Mitigation of effects on fish and fish habitat are discussed in Section 6.14 and follow-up monitoring for fish and fish habitat are discussed in Section 13.14.
651	AC(1)-324	Naotkamegwann	Current Use of		**Information Request / Comment:**

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		ing First Nation	Lands and Resources for Traditional Purposes Aboriginal Health and Socio-economic Conditions		• Adverse effects on use of water and aquatic plants (i.e., wild rice) due to potential contamination of Blackwater creek and Wabigoon Lake; **Response:** The Project has been designed with consideration for protecting downstream watercourses. The Project is described in Section 3 of the EIS, as well as in Section 3.16, which describes the refinements to the Project since the completion of the EIS. The operations area for the Project will be surrounded by a perimeter ditch. All of the runoff from the operations area will be intercepted by the perimeter ditch and the collected water incorporated into the water management system. The water will ultimately be treated to ensure it meets the Provincial Water Quality Objectives (PWQO) prior to discharge into Blackwater Creek. At the request of the Agency and as part of the Round 1 IR process, Treasury Metals has prepared a revised EIS. An expanded assessment of the potential effects of the Project on surface water quality, vegetation and wetlands, land use, and Aboriginal peoples (including commercial and subsistence harvesting of traditional foods) has been provided in Section 6.0 of the revised EIS. In the absence of community-specific traditional knowledge / traditional land use (TK/TLU) at the time of writing the EIS, the assessment of potential impacts on resources and activities related to the current use of land and resource for traditional purposes and identified mitigation measures that will reduce or eliminate those impacts was based upon the professional judgement / knowledge of / presence of species which may be of interest to Aboriginal communities for the purpose of traditional land use. Information about the potential effects of the Project on the surface water quality, wetlands and vegetation, land use as well as Aboriginal peoples (including potential effects on the gathering of traditional foods, such as wild rice) is provided in the revised EIS in Sections 6.8 (surface water quality), 6.15 (wetlands and vegetation), 6.16 (land use) and 6.21 (Aboriginal peoples).
652	AC(1)-325	Naotkamegwanning First Nation	Cumulative effects		**Information Request / Comment:** • Significant adverse effects on treaty fishing rights and commercial fishing interests on Wabigoon Lake in the event of a catastrophic breach of the Tailings Storage Facility (TSF); **Response:** Potential accidents and malfunctions were evaluated as part of the EIS and supporting documentation. One of the accidents evaluated was the potential failure of the tailings storage facility (TSF). However, this accident was determined to be highly unlikely to occur, and a potential failure of the TSF is not a reflection of the actual safety conditions of the TSF after it is designed and built. The design of the TSF will ensure sufficient capacity to contain the Environmental Design Storm (EDS), which for the Project has been assigned as the runoff volume resulting from the 1 in a 1000-year 24-hour event. An emergency overflow spillway has been included to maintain embankment stability during the occurrence of storm events exceeding the EDS, up to the Inflow Design Flood (IDF). The current design of the TSF includes 1.5 m of freeboard above the elevations

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					of the emergency overflow spillway. The dam and associated spillway have therefore been designed to safely pass the peak flow from the IDF without overtopping the dam. Although there is no way to determine the frequency of the IDF event, it will be much more unlikely that once every thousand years. The unlikelihood of the modelled failure is increased by the relatively short operating life of the mine (approximately 10 years). Following operations, the water on the TSF will be withdrawn, treated and used to help fill the open pit mine. In the highly unlikely event of a TSF failure, Appendix GG describes the potential environmental consequences. None of the tailings present within the TSF were predicted to reach Wabigoon Lake during the modelled failure event. The tailings that would be released in the highly unlikely event of a TSF failure were predicted to be deposited on land, or in Blackwater Creek downstream of the TSF. The EIS describes that Treasury Metals will implement their spill response procedures following a TSF failure, whereby the released tailings would be contained and cleaned-up. The liquid present within the TSF (supernatant water, pore water and rainfall) is predicted to flow down Blackwater Creek and reach Wabigoon Lake in the highly unlikely event of a TSF failure. However, the quality of the water released into Blackwater Creek during the unlikely event of a TSF failure will meet the water quality authorized limits in the federal Metal Mining Effluent Regulations (MMER), with the exception of lead. The authorized limits in the MMER are the concentrations of various substances the federal government allows mining facilities to discharge to the environment. Therefore, the quality of the water released during the unlikely event of a TSF failure would generally meet the levels considered acceptable as discharges by federal regulations. These limits are reflective of continuous discharges from mining facilitates, whereas a TSF failure would represent a one-time release. Additionally, these concentrations would also be rapidly diluted once the waters reach Wabigoon Lake. The assessment of effects in the highly unlikely event of a TSF failure presented in Appendix GG did identify the potential for the physical impacts within Blackwater Creek as a result of the flood wave. This rush of water would likely cause impacts to the small bodied fish using the Blackwater Creek, and could result in erosion of the channel near to the TSF. However, the low gradient nature of the channel and the presence of beaver dams and bends within the watercourse would dissipate the energy before reaching Wabigoon Lake. Based on the above, Treasury Metals acknowledges that there would be effects in Blackwater Creek in the highly unlikely event of a TSF failure due to the physical effects of the floodwater released and the deposition of tailings downstream of the TSF, until remediated in accordance with spill response procedures. However, there is no basis to conclude that there would be ecological effects in Wabigoon Lake that would affect Aboriginal commercial fishing interests and treaty rights for those using the lake. Please also see responses to TMI_653-AC(1)-326, TMI_678-AC(1)-350, TMI_682-AC(1)-354.
653	AC(1)-326	Naotkamegwanning First Nation	Accidents and Malfunctions		**<u>Information Request / Comment:</u>** • Significance adverse effects on socio-economic conditions in the event of a catastrophic breach

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					of the TSF that impacts the commercial fishery on Wabigoon Lake; **Response:** Potential accidents and malfunctions were evaluated as part of the EIS and supporting documentation. One of the accidents evaluated was the potential failure of the tailings storage facility (TSF). However, this accident was determined to be highly unlikely to occur, and a potential failure of the TSF is not a reflection of the actual safety conditions of the TSF after it is designed and built. The design of the TSF will ensure sufficient capacity to contain the Environmental Design Storm (EDS), which for the Project has been assigned as the runoff volume resulting from the 1 in a 1000-year 24-hour event. An emergency overflow spillway has been included to maintain embankment stability during the occurrence of storm events exceeding the EDS, up to the Inflow Design Flood (IDF). The current design of the TSF includes 1.5 m of freeboard above the elevations of the emergency overflow spillway. The dam and associated spillway have therefore been designed to safely pass the peak flow from the IDF without overtopping the dam. Although there is no way to determine the frequency of the IDF event, it will be much more unlikely that once every thousand years. The unlikelihood of the modelled failure is increased by the relatively short operating life of the mine (approximately 10 years). Following operations, the water on the TSF will be withdrawn, treated and used to help fill the open pit mine. In the highly unlikely event of a TSF failure, Appendix GG describes the potential environmental consequences. None of the tailings present within the TSF were predicted to reach Wabigoon Lake during the modelled failure event. The tailings that would be released in the unlikely event of a TSF failure were predicted to be deposited on land, or in Blackwater Creek downstream of the TSF. The EIS describes that Treasury Metals will implement their spill response procedures following a TSF failure, whereby the released tailings would be contained and cleaned-up. The liquid present within the TSF (supernatant water, pore water and rainfall) is predicted to flow down Blackwater Creek and reach Wabigoon Lake in the highly unlikely event of a TSF failure. However, the quality of the water released into Blackwater Creek during the unlikely event of a TSF failure will meet the water quality authorized limits in the federal Metal Mining Effluent Regulations (MMER), with the exception of lead. The authorized limits in the MMER are the concentrations of various substances the federal government allows mining facilities to discharge to the environment. Therefore, the quality of the water released during the unlikely event of a TSF failure would generally meet the levels considered acceptable as discharges by federal regulations. These limits are reflective of continuous discharges from mining facilitates, whereas a TSF failure would represent a one-time release. Additionally, these concentrations would also be rapidly diluted once the waters reach Wabigoon Lake. The assessment of effects in the highly unlikely event of a TSF failure presented in Appendix GG did identify the potential for the physical impacts within Blackwater Creek as a result of the flood wave. This rush of water would likely cause impacts to the small bodied fish using the Blackwater Creek, and could result in erosion of the channel near to the TSF. However, the low gradient nature

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					of the channel and the presence of beaver dams and bends within the watercourse would dissipate the energy before reaching Wabigoon Lake. Based on the above, Treasury Metals acknowledges that there would be effects in Blackwater Creek in the highly unlikely event of a TSF failure due to the physical effects of the floodwater released and the deposition of tailings downstream of the TSF, until remediated in accordance with spill response procedures. However, there is no basis to conclude that there would be ecological effects in Wabigoon Lake that would affect the commercial fishery in the lake and had no associated socio-economic effect. Please also see responses to TMI_652-AC(1)-325, TMI_678-AC(1)-350, TMI_682-AC(1)-354.
654	AC(1)-327	Naotkamegwanning First Nation	Cumulative effects		**Information Request / Comment:** • Cumulative adverse effects on fishing and aquatic plant (i.e., wild rice) due to contamination and perceived risk of contamination; and **Response:** Treasury Metals has committed to treat the effluent from the Project during operations to levels that meet the Provincial Water Quality Objectives (PWQO). These levels were established to be protective of sensitive aquatic receptors, and are more stringent than the standards used in Ontario for drinking water. Therefore, there would be no basis for concerns over the safety of consuming fish and wild rice during the Project operations, and treated effluent discharged from the site is not expected to contribute to any cumulative effects on fishing and aquatic plants.
655	AC(1)-328	Naotkamegwanning First Nation	Aboriginal Health and Socio-economic Conditions		**Information Request / Comment**: • Adverse effects on edible and medicinal plants due to potential airborne distribution of contaminants (tailings particulate matter) downwind of mining site. **Response:** Treasury Metals recognizes the importance of understanding the potential effects of the Project on Aboriginal health, as well as human health on the whole. As part of the EIS, a screening-level risk assessment (SLRA) was completed (Appendix W) that identified potential health effects to Aboriginal residents, non-aboriginal residents, recreational users, and mine workers. As noted in the questions, the results of the SLRA were used in the EIS to describe the potential effects of the Project on Aboriginal health. In addition to the SLRA presented in Appendix W, the EIS included a review of country foods availability and use (Appendix EE). In evaluating the potential effects of the Project on human health (including Aboriginal health), the following exposure pathways were considered as detailed in Section 4.2.4 of Appendix W to the EIS: • Direct soil contact and dust; • Food chain exposure;

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					• Groundwater ingestion; • Surface water ingestion; • Surface water dermal contact; and • Vapour inhalation. As noted in Section 2.8 of Appendix W to the EIS, the SLRA referred to Health Canada's Useful Information for Environmental Assessments (Health Canada 2010), and made use of the conservative Health Canada recommendations when site-specific data was limited. Treasury Metals employed a conservative approach for the SLRA (Appendix W), which used the ingestion rates and exposure frequencies for all country foods of First Nation residents, as presented in the Health Canada model (Health Canada 2011), which provide upper-bound estimates of intake for country foods for all residents. References: Health Canada. 2010. Useful Information for Environmental Assessments. Health Canada. 2011. Spreadsheet Tool for Human Health Detailed Quantitative Risk Assessment.
656	AC(1)-329	Naotkamegwanning First Nation	Aboriginal Engagement		**Information Request / Comment:** Overview of gaps and deficiencies in the EIS The following critical gaps and deficiencies have been identified by NFN through a comparison of the EIS to the requirements of the EISG 1. Absence of evidence that NFN was meaningfully consulted on the development of fundamental components of the EA, including Valued Components (VCs), Key Indicators (KIs), significance thresholds for VCs and KIs, spatial and temporal boundaries;[2] *[2] Subsections 7.2.1and 7.2.2 of the EISG require the Proponent to consult with Aboriginal groups (among other parties) in regards to the development of appropriate spatial and temporal boundaries for the project. The extent of engagement by the Proponent with NFN, as indicated in the Aboriginal Engagement Report, appears to have been minimal and largely limited to show-and-tell presentations, rather than a dialogue informed by substantive studies involving the provision of traditional knowledge from community members. For example, one of the few in-person meetings between the Proponent and Treaty 3 nations is described in the Engagement Log, "TMI provided an overview/update of the project, inquired about how to move forward and responded to questions asked by band members.* **Response:** Treasury Metals has made efforts to engage and elicit input from the Aboriginal peoples regarding the Project. No Project-specific traditional knowledge and traditional land use studies were prepared for, or shared with, Treasury Metals; limited information was obtained about traditional land use areas. Treasury Metals made efforts to incorporate information provided and to address comments

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					and issues raised by Aboriginal peoples during the engagement process. A summary of the issues raised during the engagement process was provided in Section 8 and Appendix DD to the original EIS. As part of the Round 1 IRs, the Agency has requested that Treasury Metals expand and update the information presented in Appendix DD to the original EIS. This information is provided as an updated document called the Aboriginal Engagement Report, Appendix DD to the revised EIS. The Aboriginal Engagement Report provides a listing of the disaggregate comments from Aboriginal peoples, and how those were addressed in the EIS. Treasury Metals will continue to engage Naotkamegwanning First Nation for the life of the Project with the goal of understanding impacts and jointly developing mitigation measures to address any identified concerns and impacts to rights. Mitigation measures including obligations for on-going engagement will be registered in the Commitments Registry of the EIS, and will become enforceable commitments on Treasury Metals. Any traditional knowledge or mitigation measures to identified concerns will be incorporated into the design of Project. Treasury Metals will continue to attempt to engage Naotkamegwanning First Nation in an effort to ensure the community understands the Project, identifies their concerns and can contribute in developing mitigation measures for the identified concerns.
657	AC(1)-330	Naotkamegwanning First Nation	Aboriginal Engagement		**Information Request / Comment:** 2. Absence of rationale for any VCs that were excluded from the EA; **Response:** Treasury Metals has selected valued components ("VCs") for use in the EIS that are consistent with the environmental assessment processes for recent and on-going mining projects in Treaty 3. Where feedback was provided as part of the engagement process, Treasury Metals considered the feedback that in selecting the VCs, and assessment methods. No VCs that were suggested to Treasury Metals were excluded from the EA process. At the request of the Agency and as part of the Round 1 IR process, Treasury Metals has prepared a revised EIS. An expanded discussion of VCs has been provided in Section 6.1.3.
658	AC(1)-331	Naotkamegwanning First Nation	Aboriginal Engagement		**Information Request / Comment:** 3. Absence of NFN Traditional Knowledge (TK) being incorporated at any stage in the assessment of any of the VCs being considered in the EIS;[3] [3] *"Engagement and engagement efforts by Treasury have not resulted in any formal Traditional Knowledge (TK) studies being conducted that are specific to the Project. Consequently, direct traditional Aboriginal knowledge gained through these studies has not been made available or used to derive VCs. A number of Aboriginal communities have alluded to traditional use of the general area of the Project but no specific information has been provided to Treasury on either the location*

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					or extent of traditional use." Chapter 6.0, Effects Assessment, Treasury Metals Incorporated, Goliath Gold Project, Environmental Impact Statement, p. 6-2. 4. Absence of plausible rationale for the exclusion of TK from the assessment of biophysical and social VCs, as well as effects on treaty rights; **Response:** Treasury Metals has been engaged with Aboriginal peoples within the Project area for a number of years and has attempted to negotiate agreements for sharing traditional knowledge and preparing traditional land use studies. Those attempts are described in the Aboriginal Engagement Report. Treasury Metals continues to be willing to undertake affordable TK / TLU studies with affected communities. Where available, TK / TLU information that has been collected has been integrated into the EIS. Any traditional knowledge shared by the communities in the future will be incorporated into the design of Project mitigation, follow-up monitoring plans and environmental management plans, as appropriate.
659	AC(1)-332	Naotkamegwanning First Nation	Current Use of Lands and Resources for Traditional Purposes		**Information Request / Comment**: 5. Absence of baseline information for NFN's current use of lands and resources for traditional purposes and related treaty rights; **Response:** Treasury Metals has been engaged with Aboriginal peoples within the Project area, including NFN, for a number of years regarding the Project and this will continue for the life of the Project. This on-going engagement is described in the Aboriginal Engagement Report, Appendix DD to the EIS. Treasury Metals has attempted to negotiate agreements for sharing traditional knowledge and preparing traditional land use studies and those attempts are also described in the Aboriginal Engagement Report. Treasury Metals continues to be willing to undertake affordable independent technical reviews and TK / TLU studies with affected communities. Where available, TK / TLU information that has been collected has been integrated into the EIS. Any traditional knowledge shared by the communities in the future will be incorporated into the design of Project and consider it in the design of mitigation measures, follow-up monitoring and management plans for the Project, as appropriate.
660	AC(1)-333	Naotkamegwanning First Nation	Current Use of Lands and Resources for Traditional Purposes Aboriginal		**Information Request / Comment**: 6. Absence (non-aggregated) baseline studies with NFN to be able to meaningfully assess adverse effects on NFN: a. Socio-economic and health conditions b. Cultural heritage c. Current use of lands and resources for traditional purposes d. Any structure, site or thing that is of historical, archaeological, paleontological or architectural

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			Health and Socio-economic Conditions Aboriginal Physical and Cultural Heritage Structure, site, or thing of historical, archaeological, paleontological or architectural significance to Aboriginal groups		significance. **Response:** At the request of the Agency and as part of the Round 1 IR process, Treasury Metals has prepared a revised EIS. A revised assessment of the effects of the Project on the environment, along with a discussion of the mitigation measures to address those effects is provided in the revised EIS. Information about potential Project effects and mitigation measures related to these concerns can be located in Sections 6.17 (social), 6.18 (economic), 6.19 (human health), 6.20 (heritage resources) and 6.21 (Aboriginal peoples) of the revised EIS. In keeping with global best practices for monitoring and management of potential Project-related socio-economic effects, Treasury Metals is committed to undertaking an update of the socio-economic baseline presented in the EIS to establish a pre-construction baseline of the affected communities prior to commencing construction of the Project. Any updating of the socio-economic baseline should be delayed until the results of the 2016 Census are released by Statistics Canada, which are scheduled to be released between February and November 2017. The update will include primary research (i.e., in-community interviews) for the purposes of validating secondary information and developing a comprehensive profile of the socio-economic conditions within the community at that point in time. An update to the baseline prior to undertaking Project construction would allow for the inclusion of 2016 statistical information, providing a more current view of the Aboriginal and non-Aboriginal communities within the socio-economic study area. Further, the updated socio-economic baseline information will serve as the basis for future monitoring and management of socio-economic effects throughout the life of the Project.
661	AC(1)-334	Naotkamegwanning First Nation			**Information Request / Comment:** 7. Absence of any suggested mitigation/avoidance and follow-up measures from NFN; and **Response:** Treasury Metals acknowledges that there are a number of questions from the Agency and other reviewers related to the approach used in the EIS for organizing and presenting information regarding the potential effects of the Project. In order to effectively address these issues, and to address issues raised through the responses to Round 1 questions, Treasury Metals has prepared a revised EIS that sets out the assessment of effects and impacts associated with the Project in a clear and traceable manner. One area where the revised EIS expands on the information presented in the original EIS is with respect to the description of the potential effects of the Project on Aboriginal peoples. The revised EIS describes more fully how the potential effects were identified, evaluated and mitigated in Section 6.0 (6.21, Aboriginal peoples). Treasury Metals has made efforts to engage and elicit input from Aboriginal peoples regarding the Project. Treasury Metals also recognizes that engagement does not stop with the filing of the EIS and will continue throughout the life of the Project. Treasury Metals will continue to try to engage the Aboriginal peoples meaningfully

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					with respect to the Project. The engagement activities prior to filing the EIS were summarized in Section 8 and Appendix DD to the original EIS. As part of the Round 1 IRs, the Agency has requested that Treasury Metals expand and update the information presented in Appendix DD to the original EIS. This information is provided as an updated document called the Aboriginal Engagement Report, Appendix DD to the revised EIS. The Aboriginal Engagement Report provides a listing of the disaggregate comments from Aboriginal peoples, and how those were addressed in the EIS.
662	AC(1)-335	Naotkamegwanning First Nation	Aboriginal Engagement		**Information Request / Comment:** 8. Inadequate engagement with NFN, including the failure of the Proponent to develop with NFN an appropriate engagement plan, and to give NFN sufficient opportunities comment on information provided by the Proponent in the language of NFN's choosing. **Response:** Treasury Metals has made efforts to engage and elicit input from Aboriginal peoples regarding the Project. Treasury Metals will continue to try to engage the Aboriginal peoples meaningfully with respect to the Project. The engagement activities prior to filing the EIS were summarized in Section 8 and Appendix DD to the original EIS. As part of the Round 1 IRs, the Agency has requested that Treasury Metals expand and update the information presented in Appendix DD to the original EIS. This information is provided as an updated document called the Aboriginal Engagement Report, Appendix DD to the revised EIS. The Aboriginal Engagement Report provides a listing of the disaggregate comments from Aboriginal peoples, and how those were addressed in the EIS. Treasury Metals also recognizes that engagement does not stop with the filing of the EIS and will continue throughout the life of the Project. Treasury Metals will continue to engage both public stakeholders and Aboriginal peoples meaningfully with respect to the Project. Treasury Metals feels that the level of engagement has met the requirements of the EIS guidelines and the Canadian Environmental Assessment Agency.
663	AC(1)-336	Naotkamegwanning First Nation	Aboriginal Health and Socio-economic Conditions		**Information Request / Comment**: Additional Information on Specific Deficiencies Additional information on initial deficiencies identified with specific sections of the EIS is provided below. • Baseline Studies for Human Environment (Chapter 5.11): The Proponent has conducted only two baseline studies for this section, both of which are seriously deficient and do not provide baseline information related to NFN

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					o The socio-economic baseline study references three regional First Nations (Wabigoon Lake Ojibway Nation, Eagle Lake First Nation, Lac Seul First Nation) but does not include NFN, even though NFN is listed in the EISG. o The report sections related to First Nations are entirely desktop exercises that do not provide an adequate basis for assessing CEAA 2012)(c) effects. o Furthermore, these sections of the report include internal First Nations funding arrangements that that were mined from the First Nations Financial Transparency Act section of the Aboriginal Affairs and Northern Development Canada (AANDC) website.
					Response: Treasury Metals acknowledges the absence of community-specific socio-economic baseline data for Naotkamegwanning (Whitefish Bay) First Nation, Wabuskang First Nation, Grassy Narrows (Asubpeeschoseewagong) First Nation and Métis Nation of Ontario. Based on the proximity of these communities to the proposed Project, it is believed that the effects predictions contained within the EIS capture a broad range of potential Project-related effects which may be experienced by these specific communities. In keeping with global best practices for monitoring and management of potential Project-related socio-economic effects, Treasury Metals is committed to undertaking an update of the socio-economic baseline presented in the EIS to establish a pre-construction baseline of the affected communities prior to commencing construction of the Project. Any updating of the socio-economic baseline should be delayed until the results of the 2016 Census are released by Statistics Canada, which are scheduled to be released between February and November 2017. The update will include primary research (i.e., in-community interviews) for the purposes of validating secondary information and developing a comprehensive profile of the socio-economic conditions within the community at that point in time. An update to the baseline prior to undertaking Project construction would allow for the inclusion of 2016 statistical information, providing a more current view of the Aboriginal and non-Aboriginal communities within the socio-economic study area. Further, the updated socio-economic baseline information will serve as the basis for future monitoring and management of socio-economic effects throughout the life of the Project.
664	AC(1)-337	Naotkamegwanning First Nation	Aboriginal Physical and Cultural Heritage Structure, site, or thing of historical, archaeological,		**Information Request / Comment:** o The Heritage and Archaeology study indicates that only a visual survey of the mining project area for sites of archaeological potential has been conducted. No cultural heritage study has been conducted. No evidence that NFN members have been consulted on cultural heritage in the vicinity of the mine site appears in the Proponent's EIS materials. The so-called heritage and archaeology study is a very high level, superficial assessment- e.g., with no First Nation engagement, no basic test pits. Apparently from a visual investigation of surface feature only the Proponent concluded that there is NO archaeological potential throughout the entire site. This limited archaeological study

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			paleontological or architectural significance to Aboriginal groups		is the full extent of the heritage and archaeological work alluded to in the EIS. No reference whatsoever are included to First Nations' cultural and historical associations with the area in which the project is proposed.[4] *[4] In contrast, the introduction to the socio-economic report (Appendix T) for Wabigoon Lake Ojibway Nation states, "Wabigoon Lake Ojibway Nation is a Fi rst Nation community in Northwestern Ontario. The ancient presence of Wabigoon Lake Ojibway Nation people on their Land is reflected in its vast forests and countless lakes, rivers and streams. This landscape is in turn reflected in them in their language, culture and way of life. Extensive fields of Manomin (wild rice) were planted by the ancestors and now form an abundant sou rce of food for people and animals in the Region. Vast towering stands of pine, birch, cedar and spruce, as well as blueberries and other foods, were nurtured by an extensive knowledge and practice of co n trolled burning. The homeland of Wabigoon people is a n Ojibway cultural landscape." (emphasis added) Our intention in raising this comparison is not designed in any way to question the Wabigoon relationship to this a rea, but to point out that NFN's connection to this area- the area's role in the cultural landscape of the NFN, is not likewise contemplated by the Proponent.* **Response:** Treasury Metals does not agree with the NFN suggestion that the evaluation of low archaeological potential for the development area is unsupported. The Stage 1 and 2 archaeological assessment that was completed for the development area arrived at the conclusion that the area holds low archaeological potential, and recommended that no further archaeological assessment would be required. Archaeological potential considers a range of variables, including the topographic conditions of the subject property, presence and distribution of registered archaeological sites in the region, archaeological reports, local knowledge and the experience of the archaeological consultant, and a property inspection. The evaluation of low potential was based on the local terrain at the development site, including low topographic relief, small, unnavigable seasonal streams and high water table. For clarification, the evaluation of archaeological potential is based on methodology developed by Ministry of Tourism, Culture and Sport (MTCS), and is based on common archaeological practice. The MTCS have reviewed the reports prepared, and expressed satisfaction at the recommendations made. The archaeological assessment focused on the development area, the parts of the property that will be directly impacted by the construction of the open pit mine and associated infrastructure. However, all evaluations of archaeological potential also consider areas adjacent to the subject property to confirm the accuracy of evaluations made. In this case, consideration of other areas within the study area would have indicated that high archaeological potential exists adjacent to Thunder Lake and Wabigoon Lake. These areas would have been the preferred locations for settlement, and this settlement would have been related to available food resources (fish, rice), and

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					access (canoe routes), among other variables. Given this, Treasury Metals do not see the benefit of expanding the geographic scope of the archaeological and heritage assessment study to include areas beyond the development area, as this would not substantively change the results of the assessment or evaluation of impacts. The Archaeological and Cultural Heritage Resource Management Plan will further specify that archaeological assessment will be required for all new ground altering activities beyond the area assessed to date. It is also important to note that low archaeological potential does not mean that archaeological resources are completely absent from the property. Rather, this means that any sites that may be present will be small or hold low cultural heritage value or interest according to the criteria set out by MTCS. On rare occasions, areas of low archaeological potential may include small sites of unusual cultural heritage value or interest that would be undetectable using normal archaeological methodologies. The Archaeological and Cultural Heritage Resource Management Plan will set out processes for addressing archaeological or cultural heritage resources uncovered during the course of the site preparation and construction, operations, closure, and post-closure phases of the Project. Treasury Metals acknowledges that a long term relationship with local Aboriginal communities will provide mutual benefits in a range of areas. Moving forward, Treasury Metals and NFN can work together on the development of the traditional knowledge (TK) study for the Project area. Treasury Metals is committed to working with Aboriginal communities to accurately map and develop mitigation protocols for any archaeological or cultural heritage sites within the Project area that may be affected by the proposed undertaking. It is important that these sites are identified, mapped and evaluated in order to plan appropriate mitigation strategies. It is important to note that some cultural heritage values may overlap with other values for which mitigation planning is underway, such as plant or animal management studies, and may also include consideration of contemporary use by Aboriginal populations Treasury Metals will prepare an Archaeological and Cultural Heritage Resources Management Plan for work at the development site and other parts of the Project area during construction, operation and decommissioning of the mine. This plan will set out the process for notification and engagement of Aboriginal community members in archaeological assessment of areas of archaeological potential, planning for cultural heritage resource protection, and management of accidental discoveries. Section 5.0 of the archaeological assessment reports also note Treasury Metals' ongoing obligations under the *Ontario Heritage Act*, *Coroners Act* and the *Funeral, Burial and Cremation Services Act*. These obligations continue to apply throughout the duration of Treasury Metals activities at the property. The Archaeological and Cultural Heritage Resource Management Plan will include direction for active involvement of local Aboriginal communities when archaeological or cultural heritage resources are discovered, noting that this involvement is mandatory when human remains of a possible Aboriginal origin are discovered.
665	AC(1)-338	Naotkamegwanning First Nation	Aboriginal Engagement Aboriginal		**Information Request / Comment:** • Baseline for Aboriginal Peoples section (5.11.5): This section does not provide a baseline for assessing the legislative requirements under CEAA 2012, section 5(1)(c) related to First Nations,

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			Health and Socio-economic Conditions Current Use of Lands and Resources for Traditional Purposes Aboriginal Engagement		and does not provide a baseline for assessing impacts to treaty rights. The section is essentially a summary of the inadequate "Country Foods Assessment", which is described further below. • Country Food Assessment (Appendix EE) is thoroughly inadequate. o There are no indications of direct studies on country food harvesting with individual Treaty 3 Nations being undertaken for the project, therefore there is no discussion of thresholds, preferred locations, timing and methods of harvesting, or change of harvesting practices over time. o This so-called "assessment" provides no information indicating that any country food studies were conducted with any of the Treaty 3 Nations. Any information provided appears to have been obtained from existing local studies that were conducted in the area from 2010-2014, but which are not specific to Treaty 3 Nations. All data appears to have been obtained from other studies, or alternatively, collected ad hoc through other indirect meetings, e.g., information obtained from CEA Agency or through meetings with Chief and Council. Most information is presented as an aggregate of First Nation and non-First Nation harvest data, a fundamentally flawed approach given the distinction between Aboriginal priority rights and non-Aboriginal interests. Any methodological discussion, including description of the level and type of engagement, in entirely absent.
					Response: Treasury Metals has been engaged with Aboriginal peoples within the Project area, including NFN, for a number of years regarding the Project and this will continue for the life of the Project. This on-going engagement is described in the Aboriginal Engagement Report. Treasury Metals has attempted to negotiate agreements for sharing traditional knowledge and preparing traditional land use studies, including information about country food harvesting and those attempts are described in the Aboriginal Engagement Report also. Treasury Metals continues to be willing to undertake affordable independent technical reviews and TK / TLU studies with affected communities. Where available, TK / TLU information that has been collected has been integrated into the EIS. Any traditional knowledge shared by the communities in the future will be incorporated into the design of Project and considered in the design of mitigation measures, follow-up monitoring and management plans for the Project, as appropriate. At the request of the Agency and as part of the Round 1 IR process, Treasury Metals has prepared a revised EIS. An expanded description of the environmental effects associated with the development of the Project is provided in the revised EIS. The revised EIS also considers the linkages between physical and biological effects of the Project, the effects on land use, and ultimately the effects on Aboriginal peoples in Sections 6.16 (land use) and 6.21 (Aboriginal peoples). The selection of valued components used in the assessment of effects on Aboriginal

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					peoples is described in Section 6.1.3.20.
666	AC(1)-339	Naotkamegwanning First Nation	Aboriginal Engagement		**Information Request / Comment:** • Effects Assessment Chapter 6- Identification of Valued Components (6.3.2): In the introduction to Chapter 6 there is reference to "engagement" on VCs, but it does not specify that engagement was undertaken with any particular First Nations, and the precise way information was obtain from First Nations is unclear (e.g., "The CEA Agency, in discussion with Aboriginal communities has also identified issues and concerns."). It appears that much or all of the information that was collected by the Proponent did not come out of a proper engagement process, but was derived ad hoc through preliminary meetings with communities and review of First Nations' correspondence with CEAA. As a result, the evidence of meaningful engagement at least in reference to NFN- is slim to non-existent. For example, the specific section for how socio economic VCs were determined is approximately one page in length and does not provide any indication of what specific VCs or KIs were proposed by individual First Nations involved in the EA. **Response:** Treasury Metals has made efforts to engage and elicit input from Aboriginal peoples regarding the Project. No Project-specific traditional knowledge and traditional land use studies were prepared for, or shared with, Treasury Metals; limited information was obtained about traditional land use areas. Treasury Metals made efforts to incorporate information provided and to address comments and issues raised by Aboriginal peoples during the engagement process. A summary of the issues raised during the engagement process was provided in Section 8 and Appendix DD to the original EIS. As part of the Round 1 IRs, the Agency has requested that Treasury Metals expand and update the information presented in Appendix DD to the original EIS. This information is provided as an updated document called the Aboriginal Engagement Report, Appendix DD to the revised EIS. The Aboriginal Engagement Report provides a listing of the disaggregate comments from Aboriginal peoples, and how those were addressed in the EIS. Treasury Metals will continue to discuss potential Project effects on traditional land use activities with potentially affected Aboriginal peoples throughout the life the Project. As additional information regarding an Aboriginal community's traditional land use and practices become available, Treasury Metals will review and consider it in the design of mitigation measures, follow-up monitoring and management plans for the Project, as appropriate. Information related to Aboriginal traditional knowledge or current land and resource use by NFN in the area of the Project is limited; NFN did not share any Project-specific information or knowledge with Treasury Metals before the EIS was filed.

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					At the request of the Agency and as part of the Round 1 IR process, Treasury Metals has prepared a revised EIS that sets out the assessment of effects and impacts associated with the Project, including an expanded discussion and justification for VCs, in a clear and traceable manner. The selection of VCs used for the assessment of effects are detailed in Section 6.1.3.
667	AC(1)-340	Naotkamegwanning First Nation	Current Use of Lands and Resources for Traditional Purposes		**Information Request / Comment**: • Effects Assessment on Aboriginal Peoples (6.4.2.5): The inadequate baseline for all relevant VCs for NFN effectively guaranteed that any related effects assessment would also be insufficient. This is compounded by methodological errors in the effects characterization and significance estimation related to effects on aboriginal peoples. In general, deficiencies in this section are attributable to: o Prevalence of an implicit "go harvest elsewhere" argument made in section for "gathering of country foods and traditional plant materials". The Proponent's analysis has complete disregard for preferred locations, methods and timing of harvesting, and instead attempts to claim that the mine poses no adverse effects to treaty protected harvesting rights because First Nations can "go harvest elsewhere" in their territories. This is a common but thoroughly rebuked argument. Where such an argument is presented by a Proponent, the onus needs to be on the Proponent to identify where else the First Nation can go and pressures on harvesting in those alternative locations, as well as consider whether the areas where harvest will be impacted - the place the First Nation will be alienated from as a result of the Project - are preferred harvesting areas of heightened import. In addition, the Proponent and eventually the Crown ca n be subject to challenge to show how the loss of any aspect of the landscape that supports Treaty rights practices to industrial activity is justified and what forms of accommodation- and their adequacy- are committed to by the Proponent and the Crown for these infringements being contemplated; **Response:** The EIS Guidelines (CEAA, 2013) provided the framework that was used in preparing the EIS. Based on the feedback from CEAA and other technical reviewers provided in IR Round 1 questions, there are a number of issues related to the approach used in the EIS for organizing and presenting the relevant information regarding the potential effects of the Project. In order to effectively address these issues, Treasury Metals has prepared a revised EIS that sets out the assessment of effects and impacts associated with the Project, including a discussion and justification for VCs and VC / discipline specific assessment criteria, in a clear and traceable manner. At the request of the Agency and as part of the Round 1 IR process, Treasury Metals has prepared a revised EIS. An expanded description of the environmental effects associated with the development of the Project is provided in the revised EIS. The revised EIS also considers the linkages between physical and biological effects of the Project, the effects on land use, and

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					ultimately the effects on Aboriginal peoples in Sections 6.16 (land use) and 6.21 (Aboriginal peoples). The selection of valued components used in the assessment of effects on Aboriginal peoples is described in Section 6.1.3.20.
668	AC(1)-341	Naotkamegwanning First Nation	Fish and Fish Habitat		**Information Request / Comment:** o This section of the EIS is missing any reference to perception of risk related to the mine and mine effluent releases into Blackwater Creek **Response:** As stated in the EIS (Table 10.0.1), Treasury Metals has committed to effluent discharge that meets the Provincial Water Quality Objectives (PWQO), which is protective of all aquatic life. The section of the EIS referenced in the questions (fish and fish habitat) focused on the predicted effects of the Project to fish and fish habitat. The assessment considered the potential loss of habitat caused by the construction of various Project elements, as well as the possible effects associated with releases from the Project. The ecological and human health risks associated with potential releases from the Project, including the effects on fish and the consumption of fish be humans were outlined and evaluated in the screening level risk assessment (Appendix W to the EIS). At the request of the Agency and as part of the Round 1 IR process, Treasury Metals has prepared a revised EIS. The perception of risk by individuals was incorporated in the sections of the EIS dealing with humans, specifically, the "land use" and "Aboriginal peoples" components. An expanded exploration of the potential effects on these components, including the perception of risk, is provided in revised EIS. The revised EIS also considers the linkages between physical and biological effects of the Project, the effects on land use, and ultimately the effects on Aboriginal peoples in Sections 6.16 (land use) and 6.21 (Aboriginal peoples). The selection of valued components used in the assessment of effects on Aboriginal peoples is described in Section 6.1.3.20. Effects of changes to the environment on Aboriginal peoples are described in Section 6.23.4.
669	AC(1)-342	Naotkamegwanning First Nation	Fish and Fish Habitat		**Information Request / Comment:** o Impacts by the mine on fish and fish habitat are undeniable, as it will require a DFO Section 35 authorization and fisheries offsetting (compensation) plan. In addition, NFN members have indicated that fishing licenses in the Project-affected area are of high importance to the Nation. The Proponent does not present adequate information on NFN commercial and subsistence fishing values in the EIS. Nonetheless, the Proponent insists that residual effects to fishing are not

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					significant; **Response:** Treasury Metals acknowledges that portions of the Project will overprint sections of tributaries to Blackwater Creek. As a result, there will be a requirement to obtain a Section 35(2) authorization under the Fisheries Act. This authorization will likely require a fisheries offsetting (compensation) plan due to Project related effects. Offsetting will also be required under Section 2 of MMER. None of the offsets are related to effects in either Thunder Lake or Wabigoon Lake, although both of those lakes have been discussed with the agencies as potential locations for implementing the fisheries offsets (see also the response to TMI_125-FH(1)-04). An expanded evaluation of the effects of the Project on fish and fish habitat, the associated effects on commercial and recreational fisheries, as well as the corresponding effects on Aboriginal people is provided in the revised EIS. Information about potential Project effects and mitigation measures related to recreational and commercial fisheries can be located in Sections 6.14 (fish and fish habitat), 6.16 (land use), 6.18 (economic factors) and 6.21 (Aboriginal peoples) of the revised EIS.
670	AC(1)-343	Naotkamegwanning First Nation	Aboriginal Engagement		**Information Request / Comment:** o The methodology used for assessing magnitude and other criteria for characterizing residual effects is lacking transparency and certainly has not been subject to any vetting with NFN **Response:** Treasury Metals acknowledges that there are a number of questions from the Agency and other reviewers related to the approach used in the EIS for organizing and presenting information regarding the potential effects of the Project. In order to effectively address these issues, and to address issues raised through the responses to Round 1 questions, Treasury Metals has prepared a revised EIS that sets out the assessment of effects and impacts associated with the Project in a clear and traceable manner. The criteria used for assigning significance to residual effects are described in Section 6.1.8.
671	AC(1)-344	Naotkamegwanning First Nation	Current Use of Lands and Resources for Traditional Purposes		**Information Request / Comment**: o The section contains no reference to impacts on moose habitat (also identified as critical in this area to NFN Treaty rights practices), or impacts to migratory bird habitat; and **Response:** An expanded evaluation of the potential effects of the Project has been provided in the revised EIS. The relevant sections of revised EIS present the linkage between Project-related effects on components of the environment and effect on the current use of lands and resources for traditional

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					purposes by Aboriginal peoples. Section 6.4 describes the effects of the Project on noise, including identifying areas where predicted noise levels have the potential to displace, or alienate wildlife. The effects of the Project on wildlife and wildlife habitat is described in Section 6.12, and includes the effects of wildlife displacement or alienation by noise. Section 6.16 describes the effects of the Project on land use, including discussions regarding the predicted effects on hunting and trapping. Finally, Sections 6.21 and 6.23.4 describe the effects of the Project on Aboriginal people, including the effects caused by changes in the environment.
672	AC(1)-344	Naotkamegwanning First Nation	Current Use of Lands and Resources for Traditional Purposes		**Information Request / Comment**: o The section does not address the methodological limitation of assessing adverse effects on First Nations' current use of lands and resources for traditional purposes without the benefit of a study involving First Nations' traditional users of the Project vicinity. The logic and credibility of assessing effects on current use of lands and resources for traditional purposes without any knowledge of current use of lands and resources for traditional purposes, should be self-- evidently unacceptable and begging for additional information requirements from the CEA Agency to the Proponent. **Information Request / Comment**: **Response:** Treasury Metals has been engaged with Aboriginal peoples within the Project area for a number of years and has attempted to negotiate agreements for sharing traditional knowledge and preparing traditional land use studies. Those attempts are described in the Aboriginal Engagement Report. Treasury Metals continues to be willing to undertake TK / TLU studies with affected communities. Where available, TK / TLU information that has been collected has been integrated into the EIS. Any traditional knowledge shared by the communities in the future will be incorporated into the design of Project mitigation, follow-up monitoring plans and environmental management plans, as appropriate. At the request of the Agency and as part of the Round 1 IR process, Treasury Metals has prepared a revised EIS. An expanded evaluation of the potential effects of the Project on Aboriginal peoples is provided in Section 6.21.
673	AC(1)-345	Naotkamegwanning First Nation	Aboriginal Health and Socio-economic Conditions Aboriginal		**Information Request / Comment:** • Overall, our review of the baseline and effects assessment sections of the EIS indicates that NFN's socio-economic and health conditions, tradition land and resource use activities, and cultural heritage have not been adequately described or characterized, nor have potential adverse effects on these valued components and NFN's treaty rights been properly assessed. Without a proper

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			Physical and Cultural Heritage Current Use of Lands and Resources for Traditional Purposes		baseline of NFN's land use activities, the characterization of effects is necessarily deficient. For many of NFN's concerns, proposed mitigation and follow-up measures are either generic or undefined, or entirely absent. This near-absent assessment of traditional land and resource use that appears to have been exclusively relied upon by the Proponent for addressing potential Project-specific and cumulative effects on treaty rights does not support meaningful engagement and accommodation between NFN and the Crown.
					Response: Treasury Metals has made efforts to engage and elicit input from Aboriginal peoples regarding the Project. No Project-specific traditional knowledge and traditional land use studies were prepared for, or shared with, Treasury Metals; limited information was obtained about traditional land use areas. Treasury Metals made efforts to incorporate information provided and to address comments and issues raised by Aboriginal peoples during the engagement process. A summary of the issues raised during the engagement process was provided in Section 8 and Appendix DD to the original EIS. As part of the Round 1 IRs, the Agency has requested that Treasury Metals expand and update the information presented in Appendix DD to the original EIS. This information is provided as an updated document called the Aboriginal Engagement Report, Appendix DD to the revised EIS. The Aboriginal Engagement Report provides a listing of the disaggregate comments from Aboriginal peoples, and how those were addressed in the EIS. Treasury Metals will continue to discuss potential Project effects on traditional land use activities with potentially affected Aboriginal peoples throughout the life the Project. As additional information regarding an Aboriginal community's traditional land use and practices become available, Treasury Metals will review and consider it in the design of mitigation measures, follow-up monitoring and management plans for the Project, as appropriate. Information related to Aboriginal traditional knowledge or current land and resource use by Naotkamegwanning First Nation in the area of the Project is limited; Naotkamegwanning First Nation did not share any Project-specific information orknowledge with Treasury Metals before the original or revised EIS were filed.
674	AC(1)-346	Naotkamegwanning First Nation	Aboriginal Engagement		**Information Request / Comment:** • Ch. 8 Aboriginal and Public Engagement- 8.9 Aboriginal Concerns: This section is supposedly based on "Aboriginal concerns [that] have been identified to Treasury at meetings between Treasury and representatives of the Aboriginal communities, by means of letters sent by communities to Treasury and by means of comments made by communities to the CEA Agency which have been relayed to Treasury by the CEA Agency." However, all concerns have been lumped together, with no distinct listing of concerns for each individual First Nation. This is contrary to recent practice by the CEA Agency, requiring greater distinction for each First Nations of concerns and potential adverse effects. NFN calls for CEAA to follow-up with requests for greater

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					disaggregation of information that can lead to independent effects characterization for each affected First Nation. **Response:** The engagement activities prior to filing the EIS were summarized in Section 8 and Appendix DD to the original EIS. As part of the Round 1 IRs, the Agency has requested that Treasury Metals expand and update the information presented in Appendix DD to the original EIS. This information is provided as an updated document called the Aboriginal Engagement Report, Appendix DD to the revised EIS. The Aboriginal Engagement Report provides a listing of the disaggregate comments from Aboriginal peoples, and how those were addressed in the Project design and EIS.
675	AC(1)-347	Naotkamegwanning First Nation	Aboriginal Engagement		**Information Request / Comment:** • Aboriginal Engagement Report: Appendix DD: The sub-section that discusses the extent of engagement with NFN is only 2 pages long. The engagement log provided as an annex to the report indicates that only two preliminary meetings have been held with NFN's current Chief and Council. o The report implies that NFN is too far away to have any treaty rights in the "project area" and that any concerns that NFN members may have related to water quality in Wabigoon Lake are unfounded and unwarranted. This is absolutely not the case. This gap in the Proponent's knowledge is troubling to NFN, as is the Proponent's willingness to make a liberal estimation of potential impacts on rights even without strong enough knowledge about our rights and interests in the Project-affected area (as opposed to a conservative/precautionary approach, the more proper way to estimate effects in the face of uncertainty - or better yet, the Proponent could seek engagement with the First Nation itself). o This section is not informed by any TK or TUS studies. The Proponent notes as a "next step" potential TK studies with the Metis Nation of Ontario, Wabigoon Lake Ojibway Nation and Eagle Lake First Nation, but no reference is made to undertaking such studies with NFN or other Treaty 3 Nations involved in the EA. **Response:** At the request of the Agency, Treasury Metals has prepared the Aboriginal Engagement Report, Appendix DD to the EIS. The Aboriginal Engagement Report provides a detailed record of contacts with Aboriginal peoples, identifies concerns and questions raised by each Aboriginal person, a detailed list of concerns and how they were addressed in the EIS. The Aboriginal Engagement Report show Treasury Metals' efforts to provide relevant Project-related information and efforts to solicit information and concerns from the Aboriginal peoples. Treasury Metals also recognizes that engagement does not stop with the filing of the EIS and will

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					continue throughout the life of the Project. Treasury Metals will continue to try to engage the Aboriginal peoples meaningfully with respect to the Project. Treasury Metals will continue to discuss potential Project effects on traditional land use activities with potentially affected Aboriginal peoples throughout the life the Project. As additional information regarding an Aboriginal community's traditional land use and practices become available, Treasury Metals will review and consider it in the design of mitigation measures, follow-up monitoring and management plans for the Project, as appropriate. A revised assessment of the effects of the Project on the environment, along with a discussion of the mitigation measures to address those effects is provided in the revised EIS. Information about potential Project effects and mitigation measures related to Aboriginal peoples is described in Sections 6.1.3.20 and 6.21.
676	AC(1)-348	Naotkamegwanning First Nation	Fish and Fish Habitat		**Information Request / Comment:** o Effects on Fishing: The proposed Project is located within the Lower English-Wabigoon River Section of the Lake Wabigoon Ecoregion (potentially already historically contaminated). Further studies and assessment on effluent levels discharging into Wabigoon, other water bodies and downstream effects, is required. There is no evidence that thresholds related to contamination from tailings effluent into Blackwater Creek and Wabigoon Lake system has been properly discussed with NFN or other Treaty 3 Nations. **Response:** As part of the refinement to the engineering for the Project, Treasury Metals has included a perimeter ditch around the operations are of the Project. The runoff from the operations area will be intercepted by these perimeter ditches and incorporated as part of the water management systems. This water will be used as part of the process, treated and ultimately discharged to Blackwater Creek. Treasury Metals has committed (Table 10.0.1 of the EIS) that the effluent from the Project during operations will be treated to a level that meets the Provincial Water Quality Objectives (PWQO) prior to discharge into Blackwater Creek. The PWQO are established at levels that protect sensitive aquatic receptors from harm. There will be no discharges from the Project to Thunder Lake or its tributaries. An expanded evaluation of the Project has been provided in the revised EIS This assessment includes the linked effects of the Project on: • surface water quality (Section 6.8); • fish and fish habitat, including the effects of changes in water quality (Section 6.14); • commercial and recreational fishing (under the land use component), including the effects on surface water quality as well as fish and fish habitat (Section 6.14); and

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					• Aboriginal peoples, including the effects on commercial and subsistence fishing (Section 6.21). Treasury Metals will continue to discuss potential Project effects on traditional land use activities with potentially affected Aboriginal peoples throughout the life of the Project. As additional information regarding an Aboriginal community's traditional land use and practices become available, Treasury Metals will review and consider it in the design of mitigation measures, follow-up monitoring and management plans for the Project, as appropriate.
677	AC(1)-349	Naotkamegwanning First Nation	Current Use of Lands and Resources for Traditional Purposes		**Information Request / Comment**: o Effects on Hunting and plant harvesting: The EIS overlooks net adverse effects on Treaty 3 rights to hunting and plant harvesting in the vicinity of the Project area, and as mentioned previously instead relies upon a "go hunt elsewhere" rationale for assessing adverse effects as minimal and not significant. Potential for increased non-Aboriginal hunting & trapping pressure is acknowledged, however no mitigation, monitoring or follow-up measures are proposed (e.g., access management plan). This type of "catch and release" environmental assessment, where a potential impact is acknowledged, but never acted upon with any sort of plan, policy or other action to avoid, reduce, or compensate for the effect, is unacceptable to NFN, especially when critical Treaty rights are at risk
					Response: At the request of the Agency and as part of the Round 1 IR process, Treasury Metals has prepared a revised EIS that sets out the assessment of effects and impacts associated with the Project in a clear and traceable manner. The revised EIS includes an expanded discussion on valued components (VCs) and their selection, mitigation measures to address predicted effects, and an expanded description of potential Project-related effects. Information about potential Project effects and mitigation measures related to these concerns are located in Sections 6.16 (land use) and 6.21 (Aboriginal peoples). Descriptions of management plans are provided in Section 12.0. Information on follow-up monitoring related to land use and Aboriginal peoples is described in Sections 13.16 and 13.21 of the revised EIS. The provincial government will also have a role in the management of any increased pressure on hunting and trapping resources. Further to this as part of the Round 1 IRs, the Agency has requested that Treasury Metals expand and update the information presented in Appendix DD to the original EIS. This information is provided as a document called the Aboriginal Engagement Report, Appendix DD to the revised EIS. The Aboriginal Engagement report provides a listing of the disaggregated comments from Aboriginal peoples, and how those were addressed in the Project design and EIS. Where available, TK / TLU information that has been collected has been integrated into the EIS and is described within the Aboriginal Engagement Report. Any traditional knowledge shared by the communities in the future will be incorporated into the design of Project mitigation, follow-up monitoring plans and

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					environmental management plans, as appropriate.
678	AC(1)-350	Naotkamegwanning First Nation	Accidents and Malfunctions		**Information Request / Comment:** Accidents and Malfunctions: Breach of the Tailings Storage Facility (TSF): The EIS fails to either identify or address any potential adverse effects of a TSF breach on the treaty rights, current use of lands and resources for traditional purposes, and socio-economic conditions of NFN (and other Treaty 3 Nations). The EIS includes a TSF failure model illustrating the extensive contamination that such an event would cause to Wabigoon Lake, especially Kelpyn Bay. Nonetheless, the EIS does not NFN's concerns in this regard are summarily dismissed by the Proponent as a remote possibility. The EIS makes no reference to any need for monitoring or a contingency/follow-up plan involving NFN (and other Treaty 3 Nations). **Response:** The EIS did not summarily dismiss the evaluation a potential failure of the tailings storage facility (TSF), despite how unlikely such an event would be. The EIS did note that that a potential failure of the TSF is not a reflection of the actual safety conditions of the TSF after it is designed and built. The design of the TSF will ensure sufficient capacity to contain the Environmental Design Storm (EDS), which for the Project has been assigned as the runoff volume resulting from the 1 in a 1000-year 24-hour event. An emergency overflow spillway has been included to maintain embankment stability during the occurrence of storm events exceeding the EDS, up to the Inflow Design Flood (IDF). The current design of the TSF includes 1.5 m of freeboard above the elevations of the emergency overflow spillway. The dam and associated spillway have therefore been designed to safely pass the peak flow from the IDF without overtopping the dam. Although there is no way to determine the frequency of the IDF event, it will be much more unlikely that once every thousand years. The unlikelihood of the modelled failure is increased by the relatively short operating life of the mine (approximately 10 years). Following operations, the water on the TSF will be withdrawn, treated and used to help fill the open pit mine. In the highly unlikely event of a TSF failure, Appendix GG describes the potential environmental consequences. None of the tailings present within the TSF were predicted to reach Wabigoon Lake during the modelled failure event. The tailings that would be released in the unlikely event of a TSF failure were predicted to be deposited on land, or in Blackwater Creek downstream of the TSF. The EIS describes that Treasury Metals will implement their spill response procedures following a TSF failure, whereby the released tailings would be contained and cleaned-up. The liquid present within the TSF (supernatant water, pore water and rainfall) is predicted to flow down Blackwater Creek and reach Wabigoon Lake in the highly unlikely event of a TSF failure. However, the quality of the water released into Blackwater Creek during the unlikely event of a TSF failure will meet the water quality authorized limits in the federal Metal Mining Effluent Regulations (MMER), with the exception of lead. The authorized limits in the MMER are the concentrations of various substances the federal government allows mining facilities to discharge to the environment.

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					Therefore, the quality of the water released during the unlikely event of a TSF failure would generally meet the levels considered acceptable as discharges by federal regulations. These limits are reflective of continuous discharges from mining facilitates, whereas a TSF failure would represent a one-time release. Additionally, these concentrations would also be rapidly diluted once the waters reach Wabigoon Lake. The assessment of effects in the highly unlikely event of a TSF failure presented in Appendix GG did identify the potential for the physical impacts within Blackwater Creek as a result of the flood wave. This rush of water would likely cause impacts to the small bodied fish using the Blackwater Creek, and could result in erosion of the channel near to the TSF. However, the low gradient nature of the channel and the presence of beaver dams and bends within the watercourse would dissipate the energy before reaching Wabigoon Lake. Based on the above, Treasury Metals acknowledges that there would be effects in Blackwater Creek in the highly unlikely event of a TSF failure due to the physical effects of the floodwater released and the deposition of tailings downstream of the TSF, until remediated in accordance with spill response procedures. However, there is no basis to conclude that there would be ecological effects in Wabigoon Lake that would affect socio-economic conditions or treaty rights for those using the lake. Please also see responses to TMI_652-AC(1)-325, TMI_653-AC(1)-327, TMI_682-AC(1)-354.
679	AC(1)-351	Naotkamegwanning First Nation	Cumulative effects		**Information Request / Comment:** • NFN's initial review of the EIS did not have enough funding or time to fulsomely critique the Proponent's approach to cumulative effects. However, it is notable that there does not appear to be a comprehensive projects inclusions list (a list of all the other current and reasonably foreseeable future projects that might have impacts on the same VCs as Goliath) included in the EIS. Only 1 project (Wataynikaneyap Power, a proposed 300-km 230- kV transmission line that falls within the defined spatial boundaries of the cumulative effects study area) is identified as having potential to interact with potential effects of the Project. It is likely no other projects are identified primarily as a result of the Regional Study Area (RSA) being so small that few other projects are within its boundaries. Funding and time for additional review is required for NFN to conduct a close examination of cumulative effects. This type of effects assessment is especially important for NFN as we have been subject to Treaty rights infringements in other portions of our territory that have made our Nation both more reliant on the "Goliath" area and which have created long-standing and potentially significant pre-existing adverse effects on our Treaty rights. **Response:** As described by the Agency in their Operational Policy Statement (CEAA, 2015) and the draft technical guidance (CEAA, 2014) for conducting cumulative effects assessments, the cumulative assessment is conducted for those valued components (VCs) for which residual environmental effects were predicted. The scope of the cumulative effects assessment presented in the EIS was

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					reflective of the limited scope of the predicted residual effects. However, Treasury Metals acknowledges the questions received in Round 1 regarding the cumulative effects assessment. To address these comments and changes suggested by the responses to Round 1 IRs, Treasury Metals has prepared a revise EIS that sets out the assessment of effects and impacts associated with the Project, including cumulative effects, in a clear and traceable manner. The cumulative effects assessment is presented in Section 7.0 of the revised EIS.
680	AC(1)-352	Naotkamegwanning First Nation	Aboriginal Health and Socio-economic Conditions		**Information Request / Comment**: Initial Conclusions About the Adequacy of the EIS Gaps and flaws in the EIS include but are not limited to the following. Overall, the approach the EIS appears to take is that NFN's rights and interests are centred too far afield from the Project and Project-affected area to merit close attention in this EA. This is far from the truth and NFN needs to be provided time, funding and opportunity to correct the record prior to the CEA Agency making any determinations on this proposed Project. This letter is only an initial step in that direction and cannot be read as adequate in terms of NFN's required examination of the EIS or a record of its concerns. We contest the conclusion that "the Project will provide an economic net benefit to the local, Aboriginal, regional, and provincial economies and will not result in adverse impacts to Aboriginal and Treaty Rights or related interests." This claim is unfounded given that no socio-economic assessment on NFN has been conducted; no clear links have been made to benefits; and risks to the commercial fishery at Wabigoon Lake has been ignored. **Response:** As part of the Round 1 IRs, the Agency has requested that Treasury Metals expand and update the information presented in Appendix DD to the original EIS. This information is provided as an updated document called the Aboriginal Engagement Report, Appendix DD to the revised EIS. The Aboriginal Engagement report provides a listing of the disaggregated comments from Aboriginal peoples, and how those were addressed in the Project design and EIS. Treasury Metals acknowledges the absence of community-specific socio-economic baseline data for the potentially-affected Aboriginal communities. Based on the proximity of these communities to the proposed Project, it is believed that the effects predictions contained within the EIS capture a broad range of potential Project-related effects which may be experienced by these specific communities. In keeping with global best practices for monitoring and management of potential Project-related socio-economic effects, Treasury Metals is committed to undertaking an update of the socio-economic baseline presented in the EIS to establish a pre-construction baseline of the affected communities prior to commencing construction of the Project. Any updating of the socio-economic

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					baseline should be delayed until the results of the 2016 Census are released by Statistics Canada, which are scheduled to be released between February and November 2017. The update will include primary research (i.e., in-community interviews) for the purposes of validating secondary information and developing a comprehensive profile of the socio-economic conditions within the community at that point in time. An update to the baseline prior to undertaking Project construction would allow for the inclusion of 2016 statistical information, providing a more current view of the Aboriginal and non-Aboriginal communities within the socio-economic study area. Further, the updated socio-economic baseline information will serve as the basis for future monitoring and management of socio-economic effects throughout the life of the Project.
681	AC(1)-353	Naotkamegwanning First Nation	Aboriginal Physical and Cultural Heritage Structure, site, or thing of historical, archaeological, paleontological or architectural significance to Aboriginal groups		**Information Request / Comment:** The very limited archaeology study conducted to date is an inadequate basis upon which to make the assertion that "the Project is not expected to result in any significant adverse residual effects on the environment or heritage/cultural resources." **Response:** Treasury Metals notes that the Stage 1 and 2 archaeological assessment of the development area followed the methodology prescribed by Ministry of Tourism, Culture and Sport (MTCS), and is based on common archaeological practice. The evaluation of archaeological potential considers a range of variables, including the topographic conditions of the subject property, presence and distribution of registered archaeological sites in the region, archaeological reports, local knowledge and the experience of the archaeological consultant, as well as a detailed property inspection. Based on the local terrain at the development site, including low topographic relief, small, unnavigable seasonal streams and high water table, the archaeologist arrived at the conclusion that the area holds low archaeological potential, and recommended that no further archaeological assessment would be required. The MTCS have reviewed the reports, and expressed satisfaction at the recommendations made. It is also important to note that low archaeological potential does not mean that archaeological resources are completely absent from the property. Rather, this means that any sites that may be present will be small or hold low cultural heritage value or interest according to the criteria set out by MTCS. On rare occasions, areas of low archaeological potential may include small sites of unusual cultural heritage value or interest that would be undetectable using normal archaeological methodologies. The Archaeological and Cultural Heritage Resource Management Plan will set out processes for addressing archaeological or cultural heritage resources uncovered during the course of the site preparation and construction, operations, closure and post-closure phases of the Project.
682	AC(1)-354	Naotkamegwanning First Nation	Accident and Malfunctions Aboriginal		**Information Request / Comment:** A catastrophic break in the TSF has been modelled to bring significant contamination into Wabigoon Lake. This stands in stark contrast to the assertion that "any accidents or malfunctions that might occur as a result of the Project are not expected to result in significant adverse residual

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
			Health and Socio-economic Conditions		environmental or socioeconomic effects." Such an event would have significant adverse effects on the natural environment, socio-economic conditions, and our treaty rights.
					Response: As part of the EIS and supporting documentation, potential accidents and malfunctions were evaluated, regardless of whether those events were determined to be likely during the life of the Project, or whether such events are highly unlikely to occur. One of the accidents evaluated was the potential failure of the tailings storage facility (TSF). However, this accident was determined to be highly unlikely to occur, and a potential failure of the TSF is not a reflection of the actual safety conditions of the TSF after it is designed and built. The design of the TSF will ensure sufficient capacity to contain the Environmental Design Storm (EDS), which for the Project has been assigned as the runoff volume resulting from the 1 in a 1000-year 24-hour event. An emergency overflow spillway has been included to maintain embankment stability during the occurrence of storm events exceeding the EDS, up to the Inflow Design Flood (IDF). The current design of the TSF includes 1.5 m of freeboard above the elevations of the emergency overflow spillway. The dam and associated spillway have therefore been designed to safely pass the peak flow from the IDF without overtopping the dam. Although there is no way to determine the frequency of the IDF event, it will be much more unlikely that once every thousand years. The unlikelihood of the modelled failure is increased by the relatively short operating life of the mine (approximately 10 years). Following operations, the water on the TSF will be withdrawn, treated and used to help fill the open pit mine. In the highly unlikely event of a TSF failure, Appendix GG describes the potential environmental consequences. None of the tailings present within the TSF were predicted to reach Wabigoon Lake during the modelled failure event. The tailings that would be released in the unlikely event of a TSF failure were predicted to be deposited on land, or in Blackwater Creek downstream of the TSF. The EIS describes that Treasury Metals will implement their spill response procedures following a TSF failure, whereby the released tailings would be contained and cleaned-up. The liquid present within the TSF (supernatant water, pore water and rainfall) is predicted to flow down Blackwater Creek and reach Wabigoon Lake in the highly unlikely event of a TSF failure. However, the quality of the water released into Blackwater Creek during the unlikely event of a TSF failure will meet the water quality authorized limits in the federal Metal Mining Effluent Regulations (MMER), with the exception of lead. The authorized limits in the MMER are the concentrations of various substances the federal government allows mining facilities to discharge to the environment. Therefore, the quality of the water released during the unlikely event of a TSF failure would generally meet the levels considered acceptable as discharges by federal regulations. These limits are reflective of continuous discharges from mining facilitates, whereas a TSF failure would represent a one-time release. Additionally, these concentrations would also be rapidly diluted once the waters reach Wabigoon Lake. The assessment of effects in the highly unlikely event of a TSF failure presented in Appendix GG

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					did identify the potential for the physical impacts within Blackwater Creek as a result of the flood wave. This rush of water would likely cause impacts to the small bodied fish using the Blackwater Creek, and could result in erosion of the channel near to the TSF. However, the low gradient nature of the channel and the presence of beaver dams and bends within the watercourse would dissipate the energy before reaching Wabigoon Lake. Based on the above, Treasury Metals acknowledges that there would be effects in Blackwater Creek in the highly unlikely event of a TSF failure due to the physical effects of the floodwater released and the deposition of tailings downstream of the TSF, until remediated in accordance with spill response procedures. However, there is no basis to conclude that there would be ecological effects in Wabigoon Lake that would affect socio-economic conditions or treaty rights for those using the lake. Please also see responses to TMI_652-AC(1)-325 TMI_653-AC(1)-326, TMI_678-AC(1)-350.
683	AC(1)-355	Naotkamegwanning First Nation	Cumulative effects		**Information Request / Comment:** Finally, without proper baseline and effects assessments on human VCs and treaty rights, the claim that "the Project is not expected to result in any significant adverse cumulative effects on the environment or heritage/cultural resources" is simply not supportable. **Response:** Treasury Metals acknowledges that there are a number of questions from the Agency and other reviewers related to the approach used in the EIS for organizing and presenting information regarding the potential effects of the Project. In order to effectively address these issues, and to address issues raised through the responses to Round 1 questions, Treasury Metals has prepared a revised EIS that sets out the assessment of effects and impacts associated with the Project in a clear and traceable manner.
684	AC(1)-356	Naotkamegwanning First Nation	Aboriginal Health and Socio-economic Conditions Aboriginal Engagement Aboriginal Physical and Cultural Heritage Current Use of Lands and Resources for		**Information Request / Comment**: The CEA Agency and the Proponent must use this opportunity to ad dress gaps and deficiencies that place NFN's treaty rights and interests at risk. To do so, they must undertake a full assessment of: a. Socio-Economic conditions b. Health Conditions c. Current use of lands and resources for traditional purposes d. Cultural Heritage resources **Response:** Treasury Metals has made efforts to engage and elicit input from Aboriginal peoples regarding the Project. No Project-specific traditional knowledge and traditional land use studies were prepared for, or shared with, Treasury Metals; limited information was obtained about traditional land use areas.

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			Traditional Purposes		Treasury Metals made efforts to incorporate information provided and to address comments and issues raised by Aboriginal peoples during the engagement process. A summary of the issues raised during the engagement process was provided in Section 8 and Appendix DD to the original EIS. As part of the Round 1 IRs, the Agency has requested that Treasury Metals expand and update the information presented in Appendix DD to the original EIS. This information is provided as an updated document called the Aboriginal Engagement Report, Appendix DD to the revised EIS. The Aboriginal Engagement Report provides a listing of the disaggregate comments from Aboriginal peoples, and how those were addressed in the Project design and EIS. Treasury Metals will continue to discuss potential Project effects on traditional land use activities with potentially affected Aboriginal peoples throughout the life the Project. As additional information regarding an Aboriginal community's traditional land use and practices become available, Treasury Metals will review and consider it in the design of mitigation measures, follow-up monitoring and management plans for the Project, as appropriate. Information related to Aboriginal traditional knowledge or current land and resource use by NFN in the area of the Project is limited; NFN did not share any Project-specific information or knowledge with Treasury Metals before the original EIS was filed.
685	AC(1)-357	Naotkamegwanning First Nation			**Information Request / Comment:** Further work is required to understand the intersection of NFN values with Project specific and cumulative effects pathways. We would like funding and opportunity to conduct community meetings to socialize the E IS and gather members' information about potential adverse effects (and benefits that may accrue). These studies must be fully funded by the Proponent (or CEA Agency), conducted with NFN's full involvement and facilitated by a consultant of NFN's choosing. They must also include a potential scenario of a catastrophic release of TSF into both Blackwater Creek and Wabigoon Lake.
					Response: Treasury Metals has made efforts to engage and elicit input from Aboriginal peoples, including Naotkamegwanning First Nation (NFN) regarding the Project. Treasury Metals will continue to discuss potential Project effects with potentially affected Aboriginal peoples throughout the life the Project. It is Treasury Metal's understanding that Intervenor funder was available through the Agency and accessed by NFN as part of the EA process. Treasury Metals remains committed to ongoing engagement with NFN to identify ways they can participate in the process. The evaluation of a potential failure of the tailings storage facility (TSF), and the resulting release of the TSF contents, was completed as part of the EIS (Appendix GG to the EIS). This was done with accordance with the requirements of the EIS guidelines. Please also see responses to TMI_652-AC(1)-325, TMI_653-AC(1)-326, TMI_678-AC(1)-350 and TMI_682-AC(1)-354
686	AC(1)-358	Naotkamegwann	Cumulative		**Information Request / Comment:**

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
		ing First Nation	effects		In addition, the Regional Study Area (RSA) must be revised in order to permit proper consideration of cumulative effects and potential adverse effects of accidents and malfunctions on Wabigoon Lake. Currently the RSA only includes a small portion of the lake, however it is clear that potential effects on fish and water quality, as well as related traditional and commercial harvesting activities, need to be assessed throughout the entire lake system. **Response:** Both the local study area (LSA) and regional study area (RSA) used in the EIS included portions of Wabigoon Lake. Therefore, the assessment completed did consider the effects on the lake as a whole. Additionally, potential effects on Wabigoon Lake would be greatest at the point where Blackwater Creek feeds into the lake (Kelpyn Bay), which is within the LSA. To address questions from the Agency and other reviewers related to the approach and organizing of information presented in the EIS, Treasury Metals has prepared a revised EIS that sets out the assessment of effects and impacts associated with the Project in a clear and traceable manner and addresses changes suggested in the Round 1 responses. Information about potential Project effects and mitigation measures related to these concerns can be located in Sections 6.8 (surface water quality), 6.14 (fish and fish habitat), 6.16 (land use), 6.18 (economic factors), 6.21 (Aboriginal peoples) and 6.23.4 (changes in environment on Aboriginal peoples).
777	AC(1)-359	Wabauskang First Nation			**Information Request / Comment:** The Wabauskang First Nation have conducted a review of the Project including the following documents: Environmental Impact Assessment guidelines "EISG" and the Environmental Impact Statement "EIS". The Goliath Gold Project is located within the territory of the Wabauskang First Nation, throughout which we hold Aboriginal Rights including treaty rights, title and interests. Engagement with us is an integral component of our engagement process to ensure that our rights are not impacted in a way that compromises our constitutional rights as identified in Section 35. We have a right to ensure and protect our "way of life" including the recognition of the interconnection between all living things within our Territory for future generations. **Response:** Treasury Metals recognizes the constitutional rights of the Wabauskang First Nation, and have reached out to engage with the Wabauskang First Nation as part of the EIS process. Treasury Metals is committed to continue to engage with Aboriginal communities and is very interested to fully understand their Project-related concerns. The EIS considers the potential effects of the Project on Aboriginal and treaty rights through an evaluation of the potential for the Project to affect the use of resources by Aboriginal peoples for traditional purposes. Should additional information regarding an Aboriginal community's traditional practices or potential

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					Project-related effects on Aboriginal and treaty rights become available, Treasury Metals will review and consider the information in the development of mitigation measures, follow-up monitoring, and management plans, as appropriate.
778	AC(1)-360	Wabauskang First Nation			**Information Request / Comment:** While our specific comments are summarized below and provided in the attached table in Appendix A, we also summarize our comments in the following statements: • Lack of understanding of the lands and the importance to the Aboriginal peoples in the area • Lack of Traditional Knowledge in all aspects of the Project and Project Design • Lack of Traditional Land use in all aspects of the Project and Project Design **Response:** As part of the EIS process, Treasury Metals engaged with Aboriginal peoples, including the Wabauskang First Nation, to gain an understanding of the importance of the areas potentially affected by the Project to the Aboriginal peoples in the area. To the extent that information was shared with Treasury Metals, it was considered to help refine the design of the Project and identify appropriate mitigation measures. A summary of how feedback from Aboriginal peoples was considered in the EIS process has been provided in Appendix DD (Aboriginal Engagement Report) to the revised EIS. Treasury Metals continues to be committed to working with Aboriginal peoples in the area collect traditional knowledge and land use (TK/TLU) information. Treasury Metals also continues to seek to engage with Aboriginal peoples in the area to discuss measures to that can be implemented as part of the Project to mitigate and minimize potential impacts on physical and cultural heritage resources. Should additional information be received from Aboriginal peoples regarding traditional knowledge and land use within the local study area, Treasury Metals will review and consider any potential effects, and develop and implement necessary mitigation measures, as appropriate.
779	AC(1)-361	Wabauskang First Nation			**Information Request / Comment:** While our specific comments are summarized below and provided in the attached table in Appendix A, we also summarize our comments in the following statements: • Inadequate understanding of the local and regional environments • Inadequate Environmental Baseline Data • Lack of Environmental Management Plan **Response:** Treasury Metals conducted environmental baseline studies with the objective of collecting sufficient information in order to be able to predict and characterize the potential effects of the Project on the surrounding environment. Based on the design of the Project, the mitigation measures incorporated

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					into the Project, and the results of the effects assessment that are presented in the revised EIS, Treasury Metals is satisfied they have sufficient baseline information to understand and characterize the potential effects of the Project. Although it is always possible to collect more baseline data, this data is not always beneficial in helping to understand the potential effects of the Project. However, Treasury Metals has acknowledged there can be benefits from gathering specific additional baseline data, and have completed additional baseline studies related to fisheries, wildlife and wetlands since the filing of the original EIS. Section 12 of the revised EIS includes a listing and description of each of the following management plans to be developed and implemented as part of the Goliath Gold Project: • Project Environmental Management Plan • Waste Management Plan • Emergency and Spill Response Management Plan • Hazardous Materials Management Plan • Fuel Handling and Storage Management Plan • Water Management Plan • Noise Management Plan • Best Management Practices Plan for Dust • Greenhouse Gas Management Plan • Wildlife Management Plan • Fish Management Plan • Socio-Economic Management Plan • Transportation and Access Management Plan • Communications Management Plan • Archaeological and Cultural Heritage Resource Management Plan • Tailings Management Plan • Cyanide Management Plan • Dam Safety Management Plan • Mine Rock Management Plan • Explosives Management Plan • Health and Safety Management Plan These environmental management plans will include aspects of effects mitigation and prevention to ensure the effects of the Project on the environment are minimized. Rather than develop phase specific plans, Treasury Metals intends to develop a comprehensive list of management plans that will be implemented through all phases of the development of the Goliath Gold Project.
781	AC(1)-362	Wabauskang First Nation			**Information Request / Comment:** While our specific comments are summarized below and provided in the attached table in Appendix A, we also summarize our comments in the following statements:

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					• Inadequate Heritage Resources Information **Response:** The *comment* represents a concern on the part of WFN that the cultural heritage resource information provided as background to the EIS forms an inadequate basis for evaluating potential impacts to archaeological resources in the development area, or for anticipating and addressing potential future impacts elsewhere in the study area. This general response summarizes the responses to related comments from WFN. These are found in TMI_826-AC(1)-407, TMI_848-AC(1)-429, and TMI_852-AC(1)-433. As a general response, Treasury Metals points to several documents which support the position that archaeological and cultural heritage resources are and will be appropriately protected during all phases of the Project. Specifically, Stage 1 and 2 archaeological assessment reports have been competed for the development area, and the Archaeological and Cultural Heritage Resource Management Plan will include protocols for addressing proposed development or ground altering activities outside of the area previously assessed, as well as chance finds of archaeological/cultural materials, or human remains. All archaeological assessments will be required to conform to the MTCS *Standards and Guidelines for Consultant Archaeologists* and consider all available data and information, including information available through affected Indigenous communities. The plan will also identify the process for addressing and protecting archaeological or cultural heritage resources uncovered during the course of construction, operation and decommissioning phases of the Project. As acknowledged in Section 5.0 of the archaeological assessment reports prepared to date (Appendix U to the revised EIS), Treasury Metals has ongoing obligations under the *Ontario Heritage Act* and the *Funeral, Burial and Cremation Services Act*. These obligations, and others under the *Coroners Act,* continue to apply throughout the duration of Treasury Metals' activities at the property. The obligations include protocols when archaeological resources or human remains are discovered. The Archaeological and Cultural Heritage Resources Management Plan will set out the process for notification and engagement of Indigenous community members in archaeological assessment in areas of archaeological potential, and the management of accidental discoveries. Treasury Metals recognizes that a positive relationship with WFN will provide mutual benefits in a range of areas. Moving forward, Treasury Metals will work with Indigenous communities to compile a TK/TU study for the project area. With areas of cultural heritage value or interest identified, Treasury Metals can then work with communities to accurately map and develop mitigation protocols for any archaeological or cultural heritage sites within the project area that may be affected by the proposed undertaking. It is important that these sites are identified, mapped and evaluated in order to plan appropriate mitigation strategies. Where feasible, mitigation and protection protocols can be developed that address overlapping values, such as plant communities and medicinal plants, where cultural knowledge and science can both contribute.
781	AC(1)-363	Wabauskang			**Information Request / Comment:**

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
		First Nation			Baseline Studies: Inadequacies and Data "Gaps" The technical review of the baseline studies completed for the Goliath Gold Project revealed the following four major faults with the studies: - The baseline studies were found to be inadequate given the scope and proximity to critical wildlife, fisheries and aquatic habitat. - Generally, the data was found to be inconsistent and not comparable and no "control" sites were used. Two different consultants were used to set up baseline programs and it is unclear if the same methodologies were used. It was evident in some of the studies that different sample locations were used. - There were a number of follow up recommendations made by the consultants and it remains unclear if the proponent completed the recommendations. - There is no indication of on-going baseline studies
					Response: Based on the design of the Project, the mitigation measures incorporated into the Project, and the results of the effects assessment that are presented in the revised EIS, Treasury Metals is satisfied they have sufficient baseline information to understand and characterize the potential effects of the Project on wildlife and wildlife habitat, fisheries and fish habitat. The baseline wildlife and fisheries data relied on to support the EIS were collected through a series of studies. Data collection and field sampling was done using published standard methods appropriate at the time of sampling. Sampling methods and locations were refined in subsequent field programs to address identified gaps and recommendations from earlier studies. Despite these differences, the results of the various baseline studies are generally consistent in terms of the fish and wildlife communities present in the watercourses and habitat that could be affected by the Project. Treasury Metals acknowledges there can be benefits from gathering specific additional baseline data for guiding the design of mitigation measures, follow-up monitoring and management plans for the Project. Since the filing of the original EIS, Treasury Metals has completed additional baseline studies related to fisheries, wildlife and wetlands, including additional bat surveys for potential summer roost habitat and marshbird surveys in 2016. As part of the work to respond to the Round 1 information requests, Treasury Metals has prepared updated baseline wildlife, fisheries and wetlands reports that consolidate the baseline data presented to support the original EIS with additional baseline completed since the original EIS was filed. These reports are as follows: • Summary Fisheries Baseline Report (2011–2016), included as Appendix Q to the revised EIS • Summary Wildlife Baseline Report (2011–2016), included as Appendix R to the revised EIS

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					• Wetlands Baseline Study (2016), included as Appendix S to the revised EIS
782	AC(1)-364	Wabauskang First Nation			**Information Request / Comment:** Climate The climate data provided in the EIS was developed from Environment Canada data stations with the closest station approximately 12 km away from Project site with no project specific climate data. There does not appear to be 2 years of Project specific continuous data as data used in the study spans from different years. When considering this data in an EIS, it does not demonstrate how it represents current weather conditions on the site and when considering this data for model development and predictions, it creates significant risk as it introduces very broad assumptions to the model. When considering TMF operations or water quality predictions, it could lead to very unpredictable results which may result in significant impact to the local environment and WFN rights and interests. Additional data collection with new weather stations should be implemented. EIS Observations, three sites were used: 1. Dryden (1914-1997) 16 km away from Project site 2. Dryden A (1970-2005) 12.9 km away from Project site 3. Sioux Lookout A 65 km away (1938-2007) Questions: - Are the Elevations of these stations different from the project site? - Some rainfall data is from 1915-1936. How is that relevant to the region today? - No ongoing baseline data collection was evident in the EIS. Is there a plan for ongoing baseline data collection and where will the stations be located?
					Response: Environment and Climate Change Canada (2017) defines climate as being the "…prevalent characteristic weather conditions of a place or region over a period of time." For this reason, the climate of a region needs to be characterized using data from stations with a long period of record, typically in excess of 30 years. The latest climate normal period used by Environment and Climate Change Canada (ECCC) covers the period from 1981 through 2010, with the data averaged over the full 30 years. By basing climate estimates on data averaged over a minimum of 30 years of data, and only using climate data from stations with a long period of record helps to avoid the types of "unpredictable" results mentioned in the questions. Section 5.1 of the original EIS provided a summary of the climate data used in the effects assessment. The EIS talked about two stations in Dryden and single station in Sioux Lookout, the locations, elevations and periods of record for these stations are listed in Table 1. For reference, the

<table>
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<tr><td></td><td></td><td></td><td></td><td></td><td>elevation of the operations area where mining and processing activities are planned varies between about 390 to 402 metres above sea level (masl). The administrative facilities located at the former MNRF tree nursery are at an elevation of about 411 masl.

<table>
<tr><td colspan="4">Table 1: Climate Data Sources used in EIS</td></tr>
<tr><td>Station</td><td>Dryden</td><td>Dryden A</td><td>Sioux Lookout</td></tr>
<tr><td>Period of Record</td><td>1914–1997</td><td>1970–2005</td><td>1938–2007</td></tr>
<tr><td>Latitude</td><td>49.78°</td><td>49.83°</td><td>50.12°</td></tr>
<tr><td>Longitude</td><td>-92.83°</td><td>-92.75°</td><td>-91.9°</td></tr>
<tr><td>Elevation (masl)</td><td>371.9</td><td>412.7</td><td>383.1</td></tr>
<tr><td>Distance (km)</td><td>~16</td><td>12.9</td><td>~65</td></tr>
</table>

While climate data were available from the Dryden station as far back as 1915, the climate data presented in the original EIS represented the current climate normal data (1971–2000) at the time of filing. Climate normal data represent a data set averaged over 30-year period.

As part of the work to respond to the Round 1 information requests, Treasury Metals has prepared a revised EIS. Section 5.1 summarizes the climate data relied on in assessing the effects of the Project. In the revised EIS, reliance was placed on data from the Dryden A station, and the Dryden A (aut) station that replaced the Dryden A station. The data presented in Section 5.1 represents the current climate normal data (1991–2010) for the Dryden A station. In addition to the normal data, historic precipitation data from the Dryden A station were used to determine the 1 in 20 dry year and 1 in 20 wet years to ensure the effects assessment considered the range of conditions possible over the relatively short active life of this Project.

No on-site meteorological data was collect to support the EIS as it would not have provided the long-term record (minimum of 30 years). Section 13 provides a summary of the proposed monitoring programs to support the Project and confirm the findings of the EIS. It is expected that an on-site meteorological station will be required as part of the monitoring, at a minimum to support the air monitoring program (Section 13.6). The station will be installed at an as-yet determined location on the Project site to collect site specific meteorological data. While information from this station will also be useful in providing operations support, it will not be used to extrapolate climate trends, as the data set will not be a sufficiently long record (30 years at a minimum).

References Cited

Environment and Climate Change Canada, 2017. Weather and meteorology Glossary. Accessed at the following site: https://ec.gc.ca/meteo-weather/default.asp?lang=En&n=B8CD636F-1&def=allShow#wsglossary</td></tr>
<tr><td>783</td><td>AC(1)-364</td><td>Wabauskang First Nation</td><td></td><td></td><td><u>Information Request / Comment:</u>
Hydrology</td></tr>
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TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					Through our review of the hydrology studies provided in the EIS, it was found that the majority of information gathered was done through literature review. Further detail regarding our findings can be found in the table in Appendix A. Based on our findings we were unable to complete a detailed assessment of potential impacts as the information provided in the EIS was incomplete and not site specific. EIS Observations: 1. 2010/2011 information does not include a full two years of data. 2. Only one sample collected in December 2010. 3. Only one full year of data Questions: - Have methodologies changed? If so, how can the data be comparable? It appears the methodologies changed in March 2011 - No ongoing baseline data collection was evident in the EIS. Is there a plan for ongoing baseline data collection?
					Response: While the collection of baseline hydrological information helps to characterize the existing conditions, it is not possible to conduct an assessment of Project effects using baseline data only. The baseline data collected for use in the assessment is to help understand the existing flow regimes, to guide the approach to be used in evaluating the potential effects of the Project, and for use in comparing the predicted effects. A review of the available baseline hydrological monitoring data identified that the Project was located in an area with small, low gradient systems. Given the challenges associated with accurately measuring streamflow in such environments, it was concluded that baseline flow data should be used with caution. The available baseline data is likely only useful in characterizing when the creeks were flowing or when they were dry, but not for determining accurate flow rates or for the development of long term runoff coefficients or flow statistics. Additionally, it was concluded that it is unlikely that any useful data could be used for characterizing site-specific runoff coefficients and accurate flow rates could be obtained through additional flow measurements. As a result, a refined approach for evaluating the effects of the Project on surface water quantities (hydrology) was adopted in responding to the Round 1 information requests. Long term flow statistics for the Project site area have been developed based on regional runoff estimates instead. This approach estimates flow in the tributaries within the site area by directly prorating data developed from a representative Water Survey Canada (WSC) station. The approach is described in Section 6.9.2 of the revised EIS, and in further detail in Section 4.3 of this Appendix JJ (Water Report) to the revised EIS.

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					The baseline data used to characterize the existing flow conditions presented in Section 5.7 of the revised EIS are derived from the 2014 DST Consulting Engineers Hydrology Baseline Study (Appendix N of the revised EIS), which focused on collection of continuous water level and flow data for sub-watersheds within the Project and study area. Discrete baseline flow measurements within the sub-watersheds were also collected in 2012 by Klohn Crippen Berger, as presented in the Environmental Baseline Study (Appendix G of the original EIS). This information is no longer relied on in the revised EIS.
784	AC(1)-365	Wabauskang First Nation			**Information Request / Comment:** Water Quality Our review of the water quality baseline data provided have identified a number of data gaps and concerns regarding water quality predictions related to the project. Overall, we found the number of sampling locations to be limited and the data sample collection to be incomplete. Another important aspect of scientific analysis including the collection and interpretation of water quality data is the establishment of a control location. Through our review and analysis, we were not able to determine if a control sample location as established for the water quality program. Given the close proximity of the Project to water sources of importance to both local communities and the WFN, additional work is required to establish a reasonable baseline data set for impact predictions. EIS Observations: 1. 7 sample locations (4 on Black Water Creek) 2. 2010/2011 information does not include a full two years of data. Only one sample collected in December 2010. 3. Only one full year of data 4. No control sample location 5. No ongoing baseline data collection **Response:** Based on the design of the Project, the mitigation measures incorporated into the Project, and the results of the effects assessment that are presented in the revised EIS, Treasury Metals is satisfied they have sufficient baseline information to understand and characterize the potential effects of the Project on water quality in surrounding watercourses. The existing water quality data relied on in the EIS were taken from the results of the monitoring program completed from 2012 through 2013 by DST Consulting Engineers (Appendix P to the revised EIS). This baseline water sampling program included the following locations: • Blackwater Creek (4 locations) • Blackwater Creek Tributary 1 (1 location)

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					• Little Creek (1 location) • Hoffstrom's Bay Tributary (1 location) • Thunder Lake Tributary 2 (2 locations) • Thunder Lake Tributary 3 (1 location) • Thunder Lake (2 locations) • Wabigoon Lake (1 location) • McHughes Creek (1 location) • Hughes Creek (1 location) The baseline surface water sampling results relied on for evaluating the effects of the Project on surface water quality have been summarized in Section 5.8.1 of the revised EIS. On these stations, the location on Hughes Creek could be considered a control site as it is well removed from the areas where there would be any effects associated with the Project. However, as the data collected to date is baseline data, it is all really control data against which the predicted effects of the Project are evaluated. There is not any baseline surface water sampling programs currently underway at the Project. As noted above, Treasury Metals had sufficient baseline data available to evaluate the potential effects of the Project on surface water quality (Section 6.8 of the revised EIS). Section 13.8 of the revised EIS lists the proposed surface water quality monitoring program to support the EIS and to confirm the EIS findings. It is expected that, should the Project proceed, monitoring programs would be initiated before the start of site preparation and construction activities, and would continue throughout the active life of the Project.
785	AC(1)-366	Wabauskang First Nation			**Information Request / Comment:** Hydrogeology In our review of the EIS, we found limited hydrogeology data. Further details of our review are provided in Appendix A. EIS Observations: 1. Feb 2011 one site visit 2. 12 soil test pits **Response:** Based on the design of the Project, the mitigation measures incorporated into the Project, and the results of the effects assessment that are presented in the revised EIS, Treasury Metals is satisfied they have sufficient baseline information to understand and characterize the potential effects of the Project on groundwater quantity and quality (i.e., hydrogeology). Firstly, there is extensive information available in peer reviewed literature that explains the geologic setting for the Project area, which will dictate the behaviour of groundwater near the Project. This literature was

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					augmented by the results of geologic testing required to support the development of the Project by Treasury Metals, as well as a focused baseline field data program. The reviewer appears to have misunderstood or misrepresented the baseline work completed to support the hydrogeological assessment. As detailed in Section 5.6.2 of the original and revised EIS, the hydrogeological baseline studies included the following: • 9 permanent monitoring wells for testing groundwater levels and quantity • 20 geotechnical boreholes • 4 of the geotechnical boreholes were equipped to monitor groundwater levels • Hydraulic conductivity testing of the overburden soils was conducted in six of the water quality wells Section 5.6.2.2 of the revised EIS describes the focused slug testing on six of the water quality wells in the overburden layer to establish hydraulic conductivity at the site. Additionally, packer tests were conducted on five of the deep boreholes to characterize bedrock conductivity. The results are presented in the following tables in the revised EIS: • Table 5.6.2.2-1: Overburden Hydraulic Conductivity Testing Summary • Table 5.6.3.2-1: Hydraulic Conductivity Summary of Bedrock Units The groundwater monitoring wells were sampled on a near monthly basis between 2013 and 2014 and the data presented in the original EIS. The results of the testing of ground water quality are presented in the following tables in Section 5.6 of the revised EIS: • Table 5.6.2.3-1: 2013/2014 Groundwater Monitoring Data • Table 5.6.2.4-1: Groundwater Quality
786	AC(1)-367	Wabauskang First Nation			**Information Request / Comment:** Wildlife Wildlife studies and predictions in the EIS lacked traditional knowledge data to determine importance of wildlife values to WFN. Additional details regarding our review are provided in Appendix A. EIS Observations: 1. Did not find any 2010 results 2. Local Study Area only 5 km 3. Oct 13 /Oct 15 2011 song bird count-would this be a good time of year for this? should be completed in spring? 4. May 12 2011 and June 16 2011-June 14 2011 & July 12 2011 Marsh and Waterfowl Survey 5. Mammal Field Sign recorded when at site-no mammals observed

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					6. Amphibian Survey June 12 & 16, 2011 7. Bats survey June 2011 8. Historical Literature review Questions: - Did not see any discussion on Caribou? are they present in this area?
					Response: Although Woodland Caribou historically occurred in the vicinity of the Project, and specifically within the local study area (LSA), no caribou records have been reported in that area since 1990–1999. A portion of the current Woodland Caribou range does overlap with the regional study area (RSA), but the wildlife assessment focuses on those portions of the RSA where there is the greatest potential to have an effect, specifically the LSA and the Project footprint. The Project footprint will be located in Cervid Ecological Zone C1. This zone is currently being managed for moderate to high densities of moose, and low densities of white-tailed deer. There are currently no management objectives for woodland caribou other than recoding and documenting any sightings. For the above reasons, Caribou were not discussed in the EIS.
787	AC(1)-368	Wabauskang First Nation			**Information Request / Comment:** Wetland Survey The EIS provided very little information regarding the wetland values in the area of the Project. The wetlands are home to many species that hold significant value to WFN. The lack of compensation planning for the proposed alteration of wetland areas is a significant gap in the EIS. EIS Observations: 1. June 2011 & August 2011 2. Significant vegetation communities found 3. Thunder Lake, BW Creek and Nugget Creek Wetlands provide habitat, wild rice, staging for waterfowl and spawning and nursery habits for fish. 4. Provincially rare species-Floating Marsh Marigold
					Response: All wetlands within the LSA were assessed according to the provincially accepted protocol (Ontario Wetland Evaluation System). Additional wetland evaluations were completed as part of the 2016 field program; this work is summarized within the Summary Wetland Baseline Study (2016) included

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					in Appendix S to the revised EIS. As described in the response to TMI_794-AC(1)-375, there will be approximately 31.5 ha of wetlands that will be drained or overprinted the Project. All of the impacted wetlands are on, or adjacent to, tributaries of Blackwater Creek. As described in Section 6.15.4 of the revised EIS, the affected wetlands represent a loss of 0.02% of the existing fens in the local study area (LSA), 4.3% of the existing marsh wetlands in the LSA, and 5.5% of the existing swamp within the LSA. The specific wetlands affected by the Project are illustrated on Figure 6.15.4.1-1 of the revised EIS, as well as in TMI_125-FH(1)-04. There are no specific regulatory requirements for offsetting wetland areas affected by the Project. However, wetlands determined to have the potential to provide fish habitat would likely require some form of offsetting under required Fisheries Act authorizations. As part of the ongoing engagement activities for the Project, Treasury Metals will engage Fisheries and Oceans Canada (DFO), Environment Canada (EC), and MNRF in defining the offsetting strategy as part of the Fish Management Plan and will engage with Aboriginal peoples regarding the offsetting plan.
788	AC(1)-369	Wabauskang First Nation			**Information Request / Comment:** Fisheries A number of observations were made regarding fisheries data and studies provided in the EIS. Details regarding our specific concerns are provided in Appendix A. Generally, it was observed that the fisheries information and conclusions provided lacked traditional knowledge from the local First Nations including WFN. Given the significant data gaps and lack of traditional knowledge, it was difficult to determine impacts related to the Project on fisheries values. EIS Observations: - Field work focused on LSA and Regional Study Area (RSA) only literature review - Nov 15-19 2010 (5 days not a full year of data in 2010) 2011-66 samples-No winter samples o May 9-13 2011 4 o June 13-17 2011 o July 10-17 2011 o August 3-9 2011 o Oct 13-19 2011 - Benthic Invertebrates Oct 16-17 2011 - Wabigoon Lake (creek mouth) designated Provincial Fish Sanctuary to protect spawning Walleye and fishing is prohibited during Walleye spawning season.

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					- 24-27 fish species 5. - Sediment Sampling 5 sampling locations Oct 16 and 17th 2011 - no seasonal variation? **Response:** The fisheries information relied on in the EIS used information from various sources. To facilitate the review process, Treasury Metals has consolidated the available baseline data, including additional baseline studies completed since the filing of the original EIS, into a single document entitled "Summary Fisheries Baseline Report (2011–2016)", provided as Appendix Q to the revised EIS. Based on the design of the Project, the mitigation measures incorporated into the Project and the results of the effects assessment that are presented in the revised EIS, Treasury Metals is satisfied they have sufficient baseline information to understand and characterize the potential effects of the Project on fish and fish habitat. Treasury Metals has undertaken additional fisheries baseline work to confirm the information already available. Treasury Metals has been refining the engineering for the Project since the filing of the EIS, with many of the refinements aimed at minimizing the effects of the Project. Some of the important aspects of the refined Project that help avoid and minimize effects on fisheries include the following: • Construct a perimeter ditch and seepage collection system around the operations area to capture and direct all runoff from the site to the water management system. • Industry standard erosion and sediment controls, such as sediment traps within ditches, will be implemented during the site preparation and construction phase. • There will be no discharges to surface water during the site preparation and construction phase. • Activities and the construction of Project components that will impact or overprint watercourses will occur during the fisheries timing window when in-stream work is permitted. • To the extent possible, fish in the sections of Blackwater Creek Tributaries 1 and 2 that will be isolated or overprinted by the Project will be captured and relocated to the same tributary downstream from the operations area, or to the main branch of Blackwater Creek. • Detailed engineering will be completed to ensure that all downstream culverts can support any predicted increases in flows and maintain current levels of fish passage. • As part of the Project approvals process, the authorization required under the Fisheries Act will likely require Treasury Metals to provide offsetting of fisheries habitat losses. This process is yet to be completed so the specific details and locations of the offsetting are yet to be identified. As part of the process for finalizing the offsetting plan, engagement will be required by the appropriate agencies with First Nations, Aboriginal peoples and stakeholders. • Effectively manage water collected on-site using constructed storage facilities, reducing the need for fresh water withdrawals and discharges of treated water. • Fresh water takings from tree nursery irrigation ponds on Thunder Lake Tributaries 2 and 3 will not exceed 5% of the flow entering the ponds. • Pump intakes in the irrigation ponds at the former MNRF tree nursery will be fitted with fish screens to prevent entrainment.

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					• During operations, excess water not required in the process will be treated to concentrations that meet PWQO or Canadian Water Quality Guidelines (CWQG) for the protection of aquatic life, prior to discharging to Blackwater Creek. In the case of mercury, effluent will be treated to meet the background concentrations in Blackwater Creek. • An engineered structure, designed to dissipate flows and avoid erosion, will be constructed to discharge effluent during operations into Blackwater Creek. • Effluent from the processing plant will be treated prior to being discharged to the TSF. Effluent directed to the TSF would meet MMER requirements. • There will be no discharges to surface water during the closure phases. • During closure, the site will be graded such that runoff for the operations area will be directed to the open pit during closure and post-closure phases. • As the open pit is filling with water it will be tested by Treasury Metals to determine whether batch treatment of the pit lake during filling is required to ensure water quality meets PWQO prior to release. • Once the open pit has been filled, excess water from the open pit will be passively released through an engineered spillway into the existing channel of Blackwater Creek Tributary 1. With the implementation of the above measures, the effects of the Project on fisheries (described fully in Section 6.14 of the revised EIS) would be restricted to effects on the small, stream-based fish that inhabit those portions of the small tributaries of Blackwater Creek that would be overprinted as part of the Project development (Blackwater Creek Tributaries 1 and 2). There would be no residual effects on fisheries downstream from the Project, or in either Thunder lake or Wabigoon Lake.
789	AC(1)-370	Wabauskang First Nation			**Information Request / Comment:** Aquatics Baseline Our review of the aquatics baseline data provided have identified a number of data gaps and overall concerns. We found the number of sampling locations to be limited, the data sample collection to be incomplete and the program lacked a control location. Given the close proximity of the Project to fisheries values of importance to both local communities and the WFN, additional work is required to establish a reasonable baseline data set for impact predictions. EIS Observations: - 2 years data but not consistent sample site locations and different consultants and no control sites. - 2011 & 2012 some comparable data but some data collected at different locations - 2013 only habitat mapping **Response:**

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					Based on the design of the Project, the mitigation measures incorporated into the Project, and the results of the effects assessment that are presented in the revised EIS, Treasury Metals is satisfied they have sufficient baseline information to understand and characterize the potential effects of the Project on fish and fish habitat. Treasury Metals has undertaken additional fisheries baseline work to confirm the information already available. Additionally, Treasury Metals has compiled all of the available fisheries information into a single document entitled "Summary Fisheries Baseline Report (2011–2016)", included as Appendix Q to the revised EIS. Treasury Metals is aware of the importance of the downstream fisheries and has designed the Project to minimize the effects of the Project, including minimizing the effects on fisheries. Section 6.14 of the revised EIS provides a comprehensive description of the predicted effects of the Project on fisheries and the mitigation measures implemented as part of the Project to avoid effects. Treasury Metals also realizes that some form of offsetting will be required for the sections of Blackwater Creek Tributaries 1 and 2 that will be overprinted by the Project. This process is yet to be completed so the specific details and locations of the offsetting are yet to be identified. As part of the process for finalizing the offsetting plan, engagement will be required by the appropriate agencies with First Nations, Aboriginal peoples and stakeholders.
790	AC(1)-371	Wabauskang First Nation			**Information Request / Comment:** Potential Environmental Impacts from the Goliath Gold Project Based on our review, we find that the EIS is currently deficient in both WFN information as well as baseline data to be able to assess potential impacts to the local environment and WFN rights and interests. There are a number of aspects of the project which we feel requires further work to address data gaps as well as concerns that have been identified by WFN and other Treaty 3 Nations potentially impacted by the Project. In this section, we have identified a number of specific areas for consideration as we find that the potential impacts could have significant effects on WFN rights and interests.
					Response: In preparing the EIS, Treasury Metals has made efforts to engage and elicit input from Aboriginal peoples regarding the Project, including members of the Wabauskang First Nation. Although no Project-specific traditional knowledge and traditional land use studies were prepared for, or shared with, Treasury Metals; limited information was obtained about traditional land use areas. Treasury Metals made efforts to incorporate information provided and to address comments and issues raised by Aboriginal peoples during the engagement process. A summary of the issues raised during the engagement process was provided in Section 9 to the revised EIS. Additional details on the Aboriginal engagement activities are provided in the Aboriginal Engagement Report included as Appendix DD to the revised EIS. As part of the Round 1 IRs and reissue of the EIS, the Agency has requested that Treasury Metals expand and update the information presented in Appendix DD to the original EIS. The Aboriginal

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					Engagement Report (Appendix DD to the revised EIS0) provides a listing of the disaggregate comments from Aboriginal peoples, specifically WFN in Section 4.4 and Section 5.1 and how those were addressed in the EIS. Based on the work completed to respond to the Round 1 information requests, Treasury Metals is confident that they have sufficient information to fully understand, and to predict, the effects of the Project on the environment. Treasury Metals will continue to discuss with potentially affected Aboriginal peoples how the predicted effects of the Project on the environment, throughout the life the Project, could affect Aboriginal peoples and their use of the land for traditional purposes. As additional information regarding an Aboriginal community's traditional land use and practices become available, Treasury Metals will review and consider it in the design of mitigation measures, follow-up monitoring and management plans for the Project, as appropriate.
791	AC(1)-372	Wabauskang First Nation			**Information Request / Comment:** The operation of the TMF and the proposed location and proximity could impact water quality, fish and aquatic environments in both Wabigoon Lake (drainage south to Wabigoon) and Thunder Lake (drainage west to Thunder Lake). **Response:** The effects assessment completed in Section 6.11 of the revised EIS provides the predicted effects from the Project on groundwater quality, as well as the effects of seepage from on-site facilities such as the TSF to surface water. The results of the effects assessment indicated that there would be no uncontrolled seepage from the site during operations. Seepage from the TSF during operations would be captured primarily by the perimeter seepage collection systems. Any seepage that escaped the seepage collections systems would be captured by the drawdown zone created by the dewatering of the open pit and underground mine. Following closure, dewatering would cease and the groundwater levels would gradually return to near pre-development conditions. At closure, the tailings water within the TSF will be withdrawn, treated and used to help fill the open pit. The TSF would then be covered with granular material to physically isolate the tailings, and a low permeability cover to chemically isolate the tailings and limit ARD. The options considered include a dry, low-permeability cover and a wet cover with non-process water. Once groundwater levels recover to near pre-development conditions, modelling indicates a small quantity of seepage will escape the TSF and ultimately reach surface watercourses around the Project. Water quality modelling presented in Section 6.8 indicates that long-term water quality in the surrounding watercourses will be the same as existing conditions, or will meet the PWQO.
792	AC(1)-373	Wabauskang First Nation			**Information Request / Comment:** There is a lack of technical data to support alternative assessment of TMF location (including TMF effluent discharge). For example TMF #3 and Hartman Lake reasoning for excluding these two locations were economics but a comparison of detailed environmental benefits were not found or was a detailed economic review.

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					Response: A comprehensive assessment of alternative locations for the TSF was presented in Section 2, Appendix D and Appendix X of the original EIS. These assessments have been updated as part of the work to respond to the Round 1 information requests, with the details provided in Appendix D-2 to the revised EIS, and summarized in Section 2 of the revised EIS. The alternatives evaluation presented in Appendix D-2 was developed to meet the requirements under the Metal Mining Effluent Regulations (MMER) for a Schedule 2 amendment. Location 3 (Appendix D of the original EIS) is the eastern most option considered in the TSF alternatives assessment, however, this location is still a considerable distance from Hartman Lake. Location 3 is approximately 4.2 km east of the preferred TSF location, and approximately 3.4 km from Hartman Lake. The detailed evaluation of the TSF alternatives presented in Appendix D-2 of the revised EIS was done in accordance with the technical requirements set out under MMER. The guidance allows for a phased evaluation where all available options are screen to identify fatal flaws that would preclude them from further consideration. As detailed in D-2 to the revised EIS, Location 3 was not one of the TSF locations that were passed through the screening process for detailed evaluation. The primary reason this location was screened out was an increased distance away from the process plant, which would result in environmental and social effects while driving up Project costs. The reader is referred to Appendix D-2 for further details and justifications. The current design of the Goliath Gold Project, as presented in the original and revised EIS, does not include an effluent discharge from the tailings storage facility (TSF). The water management for the Project is designed to maximize the use of available water from site runoff, dewatering the underground and open pit mine, and reclaim from the TSF. Excess water not required in the process will be treated to meet PWQO prior to discharge into the environment. The preferred discharge location for treated effluent is Blackwater Creek; however, an evaluation of alternative discharge locations is presented in Appendix X and Section 2 of the revised EIS (these alternatives were also presented in the original EIS). As Treasury Metals has committed that effluent released from the Project will be treated to meet PWQO, and the PWQO are established to protect sensitive aquatic receptors, there would be no expected environmental impacts associated with any of the alternative discharge locations. Therefore, none of the options would be considered preferred environmentally from a discharge perspective. The evaluation of alternative discharge locations considered cost effectiveness, effects to the human environment, effects to the physical and biological environments and potential ability for future closure / reclamation processes. Table 1 summarizes the results of the alternatives evaluation for the final discharge point (see Appendix X of the revised EIS for additional details). As seen in the table, the only differentiator between the final discharge options was cost effectiveness, which was classified as unacceptable for the Hartman Lake option.

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<tr><th>TMI #</th><th>Agency Reference #</th><th>Parties Asking Questions</th><th>Reference to EIS</th><th>Reference to EIS Guideline</th><th>Comment / Information Request / Response</th></tr>
<tr><td></td><td></td><td></td><td></td><td></td><td>
<table>
<tr><th colspan="6">Table 1: Summary of Alternatives Assessment for Water Discharge Location</th></tr>
<tr><th rowspan="2">Indicator Categories</th><th colspan="5">Summary Ratings</th></tr>
<tr><th>Wabigoon Lake</th><th>Thunder Lake</th><th>Hartman Lake</th><th>Tree Nursery Ponds</th><th>Blackwater Creek</th></tr>
<tr><td>Cost Effectiveness</td><td>Acceptable</td><td>Acceptable</td><td>Unacceptable</td><td>Acceptable</td><td>Preferred</td></tr>
<tr><td>Technical Feasibility and Technical Reliability</td><td>Acceptable</td><td>Acceptable</td><td>Acceptable</td><td>Acceptable</td><td>Acceptable</td></tr>
<tr><td>Effects to the Human Environment</td><td>Acceptable</td><td>Acceptable</td><td>Acceptable</td><td>Acceptable</td><td>Preferred</td></tr>
<tr><td>Effects to the Physical and Biological Environments</td><td>Acceptable</td><td>Acceptable</td><td>Acceptable</td><td>Acceptable</td><td>Acceptable</td></tr>
<tr><td>Potential Ability for Future Closure / Reclamation Processes</td><td>Acceptable</td><td>Acceptable</td><td>Acceptable</td><td>Acceptable</td><td>Acceptable</td></tr>
<tr><td>Overall Summary Rating</td><td>Acceptable</td><td>Acceptable</td><td>Unacceptable</td><td>Acceptable</td><td>Preferred</td></tr>
</table>

Although all of the final discharge options would meet PWQO, and thus there would be no differences in the environmental effects associated with the discharges, the Hartman Lake option could have secondary environmental effects. Discharge to Hartman Lake would require the construction and operation of approximately 14.4 km of pipeline, as well as the construction of a lengthy access road required for the maintenance of the pipeline. The construction of the pipeline and access road would require multiple stream crossings that would have a potential environment effect on those watercourses. Additionally, the Hartman Lake option would result in greater terrestrial habitat loss and disturbance than the preferred alternative.
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<tr><td>793</td><td>AC(1)-374</td><td>Wabauskang First Nation</td><td></td><td></td><td><u>Information Request / Comment:</u>
The potential for a Tailings Dam breech could cause irreversible significant environmental effects to water quality, fish and aquatic habitats.

<u>Response:</u>
Potential accidents and malfunctions were evaluated as part of the EIS and supporting documentation and are located in Section 4 of the revised EIS. One of the accidents evaluated was the potential failure of the tailings storage facility (TSF). However, this accident was determined to be highly unlikely to occur, and a potential failure of the TSF is not a reflection of the actual safety conditions of the TSF after it is designed and built.
In the highly unlikely event of a TSF failure, the liquid present within the TSF (supernatant water,</td></tr>
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TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					pore water and rainfall) is predicted to flow down Blackwater Creek and reach Wabigoon Lake. Based on the design of the Project (Section 3 of the revised EIS), the effluent released from the process plant to the TSF is planned to meet the water quality authorized limits in the federal Metal Mining Effluent Regulations (MMER). This means that the water on the surface of the TSF would meet the authorized limits in the MMER which are the concentrations of various substances the federal government allows mining facilities to discharge to the environment. Therefore, the quality of the water released during the unlikely event of a TSF failure would generally meet the levels considered acceptable as discharges by federal regulations. These limits are reflective of continuous discharges from mining facilities, whereas a TSF failure would represent a one-time release. Additionally, these concentrations would also be rapidly diluted once the waters reach Wabigoon Lake. As detailed in Appendix GG, the water released in the highly unlikely event of a TSF failure would include a combination of supernatant water, pore water and rainfall. The combined water released was conservatively assumed to be of poorer quality than the supernatant water, thus the modelling assumed the quality of the water released into Blackwater Creek during the unlikely event of a TSF failure would meet MMER requirements, with the exception of lead. In the highly unlikely event of a TSF failure, Appendix GG describes the potential environmental consequences. None of the tailings present within the TSF were predicted to reach Wabigoon Lake during the modelled failure event. The tailings that would be released in the highly unlikely event of a TSF failure were predicted to be deposited on land, or in Blackwater Creek downstream of the TSF. The EIS describes that Treasury Metals will implement their spill response procedures following a TSF failure, whereby the released tailings would be contained and cleaned up. The assessment of effects in the highly unlikely event of a TSF failure presented in Appendix GG did identify the potential for the physical impacts within Blackwater Creek as a result of the flood wave. This rush of water would likely cause impacts to the small bodied fish using the Blackwater Creek, and could result in erosion of the channel near to the TSF. However, the low gradient nature of the channel and the presence of beaver dams and bends within the watercourse would dissipate the energy before reaching Wabigoon Lake. The design of the TSF will ensure sufficient capacity to contain the Environmental Design Storm (EDS), which for the Project has been assigned as the runoff volume resulting from the 1 in a 1000-year 24-hour event. An emergency overflow spillway has been included to maintain embankment stability during the occurrence of storm events exceeding the EDS, up to the Inflow Design Flood (IDF). The current design of the TSF includes 1.5 m of freeboard above the elevations of the emergency overflow spillway. The dam and associated spillway have therefore been designed to safely pass the peak flow from the IDF without overtopping the dam. Although there is no way to determine the frequency of the IDF event, it will be much more unlikely than once every thousand years. The unlikelihood of the modelled failure is increased by the relatively short operating life of the mine (approximately 10 years). Following operations, the water on the TSF will be withdrawn, treated and used to help fill the open pit mine. Based on the above, Treasury Metals acknowledges that there would be effects in Blackwater Creek in the highly unlikely event of a TSF failure due to

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					the physical effects of the floodwater released and the deposition of tailings downstream of the TSF, until remediated in accordance with spill response procedures. That stated, these effects would be limited to Blackwater Creek Tributary 2 and Blackwater Creek, and would be remediated in this unlikely event.
794	AC(1)-375	Wabauskang First Nation			**Information Request / Comment:** During the construction of the Project, 9 wetlands will be destroyed and altered. The EIS did not identify a wetland compensation plan (3 provincially significant avian species at 5 of the wetlands). Also, there is less than one year of baseline work completed so there is a lack of understanding of the wetland ecosystem (Thunder Wetland is considered significant).
					Response: The statement that 9 wetlands will be destroyed and altered as a result of the Project is not correct. As described in the response to TMI_125-FH(1)-04, and shown in TMI_125-FH(1)-04_Figure_1, there would only be six small wetland areas that overlap with the operations area for the Project impacted. A total of 33 ha of wetlands will be altered during the site preparation and construction phases of this Project. These wetlands represent 0.02% of the fens in the local study area (LSA), 4.3% of the marsh in the LSA, and 5.5% of the swamp in the LSA (see table 6.15.4.1-1 of the revised EIS). There are no predicted effects of the Project on wetlands upstream of the Project (i.e., Lola Lake Provincial Park nature reserve), downstream of the Project along Blackwater Creek, or on the wetlands along the lower reaches of Thunder Creek. Although there are no specific regulatory requirements for a specific compensation plan focusing solely on wetland rehabilitation, wetlands that are considered to provide fisheries habitat would likely be included as part of the offsetting plan that would be required in order to obtain the required authorizations under the Fisheries Act. Additionally, Treasury Metals will be required to file a closure plan for the Project that details the rehabilitation of the Project site post-closure. It is expected that the final closure plan will be similar to the conceptual closure plan provided in Section 11 of the original EIS, and as Appendix KK of the revised EIS. The conceptual closure plan includes the provision for the flooding of the open pit following closure, and the measures for the establishment of new wetlands, particularly within the western portion of the proposed pit lake. Since the filing of the original EIS, Treasury Metals completed a second year of wetlands evaluations in 2015. The wetlands information relied on in the EIS have consolidated into a single document entitled “Wetlands Baseline Study (2016)”, provided as Appendix S to the revised EIS.
795	AC(1)-376	Wabauskang First Nation			**Information Request / Comment:** The majority of waste rock has been classified as Potentially Acid Generating (PAG) there are limited closure and remediation plans to ensure this material remains stable long term and post closure.
					Response:

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					Treasury Metals has designed the Project with recognition of the potential acid generating (PAG) nature of the rocks, and the resulting risks associated with acid rock drainage (ARD). During production and where possible, waste rock will be classified and separated according to acid generation potential (non-acid generating [NAG] and PAG). The placement of these stockpiles will fall under Mine Rock Management Plan and will detail the methods for classifying rock type for acid generating potential through appropriate testing in order to direct this rock to the appropriate stockpile location. A management plan of this type is standard industry practice for rock that has the potential for acid generation. The open pit is planned to be developed and mined in series from west to east in 3 phases. This allows for approximately 40% (or 12 million tonnes) of the total open pit waste rock to be used to backfill the pits and minimize the volume and footprint of the waste rock stockpile north of the pit. Once operations at the Project cease, the closure activities are that are outlined in Section 3.14 of the revised EIS will ensure the PAG materials remain stable over the long term. • At closure, the portions of the waste rock storage area (WRSA) containing PAG materials will be covered with a low-permeability dry cover to reduce infiltration and seepage, and to isolate the materials from oxygen to limit ARD. Both the PAG and NAG portions of the WRSA will then be covered and re-vegetated. Runoff from the WRSA will be directed to the open pit, and should be comparable to the pre-development runoff quality. • At closure the dewatering activities will cease and the open pit will be allowed to start filling with water. As the open pit fills with water in the post-closure phase, the PAG waste rock and exposed mine faces will be flooded and isolated from oxidation. • During operations, the TSF will remain under a cover of water to isolate the PAG materials in the tailings from oxygen and prevent the onset of ARD. At closure, the tailings water in the TSF will be withdrawn, treated and used to help fill the open pit. The TSF will be covered with a layer of granular material to physically isolate the tailings. The tailings will then be covered with a low permeability dry cover or a cover of non-process water to chemically isolate the tailings and prevent ARD.
796	AC(1)-377	Wabauskang First Nation			**Information Request / Comment:** Inadequate Environmental Management System Framework and Environmental Management Plan outline. (For example did not find a frame work for a Construction Management Plan (CEMP) Operational Management Plan (OEMP)). **Response:** An overview of the environmental management plan for the Project was provided in Section 12 of the original EIS. This discussion has been expanded in Section 12 of the revised EIS, to include a listing and description of each of the following management plans to be developed and implemented as part of the Goliath Gold Project:

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					• Project Environmental Management Plan • Waste Management Plan • Emergency and Spill Response Management Plan • Hazardous Materials Management Plan • Fuel Handling and Storage Management Plan • Water Management Plan • Noise Management Plan • Best Management Practices Plan for Dust • Greenhouse Gas Management Plan • Wildlife Management Plan • Fish Management Plan • Socio-Economic Management Plan • Transportation and Access Management Plan • Communications Management Plan • Archaeological and Cultural Heritage Resource Management Plan • Tailings Management Plan • Cyanide Management Plan • Dam Safety Management Plan • Mine Rock Management Plan • Explosives Management Plan • Health and Safety Management Plan These environmental management plans will include aspects of effects mitigation and prevention to ensure the effects of the Project on the environment are minimized. Rather that develop phase specific plans, Treasury Metals intends to develop a comprehensive list of management plans that will be implemented through all phases of the development of the Goliath Gold Project. Therefore, there is no need for a 'Construction Management Plan' or an 'Operational Management Plan', as each of the management plans outlined in Section 12 of the revised EIS will encompass both these Project phases.
797	AC(1)-378	Wabauskang First Nation			**Information Request / Comment:** We have concerns regarding the protection of traditional food sources (i.e. wild rice- Black water Creek 2.4 ha wild rice exists currently-Thunder Creek 5.1 ha wild rice exists currently). **Response:** Treasury Metals is aware of the importance of protecting water quality and associated traditional food sources, such as wild rice, to Aboriginal peoples. The refined Project configuration includes a number of measures to protect water quality (Section 3.8 of the revised EIS), and as a result, protect

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					traditional food sources such as wild rice. The refined assessment of surface water effects presented in Section 6.9 of the revised EIS identified the following: <u>Site Preparation and Construction Phase</u> • A perimeter ditch will be constructed around the operations area to prevent the release of runoff from the area where mining operations occur to the environment. • There will be no water discharges to surface water from the Project during the site preparation and construction phase. All runoff collected within the perimeter ditch will be collected. The collected runoff will be used to initiate the tailings storage facility (TSF) and to build an inventory for use in the process. <u>Operations Phase</u> • During operations, all runoff collected within the perimeter ditch will be directed to the water management system, where it will be used to the extent possible within the process. • There will be no discharges from the Project during operations to Thunder Lake, or any of the tributaries that feed into Thunder Lake. • Excess water during the operations will be treated to meet the Provincial Water Quality Objectives (PWQO) prior to being discharged to Blackwater Creek through an engineered structure designed to dissipate flows and prevent erosion. • The surface water quality in Blackwater Creek downstream of the Project will meet PWQO, or will be improved from the baseline water quality prior to the development of the Project. • During the operations phase, there would be no releases to Thunder Lake during operations, or any of its tributaries. Therefore, there would be no releases that could affect the quality of the water in Thunder Creek, which flows from Thunder Lake downstream into Wabigoon Lake. • The on-site structures containing potentially acid generating (PAG) materials (i.e., waste rock storage area [WRSA] and the TSF) will have seepage collection systems to collect seepage and prevent its release to the environment. • During operations, the open pit and underground mine will be dewatered to create a safe working environment. The water collected will be directed to the water management system, where it will be used to the extent possible within the process. The dewatering will create a drawdown zone. Any seepage from the WRSA and TSF that escape the seepage collection systems will be captured within the drawdown zone and will report to the open pit. There will be no seepage that escapes the site during the operations phase. <u>Closure Phase</u> • Dewatering of the open pit and underground mine will cease at the end of mining, and the open pit will be allowed to start filling with water. It is estimated that the open pit will require between 5 to 8 years to fill, depending on the meteorological conditions. • During the closure phase, the site will be graded to direct all runoff from the operations area towards the open pit, which will aid in the filling of the open pit. • As the pit lake is filling, Treasury Metals will test the quality of water in the pit lake that is being

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					formed to determine whether batch treatment will be required to ensure the water quality meets the PWQO once the pit lake is filled. • Process water present in the TSF will be withdrawn, treated and used to help fill the open pit. The TSF will be covered with a granular material to physically isolate the tailings. The tailings will then be chemically isolated to prevent acid rock drainage (ARD) using either a low permeability dry cover, or a wet cover using non-process water. • The drawdown zone created by the dewatering activities will remain until the pit lake is fully flooded and the groundwater levels return to near pre-development conditions. Any seepage from the WRSA and TSF that escape the seepage collection systems will be captured within the drawdown zone and will report to the open pit. There will be no seepage that escapes the site during the closure phase. • There will be no water discharges to surface water from the Project during the closure phase. <u>Post-closure Phase</u> • As the pit lake is filling, Treasury Metals will test the quality of water in the pit lake that is being formed to determine whether batch treatment will be required to ensure the water quality meets the PWQO once the pit lake is filled. • Once the pit lake is filled (5 to 8 years following closure), excess water from runoff and groundwater inflow will be allowed to discharge from the pit lake to the former channel of Blackwater Creek Tributary 1 and downstream into Blackwater Creek. • As the water in the pit lake will have been treated to ensure it meets PWQO prior to being released, surface water quality in Blackwater Creek Tributary 1 and Blackwater Creek will meet PWQO, or will be improved from the baseline water quality prior to the development of the Project. • Once the pit lake is fully flooded and the groundwater levels return to near pre-development conditions, small amount of seepage from the WRSA and TSF are predicted to leave the site and will interact with surface water in the surrounding water courses. This would include seepage from the Project to Blackwater Creek, as well as to Thunder Lake and its tributaries. Water quality modelling conducted to respond to the Round 1 information requests confirms that, with a wet cover on the TSF, the post-closure water quality in the waterbodies surrounding the Project will meet PWQO, or will be improved from the baseline water quality prior to the development of the Project. As described above, the Project has been designed to minimize the potential effects on surface water quality in the waterbodies surrounding the Project. With the mitigation measures included in the refined Project configuration, surface water quality in the surrounding waterbodies will meet the PWQO, or will be improved from the baseline water quality prior to the development of the Project. As a result, traditional foods that rely on the water quality being protected (i.e., wild rice) will also be protected.
798	AC(1)-379	Wabauskang			**<u>Information Request / Comment:</u>**

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
		First Nation			We have concerns regarding the potential contamination of wild meat due to lack of any wildlife (large mammal) baseline studies and identification of pathways.
					Response: Treasury Metals recognizes the importance of understanding the potential effects of the Project on Aboriginal health, as well as human health on the whole. As part of the EIS, a screening-level risk assessment (SLRA) was completed (Appendix W) that identified potential health effects to Aboriginal residents, non-aboriginal residents, recreational users, and mine workers. The SLRA considered all of the potential exposure pathways and contaminants of concern and identified that only mercury and lead were present in sufficient concentrations to require further analysis. The SLRA also identified the following exposure pathways, which were detailed in Section 4.2.4 of Appendix W to the EIS: • Direct soil contact and dust; • Food chain exposure; • Groundwater ingestion; • Surface water ingestion; • Surface water dermal contact; and • Vapour inhalation. The potential for contamination of wild meat was considered as part of the "food chain exposure" pathway. Predicted tissue concentrations of mercury and lead were summed across four wild game species (i.e., moose, deer, hare and grouse) to provide a total concentration. The exposure assessment for ingestion of wild game is based on a common bio-concentration factor based the transfer of mercury and lead from food to bovine tissue. The results of the SLRA were used in the human health assessment presented in Section 6.19 of the revised EIS. When all of the exposures associated with the Project are considered, the resulting effects are still considerably lower than the acceptable risk threshold recommended by Health Canada (HC, 2012).
799	AC(1)-380	Wabauskang First Nation			**Information Request / Comment:** No linkage between mining and forestry cumulative effects. (i.e.. roads and fragmentation or sediment and erosion effects).
					Response: An updated cumulative effects assessment has been provided in Section 7 of the revised EIS, which included the assessment of cumulative effects of the Project in combination with those of the Dryden Forestry Management Company Limited (DFMC). The DFMC has identified through its Ten-year Forest Management Plan, that it plans on logging in areas located between Thunder Lake and Hartman Lake located on the Treasury Metals property boundary between 2016 and 2021 (Dryden Forest Management Company, 2016). Through the assessment, it was determined that both the Project and DFMC effects areas overlap for the majority of the disciplines used in the assessment.

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					However, DFMC activities would continue regardless of the Project and have identified that the operations area of the Project will be forested before 2021. Additionally, environmental effects such as noise and air quality from DFMC and the Project have the potential to overlap, but these effects overlaps would be short lived and could be managed to mitigate the effects.
800	AC(1)-381	Wabauskang First Nation			**Information Request / Comment:** Recommendations Based on our review and findings, we are recommending the following actions: -WFN engagement protocol be implemented by both CEAA and Treasury Metals -A plan to address all data gaps, questions and concerns be developed and provided to WFN for review and comment -Once all information requests have been addressed, a suitable period of time should be provided to WFN to review information provided **Response:** Treasury Metals is committed to continuing the engagement process with First Nations and Aboriginal peoples as part of the Project development, and is willing to hold meetings to discuss impacts and effects of the Project and speak to aspects of its development. Treasury Metals welcomes engagement and discussions regarding protocol and the integration of these practices as part of the continuing engagement for the Goliath Gold Project. Treasury Metals will also continue to discuss the predicted effects of the Project, and the potential to affect traditional land use activities with potentially affected Aboriginal peoples, including Wabauskang First Nation. This engagement will continue throughout the life of the Project. As additional information regarding any Aboriginal community's traditional land use and practices become available, Treasury Metals will review and consider this information it received in the design of mitigation measures, follow-up monitoring and management plans for the Project, as appropriate. Treasury Metals is committed to providing complete and direct responses to all of the questions provided by First Nations and Aboriginal peoples, including Wabauskang First Nation. Each First Nation will be provided disaggregate packages with direct responses to those questions asked by each First Nation. In addition, the sum of comments and documentation will be provided to each Aboriginal community. Finally, the responses to the individual information requests have been used when preparing the revised EIS requested by the Agency as part of the Round 1 information request process. Treasury Metals will work with the Aboriginal communities to provide opportunities for comment and feedback to the documentation provided as required by CEAA through the regulatory review process. Treasury Metals is committed to continuing engagement as part of the Project development and is willing to hold meetings to discuss impacts and effects of the Project and speak to aspects of its development.

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
801	AC(1)-382	Wabauskang First Nation	Executive Summary 4.0 Project Overview page 11		**Summary of Comment / Rationale:** No First Nations Map in this section **Information Request / Comment:** Should have a First Nations Map in the beginning of the document so readers fully understand the proximity of the Project to local communities. **Response:** The comment from the reviewer is noted, however, Section 4 of the EIS Summary (Project Overview) would not be the appropriate location for including a map of First Nations near the Project. Section 4 of the EIS summary provides an overview of the Project itself, including descriptions of the features and elements to be incorporated into the Project. A map showing the relative location of Aboriginal communities and First Nations to the Project has been added to Section 1 of the revised EIS summary. Section 1 of the revised EIS also includes the following figures showing the locations of the First Nations and Indigenous communities: • Figure 1.2.1-3: Treaty 3 and the Goliath Gold Project • Figure 1.2.1-4: Aboriginal Groups with Related Interests to the Goliath Gold Project
802	AC(1)-383	Wabauskang First Nation	Executive Summary 4.0 Project Overview page 11		**Summary of Comment / Rationale:** No First Nations Overview in this section **Information Request / Comment:** Should have a First Nations overview in the beginning of the document. A written summary of distance to project in the beginning of document so readers fully understand potential impacts. **Response:** As part of the process to respond to the Round 1 information requests, Treasury Metals has revised the EIS and prepared an updated EIS Summary. Section 1 of the revised EIS Summary includes an overview of the First Nations and Aboriginal peoples interested in the Project, along with a map and table showing the relative location of Aboriginal communities and First Nations to the Project. Section 4 of the EIS Summary (Project Overview) provides an overview of the Project itself, including descriptions of the features and mitigation incorporated into the Project. This would not be the appropriate location for providing an overview of the First Nations and Aboriginal peoples with interests in the Project. That overview is provided in Section 1 of the revised EIS Summary, as noted above.
803	AC(1)-384	Wabauskang First Nation	Executive Summary 4.0 Project		**Summary of Comment / Rationale:** Project design list does not include design for continual remediation for LOM **Information Request / Comment:**

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
			Overview page 11		
					Response: Section 4.0 of the Executive Summary to the EIS provides only a summary of the closure information that was presented more fully in Section 11 of the original EIS (Conceptual Closure Plan). The conceptual closure plan has been included as Appendix KK to the revised EIS, and highlighted the progressive reclamation of the waste rock storage area (WRSA). The WRSA is planned to be constructed beginning on the western edge of the design, affording Treasury Metals the ability to begin reclamation as soon as possible to create a more natural appearance when seen from areas on Thunder Lake. Constructing the WRSA in this manner also gives the benefit of creating an additional sound barrier early in the mine life. Prior to construction commencing, Treasury Metals is required to and will file a certified closure plan and post financial assurances with the Ministry of Northern Development and Mines (MNDM). This is a requirement under Part VII of the Ontario Mining Act. Engagement with Aboriginal communities prior to submission of a certified closure plan is also a requirement under Ontario Regulation 240/00. The certified closure plan is expected to be a refinement of the conceptual closure plan presented in Appendix KK of the revised EIS, structured in the format preferred by the MNDM (see also the response to TMI_398-AC(1)-73). It will include planned progressive reclamation measures for the entire site.
804	AC(1)-385	Wabauskang First Nation	Executive Summary 4.0 Project Overview page 11		**Summary of Comment / Rationale:** Project design list does not include "to minimize potential impacts to Aboriginal communities and traditional lifestyles
					Information Request / Comment: This should be highlighted as a critical component of the Project design considerations.
					Response: Section 4 of the Executive Summary provides the reader with an overview of the physical elements of the Project. The aspects and elements considered in arriving at the proposed design of the Project are included in the Alternatives Assessment summarized in Section 2 of the EIS, as well as provided in detail in Appendix X to the EIS. The potential for the Project to affect Aboriginal communities and traditional lifestyles were considered explicitly as part of the Alternatives Assessment. There were four specific weighting factors used in the alternatives assessment that focused on potential effects to Aboriginal peoples (see Table 2.2.3), including “Aboriginal and Treaty Rights”. The reviewer is also directed to Appendix X of the EIS as each alternative is compared to effects on Aboriginal peoples in the Alternatives Assessment tables. Treasury Metals has endeavored to minimize the effects on the surrounding environment, including Aboriginal peoples throughout each stage of Project development to date. Several significant methods to minimize these effects are to treat all effluent discharge to meet PWQO at the end of

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					pipe and to contour the waste rock storage areas in a more natural way such that the visual effect is minimized. The company also remains committed to maintaining access to the site, such that it can be done safely with ongoing operations, for traditional land use purposes. The company is interested to work with each of the respective communities to ensure a minimized loss of land use access. A full list of measures that will help mitigate the potential effects of the Project on Aboriginal peoples can be found in Section 6.21. Treasury Metals will continue to discuss potential Project effects on traditional land use activities with potentially affected Aboriginal groups throughout the life the Project. As additional information regarding an Aboriginal community's traditional land use and practices become available, Treasury Metals will review and consider it in the design of mitigation measures, follow-up monitoring and management plans for the Project, as appropriate. Treasury Metals is committed to ongoing engagement with Aboriginal groups throughout the life of the Project and will work with communities to develop and design the Goliath Gold Project, and monitoring and management plans to address potential Project-related effects identified through the environmental assessment process and/or at later stages of the Project.
805	AC(1)-386	Wabauskang First Nation	Executive Summary 4.2 Open Pit Mine page —		**Summary of Comment / Rationale:** 4.2.2 Surface and Mine Water Management Is there sufficient baseline to support the statement" there are no permanent ponds or lakes that require dewatering" **Information Request / Comment:** Picture shows what appears to be a large pond/ wetland or bog but the paragraph states that there are no permanent ponds or lake dewatered? Is that one of the nursery ponds? Please explain **Response:** Yes there is sufficient baseline information to support that "there are no permanent ponds or lakes that require dewatering". The picture (Figure ES.4.4) shows a beaver pond located on Blackwater Creek Tributary 1, which will be overlaid by the open pit. This beaver pond and the wetland areas along Blackwater Creek Tributary 1, as well as the tributary itself would be considered part of the Section 35(2) habitat removals that would require approvals under the Fisheries Act (see also response to TMI_125-FH(1)-04). A more complete discussion on the Project and the need for dewatering as part of the Project construction was provided in Section 3.3.2 of the EIS. Section 3.3.2 of the EIS is correct in stating that there are no permanent ponds or lakes that require dewatering. However, the footprint of the open pit mine as determined by the figure does overlay the upper reaches of Blackwater Creek Tributary 1. From time to time, as stated, beavers will dam this tributary forming a temporary beaver pond that will need to be dewatered as part of the site preparation and construction activities. Additionally, removing beaver dams and allowing the water levels to draw down will mitigate the number of fish that could be isolated in Blackwater Creek

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					Tributary 1 (see Section 6.14.5 fish and fish habitat mitigation).
806	AC(1)-387	Wabauskang First Nation	Executive Summary 4.5 Processing page 27		**Summary of Comment / Rationale:** How does the Proponent expect to have nil water consumption at closure while committing to ensuring the PAG rock remains submerged so acidic conditions won't occur post closure? **Information Request / Comment:** Need clarification on how this will be monitored? **Response:** As described in the Appendix KK of the EIS (Section 11.2.2), the open pits will be allowed to flood following cessation of mining activities. Flooding of the open pits will ensure that the backfilled waste rock (deposited in the pits) and pit walls remain underwater during the post-closure phase. As both the pit walls and backfilled waste rock are currently classified as PAG, placing them under a water cover is a standard practice to minimize acid rock drainage and metals leaching (ARD/ML). At the end of mining, the dewatering activities and the open pit will be allowed to start filling. The inflow of groundwater to the open pit will continue as the pit lake is filling, with the flows decreasing as the pit fills. Once the pit is filled, there will continue to be inflow of groundwater to the pit lake. During closure, the site will be graded so that the runoff from the operation area drains towards to the open pit. Finally, the process water present in the tailings storage facility (TSF) will be withdrawn during closure, treated, and used to help fill the open pit. As the open pit is filling, Treasury Metals will periodically test the water quality to determine if batch treatment is required to ensure the water quality meets PWQO prior to the pit lake being filled. The filling of the open pit with water is expected to take between 5 and 8 years depending on the meteorological conditions (6.7 years on average). Once the pit lake fills, the runoff from the operations area and the inflow of groundwater means that there will be excess water that will be released from the pit lake through a spillway into the former channel of Blackwater Creek Tributary 1. A review of the long-term climate data was used to determine the precipitation and evaporation rates expected in the region for an average year, a wet year, and a dry year. As shown in Table 6.9.2.3- of the revised EIS, the pit lake will have an excess of water in every month during both average and wet years, and will have excess water in 6 of the months during a dry year. Based on this information, there should be more than enough water present at the site to keep the open pit filled and the PAG material in the open pit covered with water without the need for additional water consumption. Based on the available information regarding future climate change in the region, annual precipitation rates are projected to continue to increase into the future (see Section 6.7.2.2 of the revised EIS and the response to TMI_263-EE(1)-06). This means there should be more excess water in the future as a result of the expected changes in climate. As part of the long-term monitoring of the site, water quality samples will be collected in the pit lake

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					and potentially affected creeks and water bodies at periodic intervals. Outflows from the pit lake to Blackwater Creek Tributary 1 will also be monitored to confirm that the pit lake is continuing to remain full. These long-term monitoring requirements will be reviewed as part of the closure plan filing in accordance with Ontario Regulation 240/00 (as amended).
807	AC(1)-388	Wabauskang First Nation	Executive Summary 4.5 Processing page 30		**Summary of Comment / Rationale:** Waste Management Plan **Information Request / Comment:** Will there be a Waste Management Plan developed? Will the tree nursery be upgraded to handle these reagents? What mitigation and emergency response management processes will be implemented? **Response:** An overview of the environmental management plan for the Project was provided in Section 12 of the original EIS. This discussion has been expanded in Section 12 of the revised EIS, to include a listing and description of each of the following management plans to be developed and implemented as part of the Goliath Gold Project: • Project Environmental Management Plan • Waste Management Plan • Emergency and Spill Response Management Plan • Hazardous Materials Management Plan • Fuel Handling and Storage Management Plan • Water Management Plan • Noise Management Plan • Best Management Practices Plan for Dust • Greenhouse Gas Management Plan • Wildlife Management Plan • Fish Management Plan • Socio-Economic Management Plan • Transportation and Access Management Plan • Communications Management Plan • Archaeological and Cultural Heritage Resource Management Plan • Tailings Management Plan • Cyanide Management Plan • Dam Safety Management Plan • Mine Rock Management Plan • Explosives Management Plan

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					• Health and Safety Management Plan These environmental management plans will include aspects of effects mitigation and prevention to ensure the effects of the Project on the environment are minimized. The Waste Management Plan will detail the material handling, sorting and disposal of solid non-hazardous waste generated by the Project. The plan will clearly outline the roles and responsibilities of key site and company personnel with respect to the management and non-hazardous waste materials. The actions set out in this plan will conform to the *Environmental Protection Act*, specifically the RRO 1990, Regulation 347: General – Waste Management. Detailed policies and procedures will be available in the plan that aim to limit environmental effects from waste produced by the Project by incorporating a reduce, reuse, and recycle mentality. The Waste Management Plan will be developed prior to the start of construction activities. Additionally, there are a number of environmental management plans that will be created to give special consideration to hazardous material handling and disposal (i.e., Cyanide Management Plan, Hazardous Material Management Plan, Fuel Management Plan and Explosives Management Plan). All fuel and chemical waste will be stored on site in appropriate collection tanks and bins and disposed of in an appropriate off-site facility. The Project site will be equipped, which would include any necessary upgrades, to safely handle all materials and reagents that enter the site. Treasury Metals will have contingency plans in place in the unlikely event of a hazardous material spill. This information will be included in the Emergency and Spill Response Management Plan (Section 12.13 of the EIS).
808	AC(1)-389	Wabauskang First Nation	Executive Summary 4.6 Tailings Storage Facility (TSF) page 36/ 39		**Summary of Comment / Rationale:** Seepage Management Plan (SeMP) **Information Request / Comment:** SeMP should be developed in engagement with WFN to ensure all WFN interests are understood and any impacts can be mitigated? If water quality started to deteriorate in Thunder Lake what would the mitigation plan be? Considering it is only 1.5 KM from Thunder Lake it could cause potential adverse effects to the lake. **Response:** The following list identifies the management plans presented Section 12 of the revised EIS to be developed and implemented as part of the Goliath Gold Project: • Project Environmental Management Plan • Waste Management Plan • Emergency and Spill Response Management Plan • Hazardous Materials Management Plan • Fuel Handling and Storage Management Plan

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					• Water Management Plan • Noise Management Plan • Best Management Practices Plan for Dust • Greenhouse Gas Management Plan • Wildlife Management Plan • Fish Management Plan • Socio-Economic Management Plan • Transportation and Access Management Plan • Communications Management Plan • Archaeological and Cultural Heritage Resource Management Plan • Tailings Management Plan • Cyanide Management Plan • Dam Safety Management Plan • Mine Rock Management Plan • Explosives Management Plan • Health and Safety Management Plan Issues related to seepage from on-site facilities such as the TSF, will be covered under the Water Management Plan. As described in Section 12 of the revised EIS, the Water Management Plan will set out the protocols and procedures that will be implemented at the Project to manage water, as well as the potential effects of the Project on water. Both surface water and groundwater quality and quantity management will be incorporated into this plan, and the plan will apply for water affected by the Project both on site and off site. The roles and responsibilities of key site and company personnel with respect to water management will be clearly stated in the plan, along with measures and controls that aim to limit any adverse environmental effects such as seepage from the TSF. The Water Management Plan will be developed with engagement from Indigenous communities prior to the start of construction activities. There will be no direct surface releases from the Project to either Thunder Lake or any of its tributaries. The Project will have a single surficial discharge location. During operations, all excess water will be treated to meet PWQO prior to discharge to Blackwater Creek, which eventually reports to Wabigoon Lake. All runoff from the site will be contained by a perimeter ditch which will be constructed around the operations area. Following closure, the open pit will be allowed to gradually fill with water. Once full, and the water quality is confirmed to be suitable for release, the water from the operations area will be released into the former channel of Blackwater Creek Tributary 1, which eventually reports to Wabigoon Lake. The site will be graded during closure to direct all runoff from the operations area to the open pit. A seepage collection system will be constructed around the TSF and around the entire operations area to capture the majority of all seepage from on-site facilities such as the TSF and waste rock storage area (WRSA). Any seepage that escapes these systems will be captured by the drawdown

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					zone created by the dewatering of the open pit and underground mine. At the end of mining activities, the dewatering will cease and the ground water levels will start to return to near pre-development levels. Hydrogeological modelling for the Project (Section 6.11 of the revised EIS) indicates that once the groundwater levels recover, small quantities of seepage from the WRSA and TSF will leave the site and ultimately reach surface watercourses, including tributaries to Thunder Lake. Surface water quality modelling for all adjacent watercourses (Section 6.8 of the revised EIS) shows that with a wet cover over the TSF, surface water quality would be the same or improved from existing conditions, or would meet PWQO. There are no predicted impacts on surface water quality in Thunder Lake or its tributaries. As described in Section 13 of the revised EIS, the proposed monitoring programs to support the Project are designed to identify issues early such that remedial actions can be implemented. Therefore, surface water quality monitoring programs would look at both the quality in the upstream tributaries as well as in Thunder Lake. Changes in water quality would be detected in the upstream tributaries before any changes associated with the Project would be measurable in Thunder Lake. Similarly, the groundwater monitoring program is designed to identify changes in groundwater quality that may indicate the presence of seepage leaving the site, long before the groundwater reaches surface watercourses. Treasury Metals has assessed a series of potential mitigation measures that could be implemented as part of the Project should monitoring results indicate the need. For example, initial plans called for the use of a dry cover for the closure of the TSF. Should geochemical monitoring indicate that acid generation rates are higher than initially anticipated; a wet cover could be used for closure.
809	AC(1)-390	Wabauskang First Nation	Executive Summary 4.6 Tailings Storage Facility (TSF) page 38/ 39		**Summary of Comment / Rationale:** Tailings Storage Facility Management Plan (TSFMP) **Information Request / Comment:** A TSFMP should be developed in engagement with WFN to ensure all WFN interests are identified and any potential impacts to these interests are addressed through mitigation. **Response:** An overview of the environmental management plan for the Project was provided in Section 12 of the original EIS. This discussion has been expanded in Section 12 of the revised EIS, to include a listing and description of each of the following management plans to be developed and implemented as part of the Goliath Gold Project: • Project Environmental Management Plan • Waste Management Plan • Emergency and Spill Response Management Plan • Hazardous Materials Management Plan • Fuel Handling and Storage Management Plan

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					• Water Management Plan • Noise Management Plan • Best Management Practices Plan for Dust • Greenhouse Gas Management Plan • Wildlife Management Plan • Fish Management Plan • Socio-Economic Management Plan • Transportation and Access Management Plan • Communications Management Plan • Archaeological and Cultural Heritage Resource Management Plan • Tailings Management Plan • Cyanide Management Plan • Dam Safety Management Plan • Mine Rock Management Plan • Explosives Management Plan • Health and Safety Management Plan These environmental management plans will include aspects of effects mitigation and prevention to ensure the effects of the Project on the environment are minimized. The Tailings Management Plan will be designed to contain the production, handling, deposition and long-term storage of tailings produced by the Project. Through acid-base accounting of a composite tailings sample, it was determined that the tailings from the Project will be PAG and will require proper measures be put in place to ensure that the onset of ARD is avoided. The actions set out in this plan will contain the necessary procedures and protocols to limit any adverse environmental effects from ARD produced by the tailings on site and will follow all applicable acts and regulations, including O. Reg. 240/00 Mine Development and Closure under the *Mining Act*. The roles and responsibilities of key site and company personnel with respects to tailings management will be clearly stated in the plan. The Tailings Management Plan will be developed with engagement from Indigenous communities prior to the production of any tailings material at the site.
810	AC(1)-391	Wabauskang First Nation	Executive Summary 4.7 Water Management page 40		**Summary of Comment / Rationale:** Tree Nursery Irrigation Ponds water supply **Information Request / Comment:** Do these ponds naturally recharge? What if there is a drought year? **Response:** As described in Section 3.8 of the revised EIS, Treasury Metals is proposing to obtain makeup water from the irrigation ponds at the former MNRF tree nursery. In total there are three irrigation ponds,

<table>
<tr><th>TMI #</th><th>Agency Reference #</th><th>Parties Asking Questions</th><th>Reference to EIS</th><th>Reference to EIS Guideline</th><th>Comment / Information Request / Response</th></tr>
<tr><td></td><td></td><td></td><td></td><td></td><td>one on Thunder Lake Tributary 2, and two on Thunder Lake Tributary 3. These ponds naturally recharge with runoff from the upstream catchments. Treasury Metals will limit their withdrawal from these ponds to 5% of the inflow, which will be monitored on a continuous basis to identify the flows available for withdrawal.

Treasury Metals has developed a refined water balance for the Project (Appendix F to the revised EIS), which considered the management of water for an average climatic year, a dry climatic year (a 1 in 20 dry year) and a wet climatic year (a 1 in 20 wet year). The majority of the water requirements for the Project will be provided by the reclaim of water from the TSF, runoff from the operations area collected by the perimeter ditch and stored in the runoff collections ponds, and water from the mine dewatering activities, which is stored in the minewater pond. The makeup water requirements from the irrigation ponds is a relatively small component of the overall water balance and the modelling shows that needs can be accommodated within the 5% that Treasury Metals will limit the withdrawal rates to. In the event there are extended dry periods, Treasury Metals would be able to use the water treatment plant to produce the required makeup water in the process.</td></tr>
<tr><td>811</td><td>AC(1)-392</td><td>Wabauskang First Nation</td><td>Executive Summary 4.7 Water Management page 42</td><td></td><td><u>Summary of Comment / Rationale:</u>
Provide effluent water quality parameters after treatment?

<u>Information Request / Comment:</u>
Need to know the predicted water quality after treatment prior to discharge to Black Water Creek?

<u>Response:</u>
Treasury Metals has made the commitment to treat the effluent discharged from the Project to a level that will not affect the receiving environment (Table 9.0.1 of the EIS). For most parameters, the effluent will be treated to meet Provincial Water Quality Objectives (PWQO) criteria. The PWQO are set at a level of water quality which is protective of all forms of aquatic life and all aspects of the aquatic life cycles during indefinite exposure to the water. For parameters with no PWQO, Treasury Metals has committed to meet the Canadian Environmental Quality Guidelines (CEQG) from the Canadian Council of Ministers of the Environment (CCME). Finally, Treasury Metals has committed to effluent discharges that are at, or below, the background levels of mercury in Blackwater Creek. The final effluent discharge levels committed to by Treasury Metals were provided in Table 9.0.1 of the original EIS, and have been replicated in Table 1.

<table>
<tr><th colspan="3">Table 1: Treated Effluent Discharge Quality</th></tr>
<tr><th>Parameter</th><th>Effluent Concentration (mg/L)</th><th>Basis for Discharge Level</th></tr>
<tr><td>Aluminum (filtered)</td><td>0.075</td><td>PWQO (1)</td></tr>
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TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response		
					Antimony	0.020	PWQO
					Arsenic	0.10	PWQO
					Beryllium	0.011	PWQO
					Boron	0.20	PWQO
					Cadmium	0.0002	PWQO
					Chloride	120	CEQG (2)
					Chromium	0.0089 (2)	PWQO
					Cobalt	0.0009 (2)	PWQO
					Copper	0.005	PWQO
					Cyanide	0.005	PWQO
					Iron	0.30	PWQO
					Lead	0.005	PWQO
					Mercury	0.00002	Background (4)
					Molybdenum	0.040 (2)	PWQO
					Nickel	0.025	PWQO
					Nitrate	13	CEQG (2)
					Phosphorus	0.030	PWQO
					Selenium	0.10	PWQO
					Silver	0.0001	PWQO
					Thallium	0.0003	PWQO
					Uranium	0.005	PWQO
					Vanadium	0.006 (2)	PWQO
					Zinc	0.030	PWQO

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					Source: Table 9.0.1 of the Original EIS Notes: (1) Provincial Water Quality Objectives (PWQO) (2) Canadian Environmental Quality Guidelines (CEQG) from the Canadian Council of Ministers of the Environment (CCME). These were identified simply as "CCME" in Table 9.0.1 of the original EIS. (3) The effluent values for chromium, cobalt, molybdenum and vanadium have been updated from those listed in Table 9.0.1 of the Original EIS to reflect current PWQO criteria (or interim PWQO when there is no firm PWQO criteria). (4) The effluent values for mercury were based on the background concentrations calculated from all of the available baseline water quality samples collected in Blackwater Creek.
812	AC(1)-393	Wabauskang First Nation	Executive Summary 4.8 Fuel and Chemical Management page 44		**Summary of Comment / Rationale:** Waste Management Plan/Wildlife Effects Management Plan **Information Request / Comment:** Will the fuel be kept in double walled tanks and a lined berm? Will fuel and chemicals be kept in appropriate locations and stored so wildlife is not attracted to it and cannot access it? **Response:** Treasury Metals has committed to implementing secondary controls at the processing plant, fuel farm and chemical storage areas to prevent spills from entering the environment. Spill prevention procedures will be enforced to reduce the potential for spills. The management plans that would describe the handling storage and spill prevention measures for fuels and chemicals would include the Fuel Handing and Storage management Plan, the Hazardous Material Management Plan, and the Explosives Management Plan. These management plans, along with the other management plans identified by Treasury Metals to help the effects of the Project are described in Section 12 of the revised EIS. An Emergency and Spill Response Management Plan will also be developed as part of the final design and permitting process. This management plan will outline responsibilities and procedures that will be enacted in the unlikely event of a spill on-site. Incidental spills that occur during transport within the site, or associated with mobile equipment, will be contained and isolated to prevent the spread of the materials released, and then cleaned up at source. Contaminated soils removed during clean-up will be transported to a licensed off-site facility for safe disposal. All spills at the Project will be reported in accordance with the Ministry of the Environment and Climate Change (MOECC) protocols. The Wildlife Management Plan will serve as the basis to describe the interaction of wildlife on the Project site. This management plan will evolve to reflect regulatory and Aboriginal perspectives in

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					wildlife management for the Project. This includes the potential interaction of wildlife with Project infrastructure including fuel and chemical storage. As stated above, Treasury Metals will work with the MOECC to ensure that all measures of environmental protection meet or exceed the requirements. Treasury Metals will use the current guidance as defined within Guidelines for Environmental Protection Measures at Chemical and Waste Storage Facilities to serve as a resource during the planning of and design of the Project.
813	AC(1)-394	Wabauskang First Nation	Executive Summary 4.13 Closure and Decommissioning page 49		**Summary of Comment / Rationale:** Waste Management Plan/Wildlife Effects Management Plan **Information Request / Comment:** Will the fuel be kept in double walled tanks and a lined berm? Will fuel and chemicals be kept in appropriate locations and stored so wildlife is not attracted to it and cannot access it? **Response:** Treasury Metals has committed to implementing secondary controls at the processing plant, fuel farm and chemical storage areas to prevent spills from entering the environment. Spill prevention procedures will be enforced to reduce the potential for spills. The management plans that would describe the handling storage and spill prevention measures for fuels and chemicals would include the Fuel Handing and Storage management Plan, the Hazardous Material Management Plan, and the Explosives Management Plan. These management plans, along with the other management plans identified by Treasury Metals to help the effects of the Project are described in Section 12 of the revised EIS. An Emergency and Spill Response Management Plan will also be developed as part of the final design and permitting process that will outline responsibilities and procedures that will be enacted in the unlikely event of a spill on-site. Incidental spills that occur during transport within the site, or associated with mobile equipment, will be contained and isolated to prevent the spread of the materials released, and then cleaned up at source. Contaminated soils removed during clean-up will be transported to a licensed off-site facility for safe disposal. All spills at the Project will be reported in accordance with the Ministry of the Environment and Climate Change (MOECC) protocols. The Wildlife Management Plan will serve as the basis to describe the interaction of wildlife on the Project site. This management plan will evolve to reflect regulatory and Aboriginal perspectives in wildlife management for the Project. This includes the potential interaction of wildlife with Project infrastructure including fuel and chemical storage. As stated above, Treasury Metals will work with the MOECC to ensure that all measures of environmental protection meet or exceed the requirements. Treasury Metals will use the current guidance as defined within Guidelines for Environmental Protection Measures at Chemical and Waste Storage Facilities to serve as a resource during the planning of and design of the Project.
814	AC(1)-395	Wabauskang	Executive		**Summary of Comment / Rationale:**

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		First Nation	Summary 4.13 Closure and Decommissioning page 50		Waste Rock Management Plan/Closure and Remediation Plan **Information Request / Comment:** How will the water levels after closure be maintained to ensure PAG rock is not exposed over the long term? **Response:** The following describes where potentially acid generating (PAG) materials associated with the Project will be located in the long-term, and how they will be isolated to manage and limit acid rock drainage (ARD) and metals leaching (ML): • A portion of the waste rock excavated from the open pit will be stored in the waste rock storage area (WRSA), located immediately to the north of the open pit. At closure, the WRSA will be reclaimed using a low-permeability cover to isolate the waste rock from oxygen and to minimize the amount of infiltration and seepage. • After the mining progresses from pit 1, waste rock will be stored in the mined out areas of the open pit. Following the end of mining, dewatering will cease and the open pit will be allowed to fill with water. To enhance the filling of the open pit, the operations area will be graded at closure to drain into the open pit. It is expected to take between 6 and 8 years, depending on the meteorological conditions, for the open pit to fill. The open pit will be flooded to isolate the waste rock and exposed mine faces from oxygen, thus minimizing any further ARD/ML. • At closure, the tailings water will be withdrawn from the TSF, treated and used to fill the open pit. The tailings will then be covered with a granular cover to physically isolate the tailings. Finally, the tailings will be capped to isolate the tailings from oxygen so as to prevent ARD. The tailings cap will consist of either a low-permeability dry cover or a water cover using non-process water. Hydrogeological and hydrological modelling of groundwater and surface water at the Project indicate that there will continue to be an inflow of groundwater to the open pit, even after the pit is fully flooded. Because the operations area will be graded to drain towards the open pit, there will be a regular influx of precipitation and runoff into the open pit. This, combined with the inflow of groundwater means the pit lake will experience a positive water balance (i.e., more water enters the pit that evaporates from its surface). As shown in Table 6.9.2.5-1 of the revised EIS, water will be released from the open pit throughout the average and wet (1 in 20 year) climatic years, and in every month but August of a dry (1 in 20 year) climatic year. This confirms that the pit lake will remain fully flooded once it fills, ensuring the PAG materials remain under water. Should a wet cover be used to isolate the PAG materials stored within the TSF, a sufficient cover of water would need to be established to ensure that a water cover remained in place, balancing the precipitation and evaporation expected in the long-term. Treasury Metals has identified in Section 12 of the revised EIS that they will develop and implement

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					both a Tailings Management Plan and a Mine Rock Management Plan for the Goliath Gold Project. Prior to any construction commencing, Treasury Metals is required to, and will, file a certified closure plan and post financial assurances with the Ministry of Northern Development and Mines (MNDM). The closure plan is intended to be a living document (as required by the MNDM). Costs will be revisited as needed during future closure plan amendments during operations to reflect the circumstances at the time, including Project changes, if any. The financial assurance is required to ensure there are sufficient funds available to execute the certified closure plan once mining operations cease and the onset of mine closure commences. Engagement with Indigenous communities prior to submission of a certified closure plan is also a requirement under Ontario Regulation 240/00. An overview for a conceptual closure plan is provided in Section 3.14 of the revised EIS.
815	AC(1)-396	Wabauskang First Nation	Executive Summary 5.2 Project Phases page 56		**Summary of Comment / Rationale:** **Information Request / Comment:** Bullet 2 mentions that the dewatering of ponds and wetlands will occur during this phase but in the project overview it states no dewatering required? Please clarify. How will the loss of wetlands be compensated for? **Response:** As described in the response to TMI_805-AC(1)-386, the EIS is correct in stating that there will be no permanent ponds or lakes drained as a result of the Project. However, the footprint of the open pit mine as determined by the figure does overlay the upper reaches of Blackwater Creek Tributary 1. From time to time, beavers will dam this tributary forming a temporary impoundment that will need to be dewatered as part of the site preparation and construction activities. An example of a beaver dam on this section of Blackwater Creek Tributary 1 was illustrated in Figure ES.4.4 of the original EIS. Removing beaver dams and allowing the water levels to draw down will mitigate the number of fish that could be isolated in Blackwater Creek Tributary 1 (see Section 6.14.5 of the revised EIS). As described in the response to TMI_794-AC(1)-375, there will be approximately 31.5 ha of wetlands that will be drained or overprinted the Project. All of the impacted wetlands are on, or adjacent to, tributaries of Blackwater Creek. As described in Section 6.15.4 of the revised EIS, the affected wetlands represent a loss of 0.02% of the existing fens in the local study area (LSA), 4.3% of the existing marsh wetlands in the LSA, and 5.5% of the existing swamp within the LSA. The specific wetlands affected by the Project are illustrated on Figure 6.15.4.1-1 of the revised EIS, as well as in TMI_125-FH(1)-04. There are no specific regulatory requirements for offsetting wetland areas affected by the Project. However, wetlands determined to have the potential to provide fish habitat would likely require some form of offsetting under required Fisheries Act authorizations. As part of the ongoing engagement

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					activities for the Project, Treasury Metals will engage Fisheries and Oceans Canada (DFO), Environment Canada (EC), and MNRF in defining the offsetting strategy as part of the Fish Management Plan and will engage with Aboriginal peoples regarding the offsetting plan.
816	AC(1)-397	Wabauskang First Nation	Executive Summary 5.2 Project Phases page 57		**Summary of Comment / Rationale:** Environmental Management (Policies, plans monitoring, reporting, internal audits etc?) Site Preparation Environmental Management Plan (SPEMP) **Information Request / Comment:** What and where are the existing environmental protection and plans? Is there an environmental monitor on-site for these activities and how will the workers be trained? **Response:** An overview of the environmental management plan for the Project was provided in Section 12 of the original EIS. This discussion has been expanded in Section 12 of the revised EIS, to include a listing and description of each of the following management plans to be developed and implemented as part of the Goliath Gold Project: • Project Environmental Management Plan • Waste Management Plan • Emergency and Spill Response Management Plan • Hazardous Materials Management Plan • Fuel Handling and Storage Management Plan • Water Management Plan • Noise Management Plan • Best Management Practices Plan for Dust • Greenhouse Gas Management Plan • Wildlife Management Plan • Fish Management Plan • Socio-Economic Management Plan • Transportation and Access Management Plan • Communications Management Plan • Archaeological and Cultural Heritage Resource Management Plan • Tailings Management Plan • Cyanide Management Plan • Dam Safety Management Plan • Mine Rock Management Plan • Explosives Management Plan • Health and Safety Management Plan These environmental management plans will include aspects of effects mitigation and prevention to

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					ensure the effects of the Project on the environment are minimized. Rather that develop phase specific plans, Treasury Metals intends to develop a comprehensive list of management plans that will be implemented through all phases of the development of the Goliath Gold Project. During specific phases of the Project, Treasury Metals will likely employ "environmental monitors" to help ensure specific elements of the management plans and Project mitigation are appropriately implemented. As part of the overall Project Environmental Management Plan, Treasury Metals will ensure all on-site environmental staff, including environmental monitors, are provided the necessary training. The specific logistics of how the training will be provided, as well as the specific roles that environmental monitors will be asked to perform, will be developed prior to the start of construction activities as part of the ongoing engineering and permitting activities.
817	AC(1)-398	Wabauskang First Nation	Executive 5.2 Project Phases page 57		**Summary of Comment / Rationale:** Environmental Management-(Policies, plans, monitoring, reporting, inernal audits etc?) Construction Environmental Management Plan (CEMP) **Information Request / Comment:** Need clarification on how/when this will be developed, managed and executed? **Response:** An overview of the environmental management plan for the Project was provided in Section 12 of the original EIS. This discussion has been expanded in Section 12 of the revised EIS to include a listing and description of each of the following management plans, which will be developed and implemented as part of the Goliath Gold Project: • Project Environmental Management Plan • Waste Management Plan • Emergency and Spill Response Management Plan • Hazardous Materials Management Plan • Fuel Handling and Storage Management Plan • Water Management Plan • Noise Management Plan • Best Management Practices Plan for Dust • Greenhouse Gas Management Plan • Wildlife Management Plan • Fish Management Plan • Socio-Economic Management Plan • Transportation and Access Management Plan • Communications Management Plan • Archaeological and Cultural Heritage Resource Management Plan • Tailings Management Plan

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					• Cyanide Management Plan • Dam Safety Management Plan • Mine Rock Management Plan • Explosives Management Plan • Health and Safety Management Plan These environmental management plans will include aspects of effects mitigation and prevention to ensure the effects of the Project on the environment are minimized. Rather that develop phase specific plans, Treasury Metals intends to develop a comprehensive suite of management plans that will be implemented through all phases of the development of the Goliath Gold Project. The specific details of the plans will be developed prior to the start of constructions activities, as part of the ongoing engineering and permitting activities. In creating these plans, the company will solicit and consider input from interested parties. Treasury Metals welcomes input from WFN in the creation of these plans and is interested in further engagement as they are developed.
818	AC(1)-399	Wabauskang First Nation	Executive Summary 5.2 Project Phases page 58		**Summary of Comment / Rationale:** Environmental Management-(Policies, plans, monitoring, reporting, internal audits etc.?) Closure Environmental Management Plan (CL **Information Request / Comment:** Need clarification on how/when this will be developed, managed and executed? **Response:** As part of the environmental assessment, and development process and prior to construction of the Project, environmental management plans will be developed for the site preparation, construction, operations, and closure phases of the Project. These environmental management plans will include aspects of mitigation and prevention to ensure the effects of the Project on the environment are minimized. The specific details of the plans will be developed prior to the start of constructions activities, as part of the ongoing engineering and permitting activities. In creating these plans, the company will solicit and consider all input from interested parties. An overview of the environmental management plan for the Project was provided in Section 12 of the original EIS. This discussion has been expanded in Section 12 of the revised EIS to include a listing and description of each of the management plans that will be developed and implemented as part of the Goliath Gold Project: Treasury Metals provided details regarding the conceptual closure plan for the Project as Section 11 of the original EIS. Since the filing of the EIS, the conceptual closure plan has been refined, and is included as Appendix KK to the revised EIS. Prior to construction commencing, Treasury Metals is required to and will file a certified closure plan and post financial assurances with the Ministry of Northern Development and Mines (MNDM). This is a requirement under Part VII of the *Ontario Mining Act*. Engagement with Aboriginal communities prior to submission of a certified closure plan is also a requirement under Ontario Regulation 240/00. The certified closure plan is expected to be a refinement of the conceptual closure plan presented in Appendix KK to the revised EIS, structured

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					in the format preferred by the MNDM.
819	AC(1)-400	Wabauskang First Nation	Executive Summary 6.0 Description of the Environment page 64		**Summary of Comment / Rationale:** Seepage and Groundwater Management Plan **Information Request / Comment:** It is indicated in the second paragraph that the water wells are 1.5KM on Thunder Lake? Are these sample wells or drinking wells? What are the on-going monitoring plans to ensure that Groundwater and seepage do not potentially impact Thunder Lake and Wabigoon Lake other Groundwater? **Response:** What is actually stated in the section of the executive summary referenced in the question is that the "…closest water wells outside of the company's property are those on Thunder Lake, approximately 1.5 km from the proposed pit." Those water wells located near the homes along East Thunder Lake Road are private wells. As described in Section 13 of the revised EIS, the proposed monitoring programs to support the Project are designed to identify issues early such that remedial actions can be implemented. Therefore, surface water quality monitoring programs would look at both the quality in the upstream tributaries as well as in Thunder Lake and Wabigoon Lake. Changes in water quality would be detected in the upstream tributaries before any changes associated with the Project would be measurable in either Thunder Lake or Wabigoon lake. Similarly, the proposed groundwater monitoring program is designed to identify changes in groundwater quality that may indicate the presence of seepage leaving the site, long before the groundwater reaches surface watercourses. Issues related to seepage from on-site facilities such as the TSF, will be covered under the Water Management Plan. As described in Section 12 of the revised EIS, the Water Management Plan will set out the protocols and procedures that will be implemented at the Project to manage water, as well as the potential effects of the Project on water. Both surface water and groundwater quality and quantity management will be incorporated into this plan, and the plan will apply for water effected by the Project both on site and off site. The roles and responsibilities of key site and company personnel with respect to water management will be clearly stated in the plan, along with measures and controls that aim to limit any adverse environmental effects such as seepage from the TSF. The Water Management Plan will be developed with engagement from Indigenous communities prior to the start of construction activities.
820	AC(1)-401	Wabauskang First Nation	Executive Summary 6.0 Description		**Summary of Comment / Rationale:** Inadequate ground water baseline (6 samples in 2013) Lack of Management and mitigation plans to address the potential of impacts to Hoffman's Bay Tributary, Thunder Lake Tributary # 3 and

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			of the Environment page 64		Blackwater Creek and ultimately Thunder Lake given the close proximately to Thunder Lake and Wabigoon Lake and related high value fisheries. **Information Request / Comment:** Insufficient data to complete effects assessment. Further data collection is required. **Response:** Based on the design of the Project, the mitigation measures incorporated into the Project, and the results of the effects assessment that are presented in the revised EIS, Treasury Metals is satisfied they have sufficient baseline information to understand and characterize the potential effects of the Project on groundwater quantity and quality (i.e., hydrogeology). Firstly, there is extensive information available in peer reviewed literature that explains the geologic setting for the Project area, which will dictate the behaviour of groundwater near the Project. This literature was augmented by the results of geologic testing required to support the development of the Project by Treasury Metals, as well as a focused baseline field data program. The reviewer appears to have misunderstood or misrepresented the baseline work completed to support the hydrogeological assessment. As detailed in Section 5.6.2 of the original and revised EIS, the hydrogeological baseline studies included the following: • 9 permanent monitoring wells for testing groundwater levels and quantity • 20 geotechnical boreholes • 4 of the geotechnical boreholes were equipped to monitor groundwater levels • Hydraulic conductivity testing of the overburden soils was conducted in six of the water quality wells Section 5.6.2.2 of the revised EIS describes the focused slug testing on six of the water quality wells in the overburden layer to establish hydraulic conductivity at the site. Additionally, packer tests were conducted on five of the deep boreholes to characterize bedrock conductivity. The results are presented in the following tables in the revised EIS: • Table 5.6.2.2-1: Overburden Hydraulic Conductivity Testing Summary • Table 5.6.3.2-1: Hydraulic Conductivity Summary of Bedrock Units The groundwater monitoring wells were sampled on a near monthly basis between 2013 and 2014 and the data presented in the original EIS. The results of the testing of ground water quality are presented in the following tables in Section 5.6 of the revised EIS: • Table 5.6.2.3-1: 2013/2014 Groundwater Monitoring Data • Table 5.6.2.4-1: Groundwater Quality
821	AC(1)-402	Wabauskang First Nation	Executive Summary 6.0 Description		**Summary of Comment / Rationale:**

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			of the Environment page 66		**Information Request / Comment:** The ground water samples that exceeded the Canadian Environmental Quality Guidelines (CEQG) what is the cause is it a natural exceedance due to mineralization? **Response:** As is the case with all groundwater, the water will take on the chemical properties of the aquifer it is in. The elevated dissolved metals seen in the groundwater samples taken from site are naturally occurring due to the geology of the surrounding area. The Canadian Environmental Quality Guidelines (CEQG) is for comparative purposes only in the case of groundwater, as the guidelines are set out for the protection of aquatic life in freshwater.
822	AC(1)-403	Wabauskang First Nation	Executive Summary 6.0 Description of the Environment page 66		**Summary of Comment / Rationale:** Consideration of the impact of potentially contaminating the wild rice (Country Food) with the transfer of mine impacted groundwater. **Information Request / Comment:** Insufficient data to complete effects assessment. Further data collection is required. **Response:** Based on the design of the Project, the mitigation measures incorporated into the Project, and the results of the effects assessment that are presented in the revised EIS, Treasury Metals is satisfied they have sufficient baseline information to understand and characterize the potential effects of the Project on surface water quality, and the resulting effects of the wild rice that relies on the quality of surface water. Treasury Metals is aware of the importance of protecting water quality and associated traditional food sources, such as wild rice, to Aboriginal peoples. Treasury Metals has designed the Project to minimize the effects on surface water quality, including associated effects on plants that rely on clean water. Section 6.9 of the revised EIS describes the effects of the Project on surface water quality. Measures to protect surface water quality include a perimeter ditch to be constructed around the operations area to ensure there would be no runoff from the Project directly to the environment and receiving waterbodies. During operations, excess water within the operations area will be treated to meet PWQO prior to being discharged to Blackwater Creek through an engineered structure. Following closure, dewatering activities will cease and the open pit will be allowed to start filling with water. As the open pit is filling, Treasury Metals will test the water quality to determine whether batch treatment will be required in order to ensure that water in the pit lake will meet PWQO once it is filled. Consideration has also been given to managing the effects of on-site structures that have the potential to affect groundwater, and ultimately surface water quality, such as the tailings storage facility (TSF) and waste rock storage area (WRSA). The TSF is proposed to be constructed in areas

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					overlain by relatively low permeability materials that will limit the rate of seepage. At the time of construction, additional low permeability materials would be incorporated into the floor of the TSF if sufficient natural materials are not present. The TSF will also be equipped with a perimeter seepage collection system that will capture most of the seepage from the TSF. A perimeter runoff and seepage collection system will be constructed around the operations area. During operations, dewatering will be required to keep both the open pit and underground mine workings free of water to provide a safe working environment. These dewatering activities will lower the groundwater table, creating what is referred to as a drawdown zone. Any seepage from the WRSA and TSF that escapes the seepage collection systems will be captured within the drawdown zone and will report to the open pit where it will be incorporated into the water management. No seepages from the WRSA or TSF will escape the operations area to affect surface waters, while there is a drawdown zone created by the dewatering activities. On completion of the mining activities, dewatering will cease and the open pit will be allowed to start filling with water, and the groundwater table allowed to start returning to near pre-development conditions. The open pit is projected to take between 6 and 8 years to fill completely, depending on the meteorological conditions. The groundwater table is projected to take considerably longer to recover to near pre-development conditions. The hydrogeological modelling also suggests that the groundwater will continue to flow toward the open pit, even when it is fully flooded. At closure, the WRSA will be reclaimed using a low-permeability cover to isolate the waste rock from oxygen and to minimize the amount of infiltration and seepage. The open pit will be flooded to isolate the waste rock and exposed mine faces from oxygen, thus minimizing any further acid rock drainage and metal leaching (ARD/ML). Finally, the tailings water will be withdrawn from the TSF at closure, treated and used to fill the open pit. The tailings will then be covered with a granular cover to physically isolate the tailings. Finally, the tailings will be capped to isolate the tailings from oxygen so as to prevent ARD. The tailings cap will consist of either a low-permeability dry cover or a water cover using non-process water. Once the open pit is fully flooded and the groundwater levels recover to near pre-development conditions, modelling suggests a portion of seepage from the TSF and WRSA will leave the site and would report to surrounding waterbodies. The effects of this seepage on surface water quality was modelled and assessed in Section 6.9 of the revised EIS. The water quality modelling confirms that with a wet cover to the TSF, the predicted post-closure phase surface water quality in all adjacent watercourses would be the same or improved from existing conditions, or would meet PWQO. Therefore there would be no impacts on downstream water quality, and thus no impacts on wild rice crops.
823	AC(1)-404	Wabauskang First Nation	Executive Summary 6.0 Description		**Summary of Comment / Rationale:** Inadequate wildlife baseline studies **Information Request / Comment:**

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			of the Environment page 67		Given the lack of observations of wildlife the survey methodology should be reviewed and on-going baseline studies should be conducted to ensure a solid understanding of the wildlife populations within the project area (i.e. grazing areas, calving, migration etc.) **Response:** The low detection of certain wildlife taxa is not a reflection of the survey methods employed, but rather the cryptic nature of some of the organisms. Surveys followed published standard methods. The biology and behaviour of the wildlife within the Project area are well understood and Treasury Metals and their experts are confident in the assessment of the potential effects of the project on wildlife presented in Section 6.12 of the revised EIS. A common management technique for many landscape scale mammals is habitat management, therefore, an emphasis on mammal habitat and the amount of habitat affected by Project development used in the revised EIS is consistent with the management practices used in Ontario. Ongoing monitoring during Project development and activity, as required by the MNRF, will ensure that changes in the wildlife communities and habitat are detected, at which time additional, appropriate mitigation measures can be employed.
824	AC(1)-405	Wabauskang First Nation	Executive Summary 6.0 Description of the Environment page 67		**Summary of Comment / Rationale:** Inadequate aquatic and fisheries baseline studies **Information Request / Comment:** Given the projects close proximity to high value aboriginal fisheries (Wabigoon Lake) and Thunder Lake (in addition to multiple small tributaries, creeks) and the potential for lasting adverse impacts requires a complete understanding of the local aquatic and fisheries habitat. Additional and on-going baseline studies should be required. It also appears in 2011 more sample sites were visited then in 2012? Were they the same locations? Is the data consistent and comparable? **Response:** In addition to the fisheries information presented in the original EIS, Treasury Metals has commissioned additional baseline studies of fisheries in the area. To facilitate the review process, Treasury Metals has consolidated the available baseline data, including additional baseline studies completed since the filing of the original EIS, into a single document entitled "Summary Fisheries Baseline Report (2011–2016)", provided as Appendix Q to the revised EIS. While the methods and sampling locations differ between years in some cases, the results are generally consistent in terms of the fish and benthic communities present in the watercourses that could be affected by the Project. Based on the design of the Project, the mitigation measures incorporated into the Project, and the results of the effects assessment that are presented in the revised EIS, Treasury Metals is satisfied they have sufficient baseline information to understand and characterize the potential effects of the Project on fish and fish habitat. Treasury Metals has undertaken additional fisheries baseline work to confirm the information already available. As detailed in Section 6.14 of the revised EIS, which provides the assessment of Project effects on

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					fisheries and a listing of the identified mitigation measures, the impacts of the Project on fisheries (described fully in) would be restricted to effects on the small, stream-based fish that inhabit those portions of the small tributaries of Blackwater Creek that would be overprinted as part of the Project development (Blackwater Creek Tributaries 1 and 2). There would be no residual impacts on fisheries downstream from the Project, or in either Thunder lake or Wabigoon Lake.
825	AC(1)-406	Wabauskang First Nation	Executive Summary 6.0 Description of the Environment page 68		**Summary of Comment / Rationale:** Traditional Knowledge and Traditional Land Use(TK/TU) Study should be completed and the information incorporated into the EIS/EA **Information Request / Comment:** The EIS lacks a traditional knowledge study of the WFN which is a gap throughout the EIS. A proper impact assessment of WFN aboriginal and treaty rights cannot be completed without an understanding of the baseline conditions before the mine and the potential impacts related to mine development. **Response:** Treasury Metals has made efforts to engage and elicit input from Aboriginal groups regarding the Project. Although no Project-specific traditional knowledge and traditional land use studies were prepared for, or shared with, Treasury Metals; limited information was obtained about traditional land use areas though the engagement process. The information that was available regarding traditional uses of the land and resources on the Crown lands surrounding the Project was incorporated into the EIS. Treasury Metals will continue to discuss potential Project effects on traditional land use activities with potentially affected Aboriginal groups throughout the life the Project. As additional information regarding an Aboriginal community's traditional land use and practices become available, Treasury Metals will review and consider it in the design of mitigation measures, follow-up monitoring and management plans for the Project, as appropriate. As part of the work to respond to the Round 1 information requests, Treasury Metals has prepared a revised EIS. Section 6 of the revised EIS includes an expanded evaluation of the effects of the Project on various components of the environment, including Aboriginal peoples. As part of that assessment, the linkages between changes to the environment as a result of the Project and the effects on Aboriginal peoples and their ability to practice traditional uses of the land is assessed.
826	AC(1)-407	Wabauskang First Nation	Executive Summary 6.0 Description of the Environment		**Summary of Comment / Rationale:** Archaeological Assessment Investigation/Chance Find Procedure/Employee training **Information Request / Comment:** The proponent should seek confirmation from Aboriginal groups regarding Archaeological sites.

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			page 68		Obtaining TK/TU information could assist in guiding the way to finding existing Archaeological locations.
					Response: Treasury Metals notes that a Stage 1 and 2 archaeological assessment was completed for the development area. The assessment reports concluded that this area held low archaeological potential, and that no further archaeological work was required. Archaeological potential considers a range of variables, including the topographic conditions of the subject property, presence and distribution of registered archaeological sites in the region, archaeological reports, local knowledge and the experience of the archaeological consultant, and a property inspection. The evaluation of low potential was based on the local terrain at the development site, including low topographic relief, small, un-navigable seasonal streams and high water table. By contrast, the shoreline areas of Thunder Lake and Wabigoon Lake would hold higher archaeological potential due to abundant and reliable food resources (fish, rice), and access (canoe routes), among other variables. For clarification, the evaluation of archaeological potential is based on methodology developed by MTCS, and is based on common archaeological practice. MTCS have reviewed the reports prepared and expressed satisfaction at the recommendations made. At the time the archaeological assessment reports were prepared, current MTCS guidance was that engaging Indigenous communities during Stage 1 assessment was considered an optional practice, and in this case was not pursued. Indigenous engagement is not required at Stage 2. The archaeological assessment and the approach used in preparing it were considered sound, and the reports have been reviewed by MTCS, who expressed satisfaction at the recommendations made. Treasury Metals acknowledges that a long term relationship with local Indigenous communities will provide mutual benefits in a range of areas. Moving forward, Treasury Metals will work with Indigenous communities to compile TK/TU knowledge for the Project area. Treasury Metals is committed to working with Indigenous communities to accurately map values and resources, and develop mitigation protocols for any archaeological or cultural heritage sites within the project area that may be affected by the proposed undertaking. It is important that these sites are identified, mapped and evaluated in order to plan appropriate mitigation strategies. It is important to note that some cultural heritage values may be protected by protocols for other values for which mitigation planning is underway, such as plant or animal management studies, which have also considered contemporary Indigenous use and management practices. As part of the management plans to be prepared to support the Goliath Gold Project, Treasury Metals will prepare and implement an Archaeological and Cultural Heritage Resources Management Plan. The Archaeological and Cultural Heritage Resources Management Plan will guide mitigation work at the development site and other parts of the project area during construction, operation and decommissioning of the mine. This plan will set out the process for notification and engagement of Indigenous community members in archaeological assessment of areas of archaeological potential, planning for cultural heritage resource protection, and management of accidental discoveries. This

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					is in addition to Treasury Metals' ongoing obligations under the *Ontario Heritage Act*, *Coroners Act* and the *Funeral, Burial and Cremation Services Act*. These obligations continue to apply throughout the duration of Treasury Metals' activities at the property. The Archaeological and Cultural Heritage Resource Management Plan will include specific direction for active involvement of local Aboriginal communities when archaeological or cultural heritage resources are discovered, noting that this involvement is mandatory when human remains of a possible Indigenous origin are discovered. A listing and description of the management plans is provided as part of Section 12 in the revised EIS.
827	AC(1)-408	Wabauskang First Nation	Executive Summary 9.0 Aboriginal Engagement page 80		**Summary of Comment / Rationale:** Inadequate aquatic and fisheries baseline studies **Information Request / Comment:** The statement that there will be no impacts to fishing identifies a significant data gap and lack of understanding of the local fish and aquatic habitat. Although treated water will be discharged to Blackwater creek the migration of untreated groundwater from Waste rock and the TSF could have definite potential adverse impacts to fishing (i.e. fish populations and fish health). **Response:** Based on the design of the Project, the mitigation measures incorporated into the Project, and the results of the effects assessment that are presented in the revised EIS, Treasury Metals is satisfied they have sufficient baseline information to understand and characterize the potential effects of the Project on fish and fish habitat. Treasury Metals has undertaken additional fisheries baseline work to confirm the information already available. Additionally, Treasury Metals has compiled all of the available fisheries information into a single document entitled "Summary Fisheries Baseline Report (2011–2016)", included as Appendix Q to the revised EIS. Treasury Metals is aware of the importance of the downstream fisheries and has designed the Project to minimize the effects of the Project, including minimizing the effects on fisheries. Section 6.9 of the revised EIS describes the effects of the Project on surface water quality. Section 6.14 of the revised EIS provides a comprehensive description of the predicted effects of the Project on fisheries and the mitigation measures implemented as part of the Project to avoid effects. A perimeter ditch will be constructed around the operations area to ensure there would be no runoff from the Project directly to the environment and receiving waterbodies. During operations, excess water within the operations area will be treated to meet PWQO prior to being discharged to Blackwater Creek through an engineered structure. Following closure, dewatering activities will cease and the open pit will be allowed to start filling with water. As the open pit is filling, Treasury Metals will test the water quality to determine whether batch treatment will be required in order to ensure that water in the pit lake will meet PWQO once it is filled. The tailings storage facility (TSF) is proposed to be constructed in areas overlain by relatively low permeability materials that will limit the rate of seepage. At the time of construction, additional low permeability materials would be incorporated into the floor of the TSF if sufficient natural materials

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					are not present. The TSF will also be equipped with a perimeter seepage collection system that will capture most of the seepage from the TSF. A perimeter runoff and seepage collection system will be constructed around the operations area. During operations, dewatering will be required to keep both the open pit and underground mine workings free of water to provide a safe working environment. These dewatering activities will lower the groundwater table, creating what is referred to as a drawdown zone. Any seepage from the waste rock storage area (WRSA) and TSF that escapes the seepage collection systems will be captured within the drawdown zone and will report to the open pit where it will be incorporated into the water management. No seepages from the WRSA or TSF will escape the operations area to affect surface waters, while there is a drawdown zone created by the dewatering activities. On completion of the mining activities, dewatering will cease and the open pit will be allowed to start filling with water, and the groundwater table allowed to start returning to near pre-development conditions. The open pit is projected to take between 6 and 8 years to fill completely, depending on the meteorological conditions. The groundwater table is projected to take considerably longer to recover to near pre-development conditions The hydrogeological modelling also suggests that the groundwater will continue to flow toward the open pit, even when it is fully flooded. At closure, the WRSA will be reclaimed using a low-permeability cover to isolate the waste rock from oxygen and to minimize the amount of infiltration and seepage. The open pit will be flooded to isolate the waste rock and exposed mine faces from oxygen, thus minimizing any further acid rock drainage and metal leaching (ARD/ML). Finally, the tailings water will be withdrawn from the TSF at closure, treated and used to fill the open pit. The tailings will then be covered with a granular cover to physically isolate the tailings. Finally, the tailings will be capped to isolate the tailings from oxygen so as to prevent ARD. The tailings cap will consist of either a low-permeability dry cover or a water cover using non-process water. Once the open pit is fully flooded and the groundwater levels recover to near pre-development conditions, modelling suggests a portion of seepage from the TSF and WRSA will leave the site and would report to surrounding waterbodies. The effects of this seepage on surface water quality was modelled and assessed in Section 6.9 of the revised EIS. The water quality modelling confirms that with a wet cover to the TSF, the predicted post-closure phase surface water quality in all adjacent watercourses would be the same or improved from existing conditions, or would meet PWQO. As PWQO are established for the protection of sensitive aquatic receptors, there would be no adverse effects on fish or fish habitat from changes in water quality as a result of the seepage from the WRSA and TSF leaving the site.
828	AC(1)-409	Wabauskang First Nation	Executive Summary 9.0 Aboriginal Engagment		**Summary of Comment / Rationale:** Inadequate wildlife baseline studies **Information Request / Comment:** The change in landscape with the development of a gold mine for animalsrequires more

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			page 81		understanding of the wildlife and habitat on a larger scale. Metal bioaccumulation in wild meat needs to be monitored. **Response:** Section 6.12 of the revised EIS presents a comprehensive evaluation of the predicted effects of the Project on wildlife and wildlife habitat. The assessment included an evaluation of the amount and arrangement of habitat available within the local study area (LSA) and regional study area (RSA), as well as a determination of the amount of habitat lost at each scale. The potential for the uptake of metals and other chemicals of concern were evaluated explicitly as part of the screening level risk assessment (SLRA), presented as Appendix W to both the original EIS and the revised EIS. The conservative exposures determined in the SLRA, which assumed that wildlife would have free access to the operations area throughout the life of the Project, did not identify risks that would exceed the Health Canada screening thresholds. To help ensure exposures to wildlife and other country foods are minimized, Treasury Metals plans to treat the effluent leaving the processing plant such that virtually all of the cyanide is removed before it is discharged to the tailings storage facility (TSF). In fact, the effluent entering the TSF will effectively meet the MMER requirements for releases to the environment. Furthermore, excess water not required in the process will be treated to meet the Provincial Water Quality Objectives (PWQO) prior to its release into the environment through an engineered structure in Blackwater Creek. Finally, Treasury Metals is considering establishing some form of fencing around the TSF to discourage wildlife from entering the area, even though the SLRA concluded that accessing the TSF would not result in unacceptable risks. Overall, the potential for contamination and bioaccumulation of toxicants in wild meat is very low.
829	AC(1)-410	Wabauskang First Nation	Executive Summary 9.0 Aboriginal Engagment page 81		**Summary of Comment / Rationale:** Inadequate TK/TU information/Country Foods Baseline **Information Request / Comment:** WFN have not been contacted regarding their practices for gathering plants and berries. This activity is an aboriginal right and the lack of specific details provided in the EIS does not provide reasonable information to undertake a proper impact assessment of this important activity. Additional investigation through a TK/TU study of the project area is required. **Response:** As part of the EIS process, Treasury Metals engaged with Aboriginal peoples, including the Wabauskang First Nation, to gain an understanding of the importance of the areas potentially affected by the Project to the Aboriginal peoples in the area. To the extent that information was shared with Treasury Metals, it was considered to help refine the design of the Project and identify appropriate mitigation measures. A summary of how feedback from Aboriginal peoples was considered in the EIS process has been provided in Appendix DD (Aboriginal Engagement Report) to the revised EIS. Treasury Metals continues to be committed to working with Aboriginal peoples in the area to collect

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					traditional knowledge and land use (TK/TLU) information. Treasury Metals also continues to seek to engage with Aboriginal peoples in the area to discuss measures to that can be implemented as part of the Project to mitigate and minimize potential impacts on physical and cultural heritage resources. Should additional information be received from Aboriginal peoples regarding traditional knowledge and land use within the local study area, Treasury Metals will review and consider any potential effects, and develop and implement necessary mitigation measures, as appropriate.
830	AC(1)-411	Wabauskang First Nation	Executive Summary 14.0 Monitoring and Environmental Management Plans page 129		**Summary of Comment / Rationale:** It is understood that the EMP list is not exhaustive at this point but critical EMPs should be highlighted in the EIS such as Aquatic Effects Monitoring Plan (AEMP), Fisheries Effects Monitoring Plan, Water Quality Management and Monitoring Plan. **Information Request / Comment:** Cultural Awareness is listed under EMP but should belong under thetraining component of the EMS-(CEMP/OEMP) **Response:** Treasury Metals agrees that cultural awareness does not belong in the listing of environmental management plans to be developed. A listing and description of each of the management plans to be developed and implemented as part of the Goliath Gold Project is provided in Section 12 of the revised EIS, and includes the following plans: • Project Environmental Management Plan • Waste Management Plan • Emergency and Spill Response Management Plan • Hazardous Materials Management Plan • Fuel Handling and Storage Management Plan • Water Management Plan • Noise Management Plan • Best Management Practices Plan for Dust • Greenhouse Gas Management Plan • Wildlife Management Plan • Fish Management Plan • Socio-Economic Management Plan • Transportation and Access Management Plan • Communications Management Plan • Archaeological and Cultural Heritage Resource Management Plan • Tailings Management Plan • Cyanide Management Plan • Dam Safety Management Plan

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					• Mine Rock Management Plan • Explosives Management Plan • Health and Safety Management Plan Treasury Metals is open to having discussions with Indigenous communities and Aboriginal peoples regarding approaches for incorporating cultural awareness training for the Project. The expectations of Treasury Metals is that, at a minimum, cultural awareness will be incorporated into the orientation and safety training all workers and visitors will receive prior to conducting work on site.
831	AC(1)-412	Wabauskang First Nation	Introduction & Project Overview 1.1 The Proponent page 3		**Summary of Comment / Rationale:** **Information Request / Comment:** What exactly are the 2 environmental positions listed? **Response:** At the time of submission of the Environmental Impact Statement in April of 2015, Treasury Metals held two environmental positions on site, that of Environmental Coordinator and Environmental Monitor/GIS Specialist.
832	AC(1)-413	Wabauskang First Nation	Introduction & Project Overview 1.1 The Proponent page 4		**Summary of Comment / Rationale:** Inclusion of a EMP Structure and plan overview **Information Request / Comment:** Further details regarding the EMP are required. It is the bullets listed appear to be referring to the company's "guiding environmental policy" not a EMP **Response:** An overview of the environmental management plan for the Project was provided in Section 12 of the original EIS. This discussion has been expanded in Section 12 of the revised EIS, to include a listing and description of each of the following management plans to be developed and implemented as part of the Goliath Gold Project: • Project Environmental Management Plan • Waste Management Plan • Emergency and Spill Response Management Plan • Hazardous Materials Management Plan • Fuel Handling and Storage Management Plan • Water Management Plan • Noise Management Plan • Best Management Practices Plan for Dust • Greenhouse Gas Management Plan

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					• Wildlife Management Plan • Fish Management Plan • Socio-Economic Management Plan • Transportation and Access Management Plan • Communications Management Plan • Archaeological and Cultural Heritage Resource Management Plan • Tailings Management Plan • Cyanide Management Plan • Dam Safety Management Plan • Mine Rock Management Plan • Explosives Management Plan • Health and Safety Management Plan These environmental management plans will include aspects of effects mitigation and prevention to ensure the effects of the Project on the environment are minimized. Rather than develop phase specific plans, Treasury Metals intends to develop a comprehensive list of management plans that will be implemented through all phases of the development of the Goliath Gold Project.
833	AC(1)-414	Wabauskang First Nation	Introduction & Project Overview 1.1 The Proponent page 5		**Summary of Comment / Rationale:** Is the Project going to become eligible for ISO14001 Certification and on-going environmental audits? **Information Request / Comment:** **Response:** As part of the environmental assessment, and development process, environmental management plans will be developed prior to the start of construction that will be applied during the site preparation and construction, operations, and closure phases of the Project. These environmental management plans will include aspects of mitigation and prevention to ensure the environmental effects of the Project are minimized, and discharges and impacts are within federal and provincial regulatory requirements. These plans will be developed with input from interested stakeholders and Aboriginal peoples. These environmental management plans will include aspects of mitigation and prevention to ensure the effects of the Project on the environment are minimized. Ongoing audits, reviews and continuous improvement of the environmental management plans will be key aspects of the overall system for environmental management at the Goliath Gold Project. ISO 14001 is a voluntary international standard that specifies requirements for an effective environmental management system providing a framework that an organization can follow, rather than establishing environmental performance requirements. Although Treasury Metals will consider whether to apply

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					for ISO 14001 Certification as part of the development process for the Project, they recognize that the Goliath Gold Project will still need to establish environmental performance requirements as part of the process for developing environmental management plans for the Project. .
834	AC(1)-415	Wabauskang First Nation	Introduction & Project Overview 1.1 The Proponent page 5		**Summary of Comment / Rationale:** Will an information system be used to assist in the management and monitoring of the EMS? **Information Request / Comment:** **Response:** Treasury Metals is committed to an open and transparent relationship with surrounding communities. As such, the company will use best practices and methodology similar to other mining Projects within the area (Goldcorp – Red Lake, Goldcorp – Musselwhite, New Gold – Rainy River Project) and will solicit input from surrounding communities to identify the need for developing an information system as the part of the overall environmental management framework for the Goliath Gold Project.
835	AC(1)-416	Wabauskang First Nation	Alternatives Description 2.3 Project Alternatives-Construction and Operations page 32		**Summary of Comment / Rationale:** Has Hartman Lake been fully assessed as an option for TSF discharge? Is it fish bearing would it be a better alternative environmentally than Black Water Creek even if the monetary cost is higher? **Information Request / Comment:** Request for further investigation & information **Response:** The current design of the Goliath Gold Project, as presented in the original and revised EIS, does not include an effluent discharge from the tailings storage facility (TSF). The water management for the Project is designed to maximize the use of available water from site runoff, dewatering the underground and open pit mine, and reclaim from the TSF. Excess water not required in the process will be treated to meet PWQO prior to discharge into the environment. The preferred discharge location for treated effluent is Blackwater Creek; however, an evaluation of alternative discharge locations is presented in Appendix X and Section 2 of the revised EIS (these alternatives were also presented in the original EIS). Hartman Lake was one of the alternative discharge locations evaluated. As Treasury Metals has committed that effluent released from the Project will be treated to meet PWQO, and the PWQO are established to protect sensitive aquatic receptors, there would be no expected environmental impacts associated with any of the alternative discharge locations. Therefore, none of the options would be considered preferred environmentally from a discharge

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<tr><td></td><td></td><td></td><td></td><td></td><td>perspective.
The evaluation of alternative discharge locations considered cost effectiveness, effects to the human environment, effects to the physical and biological environments and potential ability for future closure / reclamation processes. Table 1 summarizes the results of the alternatives evaluation for the final discharge point (see Appendix X of the revised EIS for additional details). As seen in the table, the only differentiator between the final discharge options was cost effectiveness, which was classified as unacceptable for the Hartman Lake option.

Table 1: Summary of Alternatives Assessment for Water Discharge Location
<table><tr><th rowspan="2">Indicator Categories</th><th colspan="5">Summary Ratings</th></tr><tr><th>Wabigoon Lake</th><th>Thunder Lake</th><th>Hartman Lake</th><th>Tree Nursery Ponds</th><th>Blackwater Creek</th></tr><tr><td>Cost Effectiveness</td><td>Acceptable</td><td>Acceptable</td><td>Unacceptable</td><td>Acceptable</td><td>Preferred</td></tr><tr><td>Technical Feasibility and Technical Reliability</td><td>Acceptable</td><td>Acceptable</td><td>Acceptable</td><td>Acceptable</td><td>Acceptable</td></tr><tr><td>Effects to the Human Environment</td><td>Acceptable</td><td>Acceptable</td><td>Acceptable</td><td>Acceptable</td><td>Preferred</td></tr><tr><td>Effects to the Physical and Biological Environments</td><td>Acceptable</td><td>Acceptable</td><td>Acceptable</td><td>Acceptable</td><td>Acceptable</td></tr><tr><td>Potential Ability for Future Closure / Reclamation Processes</td><td>Acceptable</td><td>Acceptable</td><td>Acceptable</td><td>Acceptable</td><td>Acceptable</td></tr><tr><td>Overall Summary Rating</td><td>Acceptable</td><td>Acceptable</td><td>Unacceptable</td><td>Acceptable</td><td>Preferred</td></tr></table>
Although all of the final discharge options would meet PWQO, and thus there would be no differences in the environmental effects associated with the discharges, the Hartman Lake option could have secondary environmental effects. Discharge to Hartman Lake would require the construction and operation of approximately 14.4 km of pipeline, as well as the construction of a lengthy access road required for the maintenance of the pipeline. The construction of the pipeline and access road would require multiple stream crossings that would have a potential environment effect on those watercourses. Additionally, the Hartman Lake option would result in greater terrestrial habitat loss and disturbance than the preferred alternative.</td></tr>
<tr><td>836</td><td>AC(1)-417</td><td>Wabauskang First Nation</td><td>Project Description 3.2 Project Phases & Schedule page 8</td><td></td><td><u>Summary of Comment / Rationale:</u>
Construction Environmental Management Plan

<u>Information Request / Comment:</u>
Plan should be developed and provided.

<u>Response:</u></td></tr>
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TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					As part of the environmental assessment and development process, Environmental Management Plans will be developed for the development, site preparation, construction, and operations phases of the Project. These environmental management plans will include aspects of mitigation and prevention to ensure discharge and environmental impacts are within federal and provincial regulatory needs. These plans will be developed with input from interested stakeholders and Aboriginal peoples. As part of the environmental assessment, and development process, environmental management plans will be prepared prior to the start of construction that include aspects of mitigation and prevention to ensure the effects of the Project on the environment are minimized. The specific details of the plans will be developed prior to the start of constructions activities, as part of the ongoing engineering and permitting activities. In creating these plans, the company will solicit and consider all input from interested parties. Rather that develop different plans that could apply during construction and operations, Treasury Metals will develop a comprehensive suite of management plans that will be implemented through all phases of the development of the Goliath Gold Project. Section 12 of the revised EIS includes a listing and description of each of the proposed environmental management plans.
837	AC(1)-418	Wabauskang First Nation	Project Description 3.7 Tailings Storage Facility page 31		**Summary of Comment / Rationale:** Seepage Management and Monitoring Plan **Information Request / Comment:** Plan should be developed and provided. **Response:** Treasury Metals will develop a comprehensive suite of management plans that will be implemented through all phases of the Goliath Gold Project. The specific details of the plans will be developed prior to the start of constructions activities, as part of the ongoing engineering and permitting activities. In creating these plans, the company will solicit and consider input from interested parties. Treasury Metals welcomes input from WFN in the creation of these plans and is interested in further engagement as they are developed. Section 12 of the revised EIS includes a listing and description of each of the following management plans, which will be developed and implemented as part of the Goliath Gold Project: • Project Environmental Management Plan • Waste Management Plan • Emergency and Spill Response Management Plan • Hazardous Materials Management Plan • Fuel Handling and Storage Management Plan • Water Management Plan • Noise Management Plan

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					• Best Management Practices Plan for Dust • Greenhouse Gas Management Plan • Wildlife Management Plan • Fish Management Plan • Socio-Economic Management Plan • Transportation and Access Management Plan • Communications Management Plan • Archaeological and Cultural Heritage Resource Management Plan • Tailings Management Plan • Cyanide Management Plan • Dam Safety Management Plan • Mine Rock Management Plan • Explosives Management Plan • Health and Safety Management Plan These environmental management plans will include aspects of effects mitigation and prevention to ensure the effects of the Project on the environment are minimized. Issues related to the management of seepage from the Project would be covered primarily as part of the Water Management Plan, which sets out the procedures and policies that will be used to manage all aspects of water at the Project, as well as managing the potential effects of the Project on surface water quality, surface water quantity, groundwater quality and groundwater quantity.
838	AC(1)-419	Wabauskang First Nation	Project Description 3.8 Water Management page 52		**Summary of Comment / Rationale:** "Surface water runoff from the processing plant site not expected to require treatment" **Information Request / Comment:** Could this not potentially cause changes to the water chemistry in Black Water Creek and couldn't a catchment be installed as a preventative measure in this case? **Response:** As described in Section 3.8.8 of the original EIS, all equipment at the processing plant will be contained inside, and therefore are not expected to affect surface water quality. Since the filling of the EIS, Treasury Metals has been refining their design for the Project. One of the aspects that has been refined (see Section 3 of the revised EIS) is that a perimeter ditch will be constructed around the entire site during the early stages of the site preparation and construction phase. This ditch will ensure that all of the runoff from the site, including runoff from the processing plant, will be captured on-site. The collected water will be directed to the water management system where it will be used in the process. Excess water from the process will be treated to meet Provincial Water Quality Objectives (PWQO) prior to being released to the environment through a engineered release structure in Blackwater Creek.

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839	AC(1)-420	Wabauskang First Nation	Project Description 3.8 Water Management page 53		**Summary of Comment / Rationale:** Will the loss of wetlands throughout the project area be included in the compensation plan? **Information Request / Comment:** Wetlands are a critical component of this ecosystem this project will permanently remove 9 from the ecosystem. **Response:** The statement that 9 wetlands will be destroyed and altered as a result of the Project is not correct. As described in the response to TMI_125-FH(1)-04, and shown in TMI_125-FH(1)-04_Figure_1, there would only be six small wetland areas that overlap with the operations area for the Project impacted. A total of 33 ha of wetlands will be altered during the site preparation and construction phases of this Project. These wetlands represent 0.02% of the fens in the local study area (LSA), 4.3% of the marsh in the LSA, and 5.5% of the swamp in the LSA (see table 6.15.4.1-1 of the revised EIS). There are no predicted effects of the Project on wetlands upstream of the Project (i.e., Lola Lake Provincial Park nature reserve), downstream of the Project along Blackwater Creek, or on the wetlands along the lower reaches of Thunder Creek. Although there are no specific regulatory requirements for a specific compensation plan focusing solely on wetland rehabilitation, wetlands that are considered to provide fisheries habitat would likely be included as part of the offsetting plan that would be required in order to obtain the required authorizations under the Fisheries Act. Additionally, Treasury Metals will be required to file a closure plan for the Project that details the rehabilitation of the Project site post-closure. It is expected that the final closure plan will be similar to the conceptual closure plan provided in Section 11 of the original EIS, and as Section 3.14 of the revised EIS. The conceptual closure plan includes the provision for the flooding of the open pit following closure, and the measures for the establishment of new wetlands, particularly within the western portion of the proposed pit lake.
840	AC(1)-421	Wabauskang First Nation	Existing Environment 5.8 Aquatic Resources page 57		**Summary of Comment / Rationale:** Limited and inconsistent WQ baseline program. **Information Request / Comment:** Is there on-going baseline studies? Was the control sample only sampled once? **Response:** Based on the design of the Project, the mitigation measures incorporated into the Project, and the results of the effects assessment that are presented in the revised EIS, Treasury Metals is satisfied they have sufficient baseline information to understand and characterize the potential effects of the Project on water quality in surrounding watercourses. The existing water quality data relied on in the EIS were taken from the results of the monitoring program completed from 2012 through 2013 by DST Consulting Engineers (Appendix P to the

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					revised EIS). This baseline water sampling program included the following locations: • Blackwater Creek (4 locations) • Blackwater Creek Tributary 1 (1 location) • Little Creek (1 location) • Hoffstrom's Bay Tributary (1 location) • Thunder Lake Tributary 2 (2 locations) • Thunder Lake Tributary 3 (1 location) • Thunder Lake (2 locations) • Wabigoon Lake (1 location) • McHughes Creek (1 location) • Hughes Creek (1 location) The baseline surface water sampling results relied on for evaluating the effects of the Project on surface water quality have been summarized in Section 5.8.1 of the revised EIS. On these stations, the location on Hughes Creek could be considered a control site as it is well removed from the areas where there would be any effects associated with the Project. However, as the data collected to date is baseline data, it is all really control data against which the predicted effects of the Project are evaluated. There are not any baseline surface water sampling programs currently underway at the Project. As noted above, Treasury Metals has sufficient baseline data available to evaluate the potential effects of the Project on surface water quality (Section 6.8 of the revised EIS). Section 13.8 of the revised EIS lists the proposed surface water quality monitoring program to support the EIS and to confirm the EIS findings. It is expected that, should the Project proceed, monitoring programs would be initiated before the start of site preparation and construction activities, and would continue throughout the active life of the Project.
841	AC(1)-422	Wabauskang First Nation	Existing Environment 5.8 Aquatic Resources page 58		**Summary of Comment / Rationale:** Figure 5.8.1 - Why were no samples collected further out in Thunder Lake, Wabigoon Lake and on Thunder Creek? **Information Request / Comment:** Further explanation is required. **Response:** Based on the design of the Project, the mitigation measures incorporated into the Project, and the results of the effects assessment that are presented in the revised EIS, Treasury Metals is satisfied they have sufficient baseline information to understand and characterize the potential effects of the Project on water quality in surrounding watercourses. The selection of the watercourses and sampling locations was consistent with the expected effects of the Project, as well as a clear

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					understanding of which watercourses could be affected. The existing water quality data relied on in the EIS were taken from the results of the monitoring program completed from 2012 through 2013 by DST Consulting Engineers (Appendix P to the revised EIS). This baseline water sampling program included the following locations: • Blackwater Creek (4 locations) • Blackwater Creek Tributary 1 (1 location) • Little Creek (1 location) • Hoffstrom's Bay Tributary (1 location) • Thunder Lake Tributary 2 (2 locations) • Thunder Lake Tributary 3 (1 location) • Thunder Lake (2 locations) • Wabigoon Lake (1 location) • McHughes Creek (1 location) • Hughes Creek (1 location) The baseline surface water sampling results relied on for evaluating the effects of the Project on surface water quality have been summarized in Section 5.8.1 of the revised EIS. A figure showing the water sampling locations is provided as Figure 5.8.1-1 of the revised EIS. On these stations, the location on Hughes Creek could be considered a control site as it is well removed from the areas where there would be any effects associated with the Project. However, as the data collected to date is baseline data, it is all really control data against which the predicted effects of the Project are evaluated. As shown on Figure 5.8.1-1 of the revised EIS, there were two water sampling locations selected in Thunder Lake, one (SW-6) is located in Hoffstrom's Bay, well away from the shoreline but influenced by discharges from both Hoffstrom's Bay Tributary and Little Creek. The second Thunder Lake sampling location (SW-5) is located towards the middle of the lake. There are no releases from the Project into Thunder Creek, nor are there any identified mechanisms for the Project to have any direct effects on the water quality within Thunder Creek. Therefore, collecting baseline surface water quality in Thunder Creek would not have contributed to Treasury Metals' understanding of how the Project could affect surface water quality in the watercourses surrounding the Project. A single monitoring location was selected in Wabigoon Lake, in Keplyn Bay at the mouth of Blackwater Creek, as shown on Figure 5.8.1-1 (SW-4). As Blackwater Creek is the only point of discharge from the Project to Wabigoon Lake, this single sampling location will provide a clear indication of changes in water quality within the lake as result of the Project.
842	AC(1)-423	Wabauskang First Nation	Existing Environment 5.8 Aquatic		**Summary of Comment / Rationale:** Figure 5.8.2 -Why were no sediment samples taken on Thunder Creek? Only one year of sediment sampling baseline

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
			Resources page 69		**Information Request / Comment:** Incomplete baseline data collection. Additional baseline data collection is recommended.
					Response: Based on the design of the Project, the mitigation measures incorporated into the Project, and the results of the effects assessment that are presented in the revised EIS, Treasury Metals is satisfied they have sufficient baseline information to understand and characterize the potential effects of the Project. The baseline sediment sampling to support the EIS was done at five locations in 2011, which focused on Blackwater Creek and its tributaries. In 2012, fourteen additional sediment samples were taken from far more locations and often with multiple sample locations within the same waterbodies. The sediment samples taken provide a good indication of the baseline sediment conditions in watercourses that could be effected by the Project. Sampling sediments on one occasion is considered sufficient as sediment quality remains relatively unchanged from year to year under natural conditions. Sampling multiple times a year over multiple years would be considered redundant and is therefore not required nor is it recommended. Additionally, sediment sampling was limited to watercourses that could be directly effected from the Project. There are no expected effects from the Project on Thunder Creek and any effects to aquatic sediment in the area would be initially detected in Thunder Lake or Wabigoon Lake.
843	AC(1)-424	Wabauskang First Nation	Existing Environment 5.8 Aquatic Resources page 75		**Summary of Comment / Rationale:** Was the fish sampling done in the same sample locations each year? Where all of these fish caught or what percentage of the results presented were from a historical literature review? Was 2 years of field work completed?
					Information Request / Comment: It is unclear if a continuous baseline dataset was established. Additional baseline data collection or further explanation is required.
					Response: Section 5.8 of the original EIS provides a summary of the baseline fisheries information provided in

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					various appendices. To facilitate the review process, Treasury Metals has consolidated the available baseline data, including additional baseline studies completed since the filing of the original EIS, into a single document entitled "Summary Fisheries Baseline Report (2011–2016)", provided as Appendix Q to the revised EIS. The fish species listed in Table 5.8.12 of the original EIS lists those species captured during the field investigations. As the text states, six fish species reported in background literature were not captured during the field surveys: Cisco, Lake Trout, Lake Whitefish, Longnose Sucker, Muskellunge and Ninespine Stickleback. Some watercourses/waterbodies were sampled in only one year (for example Hughes Creek) and others were sampled in multiple years. The exact locations differed between years. An overview of the baseline fisheries data relied on in the revised EIS has been provided in Section 5.8 of the revised EIS. A consolidation of the available baseline data, including additional baseline studies completed since the filing of the original EIS, into a single document entitled the "Summary Fisheries Baseline Report (2011–2016)", is provided as Appendix Q to the revised EIS.
844	AC(1)-425	Wabauskang First Nation	Existing Environment 5.8 Aquatic Resources page 86		**Summary of Comment / Rationale:** Seven (7) species of fish are Species of Management Concern-Northern Pike, Smallmouth Bass, Walleye, Muskellunge, Lake Whitefish, Lake Trout and White sucker. **Information Request / Comment:** **Response:** Section 5.4.8 of the original EIS identified no fish species present in the regional study area (RSA) that are considered an endangered species, of species at risk. Table 5.8.15 did identify the above species as being of management concern from the perspective of the EIS. That term does not represent any official designation. Section 5.8 of the revised EIS presents a summary of the baseline fisheries information relied on in assessing the potential effects of the Project on fish and fish habitat. The effects assessment presented in Section 6.14 of the revised EIS focused on the five VCs, namely: stream-resident fish population; migratory fish populations; lake-resident fish populations; and fish species-at-risk. All of the above species, with the exception of Lake Trout, were identified as being present in Wabigoon Lake (Table 5.8.4.2-1). All of the above species, with the exception of Muskellunge were identifies as being present in Thunder Lake (table 5.8.4.1-1). Only White Sucker was identified as being present in the tributaries that feed into Thunder Lake and Wabigoon Lake (Table 5.8.4.3-1).
845	AC(1)-426	Wabauskang First Nation	Existing Environment		**Summary of Comment / Rationale:** 9 wetlands are potentially being disturbed will there be a wetland compensation plan developed?

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
			5.8 Aquatic Resources page 94		**Information Request / Comment:** 3 provincially significant avian species were identified during the wetland survey
					Response: The statement that 9 wetlands will be destroyed and altered as a result of the Project is not correct. As described in the response to TMI_125-FH(1)-04, and shown in TMI_125-FH(1)-04_Figure_1, there would only be six small wetland areas that overlap with the operations area for the Project impacted. A total of 33 ha of wetlands will be altered during the site preparation and construction phases of this Project. These wetlands represent 0.02% of the fens in the local study area (LSA), 4.3% of the marsh in the LSA, and 5.5% of the swamp in the LSA (see table 6.15.4.1-1 of the revised EIS). There are no predicted effects of the Project on wetlands upstream of the Project (i.e., Lola Lake Provincial Park nature reserve), downstream of the Project along Blackwater Creek, or on the wetlands along the lower reaches of Thunder Creek. Although there are no specific regulatory requirements for a specific compensation plan focusing solely on wetland rehabilitation, wetlands that are considered to provide fisheries habitat would likely be included as part of the offsetting plan that would be required in order to obtain the required authorizations under the Fisheries Act. Additionally, Treasury Metals will be required to file a closure plan for the Project that details the rehabilitation of the Project site post-closure. It is expected that the final closure plan will be similar to the conceptual closure plan provided in Section 11 of the original EIS, and as Section 3.14 of the revised EIS. The conceptual closure plan includes the provision for the flooding of the open pit following closure, and the measures for the establishment of new wetlands, particularly within the western portion of the proposed pit lake.
846	AC(1)-427	Wabauskang First Nation	Existing Environment 5.8 Aquatic Resources page 95		**Summary of Comment / Rationale:** Requirement for TK/TU information for Country foods
					Information Request / Comment: Absence of baseline data collection and study for country foods. WFN based traditional knowledge study is required to understand WFN traditional knowledge and use activities as it relates to country foods.
					Response: As part of the EIS process, Treasury Metals engaged with Aboriginal peoples, including the Wabauskang First Nation, to gain an understanding of the importance of the areas potentially affected by the Project to the Aboriginal peoples in the area. To the extent that information was shared with Treasury Metals, it was considered to help refine the design of the Project and identify appropriate mitigation measures. A summary of how feedback from Aboriginal peoples was considered in the EIS process has been provided in Appendix DD (Aboriginal Engagement Report) to the revised EIS. Treasury Metals continues to be committed to working with Aboriginal peoples in the area to collect

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					traditional knowledge and land use (TK/TLU) information. Treasury Metals also continues to seek to engage with Aboriginal peoples in the area to discuss measures to that can be implemented as part of the Project to mitigate and minimize potential impacts on physical and cultural heritage resources. Should additional information be received from Aboriginal peoples regarding traditional knowledge and land use within the local study area, Treasury Metals will review and consider any potential effects, and develop and implement necessary mitigation measures, as appropriate.
847	AC(1)-428	Wabauskang First Nation	Effects Assessment and Mitigation 6.4 Effects Assessment page 34/39		**Summary of Comment / Rationale:** Sediment and erosion & control plan? CEMP/OEMP, Operator training, environmental audits, on-going monitoring **Information Request / Comment:** Lack of sufficient detail to determine if proposed plan will mitigate effects of project. **Response:** Section 12 of the revised EIS includes a listing and description of each of the management plans to be developed and implemented as part of the Goliath Gold Project. The environmental management plans will include aspects of effects mitigation and prevention to ensure the effects of the Project on the environment are minimized. Rather than develop phase specific plans, Treasury Metals intends to develop a comprehensive suite of management plans that will be implemented through all phases of the Goliath Gold Project. The specific details of the plans will be developed prior to the start of constructions activities, as part of the ongoing engineering and permitting activities. In creating these plans, the company will solicit and consider input from interested parties. Treasury Metals welcomes input from WFN in the creation of these plans and is interested in further engagement as they are developed. Since the submission of the EIS, Treasury Metals has been advancing their engineering and refining the design of the Project. One of these refinements is the construction of an engineered ditch and seepage collection system around the entire operations area prior to commencing earthworks for the Project. All of the runoff from the operations area will be intercepted by the perimeter ditch and directed to the water management system. During the site preparations and construction phase, the collected runoff will be retained within the operations area for use in initiating the tailings storage facility and building an inventory for use in the process. During operations, runoff from the operations will be used in the water management system to support the process. Excess water will be treated to meet PWQO prior to being released through an engineered structure to Blackwater Creek. During closure, the operations area will be graded to direct runoff to the open pit, which will be allowed to fill. As the open pit is filling, Treasury Metals will periodically test the water quality to determine whether batch treatment will be required to ensure the water quality meets PWQO prior to the pit being filled. Once the pit lake is filled (between 5 and 8 years following the end of operations, depending on the weather conditions), excess water from runoff and groundwater inflow will be released to former channel of Blackwater Creek Tributary 1.

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					A listing of the mitigation measures that will be implemented to protect surface water during the life of the project are provided in Section 6.8.5 of the revised EIS.
848	AC(1)-429	Wabauskang First Nation	Effects Assessment and Mitigation 6.4 Effects Assessment page 46		**Summary of Comment / Rationale:** Have First Nations had input into the Archaeological site information? Chance Find Procedure **Information Request / Comment:** Archaeological reports and studies do not relate information to WFN who have and continue to occupy the lands in the region. Concerns that the archaeological reports do not represent interests of WFN as they were not consulted on the study. **Response:** Treasury Metals points out that the Stage 1 and 2 archaeological assessment of the development area were completed under the direction of a licensed archaeologist, followed the methodology prescribed by MTCS, and is based on common archaeological practice. The report was an independent professional evaluation of the site and was not undertaken to "represent the interests" of any individual party. At the time the archaeological assessment reports were prepared, current MTCS guidance was that engaging Indigenous communities during Stage 1 assessment was considered an optional practice, and in this case was not pursued. Nevertheless, the evaluation of archaeological potential is built on consideration of a range of variables, such as the topographic condition of the subject property, presence and distribution of registered archaeological sites in the region, archaeological reports, local knowledge and the experience of the archaeological consultant, as well as a detailed property inspection. Indigenous engagement is not required at Stage 2. The archaeological assessment is considered sound. MTCS have reviewed the reports, and expressed satisfaction at the recommendations made. As part of the management plans to be prepared to support the Goliath Gold Project, Treasury Metals will prepare and implement an Archaeological and Cultural Heritage Resources Management Plan. As the approvals process for the Project advances, Treasury Metals will be finalizing the various management plans for the Goliath Gold Project. As part of that process, Treasury Metals will be engaging regulators, First Nations and indigenous communities (including WFN), and other interested stakeholders. The Archaeological and Cultural Heritage Resources Management Plan will guide mitigation work at the development site and other parts of the project area during construction, operation and decommissioning of the mine. This plan will also set out the process for notification and engagement of Indigenous community members for future archaeological assessments, planning for cultural heritage resource protection, and management of accidental discoveries. The direction found in the plan will be in addition to ongoing obligations under the *Ontario Heritage Act*, *Coroners Act* and the

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					Funeral, Burial and Cremation Services Act which will continue to apply throughout the duration of Treasury Metals' activities at the property. The Archaeological and Cultural Heritage Resource Management Plan will include specific direction for active involvement of local Indigenous communities when archaeological or cultural heritage resources are discovered, and note that this involvement is currently mandatory when human remains of a possible Indigenous origin are discovered. The Archaeological and Cultural Heritage Resource Management Plan will also set out procedures for engaging Indigenous communities at Stage 1 for future archaeological assessment work required at the property. As additional information regarding traditional uses of the land comes available, this will assist in planning for archaeological and cultural resource protection moving forward.
849	AC(1)-430	Wabauskang First Nation	Effects Assessment and Mitigation 6.4 Effects Assessment page 48		**Summary of Comment / Rationale:** How will Treasury Metals ensure fish, wild meat and country foods are not impacted by mine related activities? Will there be specific management plans and strategies to protect traditional Aboriginal food sources? **Information Request / Comment:** **Response:** Treasury Metals recognizes the importance of understanding the potential effects of the Project on Aboriginal health, as well as human health on the whole. As part of the EIS, a screening-level risk assessment (SLRA) was completed (Appendix W) that identified potential health effects to Aboriginal residents, non-aboriginal residents, recreational users, and mine workers. An assessment of the effects of the Project on human health, including Aboriginal health effects associated with eating country foods that could be affected by the Project has been included as Section 6.19 of the revised EIS. The assessment used the conservative SLRA results and determined that the potential effects of the Project on country foods and the result health of Aboriginal people would be minimal, and well below the thresholds established by Health Canada for warranting any further evaluations. The management plans identified by Treasury Metals for managing the effects of the Project are described in Section 12 of the revised EIS. While there is no specific plan that targets country foods, there are several plans (e.g., tailings management plan, water management plan) that will be used for managing the effects of the Project that will also help manage the limited effects predicted with respect to country foods. For example, Treasury Metals will construct a perimeter ditch around the operations are to capture runoff from the mining areas and ensure it is not released directly to the environment. During operations, excess water collected within the operations area will be treated to meet PWQO prior to discharge, helping to protect aquatic life downstream of the Project.
850	AC(1)-431	Wabauskang	Effects Assessment and		**Summary of Comment / Rationale:** Why is the follow up and monitoring to only monitor the health of wild rice populations periodically

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		First Nation	Mitigation 6.4 Effects Assessment page 68		during the first years of operations? It should be the life of mine through post closure (including all country foods) **Information Request / Comment:** **Response:** Treasury Metals is aware of the presence of wild rice within Wabigoon Lake, and has designed the Project to avoid impacts to aquatic receivers. In order to protect the ecosystem downstream of the Project, Treasury Metals committed that during operations, the effluent from the Project would meet Provincial Water Quality Objectives (PWQO) prior to being discharged into Blackwater Creek. The PWQO were established at levels that provide protection to sensitive aquatic receptors. As part of the responses to the Round 1 information requests, Treasury Metals has prepared a revised EIS. Section 13 of the revised EIS includes a summary of the monitoring that Treasury Metals propose to confirm the findings of the EIS that there would be no significant adverse effects on the receiving environment. With respect to managing aquatic effects, Treasury Metals will be carefully monitoring the water quality downstream of the Project throughout the site preparation and construction, operations, and closure phases of the Project. Following closure, the Project will enter a period of care and control when Treasury Metals will continue to manage the site and conduct the necessary monitoring to help the regulators confirm that the closure objectives are achieved. The regulators will determine when Treasury Metals will be allowed to cease monitoring.
851	AC(1)-432	Wabauskang First Nation	Effects Assessment and Mitigation 6.4 Effects Assessment page 77		**Summary of Comment / Rationale:** It has been identified that the project will most likely have "Potential change in abundance and health of wild rice downstream of Project" but there is no follow up or monitoring required? **Information Request / Comment:** Lack sufficient mitigation to address potential impacts. Further work is required to develop a sufficient mitigation plan. **Response:** Treasury Metals is aware of the presence of wild rice within Wabigoon Lake, and identified that there was a potential for a "change in health and abundance of wild rice downstream of the Project" in the original EIS. As part of the responses to the Round 1 information requests, Treasury Metals has prepared a revised EIS. Section 6 of the revised EIS provides an expanded assessment of the effects of the Project on the environment. Specifically, Section 6.8 provides a detailed evaluation of the predicted effects of the Project on surface water quality, including modelling the quality of surface water during the operations and post-closure phases (there would be no releases to surface water from the Project during the site preparation and construction, or the closure phases). The results of the modelling show that the water quality in the surrounding watercourses, would be

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					unchanged or improved from existing conditions, or would meet PWQO. As the PWQO are established to protect sensitive aquatic receptors, it is concluded that there would be no impacts on downstream water quality, including Wabigoon lake, and thus no impacts on species within Wabigoon Lake, including wild rice. The Project includes multiple levels of mitigation to manage off-site effects on surface water quality. A perimeter ditch will be constructed around the operations area to prevent the release of runoff to the surrounding environment. All water collected within the operations area will be used in the water management system. Excess water will be treated to meet PWQO before being discharged to Blackwater Creek through an engineered discharge. At closure, the operations area will be graded to direct all runoff to the open pit, and the pit lake will be allowed to fill with water. As the pit lake is filling, Treasury Metals will regularly test the water quality to determine whether batch treatment will be required to ensure the water in the pit lake meets the PWQO before the pit lake fills. With respect to managing aquatic effects, Treasury Metals will be carefully monitoring the water quality downstream of the Project throughout the site preparation and construction, operations, and closure phases of the Project. Following closure, the Project will enter a period of care and control when Treasury Metals will continue to manage the site and conduct the necessary monitoring to help the regulators confirm that the closure objectives are achieved. The regulators will determine when Treasury Metals will be allowed to cease monitoring.
852	AC(1)-433	Wabauskang First Nation	Effects Assessment and Mitigation 6.4 Effects Assessment page 83		**Summary of Comment / Rationale:** Archaeological sites-Chance Find Procedure all phases of mine **Information Request / Comment:** **Response:** The *comment* identifies the need for an "Archaeological sites – Chance Find Procedure" applicable during all phases of the Goliath Gold Project. As part of the management plans to be prepared to support the Goliath Gold Project, Treasury Metals will prepare and implement an Archaeological and Cultural Heritage Resources Management Plan. A listing and description of the management plans is provided as part of Section 12 in the revised EIS. The Archaeological and Cultural Heritage Resources Management Plan will include direction regarding chance finds of both archaeological/cultural material and human remains. The plan will guide mitigation work at the development site and other parts of the project area during construction, operation and decommissioning of the mine. This plan will also set out the process for notification and engagement of Indigenous community members for future archaeological assessments, planning for cultural heritage resource protection, and management of accidental discoveries. The direction found in the plan will be in addition to ongoing obligations under the *Ontario Heritage*

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					Act, *Coroners Act* and the *Funeral, Burial and Cremation Services Act* which will continue to apply throughout the duration of Treasury Metals' activities at the property. The Archaeological and Cultural Heritage Resource Management Plan will include specific direction for active involvement of local Indigenous communities when archaeological or cultural heritage resources are discovered, and note that this involvement is currently mandatory when human remains of a possible Indigenous origin are discovered.
853	AC(1)-434	Wabauskang First Nation	Cumulative Effects Assessment 7.2 Scope of Cumulative Effects Assessment page 5		**Summary of Comment / Rationale:** Why has there been no linkage between forestry cumulative impacts and mining cumulative effects. (i.e roads and fragmentation and alternation of the landscape, changes to water quality and degradation of fish habitat?) **Information Request / Comment:** Current cumulative effects assessment lacks is deficient. Additional work is required to address deficiencies including: list of projects including foreseeable project, current developments including forestry and consideration for effects to aboriginal rights, interests and treaty rights should also be included. **Response:** An updated cumulative effects assessment has been provided in Section 7 of the revised EIS, which included an assessment of the potential cumulative effects of the Project and the effects associated with activities of the Dryden Forestry Management Company Limited (DFMC). The DFMC has identified through its Ten-year Forest Management Plan, that it plans on logging in areas located between Thunder Lake and Hartman Lake located on the Treasury Metals property boundary between 2016 and 2021 (Dryden Forest Management Company, 2016). Through the assessment, it was determined that both the Project and DFMC effects areas overlap for the majority of the disciplines used in the assessment. However, DFMC activities would continue regardless of the Project and have identified that the operations area of the Project will be forested before 2021. Additionally, environmental effects such as noise and air quality from DFMC and the Project have the potential to overlap, but these effects overlaps would be short lived and could be managed to mitigate the effects.
854	AC(1)-435	Wabauskang First Nation	Commitment Registry Table 9.0.1 Treasury Commitments for the Project page 1		**Summary of Comment / Rationale:** No overall commitment to environmental excellence (ISO14001 certification, environmental policies, procedures, training, auditing) **Information Request / Comment:** **Response:** Section 12 of the revised EIS describes the environmental management plans that will be developed

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					prior to the start of construction that will be applied during the site preparation and construction, operations, and closure phases of the Project. These environmental management plans will include aspects of mitigation and prevention to ensure the environmental effects of the Project are minimized, and discharges and impacts are within federal and provincial regulatory requirements. These plans will be developed with input from interested stakeholders and Aboriginal peoples. These environmental management plans will include aspects of mitigation and prevention to ensure the effects of the Project on the environment are minimized. Ongoing audits, reviews and continuous improvement of the environmental management plans will be key aspects of the overall system for environmental management at the Goliath Gold Project. ISO 14001 is a voluntary international standard that specifies requirements for an effective environmental management system providing a framework that an organization can follow, rather than establishing environmental performance requirements. Although Treasury Metals will consider whether to apply for ISO 14001 Certification as part of the development process for the Project, they recognize that the Goliath Gold Project will still need to establish environmental performance requirements as part of the process for developing environmental management plans for the Project.
855	AC(1)-436	Wabauskang First Nation	Commitment Registry Table 9.0.1 Treasury Commitments for the Project page 1		**Summary of Comment / Rationale:** No commitment to training Aboriginal people **Information Request / Comment:** **Response:** Treasury Metals has committed to providing all on-site employees and visitors, including Aboriginal peoples, appropriate orientation and safety training (see Section 10 of the revised EIS). Further to this, Treasury Metals has committed to develop and implement employment practices that give preference to local and regional labour where possible (Section 10). Treasury Metals has also identified the importance of providing training to individuals in the region, including Aboriginal peoples, to enhance skills and provide improved opportunities for employment. This training will help mitigate effects of the Project and enhance benefits. This would include engaging the local and regional workforce in Project-related employment to the extent practicable, and developing training programs for unemployed and underemployed persons.
856	AC(1)-437	Wabauskang First Nation	Commitment Registry Table 9.0.1 Treasury Commitments		**Summary of Comment / Rationale:** No commitment to a complete list of Project specific EMP's **Information Request / Comment:**

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
			for the Project page 1		**Response:** Treasury Metals has committed that environmental aspects and potential impacts of the Project will be managed within an environmental management plan (EMP) which integrates environmental performance with overall Project management. Section 12 of the revised EIS provides a description of each of the following management plans to be developed and implemented as part of the Goliath Gold Project: • Project Environmental Management Plan • Waste Management Plan • Emergency and Spill Response Management Plan • Hazardous Materials Management Plan • Fuel Handling and Storage Management Plan • Water Management Plan • Noise Management Plan • Best Management Practices Plan for Dust • Greenhouse Gas Management Plan • Wildlife Management Plan • Fish Management Plan • Socio-Economic Management Plan • Transportation and Access Management Plan • Communications Management Plan • Archaeological and Cultural Heritage Resource Management Plan • Tailings Management Plan • Cyanide Management Plan • Dam Safety Management Plan • Mine Rock Management Plan • Explosives Management Plan • Health and Safety Management Plan These environmental management plans will include aspects of effects mitigation and prevention to ensure the effects of the Project on the environment are minimized. Rather that develop phase specific plans, Treasury Metals intends to develop a comprehensive list of management plans that will be implemented through all phases of the development of the Goliath Gold Project.
857	AC(1)-438	Wabauskang First Nation	Conceptual Closure 11.4 Post-Closure Site Conditions		**Summary of Comment / Rationale:** Concern with pit and TSF effluent discharge/runoff post closure which would migrate to Black Water Creek then into Thunder Lake in the Wabigoon Watershed. This could potentially cause adverse environmental impacts to the watershed. Why has the company only committed to a monitoring program for three years post closure?

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
			page 7		**Information Request / Comment:**
					Response: Following operations, the TSF will be reclaimed which involves draining the supernatant water, treating the water and using it to help fill the pit, placing a granular layer to physically isolate the tailings, and covering the tailings to isolate them from oxygen. The cover could be a low-permeability dry cover or a cover of non-process water. The site infrastructure will be removed and the site will be graded to direct water that is captured within the operations area to the open pit. As the open pit is filling, Treasury Metals will monitor the quality of water in the pit to identify whether mitigation will be required in order to meet PWQO. The mitigation required during filling of the open pit would likely include batch treatment processes, such as the addition of lime, to adjust the pH of the water and reduce the concentrations of metals in the water. Once the pit is flooded, the water will be allowed to discharge into Blackwater Creek Tributary 1. That stated, there are no expected adverse environmental impacts to either the Wabigoon Lake watershed or the Thunder Lake watershed from surface water quality. Following the completion of the closure activities, there will be a period when the mine remains in the care and control of Treasury Metals. During this phase of the Project, monitoring will continue to demonstrate the success of the closure operations. This period of care and control will continue until the regulators are fully satisfied that Treasury Metals has rehabilitated the mine and that no further impacts to the environment are likely.
858	AC(1)-439	Wabauskang First Nation	Safety, Health and Environmental Management Plan 12.2 Objectives and Context page 1		**Summary of Comment / Rationale:** No apparent framework included to guide the implementation of a Environmental Management Plan or EMS. Policies, guiding principles, company responsibility chart, communication plan, environmental audit, information systems, training and procedures not identified this is only an explanation of the environmental monitoring plan.
					Information Request / Comment:
					Response: A listing and description of the proposed environmental management plans to be implemented as part of the Project are provided in Section 12 of the revised EIS. The specific details of the plans will be developed prior to the start of constructions activities, as part of the ongoing engineering and permitting activities. In creating these plans, the company will solicit and consider all input from interested parties. Rather than develop different plans that could apply during construction and

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					operations, Treasury Metals will develop a comprehensive suite of management plans that will be implemented through all phases of the development of the Goliath Gold Project. Although training is not specifically part of the environmental management plans, the plans would provide indications of the training necessary for individuals undertaking specific roles at the Project. Treasury Metals has committed to providing all on-site employees and visitors, including Aboriginal peoples, appropriate orientation and safety training (see Section 10 of the revised EIS). Further to this, Treasury Metals has committed to develop and implement employment practices that give preference to local and regional labour where possible (Section 10). Treasury Metals has also identified the importance of providing training to individuals in the region, including Aboriginal peoples, to enhance skills and provide improved opportunities for employment. This training will help mitigate effects of the Project and enhance benefits. This would include engaging the local and regional workforce in Project-related employment to the extent practicable, and developing training programs for unemployed and underemployed persons.
859	AC(1)-440	Wabauskang First Nation	Environmental Monitoring Program 13.4 Surface Water and Aquatics page 4		**Summary of Comment / Rationale:** Where are the actual monitoring methods and plans located? Are the baseline studies on-going? **Information Request / Comment:** **Response:** An overview of the environmental monitoring programs for the Project was provided in Section 12 and 13 of the original EIS. This discussion has been expanded in Section 13 of the revised EIS, to include a description of proposed monitoring programs to be developed and implemented as part of the Goliath Gold Project. These monitoring programs have been developed as part of the EA process and will help to verify the effectiveness of the avoidance and mitigation measures on effects from the Project presented in the EIS. Additionally, as the Project moves forward, it is expected that there will be additional regulatory monitoring required by government agencies under applicable Federal and Provincial acts and regulations. Following the issuing of these monitoring programs by government agencies, the monitoring described in Section 13 of the revised EIS is subject to change to harmonize both monitoring programs to achieve uniformity. The results of this monitoring will be included in an Annual Monitoring Report, which will be provided to Aboriginal peoples, stakeholders and government agencies. Treasury Metals acknowledges there can be benefits from gathering specific additional baseline data for guiding the design of mitigation measures, follow-up monitoring and management plans for the Project. Since the filing of the original EIS, Treasury Metals has completed additional baseline studies related to fisheries, wildlife and wetlands, including additional bat surveys for potential summer roost habitat and marshbird surveys in 2016. The additional baseline data have been

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					included in the revised EIS summary reports as Appendix Q (Fisheries and Habitat), Appendix R (Terrestrial) and Appendix S (Wetlands). Treasury Metals is committed to undertaking further baseline data collection, as required, prior to entering the site preparation and construction phase of the Project.