Annex A3: Note to Readers

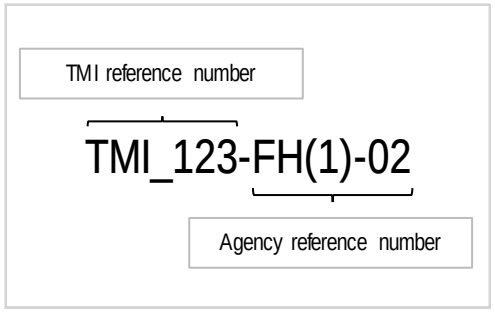
Introduction

In April 2015, Treasury Metals Inc. (Treasury Metals) 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 Treasury Metals 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 Treasury Metals 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, Treasury Metals 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 for the 440 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 from 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.



On October 5, 2017, The Canadian Environmental Assessment Agency indicated that 287 of the 859 questions raise as part of the Round #1 Information Request process (contained in Annexes A1 to A4 of IR#1) were found to be incomplete. The enclosed document provides the original responses to the 572 responses deemed complete, and revised responses for the 287 information requests requiring additional information to be considered complete. The responses are provided in a tabular form, with each response including the original “Summary of Comment / Rationale” and the “Information Request”, for reference. Those responses initially identified as complete are

indicated with “Response”, while the expanded responses for the 287 identified by the Agency are indicated by “Revised Response”. 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.
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.

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					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 Ojibway Nation			**Information Request / Comment:** 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

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					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. **Revised Response:** Since the time of the original EIS submission, Treasury Metals has participated in a number of meaningful engagement activities. Treasury Metals as revised the EIS substantially to reflect the traditional knowledge and traditional land and resource use information shared since the original EIS submission. Treasury Metals has revised the EIS to include the following key changes with respect to traditional knowledge and traditional land and resource use: • Traditional knowledge obtained from various Indigenous communities has been incorporated into each subsection of Section 5 (Existing Environment) (i.e. 5.1 Climate, 5.2 Air Quality, 5.3 Noise and Light, 5.4 Geology, 5.5 Terrain and Soil, 5.6 Hydrogeology, 5.7 Surface Hydrology, 5.8 Aquatic Resources, 5.9 Terrestrial Resources, 5.10 Migratory Birds,5.11 Species at Risk, and 5.12 Human Environment); o owls (barn and long horn), wild turkeys and robins observed in the project area – found in Section 5.9.9 and 5.11.4 of the revised EIS o project area is a fly through area for migratory birds that may be impacted by the Project- found in Section 5.10.1 of the revised EIS o migratory bird nesting area located to the north of the site- found in Section 5.10.1 of the revised EIS o blueberry areas attract robins and other birds- Found in 5.10.1 and 5.9.9 of the revised EIS • Traditional land and resource use is discussed for each Indigenous community including in Section 5.13.3; • The information presented in Section 5 of the revised EIS was essential to the effects assessment completed for Aboriginal peoples in Section 6.21 and specifically for each community in Section 6.22 of the revised EIS. It was also essential to the selection of Valued Components (VCs) as discussed in Section 6.1.3 of the revised EIS. Trails and

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					travel ways were considered under the VCs "Harvesting of Plants", and "Cultural and Spiritual'. • All engagement activities to date are summarized in Section 9 of the revised EIS and provided in detail in Appendix DD. Engagement logs for all indigenous communities are attached to Appendix DD. • The executive summary has been updated to reflect the meaningful engagement activities with indigenous communities.
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:** 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.

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					• *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. 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			**Information Request / Comment:** Provided comments about potential effects to groundwater quantity and the information presented in the EIS:

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		Aboriginal People of Wabigoon			• 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 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

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					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 (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

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					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 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

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					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). 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

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					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 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

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					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 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. **Revised Response:** Samples of the ore and waste rock from the Project site indicate that the materials are potentially acid generating (PAG), and will need to be managed effectively throughout the life of the Project. Section 6.3 of the revised EIS provides a thorough analysis of the potential effects of the Project associated with acid rock drainage (ARD), and identified the following mitigation measures that will be used to manage these issues: • The geochemical properties of the waste rock will be evaluated and non-acid generating

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					(NAG) waste rock will be segregated from PAG waste rock. • The PAG waste rock would be placed in the mined out areas of the open pit, to the extent practical, to minimize the volume of PAG material in the waste rock storage area (WRSA). • During operations, a water cover will be maintained over the tailings within the tailings storage facility (TSF) to prevent the onset of acidification. • As part of the closure activities, the WRSA will be covered with a low permeability cover to isolate the waste rock and reduce the potential for acidification. • At closure, the open pit will be allowed to flood, isolating the exposed mine faces and the waste rock placed in the open pit underneath a static cover of water to prevent acidification. • At closure, the process water will be withdrawn from the TSF, treated and used to help fill the open pit. The tailings within the TSF will be isolated using either a low permeability dry cover, or a wet cover of non-process water. Use a wet cover for closure of the TSF is preferred, as a wet cover prevents acidification of the tailings, which improves the quality of seepage in the long-term and results in improved pit lake water quality. The wet cover for the TSF will also improve the quality of seepage, which benefits the quality of the post-closure surface water quality in the nearby waterbodies. • The pit lake will be monitored as it is filling to determine whether batch treatment will be required to ensure the water meets PWQO, or background if background levels exceed the PWQO, prior to the discharge from the pit lake to a tributary of Blackwater Creek. [Mit_024]. Firstly, a detailed analysis has been completed for the open pit water quality during closure and post-closure that can be found in both 5.3 of Appendix JJ (the Water Report) and Section 6.3 of the revised EIS. At the end of operations, dewatering activities will cease and the open pit will be allowed to fill with water. As part of the closure activities, the operations area for the Project will be graded to direct runoff towards the open pit. The estimated pit flooding time, based on the average meteorological conditions for the area, will 6.7 years after completion of mining, with actual filling ranging between 6 to 8 years, depending on climatic conditions. The pit lake will be monitored as it is filling to determine whether batch treatment will be required to ensure the water meets PWQO, or background if background levels exceed the PWQO, prior to the discharge from the pit lake to a tributary of Blackwater Creek. Once the pit lake is flooded, it will continue to be a sink for the inflow of groundwater, and will receive runoff from the former operations area. Excess water within the pit lake will be passively discharged into the former channel of Blackwater Creek Tributary 1 through an engineered spillway. Once the pit lake is fully flooded, it is expected that the monitoring of the quality will continue for a period of time to determine whether additional batch treatment may be required to ensure the pit lake water quality meets PWQO prior to the discharge from the pit lake.

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					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 Appendix M to the revised EIS, 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. Within this drawdown cone, groundwater will migrate towards the open pit. During operations, only a limited quantity of seepage is expected to originate from the tailings storage facility (TSF). The seepage will be captured largely by the perimeter collection ditches around each structure. Seepage that escapes the seepage collection systems will be captured within the drawdown cone caused by dewatering and will ultimately go to the open pit where it will be collected as part of the dewatering activities and transferred to the water management system. Following closure, there will be a period while the open pit fills and the groundwater table returns to near its pre-disturbance levels when the drawdown cone will continue to collect the seepage from the site and direct it to the open pit. Once the open pit is flooded, the groundwater table returns to the pre-disturbance levels, the groundwater modelling identified that seepage from the TSF will leave the site and interact with the groundwater. However, the quality of the groundwater is expected to remain largely unchanged once it reaches the nearest private groundwater drinking wells. The relatively small quantity of seepage coming from the TSF will undergo many chemical reactions as it travels through the bedrock (i.e., adsorption) as well as dilution with the large quantity of groundwater. The effects of the Project on groundwater quality, including the effects on the quality in nearby private wells is described further in Section 6.10 of 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 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

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					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 a revised EIS.

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					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 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

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					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 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

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					peoples is limited to arrowheads, subsistence land uses, and impacts on reserve only. Population of Village of Wabigoon is 75% Aboriginal peoples. **Revised Response:** Section 5.13 of the revised EIS provides details of the baseline conditions including traditional land and resource use information obtained directly from WLON as well as census data collected by Statistics Canada on the population demographics of the areas surrounding the project. Traditional knowledge shared with Treasury Metals by WLON has been incorporated into all sub-sections of Section 5, Existing Environment of the revised EIS. For example, Section 5.8 "aquatic resources" includes section 5.8.5 "Traditional Knowledge" from (but not limited to) WLON, where it states… "Members of the Wabigoon Lake Ojibway Nation identified the following with respect to their traditional knowledge of aquatic resources: • Fishing continues to be a critical activity year-round, with pike and walleye being the preferred species, but other species taken as well; • Baitfish and minnow trapping conducted within the local area – 2 locations identified within Project area but outside Project footprint; • Fish spawning occurs in Blackwater Creek mouth area; The baseline conditions presented in Section 5 of the revised EIS were essential to the assessment of the effects of the project on Indigenous communities in Section 6 of the revised EIS. The traditional knowledge and traditional land and resource use was also essential to the selection of valued components in Section 6.1.3 of the revised EIS. Aboriginal peoples are specifically assessed in Section 6.21 of the revised EIS, and a discussion of the effects of the project on WLON is provided in Section 6.22 of the Revised EIS. The following valued components were assessed part of Section 6.21 of the revised EIS-Description of Project Effects, Aboriginal Peoples: • Human health • Gathering pf plant materials • Hunting and trapping • Fishing • Cultural and spiritual activities • Socio-economic effects. The potential effect on each one of these VCs was considered for members of indigenous communities both on and off official first nation reserves. The methods used for the effects prediction are explained in detail in Section 6.21.2 of the revised EIS. In the revised EIS, a summary of the potential effects of the project including on traditional land and

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					resource use for each indigenous community i.e. there is a subsection specific to WLON which is provided in Section 6.22 of the revised EIS.
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. **Revised Response:** Treasury Metals acknowledges and respects that Naotkamegwanning First Nation has a strong connection to the land, and appreciate the sacred aspects of the environment that the reviewer has identified. Treasury Metals has designed the Project to limit the effects of Project on the environment to the extent practicable. A list of mitigation measures and commitments designed to limit effects of the Project on the environment is provided in Tables 6.23-1 through 6.23-20 and Table 10.0-1, respectively of the revised EIS. The effects assessment provided in Section 6 of the revised EIS used specific concerns raised by the Indigenous communities to define the valued components (VC) to be assessed. For example, the Project effects to both turtles and frogs were assessed within the reptiles and amphibians VC (Section 6.12 of the revised EIS). The summary of adverse effects to wildlife and wildlife habitat (including turtles and frogs) can be found in Table 6.12.4.5-1 of the revised EIS. No significant adverse effects were found for any of the specific aforementioned VCs. Further to this WBFN (Insert Name) was presented the information reflected in Section 6, and within the Impact and Effects Report on September 19, 2018 in collaboration with Treasury Metals, AmecFW, Wabigoon Lake Ojibway Nation, Eagle Lake First Nation, and Wabauskang First Nation. WBFN has informed Treasury Metals that its members partake in land use practices within the regional area of the operation exclusive of commercial fishing rights. Treasury Metals respects the overall concern as it relates to sacred sites within the Project area. Treasury Metals is continue to build relationships and have strived to solicit this information. Treasury Metals requests that the sites are identified so that an accommodation can made, such as to preserve the site or reduce the effects to the site. Treasury Metals has also discussed as part of prior activities that it is open to all communities including Naotkamegwanning First Nation conduct a ceremony or prayers if they choose on culturally significant sites or sacred sites. Lastly (and although the location of the sacred site south of Wabigoon has not been explicitly identified to Treasury Metals), there are no anticipated physical effects from the Project that reach Wabigoon. Therefore, there will be no Project effects on the sacred site that Naotkamegwanning First Nation mention in their information request.
354	AC(1)-28	Wabigoon Lake			**Information Request / Comment:**

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		Ojibway Nation			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 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

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					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 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

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					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 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

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					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 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. **Revised Response:**

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					REVISED: Treasury Metals confirms the removal of text in all sections and appendices of the Revised EIS that relate to the interpretation of Treaty 3. 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 comments and questions raised by each Aboriginal person, a detailed list of comments 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, without an interpretation of Treaty 3.
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.
					Revised Response: The mitigation measures identified for the potential impacts of the Project on the environment have been provided in Section 10, Table 10.0-2 of the revised EIS and attached as TMI_357-AC(1)-31_Attachment 1. This list is considered a working document is should not be considered finalized, as Treasury Metals fully expects that further mitigation measures can be added as required and with further input from Indigenous communities. Treasury Metals is committed to engaging with Treaty 3 First Nations for the life of the Project and particularly during the detailed design and approvals stage 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.
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

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					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 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

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					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; • 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). **Revised Response:** Treasury Metals understands and respects that Aboriginal peoples, including people from Wabigoon Lake Ojibway Nation (WLON), have historically and currently use the land in the vicinity of the proposed Project for traditional purposes. A primary consideration for Treasury Metals in the Project design was that Indigenous communities would still able to perform traditional land uses around the Project on as much unaltered land as possible. The mitigation measures listed in Tables 6.23-1 through 6.23-20 of the revised EIS are in place to limit the effects of the Project as much as feasible. Treasury Metals thanks WLON for sharing this information on their current use of the land and

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					resource for traditional purposes. This information has been added to traditional uses of the land, which has been incorporated into each the Traditional Knowledge subsection of each discipline in Section 5 and then specifically presented in Section 5.13.3 Indigenous Communities of the revised EIS. This information was also used to select the valued components discussed in Section 6.1.3 and to develop additional mitigation measures (Tables 6.23-1 through 6.23-20) to reduce or eliminate some effects from the Project on WLON. For example, as a mitigation measure, Treasury Metals will support accompanied access for Aboriginal peoples through site to the property to the north of the operations area (identified as the green shaded area in Figure 6.16.6-1 of the revised EIS) for traditional land use. This is to ensure Aboriginal peoples have access to the land safely, and ensure safety and security of the site.
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: 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

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					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. 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. **Revised Response:** Treasury Metals has revised the EIS to include Section 5.13 which provides a detailed discussion of traditional land and resource use of the Wabauskang First Nation. In addition, traditional knowledge

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					with respect to soils and terrain, hydrogeology, surface hydrology, aquatic and terrestrial resources, migratory birds, species at risk and the human environment shared by the Wabauskang First Nation has been included into its respective subsection of Section 5 of the revised EIS (i.e. 5.1 through 5.12 of the revised EIS). This baseline environmental condition data were used to assess the potential impacts of the project on Aboriginal peoples in Section 6.21 of the revised EIS, and the effects of the project on the traditional land and resource use of Wabauskang First Nation has been discussed in Section 6.22 of the Revised EIS. Treasury has revised Section 9 of the revised EIS to provide a summary of all engagement activities with Wabauskang First Nation, as well Appendix DD provides a record of all of the demonstrated engagement activities with Wabauskang First Nation. The engagement logs are attached to Appendix DD of the revised EIS. Treasury Metals has history of communications with Wabauskang First Nation beginning in 2012. As of March 28, 2018 there have been 164 records of engagement with WFN, including 10 in person presentations of information regarding the project and specific discussions for a path forward for gathering traditional knowledge on September 19, 2017. Treasury Metals recognizes that Indigenous people including those part of the community of Wabuaskang First Nation live, work, hunt, fish, trap, and harvest throughout their lands and rely on them for their individual as well as their communities overall cultural, social, spiritual, physical, and economic well-being. Further to this Treasury recognizes that these lands are inextricably connected to a communities identify and culture, inclusive of ceremonial and spiritual recognition. Treasury in respect to this recognizes the importance of assessing any impact as it relates to traditional land use activities and practices. Treasury Metals acknowledges that the Project may impact these availability or practices within the Project area, and is committed to working with all communities to identify, mitigate, and avoid these respective aspects. As stated Treasury Metals acknowledges that the Project may have potential impacts on the traditional land and resource use within the Project area, and is committed to working with all communities to identify, mitigate, and avoid these respective aspects in addition to those aspects currently proposed within the EIS.
364	AC(1)-38	Wabauskang First Nation Aboriginal People of Wabigoon			**Information Request / Comment**: The proposed Project will infringe upon Aboriginal and Treaty Rights. **Revised Response:** Section 6.22 of the revised EIS assesses the effects of the Project on Aboriginal and Treaty Rights. For the purposes of the EIS, "Aboriginal and Treaty rights" are defined as the historic and current uses of lands and resources for traditional purposes by members of indigenous communities. Traditional land and resource use is discussed for each Indigenous community including both Wabauskang First Nation and Aboriginal People of Wabigoon in Section 5.13 of the revised EIS. This information was obtained from the engagement activities summarized in Section 9 and discussed in detail in Appendix DD of the revised EIS. The potential effects (including infringement) of the project on the valued components related to traditional land use are assessed as part of

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					Section 6.21 of the revised EIS. Valued Components (Section 6.1.3 of the revised EIS) were also chosen based on the shared information regarding traditional knowledge and traditional land use and included the following related to traditional land and resource use: • Gathering of plant material • Hunting and trapping • Fishing • Cultural and Spiritual Section 6.22 of the revised EIS summarizes the potential effects of the project on traditional land and resource uses of all local indigenous communities including both Wabauskang First Nation and Aboriginal People of Wabigoon. Traditional knowledge has also been incorporated into each subsection of Section 5 of the revised EIS, (i.e., climate, air quality, noise and light, geology, terrain and soil, geology, surface hydrology, aquatic resources, terrestrial resources, migratory birds, species at risk, and human environment). The information presented in Section 5 of the revised ES was essential to the effects assessment completed for Aboriginal peoples in Section 6.21 and specifically for each community in Section 6.22 of the revised EIS. As stated Treasury Metals acknowledges that the Project may potentially impact the traditional land and resource use within the Project area, and is committed to working with all communities to identify, mitigate, and avoid these respective aspects in addition to those aspects currently proposed within the EIS.
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. **Revised Response:** Mitigation measures for the potential impacts of the project on "traditional trapping, fishing, hunting, berry and medicinal plant collecting, timber harvesting, and potential land claims" which are collectively referred to as traditional land and resource use in the revised EIS, are provided in Section 6.21 of the revised EIS, and summarized specifically for Aboriginal People of Wabigoon I Section 6.22 of the revised EIS. Treasury Metals has revised the EIS to include the following key changes with respect to traditional knowledge and traditional land and resource use: • Traditional knowledge from all communities include Aboriginal People of Wabigoon, has been incorporated into each subsection of 5 i.e. climate, air quality, noise and light, geology, terrain and soil, geology, surface hydrology, aquatic resources, terrestrial

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					resources, migratory birds, species at risk, and human environment. • Section 9 has been revised to summarize all meaningful engagement, as well Appendix DD provides a revised detailed discussion of traditional knowledge and traditional land and recourse use. Engagement log records are also attached to Appendix DD. • The information presented in Section 5 of the revised ES was utilized in the effects assessment completed for Aboriginal peoples in Section 6.21 and specifically for each community including Aboriginal People of Wabigoon, in Section 6.22 of the revised EIS. The potential effects of the project on the valued components related to traditional land and resource use are assessed as part of Section 6.21 of the revised EIS. Specific valued components related to traditional land and resource use include: • Gathering of plant material • Hunting and trapping • Fishing • Cultural and Spiritual Treasury Metals has history of communications with the Aboriginal People of Wabigoon (APW) beginning in 2013. As of March 28, 2018 there have been 71 records of engagement with APW. These records focus on a Project information sharing, Project impact and effects, and overall meeting planning. Contacts have included telephone conversations, emails, letters, and in-person meetings. There have been 4 formal and informal meetings. Treasury Metals is committed to the continued engagement of all relevant stakeholders associated with the Goliath Gold Project. Treasury Metals is committed to working with the Aboriginal People of Wabgioon to capture the values and traditional aspects not currently captured within the design parameters of the Project and the incorporation on the federal and provincial environmental assessments, and subsequent engineering studies.
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 compensation plans is essential before this Project can be permitted to proceed. **Revised Response:** Treasury Metals has made overtures to each community including Grassy Narrows First Nation, and collated all biophysical and traditional values/land and recourse use information within the EIS to date. This information in turn has been sourced from engagement with Indigenous communities (open houses, presentations, meetings, calls, discussions), and secondary source information. All

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					information received via engagement has been formally captured within the Stakeholder Engagement Report which is included in the revised EIS as appendix DD and summarized in Section 9 of the revised EIS. As stated in Section 3.3.6 of Appendix DD, the Indigenous engagement report, Treasury Metals has history of communications with Grassy Narrows First Nation (GNFN) beginning in 2012. As of March 28, 2018 there have been 42 records of engagement with GNFN. These records focus on a drilling/exploration information, meeting planning efforts with Chief and Council and community open houses, and invitation to discuss the overall effects and impacts of the Project. Contacts have included telephone conversations, emails, letters, and in-person meetings. Treasury Metals has revised the EIS to include the following key changes with respect to traditional knowledge and traditional land and resource use: • Traditional knowledge obtained from various Indigenous communities including Grassy Narrows First Nation has been incorporated into each subsection of Section 5 (Existing Environment) i.e. 5.1 climate, 5.2 air quality, 5.3 noise and light, 5.4 geology, 5.5 terrain and soil, 5.6 hydrogeology, 5.7 surface hydrology, 5.8 aquatic resources, 5.9 terrestrial resources, 5.10 migratory birds, 5.11 species at risk, and 5.12 human environment. • Traditional land and resource use is discussed for each Indigenous community including Grassy Narrows First Nation in Section 5.13; • The information presented in Section 5 of the revised EIS was essential to the effects assessment completed for Aboriginal peoples in Section 6.21 and specifically for each community in Section 6.22 of the revised EIS. It was also essential as part of the valued component (VC) selection process outlined in Section 6.1.3 of the revised EIS. Based on the information shared with Treasury Metals by Grassy Narrows First Nation, it is Treasury Metals understanding that this community is specifically interested in the potential effects on the project on their ability to practice their traditional land and resource uses, This included but is not limited to potential effects on surface water quality, or surface water contamination. Treasury Metals has revised the EIS to reflect the valued traditional knowledge shared by Grassy Narrows First Nation and will continue to work with this community to ensure that any potential impacts of the project on their traditional land and resource use are properly mitigated.
367	AC(1)-41	Grand Council Treaty # 3 Grassy Narrows First Nation Eagle Lake 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:**

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		Métis Nation of Ontario Naotkamegwanning First Nation Wabigoon Lake Ojibway Nation Wabauskang First Nation			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. **Revised Response:** The updated EIS was revised so that it considers the traditional land and resource practices of indigenous community members such as those of the Naotkamegwanning First Nation both on and off the official First Nation reserve. Therefore, yes the revised EIS considers the Dryden area as part of the assessment of impacts on traditional hunting as well as other traditional land and resources use. Treasury Metals recognizes that Indigenous people including those part of the community of Naotkamegwanning First Nation live, work, hunt, fish, trap, and harvest throughout their lands and rely on them for their individual as well as their communities overall cultural, social, spiritual, physical, and economic well-being. Further to this Treasury recognizes that these lands are inextricably connected to a communities identify and culture, inclusive of ceremonial and spiritual recognition. Treasury in respect to this recognizes the importance of assessing any impact as it relates to traditional land use activities and practices. Treasury Metals acknowledges that the Project may impact these availability or practices within the Project area, and is committed to working with all communities to identify, mitigate, and avoid these respective aspects. Treasury Metals has made overtures to each community including Naotkamegwanning First Nation, and collated all biophysical and traditional values/land and recourse use information within the EIS to date. This information in turn has been sourced from engagement with Indigenous communities (open houses, presentations, meetings, calls, discussions), and secondary source information. All information received via engagement has been formally captured within the Aboriginal Engagement Report which is included in the revised EIS as appendix DD and summarized in Section 9 of the revised EIS. Treasury Metals has history of communications with Naotkamegwanning First Nation (Whitefish

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					Bay, WBFN) beginning in 2012. As of March 28, 2018 there have been 248 records of engagement with WBFN. These records focus on a number of areas including discussion regarding the Project including the predicted effects, meeting planning efforts with Chief and Council and community open houses, recent overtures regarding a commercial/business agreement, and community visits. Contacts have included telephone conversations, emails, letters, and in-person meetings. There have been 11 formal and informal meetings. Treasury Metals has revised the EIS to include the following key changes with respect to traditional knowledge and traditional land and resource use: • Traditional knowledge obtained from various Indigenous communities including Naotkamegwanning First Nation has been incorporated into each subsection of Section 5 (Existing Environment) i.e. 5.1 climate, 5.2 air quality, 5.3 noise and light, 5.4 geology, 5.5 terrain and soil, 5.6 hydrogeology, 5.7 surface hydrology, 5.8 aquatic resources, 5.9 terrestrial resources, 5.10 migratory birds, 5.11 species at risk, and 5.12 human environment. • Traditional land and resource use is discussed for each Indigenous community including Naotkamegwanning First Nation in Section 5.13; • The information presented in Section 5 of the revised EIS was essential to the effects assessment completed for Aboriginal peoples in Section 6.21 and specifically for each community in Section 6.22 of the revised EIS. It was also essential as part of the valued component (VC) selection process outlined in Section 6.1.3 of the revised EIS. Based on the information shared with Treasury Metals by Naotkamegwanning First Nation it is Treasury Metals understanding that this community is specifically interested in the potential effects on the project on their ability to practice their traditional land and resource uses, this included but is not limited to potential effects on surface water quality (including surface water contamination) and their ability to hunt on the land. Treasury Metals has revised the EIS to reflect the valued traditional knowledge shared by Naotkamegwanning First Nation and will continue to work with this community to ensure that any potential impacts of the project on their traditional land and resource use are properly mitigated.
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

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					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 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).

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					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 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

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					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 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.

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					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 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

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					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.
					Revised Response: It should be clearly understood that in the event of a cyanide spill into a waterway, there are generally no effective means by which the cyanide spill can be remediated or cleaned up, as per guidance provided in the Implementation Guidance for the International Cyanide Management Code. All emphasis must therefore be placed on strategies designed to prevent such an occurrence. In the event the cyanide is spilled on land, including near a watercourse, measures are available to either clean up the spilled material, or to neutralize it in the generic sense by oxidizing it with hypochlorite or hydrogen peroxide solutions, or chemically binding it with ferrous sulphate. The provision of such actions would be the responsibility of the licensed transporter, supported by the Mine. With respect to preventative measures, 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. The International Cyanide Code focuses exclusively on the safe management of cyanide that is produced, transported and used for the recovery of gold and silver, and on mill tailings and leach solutions. The Cyanide Code addresses production, transport, storage, and use of cyanide and the decommissioning of cyanide facilities. It also includes requirements related to financial assurance, accident prevention, emergency response, training, public reporting, stakeholder involvement and verification procedures. As cyanide is a controlled substance, cyanide producers and transporters are subject to the applicable portions of the Cyanide Code identified in their respective Verification Protocols.

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					Key Safeguards and Response Plans for the transport and handling of cyanide stated in the International Cyanide Code that Treasury has incorporated into the project include: 1. Production of cyanide to encourage responsible manufacture for the safety of the environment- Purchase cyanide from manufacturers employing appropriate practices and procedures to limit exposure of their workforce to cyanide and to prevent releases of cyanide to the environment. 2. Transportation for the protection of communities during transport- stablish clear lines of responsibility for safety, security, release prevention, training and emergency response in written agreements with producers, distributors and transporters. Require that cyanide transporters implement appropriate emergency response plans and capabilities, and employ adequate measures for cyanide management. 3. Handling and Storage to Protect workers and the environment- Design and construct unloading, storage and mixing facilities consistent with sound, accepted engineering practices and quality control and quality assurance procedures, spill prevention and spill containment measures. Operate unloading, storage and mixing facilities using inspections, preventive maintenance and contingency plans to prevent or contain releases and control and respond to worker exposures. 4. Operations- manage cyanide process solutions to protect human health and the environment- Implement management and operating systems designed to protect human health and the environment including contingency planning and inspection and preventive maintenance procedures. Introduce management and operating systems to minimize cyanide use, thereby limiting concentrations of cyanide in mill tailings.\ Implement a comprehensive water management program to protect against unintentional releases. Implement measures to protect birds, other wildlife and livestock from adverse effects of cyanide process solutions. Implement measures to protect fish and wildlife from direct and indirect discharges of cyanide process solutions to surface water. Implement measures designed to manage seepage from cyanide facilities to protect the beneficial uses of ground water. Provide spill prevention or containment measures for process tanks and pipelines. Implement quality control/quality assurance procedures to confirm that cyanide facilities are constructed according to accepted engineering standards and specifications. Implement monitoring programs to evaluate the effects of cyanide use on wildlife, surface and ground water quality. 5. Decommissioning for the protection of communities and the environment- Plan and implement procedures for effective decommissioning of cyanide facilities to protect human health and the environment. Establish an assurance mechanism capable of fully funding cyanide-related decommissioning activities. 6. Worker Safety- ensure that workers are not exposed to cyanide via identification of

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					exposure scenarios, monitoring of cyanide facilities, evaluations of health and safety protocols, and the development of emergency response plans in the event a worker is unintentionally exposed. 7. Emergency Response for the protection of communities and the environment through the development of emergency response strategies. Emergency response plans are incorporated into monitoring elements and remediation measures that account for the additional hazards of using cyanide treatment chemicals. 8. Training of workers and emergency personnel to manage cyanide in a safe and environmentally protective manner- Train workers to understand the hazards associated with cyanide use. Train appropriate personnel to operate the facility according to systems and procedures that protect human health, the community and the environment. Train appropriate workers and personnel to respond to worker exposures and environmental releases of cyanide 9. Dialogue and engagement with public and open disclosure- Provide stakeholders the opportunity to communicate issues of concern. Initiate dialogue describing cyanide management procedures and responsively address identified concerns. Make appropriate operational and environmental information regarding cyanide available to stakeholders. In the revised EIS, these safeguards and responses plans for safe handling and transport of cyanide are discussed in Table 4.3.1-1 of the Accidents and Malfunctions Section as well as in Section 12.5 Cyanide Management Plan.
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

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					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 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;

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					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 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

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					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 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

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					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. 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.

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					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. • 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.

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					• 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. **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			**Information Request / Comment:**

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		Ojibway Nation			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. 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

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					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. **Revised Response:** ELFN community members visited the site in 2013, as part of initial engagement efforts for the Project. Treasury Metals has specifically invited and maintained an open invitation to visit the site with ELFN in the time since then. Should the community members wish to arrange a second visit of the site, Treasury Metals would be pleased to help arrange such a visit.
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. **Revised Response:** Treasury Metals recognizes that Indigenous people live, work, hunt, fish, trap, and harvest throughout their lands and rely on them for their individual as well as their communities overall

<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>
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cultural, social, spiritual, physical, and economic well-being. Further to this Treasury recognizes that these lands are inextricably connected to a communities identify and culture, inclusive of ceremonial and spiritual recognition. Treasury in respect to this recognizes the importance of assessing any impact as it relates to traditional land use activities and practices. Treasury Metals acknowledges that the Project may impact these availability or practices within the Project area, and is committed to working with all communities to identify, mitigate, and avoid these respective aspects.
The revised EIS includes the following:
• Traditional knowledge obtained from various Indigenous communities has been incorporated into each subsection of Section 5 (Existing Environment) i.e. climate, air quality, noise and light, geology, terrain and soil, hydrogeology, surface hydrology, aquatic resources, terrestrial resources, migratory birds, species at risk, and human environment;
• Traditional land and resource use is discussed for each Indigenous community including in Section 5.13.3;
• The information presented in Section 5 of the revised EIS was essential to the effects assessment completed for Aboriginal peoples in Section 6.21 and specifically for each community in Section 6.22 of the revised EIS.
• All engagement activities to date are summarized in Section 9 of the revised EIS and provided in detail in Appendix DD. Engagement logs for all indigenous communities are attached to Appendix DD.

The following table shows show the EIS has been revised in response to each of the identified issues

<table>
<tr><td>IR Engagement Topic of Concern</td><td>Treasury Metals has revised the EIS to include the following key changes with respect to traditional knowledge and traditional land and resource use:</td></tr>
<tr><td>valued components;</td><td>Traditional knowledge obtained from engagement (Section 9) and summarized by disciplines in the sub-sections of Section 5 “Existing Environment”, as well as knowledge of traditional land and resource use (Section 5.13) were considered when selecting the valued components. For example as stated in Section 5.8.5, WLON shared with treasury that “Fishing continues to be a critical activity year-round, with pike and walleye being the preferred species, but other species taken as well”, and therefore in Section 6.1.3 6.1.3 Selection of Valued</td></tr>
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						Components (VCs) and Indicators, the individual fish species of walleye and pike were considered. The specific VCs for fish and fish habitat were then selected as: • Stream-resident fish population • Migratory fish populations • Lake-resident fish populations • Fish species-at-risk
					baseline studies;	Traditional knowledge with respect to baseline studies and baseline conditions obtained from various Indigenous communities has been incorporated into each subsection of Section 5 (Existing Environment) i.e. climate, air quality, noise and light, geology, terrain and soil, geology, surface hydrology, aquatic resources, terrestrial resources, migratory birds, species at risk, and human environment. If there was a discrepancy between a baseline study and the information obtained via traditional knowledge then it was appropriately discussed and considered in the effects assessment in 6.21.
					traditional knowledge and traditional land use;	Traditional knowledge obtained from various Indigenous communities has been incorporated into each subsection of Section 5 (Existing Environment) i.e. 5.1 climate, 5.2 air quality, 5.3 noise and light, 5.4 geology, 5.5 terrain and soil, 5.6 hydrogeology, 5.7 surface hydrology, 5.8 aquatic resources, 5.9 terrestrial resources, 5.10 migratory birds, 5.11 species at risk, and 5.12 human environment. A new section 5.13 has been added to the revised EIS to capture the existing environment specific to the Indigenous communities. 5.13.3 discusses the traditional land and resource use of each indigenous community. Traditional knowledge and traditional land use were used in the effects assessment on Aboriginal Peoples (Section 6.21 of the revised EIS) and the potential effects of the project on the ability of each Indigenous community to practice their traditional uses

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						of the land is summarized in Section 6.22 of the revised EIS.
					potential impacts to Aboriginal and Treaty rights;	For the purposes of the EIS, Aboriginal and Treaty Rights are defined as the historic and current uses of lands and resources for traditional purposes by members of Indigenous communities. It is Treasury Metals' understanding that Aboriginal peoples are entitled to access to their lands according to their Aboriginal and Treaty #3 (1873) Rights, and Treasury Metals is committed to working with the Indigenous communities to ensure that the effects of the project on their traditional land and resource use or "aboriginal and treaty rights" are appropriately considered and protected. Section 5.13.3 "Traditional Land and Resource Use" includes all information shared by the Indigenous communities with Treasury Metlas with respect to Aboriginal and Treaty Rights. Traditional knowledge and traditional land use were used in the effects assessment on Aboriginal Peoples (Section 6.21 of the revised EIS) and the potential effects of the project on the ability of each Indigenous community to practice their traditional uses of the land is summarized in Section 6.22 of the revised EIS.
					potential environmental effects;	The potential effects of the project on Aboriginal People is presented in Section 6.21 of the revised EIS. The effects assessment is built on the Traditional Knowledge and Traditional Land and Resource information shared with Treasury Metals as presented in Sections 5.1 through 5.13 via the various engagement activities,
					mitigation measures; and	6.21.5 specifically identifies the mitigation measures for effects of the project on Aboriginal people. Treasury Metals is committed to continuing to engagement with the Indigenous communities to ensure that potential effects of the project on their traditional uses of the land is appropriately considered and mitigated against (Section 6.22)
					monitoring program.	To ensure that Indigenous communities most affected by the Project have input into the effectiveness of the Environmental Management Plans and Follow-up Monitoring Programs, Treasury Metals proposes to form an Environmental Management Committee. Details of this committee are provided

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					in Section 12.22 of the revised EIS. This committee would be made up of members from Indigenous communities and would meet with representatives from Treasury Metals on a to-be-determined basis, possibly quarterly or at least semi-annually. Treasury Metals would present any reportable information on the management plans as well as the results of the follow-up programs. If exceedances or issues arise that show mitigation measures have not been as effective as expected, the potential for further actions would be discussed with the committee. The Environmental Management Committee would also provide a forum for discussing other environmental matters with the potentially affected Indigenous communities such as upcoming permits, additional TK that might have been collected since completion of the EA process, and any other environmental matters of relevance to the committee including financial support for operation of the committee.
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 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

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					not done, any future engagement will ultimately be meaningless and superficial because of the underlying deficiencies within the EIS.
					Revised Response: Treasury Metals has made overtures to each community including Métis Nation of Ontario and collated all biophysical and traditional values/land and recourse use information within the EIS to date. This information in turn has been sourced from engagement with Indigenous communities (open houses, presentations, meetings, calls, discussions), and secondary source information. All information received via engagement has been formally captured within the Stakeholder Engagement Report which is included in the revised EIS as appendix DD and summarized in Section 9 of the revised EIS. Treasury Metals as part of the responsible development of the Project as of December 18, 2017 announced that it has entered into a Memorandum of Understanding (MOU) with the MNO in relation to the Project. The MOU is a framework agreement with the MNO – including the Atikokan Métis Community Council, the Kenora Métis Community Council, the Northwest Métis Community Council and the Sunset Country Métis Community Council which represent the regional rights-bearing Métis communities (the "Métis Community") in the Treaty #3 area, including, the Métis traditional territories of Lake of the Woods, Lac Seul, Rainy River and Rainy Lake. This MOU is designed to foster a cooperative and productive ongoing relationship between the MNO and Treasury Metals and to assess any potential impacts of the Project on the MNO citizens. The MOU also provides the Métis Community with an opportunity to participate in the Project through employment, training and business development and ongoing consultation of key aspects of both the relationship and Project. Further to this the MOU document provides the framework of a TKLUS. The TKLUS is currently underway with TK aspects to be considered as part of the Projects development Contacts have included telephone conversations, emails, letters, and in-person meetings. Treasury Metals has revised the EIS to include the following key changes with respect to traditional knowledge and traditional land and resource use: • Traditional knowledge obtained from various Indigenous communities has been incorporated into each subsection of Section 5 (Existing Environment) i.e. 5.1 climate, 5.2 air quality, 5.3 noise and light, 5.4 geology, 5.5 terrain and soil, 5.6 hydrogeology, 5.7 surface hydrology, 5.8 aquatic resources, 5.9 terrestrial resources, 5.10 migratory birds,5.11 species at risk, and 5.12 human environment; • Traditional land and resource use is discussed for each Indigenous community including in Section 5.13.3; • The information presented in Section 5 of the revised EIS was essential to the effects assessment completed for Aboriginal peoples in Section 6.21 and specifically for each community in Section 6.22 of the revised EIS. It was also essential to the selection of

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					valued components (VCs) as discussed in Section 6.1.3 of the revised EIS. • All engagement activities to date are summarized in Section 9 of the revised EIS and provided in detail in Appendix DD. Engagement logs for all indigenous communities are attached to Appendix DD. Based on the information shared with Treasury Metals by Métis Nation of Ontario, it is Treasury Metals understanding that this community is specifically interested in the potential effects on the project on their ability to practice their traditional land and resource uses, This included but is not limited to potential effects on surface water quality, and terrestrial resources. Treasury Metals has revised the EIS to reflect the valued traditional knowledge shared Métis Nation of Ontario and will continue to work with this community to ensure that any potential impacts of the project on their traditional land and resource use are properly mitigated. Based on the traditional knowledge and traditional land and resource use knowledge shared by all Indigenous communities including the by Métis Nation of Ontario to-date, the additional information obtained from the traditional knowledge/land use study (TKLUS) is not anticipated to result in substantial changes to the EIS, given the conservative approach already employed in the assessment of the effects of the project on Indigenous communities. Treasury Metlas welcomes ongoing engagement and information with respect to traditional land and resource use and traditional knowledge.
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 made overtures to each community including Métis Nation of Ontario and collated all biophysical and traditional values/land and recourse use information within the EIS to date. This information in turn has been sourced from engagement with Indigenous communities (open houses, presentations, meetings, calls, discussions), and secondary source information. All information received via engagement has been formally captured within the Stakeholder Engagement Report which is included in the revised EIS as appendix DD and summarized in Section 9 of the revised EIS. Treasury Metals as part of the responsible development of the Project as of December 18, 2017 announced that it has entered into a Memorandum of Understanding (MOU) with the MNO in relation to the Project. The MOU is a framework agreement with the MNO – including the Atikokan Métis Community Council, the Kenora Métis Community Council, the Northwest Métis Community Council and the Sunset Country Métis Community Council which represent the regional rights-bearing Métis communities (the "Métis Community") in the Treaty #3 area, including, the Métis traditional territories of Lake of the Woods, Lac Seul, Rainy River and Rainy Lake. This MOU is

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					designed to foster a cooperative and productive ongoing relationship between the MNO and Treasury Metals and to assess any potential impacts of the Project on the MNO citizens. The MOU also provides the Métis Community with an opportunity to participate in the Project through employment, training and business development and ongoing consultation of key aspects of both the relationship and Project. Further to this the MOU document provides the framework of a TKLUS. The TKLUS is currently underway with TK aspects to be considered as part of the Projects development Contacts have included telephone conversations, emails, letters, and in-person meetings. Treasury Metals has revised the EIS to include the following key changes with respect to traditional knowledge and traditional land and resource use: • Traditional knowledge obtained from various Indigenous communities has been incorporated into each subsection of Section 5 (Existing Environment) i.e. 5.1 climate, 5.2 air quality, 5.3 noise and light, 5.4 geology, 5.5 terrain and soil, 5.6 hydrogeology, 5.7 surface hydrology, 5.8 aquatic resources, 5.9 terrestrial resources, 5.10 migratory birds,5.11 species at risk, and 5.12 human environment; • Traditional land and resource use is discussed for each Indigenous community including in Section 5.13.3; • The information presented in Section 5 of the revised EIS was essential to the effects assessment completed for Aboriginal peoples in Section 6.21 and specifically for each community in Section 6.22 of the revised EIS. It was also essential to the selection of valued components (VCs) as discussed in Section 6.1.3 of the revised EIS. • All engagement activities to date are summarized in Section 9 of the revised EIS and provided in detail in Appendix DD. Engagement logs for all indigenous communities are attached to Appendix DD. Based on the information shared with Treasury Metals by Métis Nation of Ontario, it is Treasury Metals understanding that this community is specifically interested in the potential effects on the project on their ability to practice their traditional land and resource uses, This included but is not limited to potential effects on surface water quality, and terrestrial resources. Treasury Metals has revised the EIS to reflect the valued traditional knowledge shared Métis Nation of Ontario and will continue to work with this community to ensure that any potential impacts of the project on their traditional land and resource use are properly mitigated. Based on the traditional knowledge and traditional land and resource use knowledge shared by all Indigenous communities including the by Métis Nation of Ontario to-date, the additional information obtained from the traditional knowledge/land use study (TKLUS) is not anticipated to result in substantial changes to the EIS, given the conservative approach already employed in the assessment of the effects of the project on Indigenous communities. Treasury Metlas welcomes

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					ongoing engagement and information with respect to traditional land and resource use and traditional knowledge.
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. **Revised Response:** TK/TLU studies are not the only way of obtaining traditional knowledge and land use of Indigenous communities and Treasury Metals continues to engage these communities to elicit this information. All information gained from engagement with Indigenous communities has been, incorporated throughout the EIS. Treasury Metals agrees that traditional knowledge and land use studies are an efficient way of capturing Indigenous community knowledge about the Project area as well as understand how the Project may impact Aboriginal and Treaty Rights. We welcome the opportunity to discuss ways to accommodate traditional land uses through the detailed design of the project and environmental approvals processes. Treasury Metals remains committed to continued engagement with all of these communities to identify ways they can participate in the process. It is Treasury Metal's understanding that Intervenor funding was available through the Agency to be accessed by each of these Indigenous communities as part of the EA process for technical review. If this was not the case, these communities will need to bring their concerns to the Agency.
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 **Revised Response:** Appendix DD, the Indigenous Stakeholder Report provides the details of all engagement activities

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					completed with Grassy Narrows First Nation to-date. Treasury Metals has history of communications with Grassy Narrows First Nation (GNFN) beginning in 2012. As of March 28, 2018 there have been 42 records of engagement with GNFN. These records focus on a drilling/exploration information, meeting planning efforts with Chief and Council and community open houses, and invitation to discuss the overall effects and impacts of the Project. Contacts have included telephone conversations, emails, letters, and in-person meetings. A. Treasury Metals recognizes that Indigenous people including those part of the community of the Grassy Narrows First Nation live, work, hunt, fish, trap, and harvest throughout their lands and rely on them for their individual as well as their communities overall cultural, social, spiritual, physical, and economic well-being. Further to this Treasury recognizes that these lands are inextricably connected to a communities identify and culture, inclusive of ceremonial and spiritual recognition. Treasury in respect to this recognizes the importance of assessing any impact as it relates to traditional land use activities and practices. Treasury Metals acknowledges that the Project may impact these availability or practices within the Project area, and is committed to working with all communities to identify, mitigate, and avoid these respective aspects. Treasury Metals has made overtures to each community including Grassy Narrows First Nation, and collated all biophysical and traditional values/land use information within the EIS to date. This information in turn has been sourced from engagement with Indigenous communities (open houses, presentations, meetings, calls, discussions), and secondary source information. Treasury Metals as part of the responsible development of the Goliath Project has sought out meaningful input speaking to impacts, and current aspects of designed mitigation associated with the Project. The information was sought out in the way of multiple requests for meetings to present to the effects of the Project as well as ensuring that GNFN has all up to date information regarding the EIS including all draft IR responses, EIS documents and any supporting information has been delivered to GNFN for review. Treasury Metals continues to reach out to Grassy Narrows First Nation to solicit comment on the Project from the community. Treasury notes that it has forwarded on all information packages in good faith to GNFN to ensure the community is informed of current undertakings and the evolution of the environmental process. As part of the EIS process GNFN has been provided funds for participation in the EIS review by the Federal government and has subsequently returned comments following the review of the Original EIS. Treasury has given draft responses to each of these comments in a disaggregated form to GNFN for review. B. Treasury Metals as part of the responsible development of the Goliath Project has sought out meaningful input speaking to impacts, and current aspects of designed mitigation associated with the Project. Treasury Metals continues to reach out to Grassy Narrows First Nation to speak to the community, in addition to Chief and Council as it relates to the mitigation strategies for the Project. In the revised EIS Treasury Metals has considered all traditional knowledge and traditional land use information shared by the Indigenous communities including Grassy Narrows First Nation in Section 6.21 of the revised EIS the assessment of the effects of the project and proposed mitigation

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					measures. This is summarized in Section 6.22 of the revised EIS to be specific to each community. Treasury Metals recognizes that for some community's the project may have a potential effect on their traditional use of the land and Treasury Metals is committed to appropriately mitigating those potential effects. C. Treasury Metals has forwarded on all information packages in good faith to GNFN to ensure the community is informed of current undertakings and the evolution of the environmental process. Due to lack of response to packages Treasury Metals continues outreach efforts to Grassy Narrows First Nation to hold meetings with Chief and Council and also the community. As part of this Treasury has proposed a community open house, to speak to not only the Project but traditional usages within the Project area. D. Treasury Metals has endeavored to provide economic and business opportunities as part of the development of the Project. Further to this Treasury Metals is open to commercial arrangements as part of development speaking to communication protocols, operational aspects, sharing benefits and business opportunities. E. Treasury Metals has made overtures to each community including Grassy Narrows First Nation, and collated all biophysical and traditional values/land use information within the EIS to date. This information in turn has been sourced from engagement with Indigenous communities (open houses, presentations, meetings, calls, discussions), and secondary source information. Treasury Metals as part of the responsible development of the Goliath Project has sought out meaningful input speaking to impacts, and current aspects of designed mitigation associated with the Project. Treasury Metals continues to reach out to Grassy Narrows First Nation to solicit comment on the Project from the community, and sees engagement as a long-term commitment and on-going forum to ensure meaningful input into not only the initial EA process, but the long-term operation of the Project. Furthermore, as per Section 12.22 of the revised EIS, Treasury Metals would like to engage Indigenous communities long term and as part of this include them in an environmental management committee.
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. **Revised Response:** Treasury Metals has made overtures to each Indigenous community including Eagle Lake First Nation and collated all biophysical and traditional values/land and recourse use information within the EIS to date. This information in turn has been sourced from engagement with Indigenous communities (open houses, presentations, meetings, calls, discussions), and secondary source

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					information. All information received via engagement has been formally captured within the Stakeholder Engagement Report which is included in the revised EIS as appendix DD and summarized in Section 9 of the revised EIS. The revised EIS includes the following: • Traditional knowledge obtained from various Indigenous communities including Eagle Lake First Nation has been incorporated into each subsection of Section 5 (Existing Environment) i.e. climate, air quality, noise and light, geology, terrain and soil, hydrogeology, surface hydrology, aquatic resources, terrestrial resources, migratory birds, species at risk, and human environment; • Traditional land and resource use is discussed for each Indigenous community including Eagle Lake First Nation has been discussed in Section 5.13.3; • The information presented in Section 5 of the revised EIS was essential to the effects assessment completed for Aboriginal peoples in Section 6.21 and specifically for each community in Section 6.22 of the revised EIS. It was also essential to the selection of VCs discussed din Section 6.1.3 of the revised EIS. • All engagement activities to date are summarized in Section 9 of the revised EIS and provided in detail in Appendix DD. Engagement logs for all indigenous communities are attached to Appendix DD. Based on the information shared with Treasury Metals by Eagle Lake First Nation, it is Treasury Metals understanding that this community is specifically interested in the potential effects on the project on their ability to practice their traditional land and resource uses, This included but is not limited to potential effects on surface water quality, and terrestrial resources. Treasury Metals has revised the EIS to reflect the valued traditional knowledge shared by Eagle Lake First Nation and will continue to work with this community to ensure that any potential impacts of the project on their traditional land and resource use are properly mitigated. As stated in Section 3.3.2 of Appendix DD, the Indigenous engagement report, Treasury Metals has history of communications with ELFN beginning in 2009. As of March 28, 2018 there have been 288 records of engagement with ELFN. These records focus on a number of areas including discussion regarding the Project including effects, inquiries from the community and ELFN staff as part of open houses and discussions, recent overtures regarding a business agreement (MOU), and overall meeting planning efforts. Contacts have included telephone conversations, emails, letters, and in-person meetings. There have been 16 formal and informal meetings. Treasury Metals is committed to working with all designated and regional communities to echo the values of Indigenous stakeholders within the design parameters of the Project and the incorporation on the federal and provincial environmental assessments, and subsequent engineering studies.
393	AC(1)-68	Wabigoon Lake			**Information Request / Comment:**

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		Ojibway Nation			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 believe the Project has been approved.
					Revised Response: Treasury Metals is committed to its ongoing engagement with local Indigenous communities, including Wabigoon Lake Ojibway Nation (WLON). As part of the engagement efforts, Treasury Metals has been keeping an up-to date log of all engagement related activities with all Indigenous communities surrounding the Project. The engagement log for all engagement related activities between Treasury Metals and WLON is attached to these responses (TMI_393-AC(1)-68_Attachment 1). Additionally, Section 9 of the EIS has been substantially revised to reflect the ongoing engagement efforts since the original submission. With respect to information requests from WLON, as well as other Indigenous communities, Treasury Metals has endeavored to provide comprehensive responses to all requests in a timely manner. Treasury Metals are not specifically aware of the information request the reviewer is referencing, and do not have a record of the requested in their engagement logs. No slight was intended with respect to the requested information and Treasury Metals will be happy to respond to the specific questions related to the "clarification on impacts to water on March 28, 2013" if the reviewer would re-issue the request. Treasury Metals were made aware of the recommendation to undertake cultural awareness training, and arranged for their staff, including personal from corporate, to complete a cultural awareness training program given by Lyndon Linklater on October 25, 2017. Lyndon Linklater is a noted speaker on the subjects of cultural awareness, treaties and First Nations people. The training focused on culture, traditions, and history of the Indigenous people of Canada, and Treaty 3. Treasury Metals are also open to incorporating some aspects of cultural sensitivity into the orientation provided to all workers and visitors to the site. Treasury Metals have endeavored to make the EIS factually correct and scientifically sound. The EIS has been revised in response to the Round 1 information requests, and has used the opportunity to address sections where members of Indigenous communities raised concerns regarding consistency and accuracy. Treasury Metals is committed to working with the Indigenous Communities and in no way wishes to mislead any individual with this respect to any aspect of the project including approvals.
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

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					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 square kilometers of Treaty 3 lands are demonstrative of the lack of meaningful engagement with First Nations.
					Revised Response: Treasury Metals has made overtures to each community including Grassy Narrows First Nation, and collated all biophysical and traditional values/land and recourse use information within the EIS to date. This information in turn has been sourced from engagement with Indigenous communities (open houses, presentations, meetings, calls, discussions), and secondary source information. All information received via engagement has been formally captured within the Stakeholder Engagement Report which is included in the revised EIS as appendix DD and summarized in Section 9 of the revised EIS. Treasury Metals has revised the EIS to include the following key changes with respect to traditional knowledge and traditional land and resource use: • Traditional knowledge obtained from various Indigenous communities including Grassy Narrows First Nation has been incorporated into each subsection of Section 5 (Existing Environment) i.e. 5.1 climate, 5.2 air quality, 5.3 noise and light, 5.4 geology, 5.5 terrain and soil, 5.6 hydrogeology, 5.7 surface hydrology, 5.8 aquatic resources, 5.9 terrestrial resources, 5.10 migratory birds, 5.11 species at risk, and 5.12 human environment. • Traditional land and resource use is discussed for each Indigenous community including Grassy Narrows First Nation in Section 5.13; • The information presented in Section 5 of the revised EIS was essential to the effects assessment completed for Aboriginal peoples in Section 6.21 and specifically for each community in Section 6.22 of the revised EIS. It was also essential as part of the valued component selection process outlined in Section 6.1.3 of the revised EIS. Based on the information shared with Treasury Metals by Grassy Narrows First Nation, it is Treasury Metals' understanding that this community is specifically interested in the potential effects on the project on their ability to practice their traditional land and resource uses, This included but is not limited to potential effects on surface water quality, or surface water contamination. Treasury Metals has revised the EIS to reflect the valued traditional knowledge shared by Grassy Narrows First Nation and will continue to work with this community to ensure that any potential impacts of the project on their traditional land and resource use are properly mitigated. Treasury is committed to continued engagement with all indigenous communities to ensure that any potential effect of the project on their ability to practice their traditional use of the land is sufficiently off-set and that it does not have a meaningful impact on their traditional uses of the land. Based on

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					the current amount of traditional land and recourse information nad traditional knowledge information shared with Treasury Metals by the various Indigenous communities, it is Treasury's opinion that it would not cause substantial changes to the findings presented in the revised EIS. With respect to: Annex B – Goliath Gold Project IR-1 Companion Sheet, As stated in Section 3.3.6 of Appendix DD, the Indigenous engagement report, Treasury Metals has history of communications with Grassy Narrows First Nation (GNFN) beginning in 2012. As of March 28, 2018 there have been 42 records of engagement with GNFN. These records focus on a drilling/exploration information, meeting planning efforts with Chief and Council and community open houses, and invitation to discuss the overall effects and impacts of the Project. Contacts have included telephone conversations, emails, letters, and in-person meetings.
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

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					Treaty rights. **Revised Response:** Treasury Metals has received the Engagement and Accommodation Protocol from Wabauskang First Nation, as part of engagement activities. This document has been considered and Treasury Metals has moved forward as part of engagement activities with in-person meetings with Council, in addition to open house presentation directly relating to Project related impacts, effects, and changes to the Project as a result of engagement. Treasury Metals has made overtures to each community including Wabauskang First Nation First Nation, and collated all biophysical and traditional values/land and recourse use information within the EIS to date. This information in turn has been sourced from engagement with Indigenous communities (open houses, presentations, meetings, calls, discussions), and secondary source information. All information received via engagement has been formally captured within the Stakeholder Engagement Report which is included in the revised EIS as appendix DD and summarized in Section 9 of the revised EIS. As per Section 3.3.4, Treasury Metals has history of communications with Wabauskang First Nation beginning in 2012. As of March 28, 2018 there have been 164 records of engagement with WFN. These records focus on a number of areas including discussion regarding the Project including the predicted effects, meeting planning efforts with Chief and Council with community liaison personnel, and community visits. Contacts have included telephone conversations, emails, letters, and in-person meetings. There have been 10 formal and informal meetings. WFN has noted as part of discussions with Council that they will directly support and respect the decision making of WLON, and ELFN. Treasury Metals has revised the EIS to include the following key changes with respect to traditional knowledge and traditional land and resource use: • Traditional knowledge obtained from various Indigenous communities including Wabauskang First Nation First Nation has been incorporated into each subsection of Section 5 (Existing Environment) i.e. 5.1 climate, 5.2 air quality, 5.3 noise and light, 5.4 geology, 5.5 terrain and soil, 5.6 hydrogeology, 5.7 surface hydrology, 5.8 aquatic resources, 5.9 terrestrial resources, 5.10 migratory birds, 5.11 species at risk, and 5.12 human environment. • Traditional land and resource use is discussed for each Indigenous community including Wabauskang First Nation First Nation in Section 5.13; • The information presented in Section 5 of the revised EIS was essential to the effects assessment completed for Aboriginal peoples in Section 6.21 and specifically for each community in Section 6.22 of the revised EIS. It was also essential as part of the valued

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					component (VC) selection process outlined in Section 6.1.3 of the revised EIS. Based on the information shared with Treasury Metals by Wabauskang First Nation, it is Treasury Metals understanding that this community is specifically interested in the potential effects on the project on their ability to practice their traditional land and resource uses, This included but is not limited to potential effects on surface water quality, or surface water contamination. It is Treasury Metals' understanding that members of the Wabauskang First Nation traditionally use the land for hunting and trapping, fishing and for cultural purposes. Treasury Metals has revised the EIS to reflect the valued traditional knowledge shared by Wabauskang First Nation and will continue to work with this community to ensure that any potential impacts of the project on their traditional land and resource use are properly mitigated.
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 • Identify impacts to community after mine closure.

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					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 proposed changes to the various regulations that will apply to the Project. Treasury Metals has

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					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.
403	AC(1)-78	Eagle Lake First			**Information Request / Comment:**

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		Nation Wabigoon Lake Ojibway Nation			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. **Revised Response:** Since the filing of the original EIS the company has released an additional Preliminary Economic Assessment that updates the economics with current (as of March, 2017) commodity prices and other market factors. The Net Present Value of the project was significantly improved to an estimated $306 million. 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. These studies will include detailed risk assessments for failures and methodologies such that appropriate factors of safety can be incorporated into the project design. These design elements along with the proper operational procedures are key to ensuring the safe operation of the Project such that a catastrophic failure is avoided altogether. Further to the aforementioned mitigation measures the company will be expected to carry reasonable insurance for operational failures. This is in line with industry standard practice for other mine and mine projects. It is also expected that should the mine project create sufficient value and the decision to proceed to construction and operational phases is made, the company will be in an adequate financial position to cover any such failures.
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.

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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 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		**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

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			Effects on Hunting and Trapping EIS, Section 2.2.1.2 Alternatives Assessment Approach		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 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		**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

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			Groups		instead subject to a Class EA. **Revised Response:** MNRF's Class EA requirements are defined in the document "*A Class Environmental Assessment for MNR Resource Stewardship and Facility Development Projects"* (MNR 2003). The MNRF Class EA process applies to projects where MNRF is either the proponent, or disposes of rights to Crown resources through the *Public Lands Act,* the *Crown Forest Sustainability Act,* the *Lakes and Rivers Improvement Act,* or other legislation. The Class EA for MNRF projects can be carried out at three levels, depending on anticipated environmental effects associated with the disposition of Crown resources: • A – potential for low negative effects and/or public/agency concern; • B – potential for low to medium negative effects and/or public/agency concern; or • C – potential for medium to high negative effects and/or public/agency concern. MNRF has not as yet provided guidance to Treasury Metals as to the level required. It is anticipated that the MNRF Class EA for the Project would be carried out at the Category B or C level. The requirements for consultation per MNR (2003) for these levels is as follows: • Category B level Class EAs require, in the following specific order: a Public Notice, likely some form of more direct engagement with Aboriginal communities and potentially other stakeholders (e.g., an open house), a Notice of Completion, an environmental Screening Report, and a Statement of Completion. • Category C EAs, in addition to the above, require preparation of a draft and final Environmental Study Report (ESR), with stakeholders given the opportunity to inspect the draft ESR, and potentially the final ESR depending on the level of interest and concern expressed during review of the draft ESR. For Category B and C Class EAs, MNRF may require the proponent to carryout pre-consultation activities to inform the Project Evaluation in the case of a Category B Class EA, or to inform the preparation of the draft ESR in the case of Category C projects. It is anticipated that information gathered as part of Traditional Knowledge study that is currently ongoing with MNO will help to inform the engagement process for the Provincial Class EAs as required.
409	AC(1)-84	MNO	Environmental Impact Statement Executive Summary 4.1.4 Railway		**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:** 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

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					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. **Revised Response:** In the revised EIS, Figure 5.9.4-1: Current and Historic Beaver Activity provides the information requested by the MNO. This figure is provided attached to this IR as TMI_410-AC(1)-85_Attachment _1. In the EIS, effects of the Project on beavers are assessed using the "wildlife and wildlife habitat" valued component with beaver as an indicator. The Executive summary has also been updated in the revised EIS to reflect this. Due to the concerns and requests for additional information on beaver and beaver dam removal identified through the engagement process, beaver has been added as an indicator to the furbearers valued component under the wildlife and wildlife habitat effects assessment (Section 6.12 of the revised EIS). This ensures that any effects to this species, identified by a number of Indigenous communities as a specific concern, is directly captured under the effects assessment. Additionally, the Wildlife and Wildlife Follow-up Program (Section 13.12 of the revised EIS) and Wildlife Management Plans (Section 12.9 of the revised EIS), which will include the removal of beaver and beaver dams from the Project site has not been finalized. Treasury Metals plans to engage and consult the local trapping council, Indigenous communities and the Ontario Ministry of Natural Resources and Forestry (MNRF) to prepare and plan for beavers and wildlife encounters. The Wildlife Management Plan will serve as the basis of this engagement, and will evolve to reflect regulatory and Aboriginal perspectives in wildlife management for the Project. Some examples of what might be in the Wildlife Management Plan include protocols for identifying beaver in the area of the Project, contact information of the trapper who owns the trapline the beaver was found in, and procedures for removing beaver dams once the beaver has been removed. Treasury Metals cannot speak to the perspective of Aboriginal peoples and their requests for managing and monitoring beaver, which is why Treasury Metals plans to consult with Indigenous communities to include their perspectives into the Wildlife Management Plan (Section 12.9 of the revised EIS) and Wildlife and Wildlife Habitat Follow-up Program (Section 13.12 of the revised EIS). It would also be inappropriate to detail both the follow-up program and the management plans without first discussing this with Indigenous communities.
411	AC(1)-86	MNO	Environmental		**Information Request / Comment:**

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			Impact Statement Executive Summary 4.5.2 Pipelines		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 Statement Executive Summary 4.13.3 Stockpiles		**Information Request / Comment:** MNO requires additional information on the specific progressive rehabilitation that is proposed for 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,		**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."

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			Pipelines and Power Distribution		**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 Impact Statement Executive Summary 4.14 In-Design Mitigation	11.2 Measures to address impacts on Aboriginal Rights	**Information Request / Comment**: 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.
					Revised Response: Treasury Metals has made overtures to each community including Métis Nation of Ontario and collated all biophysical and traditional values/land and recourse use information within the EIS to date. This information in turn has been sourced from engagement with Indigenous communities (open houses, presentations, meetings, calls, discussions), and secondary source information. All information received via engagement has been formally captured within the Stakeholder Engagement Report which is included in the revised EIS as appendix DD and summarized in Section 9 of the revised EIS. As stated in Section 3.2.8 of Appendix DD, the Indigenous engagement report, Treasury Metals has history of communications with the Métis Nation of Ontario (MNO) beginning in 2009. As of March 28, 2018 there have been 326 records of engagement with MNO. Treasury Metals as part of the responsible development of the Project as of December 18, 2017 announced that it has entered into a Memorandum of Understanding (MOU) with the MNO in relation to the Project. The MOU is a framework agreement with the MNO – including the Atikokan Métis Community Council, the Kenora Métis Community Council, the Northwest Métis Community Council and the Sunset Country Métis Community Council which represent the regional rights-bearing Métis communities (the "Métis Community") in the Treaty #3 area, including, the Métis traditional territories of Lake of the Woods, Lac Seul, Rainy River and Rainy Lake. This MOU is designed to foster a cooperative and productive ongoing relationship between the MNO and Treasury Metals and to assess any potential impacts of

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					the Project on the MNO citizens. The MOU also provides the Métis Community with an opportunity to participate in the Project through employment, training and business development and ongoing consultation of key aspects of both the relationship and Project. Further to this the MOU document provides the framework of a TKLUS. The TKLUS is currently underway with TK aspects to be considered as part of the Projects development Contacts have included telephone conversations, emails, letters, and in-person meetings. There have been 7 formal meetings. The MOU also provides the Métis Community with an opportunity to participate in the Project through employment, training and business development and ongoing engagement of key aspects of both the relationship and Project. This engagement is inclusive of the in-design mitigation features as they directly relate to potential impacts to the Métis way-of-life and values identified in the TK/TLU within the Project area. It is Treasury Metals' intent to work with MNO to incorporate, mitigate, and avoid the values identified during this study as part of the EA process, but also the development of the Project. Treasury Metals has revised the EIS to include the following key changes with respect to traditional knowledge and traditional land and resource use: • Traditional knowledge obtained from various Indigenous communities has been incorporated into each subsection of Section 5 (Existing Environment) i.e. 5.1 climate, 5.2 air quality, 5.3 noise and light, 5.4 geology, 5.5 terrain and soil, 5.6 hydrogeology, 5.7 surface hydrology, 5.8 aquatic resources, 5.9 terrestrial resources, 5.10 migratory birds,5.11 species at risk, and 5.12 human environment; • Traditional land and resource use is discussed for each Indigenous community including in Section 5.13.3; • The information presented in Section 5 of the revised EIS was essential to the effects assessment completed for Aboriginal peoples in Section 6.21 and specifically for each community in Section 6.22 of the revised EIS. It was also essential to the selection of valued components (VCs) as discussed in Section 6.1.3 of the revised EIS. • All engagement activities to date are summarized in Section 9 of the revised EIS and provided in detail in Appendix DD. Engagement logs for all indigenous communities are attached to Appendix DD. Based on the information shared with Treasury Metals by Métis Nation of Ontario, it is Treasury Metals understanding that this community is specifically interested in the potential effects on the project on their ability to practice their traditional land and resource uses, From the engagement activities completed to date traditional land and resource uses include harvesting/gathering of plants, trapping of beaver, hunting of moose, and fishing. Treasury Metals has revised the EIS to reflect the valued traditional knowledge shared Métis Nation of Ontario and will continue to work with this community to ensure that any potential impacts of the project on their traditional land and

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					resource use are properly mitigated. Based on the traditional knowledge and traditional land and resource use knowledge shared by all Indigenous communities including the by Métis Nation of Ontario to-date, the additional information obtained from the traditional knowledge/land use study (TKLUS) is not anticipated to result in substantial changes to the EIS, given the conservative approach already employed in the assessment of the effects of the project on Indigenous communities. Treasury Metals welcomes ongoing engagement and information it will further the understanding of traditional land and recourse use and assist in ongoing monitoring and mitigation of potential effects with respect to the project.
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. **Revised Response:** The mitigation measures that have been developed and listed in Tables 6.23-1 through 6.23-20 of the revised EIS were not specific to private land or crown land. In compiling the mitigation measures for Project related effects, it was the focus of Treasury Metals to minimize all Project effects as much as feasible regardless of whether the effect was on private land or Crown land. It was an oversight to distinguish mitigation measures based on the land ownership with which they affected and this has been rectified in the revised EIS. The mitigation measure that the reviewer is referring to has been revised to more accurately describe the mitigation measure proposed, which states "Project design incorporates a compact footprint" (Mit_050). Treasury Metals feels this mitigation measure more accurately reflects the mitigation proposed.
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. **Revised Response:** Treasury Metals as part of the responsible development of the Project as of December 18, 2017 announced that it has entered into a Memorandum of Understanding (MOU) with the MNO in relation to the Project. The MOU is a framework agreement with the MNO – including the Atikokan Métis Community Council, the Kenora Métis Community Council, the Northwest Métis Community Council and the Sunset Country Métis Community Council which represent the regional rights-

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					bearing Métis communities (the "Métis Community") in the Treaty #3 area, including, the Métis traditional territories of Lake of the Woods, Lac Seul, Rainy River and Rainy Lake. This MOU is designed to foster a cooperative and productive ongoing relationship between the MNO and Treasury Metals and to assess any potential impacts of the Project on the MNO citizens. The MOU also provides the Métis Community with an opportunity to participate in the Project through employment, training and business development and ongoing engagement of key aspects of both the relationship and Project. This engagement is inclusive of the in-design mitigation features including air quality and noise measures as they directly relate to potential impacts to the Métis way-of-life and values identified in the TK/TLU within the Project area. It is Treasury Metals intent to work with MNO to incorporate, mitigate, and avoid the values identified during this study as part of the EA process, but also the development of the Project. Treasury Metals has revised the EIS to include the following key changes with respect to traditional knowledge and traditional land and resource use: • Traditional knowledge obtained from various Indigenous communities including Métis Nation of Ontario has been incorporated into each subsection of Section 5 (Existing Environment) i.e. 5.1 climate, 5.2 air quality, 5.3 noise and light, 5.4 geology, 5.5 terrain and soil, 5.6 hydrogeology, 5.7 surface hydrology, 5.8 aquatic resources, 5.9 terrestrial resources, 5.10 migratory birds,5.11 species at risk, and 5.12 human environment; • Traditional land and resource use is discussed for each Indigenous community including in Section 5.13.3; • The information presented in Section 5 of the revised EIS was essential to the effects assessment completed for Aboriginal peoples in Section 6.21 and specifically for each community in Section 6.22 of the revised EIS. It was also essential to the selection of valued components (VCs) as discussed in Section 6.1.3 of the revised EIS. • All engagement activities to date are summarized in Section 9 of the revised EIS and provided in detail in Appendix DD. Engagement logs for all indigenous communities are attached to Appendix DD. • To reflect this IR specifically, Treasury Metals has also updated the executive summary of the EIs to reflect the meaningful engagement activities and information shared since the time of the original EIS submission. Based on the information shared with Treasury Metals by Métis Nation of Ontario, it is Treasury Metals understanding that this community is specifically interested in the potential effects on the project on their ability to practice their traditional land and resource uses, From the engagement activities completed to date traditional land and resource uses include harvesting/gathering of plants, trapping of beaver, hunting of moose, and fishing. Treasury Metals has revised the EIS to reflect the valued traditional knowledge shared Métis Nation of Ontario and will continue to work

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					with this community to ensure that any potential impacts of the project on their traditional land and resource use are properly mitigated. Based on the traditional knowledge and traditional land and resource use knowledge shared by all Indigenous communities including the by Métis Nation of Ontario to-date, the additional information obtained from the traditional knowledge/land use study (TKLUS) is not anticipated to result in substantial changes to the EIS, given the conservative approach already employed in the assessment of the effects of the project on Indigenous communities. Treasury Metals welcomes ongoing engagement and information it will further the understanding of traditional land and recourse use and assist in ongoing monitoring and mitigation of potential effects with respect to the project. All information received via engagement has been formally captured within the Stakeholder Engagement Report which is included in the revised EIS as appendix DD and summarized in Section 9 of the revised EIS.
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. **Revised Response:** Treasury Metals has made overtures to each community including Métis Nation of Ontario and collated all biophysical and traditional values/land and recourse use information within the EIS to date. This information in turn has been sourced from engagement with Indigenous communities (open houses, presentations, meetings, calls, discussions), and secondary source information. All information received via engagement has been formally captured within the Indigenous Stakeholder Engagement Report which is included in the revised EIS as appendix DD and summarized in Section 9 of the revised EIS. Treasury Metals as part of the responsible development of the Project as of December 18, 2017 announced that it has entered into a Memorandum of Understanding (MOU) with the MNO in relation to the Project. The MOU is a framework agreement with the MNO – including the Atikokan Métis Community Council, the Kenora Métis Community Council, the Northwest Métis Community Council and the Sunset Country Métis Community Council which represent the regional rights-bearing Métis communities (the "Métis Community") in the Treaty #3 area, including, the Métis traditional territories of Lake of the Woods, Lac Seul, Rainy River and Rainy Lake. This MOU is designed to foster a cooperative and productive ongoing relationship between the MNO and Treasury Metals and to assess any potential impacts of the Project on the MNO citizens. The MOU also provides the Métis Community with an opportunity to participate in the Project through employment, training and business development and ongoing consultation of key aspects of both

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					the relationship and Project. Further to this the MOU document provides the framework of a TKLUS. The TKLUS is currently underway with TK aspects to be considered as part of the Projects development Contacts have included telephone conversations, emails, letters, and in-person meetings. The MOU also provides the Métis Community with an opportunity to participate in the Project through employment, training and business development and ongoing engagement of key aspects of both the relationship and Project. This engagement is inclusive of the in-design mitigation features as they directly relate to potential impacts to the Métis way-of-life and values identified in the TK/TLU within the Project area. It is Treasury Metals' intent to work with MNO to incorporate, mitigate, and avoid the values identified during this study as part of the EA process, but also the development of the Project. Treasury Metals has revised the EIS to include the following key changes with respect to traditional knowledge and traditional land and resource use: • Traditional knowledge obtained from various Indigenous communities has been incorporated into each subsection of Section 5 (Existing Environment) i.e. 5.1 climate, 5.2 air quality, 5.3 noise and light, 5.4 geology, 5.5 terrain and soil, 5.6 hydrogeology, 5.7 surface hydrology, 5.8 aquatic resources, 5.9 terrestrial resources, 5.10 migratory birds,5.11 species at risk, and 5.12 human environment; • Traditional land and resource use is discussed for each Indigenous community including in Section 5.13.3; • The information presented in Section 5 of the revised EIS was essential to the effects assessment completed for Aboriginal peoples in Section 6.21 and specifically for each community in Section 6.22 of the revised EIS. It was also essential to the selection of valued components (VCs) as discussed in Section 6.1.3 of the revised EIS. • All engagement activities to date are summarized in Section 9 of the revised EIS and provided in detail in Appendix DD. Engagement logs for all indigenous communities are attached to Appendix DD. • The executive summary has been updated to reflect the meaningful engagement activities with Métis Nation of Ontario. In addition, to ensure that Indigenous communities most affected by the Project have input into the effectiveness of the Environmental Management Plans and Follow-up Programs, Treasury Metals proposes to form an Environmental Management Committee (Section 12.22 of the revised EIS). This committee would be made up of members from Indigenous communities and would meet with representatives from Treasury Metals on a to-be-determined basis, possibly quarterly or at least semi-annually. Treasury Metals would present any reportable information on the management plans as well as the results of the follow-up programs. If exceedances or issues arise that show mitigation measures have not been as effective as expected, the potential for further actions would be

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					discussed with the committee. The Environmental Management Committee would also provide a forum for discussing other environmental matters with the potentially affected Indigenous communities such as upcoming permits, additional TK that might have been collected since completion of the EA process, and any other environmental matters of relevance to the committee including financial support for operation of the committee. Based on the information shared with Treasury Metals by Métis Nation of Ontario, it is Treasury Metals understanding that this community is specifically interested in the potential effects on the project on their ability to practice their traditional land and resource uses, From the engagement activities completed to date traditional land and resource uses include harvesting/gathering of plants, trapping of beaver, hunting of moose, and fishing. Treasury Metals has revised the EIS to reflect the valued traditional knowledge shared Métis Nation of Ontario and will continue to work with this community to ensure that any potential impacts of the project on their traditional land and resource use are properly mitigated. Based on the traditional knowledge and traditional land and resource use knowledge shared by all Indigenous communities including the by Métis Nation of Ontario to-date, the additional information obtained from the traditional knowledge/land use study (TKLUS) is not anticipated to result in substantial changes to the EIS, given the conservative approach already employed in the assessment of the effects of the project on Indigenous communities. Treasury Metals welcomes ongoing engagement and information it will further the understanding of traditional land and recourse use and assist in ongoing monitoring and mitigation of potential effects with respect to the project.
418	AC(1)-93	MNO	Environmental Impact Statement Executive Summary 5.2.4 Closure and Post Closure Phase		**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 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.

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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 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. **Revised Response:**

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					Treasury Metals has made overtures to each community including Métis Nation of Ontario and collated all biophysical and traditional values/land and resource use information within the EIS to date. This information in turn has been sourced from engagement with Indigenous communities (open houses, presentations, meetings, calls, discussions), and secondary source information. All information received via engagement has been formally captured within the Stakeholder Engagement Report which is included in the revised EIS as appendix DD and summarized in Section 9 of the revised EIS. Treasury Metals as part of the responsible development of the Project as of December 18, 2017 announced that it has entered into a Memorandum of Understanding (MOU) with the MNO in relation to the Project. The MOU is a framework agreement with the MNO – including the Atikokan Métis Community Council, the Kenora Métis Community Council, the Northwest Métis Community Council and the Sunset Country Métis Community Council which represent the regional rights-bearing Métis communities (the "Métis Community") in the Treaty #3 area, including, the Métis traditional territories of Lake of the Woods, Lac Seul, Rainy River and Rainy Lake. This MOU is designed to foster a cooperative and productive ongoing relationship between the MNO and Treasury Metals and to assess any potential impacts of the Project on the MNO citizens. The MOU also provides the Métis Community with an opportunity to participate in the Project through employment, training and business development and ongoing consultation of key aspects of both the relationship and Project. Further to this the MOU document provides the framework of a TKLUS. The TKLUS is currently underway with TK aspects to be considered as part of the Projects development. Contacts have included telephone conversations, emails, letters, and in-person meetings. The MOU also provides the Métis Community with an opportunity to participate in the Project through employment, training and business development and ongoing engagement of key aspects of both the relationship and Project. This engagement is inclusive of the in-design mitigation features as they directly relate to potential impacts to the Métis way-of-life and values identified in the TK/TLU within the Project area. It is Treasury Metals' intent to work with MNO to incorporate, mitigate, and avoid the values identified during this study as part of the EA process, but also the development of the Project. Treasury Metals has revised the EIS to include the following key changes with respect to traditional knowledge and traditional land and resource use: • Traditional knowledge obtained from various Indigenous communities has been incorporated into each subsection of Section 5 (Existing Environment) (i.e. 5.1 Climate, 5.2 Air Quality, 5.3 Noise and Light, 5.4 Geology, 5.5 Terrain and Soil, 5.6 Hydrogeology, 5.7 Surface Hydrology, 5.8 Aquatic Resources, 5.9 Terrestrial Resources, 5.10 Migratory Birds,5.11 Species at Risk, and 5.12 Human Environment); • Traditional land and resource use is discussed for each Indigenous community including in Section 5.13.3;

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					• The information presented in Section 5 of the revised EIS was essential to the effects assessment completed for Aboriginal peoples in Section 6.21 and specifically for each community in Section 6.22 of the revised EIS. It was also essential to the selection of Valued Components (VCs) as discussed in Section 6.1.3 of the revised EIS. • All engagement activities to date are summarized in Section 9 of the revised EIS and provided in detail in Appendix DD. Engagement logs for all indigenous communities are attached to Appendix DD. • The executive summary has been updated to reflect the meaningful engagement activities with Métis Nation of Ontario. Based on the information shared with Treasury Metals by Métis Nation of Ontario, it is Treasury Metals understanding that MNO is specifically interested in the potential effects on the project on their ability to practice their traditional land and resource uses. From the engagement activities completed to date traditional land and resource uses include but are not limited to harvesting/gathering of plants, trapping of beaver, hunting of moose, and fishing. Treasury Metals has revised the EIS to reflect the valued TKLU information shared by MNO to date and will continue to work with this community to ensure that any potential impacts of the project on their traditional land and resource use are properly mitigated. Further to this based on the traditional knowledge and traditional land and resource use knowledge shared by all Indigenous communities including MNO to-date, the additional information obtained from the traditional knowledge/land use study (TKLUS) is not anticipated to result in substantial changes to the EIS, given the conservative approach already employed in the assessment of the effects of the project on Indigenous communities. Treasury Metals welcomes ongoing engagement and information it will further the understanding of traditional land and resource use and assist in ongoing monitoring and mitigation of potential effects with respect to the Project.
423	AC(1)-98	MNO	Environmental Impact Statement Executive Summary 6.4 Geochemistry	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 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

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					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 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	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

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			Summary 6.7 Vegetation		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.
					Revised Response: Treasury Metals has made overtures to each community including Métis Nation of Ontario and collated all biophysical and traditional values/land and resource use information within the EIS to date. This information in turn has been sourced from engagement with Indigenous communities (open houses, presentations, meetings, calls, discussions), and secondary source information. All information received via engagement has been formally captured within the Stakeholder Engagement Report which is included in the revised EIS as appendix DD and summarized in Section 9 of the revised EIS. Treasury Metals as part of the responsible development of the Project as of December 18, 2017 announced that it has entered into a Memorandum of Understanding (MOU) with the MNO in relation to the Project. The MOU is a framework agreement with the MNO – including the Atikokan Métis Community Council, the Kenora Métis Community Council, the Northwest Métis Community Council and the Sunset Country Métis Community Council which represent the regional rights-bearing Métis communities (the "Métis Community") in the Treaty #3 area, including, the Métis traditional territories of Lake of the Woods, Lac Seul, Rainy River and Rainy Lake. This MOU is designed to foster a cooperative and productive ongoing relationship between the MNO and Treasury Metals and to assess any potential impacts of the Project on the MNO citizens. The MOU also provides the Métis Community with an opportunity to participate in the Project through employment, training and business development and ongoing consultation of key aspects of both the relationship and Project. Further to this the MOU document provides the framework of a TKLUS. The TKLUS is currently underway with TK aspects to be considered as part of the Projects development. Contacts have included telephone conversations, emails, letters, and in-person meetings. The MOU also provides the Métis Community with an opportunity to participate in the Project through employment, training and business development and ongoing engagement of key aspects of both the relationship and Project. This engagement is inclusive of the in-design mitigation features as they directly relate to potential impacts to the Métis way-of-life and values identified in the TK/TLU within the Project area. It is Treasury Metals' intent to work with MNO to incorporate, mitigate, and avoid the values identified during this study as part of the EA process, but also the development of the Project. Treasury Metals has specifically asked the Métis Nation of Ontario to confirm the 270 species identified in the LSA during the course of field survey activities, and describe how they align with their traditional uses of the land.

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					Treasury Metals has revised the EIS to include the following key changes with respect to traditional knowledge and traditional land and resource use: • Traditional knowledge obtained from various Indigenous communities has been incorporated into each subsection of Section 5 (Existing Environment) (i.e. 5.1 Climate, 5.2 Air Quality, 5.3 Noise and Light, 5.4 Geology, 5.5 Terrain and Soil, 5.6 Hydrogeology, 5.7 Surface Hydrology, 5.8 Aquatic Resources, 5.9 Terrestrial Resources, 5.10 Migratory Birds,5.11 Species at Risk, and 5.12 Human Environment); • Traditional land and resource use is discussed for each Indigenous community including in Section 5.13.3; • The information presented in Section 5 of the revised EIS was essential to the effects assessment completed for Aboriginal peoples in Section 6.21 and specifically for each community in Section 6.22 of the revised EIS. It was also essential to the selection of Valued Components (VCs) as discussed in Section 6.1.3 of the revised EIS. • All engagement activities to date are summarized in Section 9 of the revised EIS and provided in detail in Appendix DD. Engagement logs for all indigenous communities are attached to Appendix DD. • The executive summary has been updated to reflect the meaningful engagement activities with Métis Nation of Ontario. Based on the information shared with Treasury Metals by Métis Nation of Ontario, it is Treasury Metals understanding that MNO is specifically interested in the potential effects on the project on their ability to practice their traditional land and resource uses. From the engagement activities completed to date traditional land and resource uses include but are not limited to harvesting/gathering of plants, trapping of beaver, hunting of moose, and fishing. Treasury Metals has revised the EIS to reflect the valued TKLU information shared by MNO to date and will continue to work with this community to ensure that any potential impacts of the project on their traditional land and resource use are properly mitigated. Further to this based on the traditional knowledge and traditional land and resource use knowledge shared by all Indigenous communities including MNO to-date, the additional information obtained from the traditional knowledge/land use study (TKLUS) is not anticipated to result in substantial changes to the EIS, given the conservative approach already employed in the assessment of the effects of the project on Indigenous communities. Treasury Metals welcomes ongoing engagement and information it will further the understanding of traditional land and resource use and assist in ongoing monitoring and mitigation of potential effects with respect to the Project.
426	AC(1)-101	MNO	Environmental Impact Statement	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

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
			Executive Summary 6.8 Wildlife		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.
					Revised Response: Treasury Metals has made overtures to each community including Métis Nation of Ontario and collated all biophysical and traditional values/land and resource use information within the EIS to date. This information in turn has been sourced from engagement with Indigenous communities (open houses, presentations, meetings, calls, discussions), and secondary source information. All information received via engagement has been formally captured within the Stakeholder Engagement Report which is included in the revised EIS as appendix DD and summarized in Section 9 of the revised EIS. Treasury Metals as part of the responsible development of the Project as of December 18, 2017 announced that it has entered into a Memorandum of Understanding (MOU) with the MNO in relation to the Project. The MOU is a framework agreement with the MNO – including the Atikokan Métis Community Council, the Kenora Métis Community Council, the Northwest Métis Community Council and the Sunset Country Métis Community Council which represent the regional rights-bearing Métis communities (the "Métis Community") in the Treaty #3 area, including, the Métis traditional territories of Lake of the Woods, Lac Seul, Rainy River and Rainy Lake. This MOU is designed to foster a cooperative and productive ongoing relationship between the MNO and Treasury Metals and to assess any potential impacts of the Project on the MNO citizens. The MOU also provides the Métis Community with an opportunity to participate in the Project through employment, training and business development and ongoing consultation of key aspects of both the relationship and Project. Further to this the MOU document provides the framework of a TKLUS. The TKLUS is currently underway with TK aspects to be considered as part of the Projects development. Contacts have included telephone conversations, emails, letters, and in-person meetings. There have been 7 formal and informal meetings. The MOU also provides the Métis Community with an opportunity to participate in the Project through employment, training and business development and ongoing engagement of key aspects of both the relationship and Project. This engagement is inclusive of the in-design mitigation features as they directly relate to potential impacts to the Métis way-of-life and values identified in the TK/TLU within the Project area. It is Treasury Metals' intent to work with MNO to incorporate, mitigate, and avoid the values identified during this study as part of the EA process, but also the development of the Project. Treasury Metals has specifically asked the Métis Nation of Ontario to confirm the wildlife species identified during the course of field survey activities, and describe how they align with their

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					traditional uses of the land. Treasury Metals has revised the EIS to include the following key changes with respect to traditional knowledge and traditional land and resource use: • Traditional knowledge obtained from various Indigenous communities has been incorporated into each subsection of Section 5 (Existing Environment) (i.e. 5.1 Climate, 5.2 Air Quality, 5.3 Noise and Light, 5.4 Geology, 5.5 Terrain and Soil, 5.6 Hydrogeology, 5.7 Surface Hydrology, 5.8 Aquatic Resources, 5.9 Terrestrial Resources, 5.10 Migratory Birds,5.11 Species at Risk, and 5.12 Human Environment); • Traditional land and resource use is discussed for each Indigenous community including in Section 5.13.3; • The information presented in Section 5 of the revised EIS was essential to the effects assessment completed for Aboriginal peoples in Section 6.21 and specifically for each community in Section 6.22 of the revised EIS. It was also essential to the selection of Valued Components (VCs) as discussed in Section 6.1.3 of the revised EIS. • All engagement activities to date are summarized in Section 9 of the revised EIS and provided in detail in Appendix DD. Engagement logs for all indigenous communities are attached to Appendix DD. • The executive summary has been updated to reflect the meaningful engagement activities with Métis Nation of Ontario. Based on the information shared with Treasury Metals by Métis Nation of Ontario, it is Treasury Metals understanding that MNO is specifically interested in the potential effects on the project on their ability to practice their traditional land and resource uses. From the engagement activities completed to date traditional land and resource uses include but are not limited to harvesting/gathering of plants, trapping of beaver, hunting of moose, and fishing. Treasury Metals has revised the EIS to reflect the valued TKLU information shared by MNO to date and will continue to work with this community to ensure that any potential impacts of the project on their traditional land and resource use are properly mitigated. Further to this based on the traditional knowledge and traditional land and resource use knowledge shared by all Indigenous communities including MNO to-date, the additional information obtained from the traditional knowledge/land use study (TKLUS) is not anticipated to result in substantial changes to the EIS, given the conservative approach already employed in the assessment of the effects of the project on Indigenous communities. Treasury Metals welcomes ongoing engagement and information it will further the understanding of traditional land and resource use and assist in ongoing monitoring and mitigation of potential effects with respect to the Project.
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

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
			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.
					Revised Response: Treasury Metals has made overtures to each community including Métis Nation of Ontario and collated all biophysical and traditional values/land and resource use information within the EIS to date. This information in turn has been sourced from engagement with Indigenous communities (open houses, presentations, meetings, calls, discussions), and secondary source information. All information received via engagement has been formally captured within the Stakeholder Engagement Report which is included in the revised EIS as appendix DD and summarized in Section 9 of the revised EIS. Treasury Metals as part of the responsible development of the Project as of December 18, 2017 announced that it has entered into a Memorandum of Understanding (MOU) with the MNO in relation to the Project. The MOU is a framework agreement with the MNO – including the Atikokan Métis Community Council, the Kenora Métis Community Council, the Northwest Métis Community Council and the Sunset Country Métis Community Council which represent the regional rights-bearing Métis communities (the "Métis Community") in the Treaty #3 area, including, the Métis traditional territories of Lake of the Woods, Lac Seul, Rainy River and Rainy Lake. This MOU is designed to foster a cooperative and productive ongoing relationship between the MNO and Treasury Metals and to assess any potential impacts of the Project on the MNO citizens. The MOU also provides the Métis Community with an opportunity to participate in the Project through employment, training and business development and ongoing consultation of key aspects of both the relationship and Project. Further to this the MOU document provides the framework of a TKLUS. The TKLUS is currently underway with TK aspects to be considered as part of the Projects development. Contacts have included telephone conversations, emails, letters, and in-person meetings. There have been 7 formal and informal meetings. The MOU also provides the Métis Community with an opportunity to participate in the Project through employment, training and business development and ongoing engagement of key aspects of both the relationship and Project. This engagement is inclusive of the in-design mitigation features as they directly relate to potential impacts to the Métis way-of-life and values identified in the TK/TLU within the Project area. It is Treasury Metals' intent to work with MNO to incorporate, mitigate, and avoid the values identified during this study as part of the EA process, but also the development of the Project. Treasury Metals has specifically asked the Métis Nation of Ontario to confirm the thirty-six species

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					identified during a review of historical records and thirty-one identified in the LSA during the course of field survey activities and describe how they align with their traditional uses of the land. Treasury Metals has revised the EIS to include the following key changes with respect to traditional knowledge and traditional land and resource use: • Traditional knowledge obtained from various Indigenous communities has been incorporated into each subsection of Section 5 (Existing Environment) (i.e. 5.1 Climate, 5.2 Air Quality, 5.3 Noise and Light, 5.4 Geology, 5.5 Terrain and Soil, 5.6 Hydrogeology, 5.7 Surface Hydrology, 5.8 Aquatic Resources, 5.9 Terrestrial Resources, 5.10 Migratory Birds,5.11 Species at Risk, and 5.12 Human Environment); • Traditional land and resource use is discussed for each Indigenous community including in Section 5.13.3; • The information presented in Section 5 of the revised EIS was essential to the effects assessment completed for Aboriginal peoples in Section 6.21 and specifically for each community in Section 6.22 of the revised EIS. It was also essential to the selection of Valued Components (VCs) as discussed in Section 6.1.3 of the revised EIS. • All engagement activities to date are summarized in Section 9 of the revised EIS and provided in detail in Appendix DD. Engagement logs for all indigenous communities are attached to Appendix DD. • The executive summary has been updated to reflect the meaningful engagement activities with Métis Nation of Ontario. Based on the information shared with Treasury Metals by Métis Nation of Ontario, it is Treasury Metals understanding that MNO is specifically interested in the potential effects on the project on their ability to practice their traditional land and resource uses. From the engagement activities completed to date traditional land and resource uses include but are not limited to harvesting/gathering of plants, trapping of beaver, hunting of moose, and fishing. Treasury Metals has revised the EIS to reflect the valued TKLU information shared by MNO to date and will continue to work with this community to ensure that any potential impacts of the project on their traditional land and resource use are properly mitigated. Further to this based on the traditional knowledge and traditional land and resource use knowledge shared by all Indigenous communities including MNO to-date, the additional information obtained from the traditional knowledge/land use study (TKLUS) is not anticipated to result in substantial changes to the EIS, given the conservative approach already employed in the assessment of the effects of the project on Indigenous communities. Treasury Metals welcomes ongoing engagement and information it will further the understanding of traditional land and resource use and assist in ongoing monitoring and mitigation of potential effects with respect to the Project.
428	AC(1)-103	MNO	Environmental	2.3 Aboriginal	**Information Request / Comment**:

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			Impact Statement Executive Summary 6.10 Land and Resource Use, Traditional Knowledge and Land Use	engagement	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.
					Revised Response: Treasury Metals has made overtures to each community including Métis Nation of Ontario and collated all biophysical and traditional values/land and resourse use information within the EIS to date. This information in turn has been sourced from engagement with Indigenous communities (open houses, presentations, meetings, calls, discussions), and secondary source information. All information received via engagement has been formally captured within the Indigenous Stakeholder Engagement Report which is included in the revised EIS as appendix DD and summarized in Section 9 of the revised EIS. Treasury Metals as part of the responsible development of the Project as of December 18, 2017 announced that it has entered into a Memorandum of Understanding (MOU) with the MNO in relation to the Project. The MOU is a framework agreement with the MNO – including the Atikokan Métis Community Council, the Kenora Métis Community Council, the Northwest Métis Community Council and the Sunset Country Métis Community Council which represent the regional rights-bearing Métis communities (the "Métis Community") in the Treaty #3 area, including, the Métis traditional territories of Lake of the Woods, Lac Seul, Rainy River and Rainy Lake. This MOU is designed to foster a cooperative and productive ongoing relationship between the MNO and Treasury Metals and to assess any potential impacts of the Project on the MNO citizens. The MOU also provides the Métis Community with an opportunity to participate in the Project through employment, training and business development and ongoing consultation of key aspects of both the relationship and Project. Further to this the MOU document provides the framework of a TKLUS. The TKLUS is currently underway with TK aspects to be considered as part of the Projects development. Contacts have included telephone conversations, emails, letters, and in-person meetings. The MOU also provides the Métis Community with an opportunity to participate in the Project through employment, training and business development and ongoing engagement of key aspects of both the relationship and Project. This engagement is inclusive of the in-design mitigation features as they directly relate to potential impacts to the Métis way-of-life and values identified in the TK/TLU within the Project area. It is Treasury Metals' intent to work with MNO to incorporate, mitigate, and avoid the values identified during this study as part of the EA process, but also the development of the Project. Treasury Metals has revised the EIS to include the following key changes with respect to traditional knowledge and traditional land and resource use:

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					• Traditional knowledge obtained from various Indigenous communities has been incorporated into each subsection of Section 5 (Existing Environment) (i.e. 5.1 Climate, 5.2 Air Quality, 5.3 Noise and Light, 5.4 Geology, 5.5 Terrain and Soil, 5.6 Hydrogeology, 5.7 Surface Hydrology, 5.8 Aquatic Resources, 5.9 Terrestrial Resources, 5.10 Migratory Birds,5.11 Species at Risk, and 5.12 Human Environment); • Traditional land and resource use is discussed for each Indigenous community including in Section 5.13.3; • The information presented in Section 5 of the revised EIS was essential to the effects assessment completed for Aboriginal peoples in Section 6.21 and specifically for each community in Section 6.22 of the revised EIS. It was also essential to the selection of Valued Components (VCs) as discussed in Section 6.1.3 of the revised EIS. • All engagement activities to date are summarized in Section 9 of the revised EIS and provided in detail in Appendix DD. Engagement logs for all indigenous communities are attached to Appendix DD. • The executive summary has been updated to reflect the meaningful engagement activities with Métis Nation of Ontario. Based on the information shared with Treasury Metals by Métis Nation of Ontario, it is Treasury Metals understanding that MNO is specifically interested in the potential effects on the project on their ability to practice their traditional land and resource uses. From the engagement activities completed to date traditional land and resource uses include but are not limited to harvesting/gathering of plants, trapping of beaver, hunting of moose, and fishing. Treasury Metals has revised the EIS to reflect the valued TKLU information shared by MNO to date and will continue to work with this community to ensure that any potential impacts of the project on their traditional land and resource use are properly mitigated. Further to this based on the traditional knowledge and traditional land and resource use knowledge shared by all Indigenous communities including MNO to-date, the additional information obtained from the traditional knowledge/land use study (TKLUS) is not anticipated to result in substantial changes to the EIS, given the conservative approach already employed in the assessment of the effects of the project on Indigenous communities. Treasury Metals welcomes ongoing engagement and information it will further the understanding of traditional land and resource use and assist in ongoing monitoring and mitigation of potential effects with respect to the Project.
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:**

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					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 Statement Executive Summary 6.14 Socio-economics	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 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

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					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.
					Revised 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 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. The wording in the original EIS has been changed in the Revised EIS to reflect the above response. This can be found in both Section 9.0 of the revised EIS and the Executive Summary, with the same collaborative philosophy of engagement with Aboriginal persons and communities throughout the entire document. Treasury Metals acknowledges that it is beneficial to collaboratively work with Indigenous communities such as MNO, to gain specific information about the land from the people who have the most experience on it. Traditional knowledge from Indigenous communities has been incorporated into the Section 5 (Existing Environment) to supplement the studies conducted by Treasury Metals within the local and regional study areas. Treasury Metals has been engaged with Aboriginal peoples within the Project area, including MNO,

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					for a number of years regarding the Project and this will continue for the life of the Project including through the detailed design and environmental approvals stage This on-going engagement is described in the Aboriginal Engagement Report (Appendix DD to the revised EIS). Treasury Metals has signed a Memorandum of Understanding with MNO in January of 2018 with a TK/TLU study being prepared by MNO. Any additional information gained from such studies will be incorporated into future design of the project.
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. **Revised Response:** Losses of fish habitat that require offsetting will occur in Blackwater Creek Tributary 1 and Blackwater Creek Tributary 2. A conceptual fish habitat offsetting plan has been developed as part of the revised EIS (Appendix II and Section 6.14.5.2 of the revised EIS), and includes three primary offsetting measures: • Shoreline stabilization on Wabigoon Lake, • Creation of fish habitat, after mine closure, in ponds adjacent and connected to Blackwater Creek, and • Removal of the dam on Thunder Lake Tributary 2 to allow upstream fish passage. Treasury Metals is committed to ongoing engagement with all Indigenous communities including the MNO to ensure that any potential effect of the project is appropriately offset. Since the time of the original EIS, and MOU has been signed with the MNO to complete a Traditional Knowledge Study. Treasury Metals provided Appendix II to the MNO on April 22, 2015 with the original EIS submission that they has the opportunity to provide feedback. Treasury Metals has also provided the MNO with the revised Fish Compensation Plan (Appendix II) to allow for feedback. Further to this based on the traditional knowledge and traditional land and resource use knowledge shared by all Indigenous communities including MNO to-date, the additional information obtained from the traditional knowledge/land use study (TKLUS) is not anticipated to result in substantial changes to the EIS, given the conservative approach already employed in the assessment of the effects of the project on Indigenous communities. It will however be incorporated into the Follow-Up and Monitoring for Fish and Fish Habitat. Treasury Metals welcomes ongoing engagement and information it will further the understanding of traditional land and resource use and assist in ongoing monitoring and mitigation of potential effects with respect to the Project.
433	AC(1)-108	MNO	Environmental		**Information Request / Comment:**

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			Impact Statement Executive Summary 9.3 Potential Effects on Hunting and Trapping		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.
					Revised Response: Treasury Metals has made overtures to each community including Métis Nation of Ontario and collated all biophysical and traditional values/land and resource use information within the EIS to date. This information in turn has been sourced from engagement with Indigenous communities (open houses, presentations, meetings, calls, discussions), and secondary source information. All information received via engagement has been formally captured within the Stakeholder Engagement Report which is included in the revised EIS as appendix DD and summarized in Section 9 of the revised EIS. Treasury Metals as part of the responsible development of the Project as of December 18, 2017 announced that it has entered into a Memorandum of Understanding (MOU) with the MNO in relation to the Project. The MOU is a framework agreement with the MNO – including the Atikokan Métis Community Council, the Kenora Métis Community Council, the Northwest Métis Community Council and the Sunset Country Métis Community Council which represent the regional rights-bearing Métis communities (the "Métis Community") in the Treaty #3 area, including, the Métis traditional territories of Lake of the Woods, Lac Seul, Rainy River and Rainy Lake. This MOU is designed to foster a cooperative and productive ongoing relationship between the MNO and Treasury Metals and to assess any potential impacts of the Project on the MNO citizens. The MOU also provides the Métis Community with an opportunity to participate in the Project through employment, training and business development and ongoing consultation of key aspects of both the relationship and Project. Further to this the MOU document provides the framework of a TKLUS. The TKLUS is currently underway with TK aspects to be considered as part of the Projects development. Contacts have included telephone conversations, emails, letters, and in-person meetings. The MOU also provides the Métis Community with an opportunity to participate in the Project through employment, training and business development and ongoing engagement of key aspects of both the relationship and Project. This engagement is inclusive of the in-design mitigation features as they directly relate to potential impacts to the Métis way-of-life and values identified in the TK/TLU within the Project area. It is Treasury Metals' intent to work with MNO to incorporate, mitigate, and avoid the values identified during this study as part of the EA process, but also the

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					development of the Project. Treasury Metals has revised the EIS to include the following key changes with respect to traditional knowledge and traditional land and resource use: • Traditional knowledge obtained from various Indigenous communities has been incorporated into each subsection of Section 5 (Existing Environment) (i.e. 5.1 Climate, 5.2 Air Quality, 5.3 Noise and Light, 5.4 Geology, 5.5 Terrain and Soil, 5.6 Hydrogeology, 5.7 Surface Hydrology, 5.8 Aquatic Resources, 5.9 Terrestrial Resources, 5.10 Migratory Birds,5.11 Species at Risk, and 5.12 Human Environment); • Traditional land and resource use is discussed for each Indigenous community including in Section 5.13.3; • The information presented in Section 5 of the revised EIS was essential to the effects assessment completed for Aboriginal peoples in Section 6.21 and specifically for each community in Section 6.22 of the revised EIS. It was also essential to the selection of Valued Components (VCs) as discussed in Section 6.1.3 of the revised EIS. • All engagement activities to date are summarized in Section 9 of the revised EIS and provided in detail in Appendix DD. Engagement logs for all indigenous communities are attached to Appendix DD. • The executive summary has been updated to reflect the meaningful engagement activities with Métis Nation of Ontario. Based on the information shared with Treasury Metals by Métis Nation of Ontario, it is Treasury Metals understanding that MNO is specifically interested in the potential effects on the project on their ability to practice their traditional land and resource uses. From the engagement activities completed to date traditional land and resource uses include but are not limited to harvesting/gathering of plants, trapping of beaver, hunting of moose, and fishing. Treasury Metals has revised the EIS to reflect the valued TKLU information shared by MNO to date and will continue to work with this community to ensure that any potential impacts of the project on their traditional land and resource use are properly mitigated. Further to this based on the traditional knowledge and traditional land and resource use knowledge shared by all Indigenous communities including MNO to-date, the additional information obtained from the traditional knowledge/land use study (TKLUS) is not anticipated to result in substantial changes to the EIS, given the conservative approach already employed in the assessment of the effects of the project on Indigenous communities. Treasury Metals welcomes ongoing engagement and information it will further the understanding of traditional land and resource use and assist in ongoing monitoring and mitigation of potential effects with respect to the Project.
434	AC(1)-109	MNO	Environmental Impact Statement	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

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			Executive Summary 9.3 Potential Effects on Hunting and Trapping		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-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

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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.
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. **Revised Response:** Treasury Metals has made overtures to each community including Métis Nation of Ontario and collated all biophysical and traditional values/land and resource use information within the EIS to date. This information in turn has been sourced from engagement with Indigenous communities (open houses, presentations, meetings, calls, discussions). All information received via engagement has been formally captured within the Stakeholder Engagement Report which is included in the revised EIS as appendix DD and summarized in Section 9 of the revised EIS. Treasury Metals as part of the responsible development of the Project as of December 18, 2017 announced that it has entered into a Memorandum of Understanding (MOU) with the MNO in relation to the Project. The MOU is a framework agreement with the MNO – including the Atikokan Métis Community Council, the Kenora Métis Community Council, the Northwest Métis Community Council and the Sunset Country Métis Community Council which represent the regional rights-bearing Métis communities (the "Métis Community") in the Treaty #3 area, including, the Métis traditional territories of Lake of the Woods, Lac Seul, Rainy River and Rainy Lake. This MOU is designed to foster a cooperative and productive ongoing relationship between the MNO and Treasury Metals and to assess any potential impacts of the Project on the MNO citizens. The MOU also provides the Métis Community with an opportunity to participate in the Project through employment, training and business development and ongoing consultation of key aspects of both the relationship and Project. Further to this the MOU document provides the framework of a TKLUS. The TKLUS is currently underway with TK aspects to be considered as part of the Projects development. Contacts have included telephone conversations, emails, letters, and in-person meetings. The MOU also provides the Métis Community with an opportunity to participate in the Project through employment, training and business development and ongoing engagement of key aspects of both the relationship and Project. This engagement is inclusive of the in-design mitigation

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					features as they directly relate to potential impacts to the Métis way-of-life and values identified in the TK/TLU within the Project area. It is Treasury Metals' intent to work with MNO to incorporate, mitigate, and avoid the values identified during this study as part of the EA process, but also the development of the Project. Treasury Metals has revised the EIS to include the following key changes with respect to traditional knowledge and traditional land and resource use: • Traditional knowledge obtained from various Indigenous communities including Métis Nation of Ontario has been incorporated into each subsection of Section 5 (Existing Environment) (i.e. 5.1 Climate, 5.2 Air Quality, 5.3 Noise and Light, 5.4 Geology, 5.5 Terrain and Soil, 5.6 Hydrogeology, 5.7 Surface Hydrology, 5.8 Aquatic Resources, 5.9 Terrestrial Resources, 5.10 Migratory Birds,5.11 Species at Risk, and 5.12 Human Environment); o Included in Section 5.9 is traditional knowledge from MNO regarding berry harvesting/ gathering of plants and berries • Traditional land and resource use is discussed for each Indigenous community including in Section 5.13.3; o Including information regarding harvesting and gathering of plants and berries by the MNO via primary engagement information. • The information presented in Section 5 of the revised EIS was essential to the effects assessment completed for Aboriginal peoples in Section 6.21 and specifically for each community in Section 6.22 of the revised EIS. It was also essential to the selection of Valued Components (VCs) as discussed in Section 6.1.3 of the revised EIS. • All engagement activities to date are summarized in Section 9 of the revised EIS and provided in detail in Appendix DD. Engagement logs for all indigenous communities are attached to Appendix DD. • The executive summary has been updated to reflect the meaningful engagement activities with Métis Nation of Ontario. Based on the information shared with Treasury Metals by Métis Nation of Ontario, it is Treasury Metals understanding that MNO is specifically interested in the potential effects on the project on their ability to practice their traditional land and resource uses. From the engagement activities completed to date traditional land and resource uses include but are not limited to harvesting/gathering of plants, trapping of beaver, hunting of moose, and fishing. Treasury Metals has revised the EIS to reflect the valued TKLU information shared by MNO to date and will continue to work with this community to ensure that any potential impacts of the project on their traditional land and resource use are properly mitigated. Further to this based on the traditional knowledge and traditional land and resource use knowledge shared by all Indigenous communities including MNO to-date, the additional information obtained

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					from the traditional knowledge/land use study (TKLUS) is not anticipated to result in substantial changes to the EIS, given the conservative approach already employed in the assessment of the effects of the project on Indigenous communities. Treasury Metals welcomes ongoing engagement and information it will further the understanding of traditional land and resource use and assist in ongoing monitoring and mitigation of potential effects with respect to the Project.
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. **Revised Response:** Since the time of the original EIS submission, Treasury Metals has participated in a number of meaningful engagement activities. Mostly notably, as of December 18, 2017 announced that it has entered into a Memorandum of Understanding (MOU) with the MNO in relation to the Project. Treasury Metals as revised the EIS substantially to reflect the traditional knowledge and traditional land and resource use information shared since the original EIS submission. Appendix DD was also substantially revised and Section 3.3.8 of the Stakeholder engagement report speaks specifically to information as it pertains to MNO. The environmental assessment on fish, wildlife, vegetation and wetlands included in the revised EIS generally employs a habitat-based approach. Regarding vegetation specifically, ecosite classifications, which incorporate soil characteristics and indicator plant species, were used to describe habitat. Only plants with a particular affinity for specific ecosite conditions are used as indicators, whereas many plant species may occur across a broader range of ecosite conditions. Blueberry and dwarf raspberry habitat was incorporated into the Vegetation and Wetland Effects Assessment (Section 6.15). Combined, their corresponding ecosites comprise the majority of the LSA (see Figure 6.15.4.1-3, TMI_437-AC(1)-112_Figure 1 Blueberry and Dwarf Raspberry Habitat in the Goliath Gold LSA). Although only representing a fraction of a great-many berry species, blueberries and dwarf raspberries serve as "umbrella species", where managing for their habitat also manages for the habitat of most other berries in the Project area. Treasury Metals has revised the EIS to include the following key changes with respect to traditional knowledge and traditional land and resource use: • Traditional knowledge obtained from various Indigenous communities has been incorporated into each subsection of Section 5 (Existing Environment) (i.e. 5.1 Climate,

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					5.2 Air Quality, 5.3 Noise and Light, 5.4 Geology, 5.5 Terrain and Soil, 5.6 Hydrogeology, 5.7 Surface Hydrology, 5.8 Aquatic Resources, 5.9 Terrestrial Resources, 5.10 Migratory Birds,5.11 Species at Risk, and 5.12 Human Environment); o Traditional knowledge of berries is located in Section 5.9.9 of the revised EIS and traditional land and resource use of how the MNO gathers/harvest berries is discussed in 5.13.5 of the revised EIS. Berry harvesting is an indicator of Harvesting/Gathering of Planter Material used to assess the effects of the project on Aboriginal peoples as described in Table 6.1.3.20-1 of the revised EIS. • Traditional land and resource use is discussed for each Indigenous community including in Section 5.13.3; • The information presented in Section 5 of the revised EIS was essential to the effects assessment completed for Aboriginal peoples in Section 6.21 and specifically for each community in Section 6.22 of the revised EIS. It was also essential to the selection of Valued Components (VCs) as discussed in Section 6.1.3 of the revised EIS. Trails and travel ways were considered under the VCs "Harvesting of Plants", and "Cultural and Spiritual'. • All engagement activities to date are summarized in Section 9 of the revised EIS and provided in detail in Appendix DD. Engagement logs for all indigenous communities are attached to Appendix DD. • The executive summary has been updated to reflect the meaningful engagement activities with Métis Nation of Ontario. Based on the information shared with Treasury Metals by Métis Nation of Ontario, it is Treasury Metals understanding that MNO is specifically interested in the potential effects on the project on their ability to practice their traditional land and resource uses. From the engagement activities completed to date traditional land and resource uses include but are not limited to harvesting/gathering of plants, trapping of beaver, hunting of moose, and fishing. Treasury Metals has revised the EIS to reflect the valued TKLU information shared by MNO to date and will continue to work with this community to ensure that any potential impacts of the project on their traditional land and resource use are properly mitigated. Further to this based on the traditional knowledge and traditional land and resource use knowledge shared by all Indigenous communities including MNO to-date, the additional information obtained from the traditional knowledge/land use study (TKLUS) is not anticipated to result in substantial changes to the EIS, given the conservative approach already employed in the assessment of the effects of the project on Indigenous communities. Treasury Metals welcomes ongoing engagement and information it will further the understanding of traditional land and resource use and assist in ongoing monitoring and mitigation of potential effects with respect to the Project.

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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 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

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					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 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. **Revised Response:**

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					For the purposes of the EIS, Aboriginal and Treaty Rights are defined as the historic and current uses of lands and resources for traditional purposes by members of Indigenous communities. It is Treasury Metals' understanding that Aboriginal peoples are entitled to access to their lands according to their Aboriginal and Treaty #3 (1873) Rights, and Treasury Metals is committed to working with the Indigenous communities to ensure that the effects of the project on their traditional land and resource use or "aboriginal and treaty rights" are appropriately considered and protected. Treasury Metals has revised the EIS to represent the holistic approach to the environment that the Métis Nation of Ontario has indicated is a component of their Treaty Rights. Treasury Metals has made overtures to each community including Métis Nation of Ontario and collated all biophysical and traditional values/land and resource use information within the EIS to date. This information in turn has been sourced from engagement with Indigenous communities (open houses, presentations, meetings, calls, discussions), and secondary source information. All information received via engagement has been formally captured within the Stakeholder Engagement Report which is included in the revised EIS as appendix DD and summarized in Section 9 of the revised EIS. Treasury Metals as part of the responsible development of the Project as of December 18, 2017 announced that it has entered into a Memorandum of Understanding (MOU) with the MNO in relation to the Project. The MOU is a framework agreement with the MNO – including the Atikokan Métis Community Council, the Kenora Métis Community Council, the Northwest Métis Community Council and the Sunset Country Métis Community Council which represent the regional rights-bearing Métis communities (the "Métis Community") in the Treaty #3 area, including, the Métis traditional territories of Lake of the Woods, Lac Seul, Rainy River and Rainy Lake. This MOU is designed to foster a cooperative and productive ongoing relationship between the MNO and Treasury Metals and to assess any potential impacts of the Project on the MNO citizens. The MOU also provides the Métis Community with an opportunity to participate in the Project through employment, training and business development and ongoing consultation of key aspects of both the relationship and Project. Further to this the MOU document provides the framework of a TKLUS. The TKLUS is currently underway with TK aspects to be considered as part of the Projects development. Contacts have included telephone conversations, emails, letters, and in-person meetings. MOU also provides the Métis Community with an opportunity to participate in the Project through employment, training and business development and ongoing engagement of key aspects of both the relationship and Project. This engagement is inclusive of the in-design mitigation features as they directly relate to potential impacts to the Métis way-of-life and values identified in the TK/TLU within the Project area. It is Treasury Metals' intent to work with MNO to incorporate, mitigate, and avoid the values identified during this study as part of the EA process, but also the development of the Project.

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					Treasury Metals has revised the EIS to include the following key changes with respect to traditional knowledge and traditional land and resource use: • Traditional knowledge obtained from various Indigenous communities has been incorporated into each subsection of Section 5 (Existing Environment) (i.e. 5.1 Climate, 5.2 Air Quality, 5.3 Noise and Light, 5.4 Geology, 5.5 Terrain and Soil, 5.6 Hydrogeology, 5.7 Surface Hydrology, 5.8 Aquatic Resources, 5.9 Terrestrial Resources, 5.10 Migratory Birds,5.11 Species at Risk, and 5.12 Human Environment); • Traditional land and resource use is discussed for each Indigenous community including in Section 5.13.3; • The information presented in Section 5 of the revised EIS was essential to the effects assessment completed for Aboriginal peoples in Section 6.21 and specifically for each community in Section 6.22 of the revised EIS. It was also essential to the selection of Valued Components (VCs) as discussed in Section 6.1.3 of the revised EIS. • All engagement activities to date are summarized in Section 9 of the revised EIS and provided in detail in Appendix DD. Engagement logs for all indigenous communities are attached to Appendix DD. • The executive summary has been updated to reflect the meaningful engagement activities with Métis Nation of Ontario. Based on the information shared with Treasury Metals by Métis Nation of Ontario, it is Treasury Metals understanding that MNO is specifically interested in the potential effects on the project on their ability to practice their traditional land and resource uses. From the engagement activities completed to date traditional land and resource uses include but are not limited to harvesting/gathering of plants, trapping of beaver, hunting of moose, and fishing. Treasury Metals has revised the EIS to reflect the valued TKLU information shared by MNO to date and will continue to work with this community to ensure that any potential impacts of the project on their traditional land and resource use are properly mitigated. Further to this based on the traditional knowledge and traditional land and resource use knowledge shared by all Indigenous communities including MNO to-date, the additional information obtained from the traditional knowledge/land use study (TKLUS) is not anticipated to result in substantial changes to the EIS, given the conservative approach already employed in the assessment of the effects of the project on Indigenous communities. Treasury Metals welcomes ongoing engagement and information it will further the understanding of traditional land and resource use and assist in ongoing monitoring and mitigation of potential effects with respect to the Project.
441	AC(1)-116	MNO	Environmental Impact Statement		**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

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			Executive Summary 9.7 Access Restrictions		potential information. Overreaching **Revised Response:** As part of the revised EIS, trails and travel ways are assessed as part of the valued components for Aboriginal peoples (Indigenous Communities) for their traditional land and resource use in terms of ability to harvest ,hunt and for cultural and spiritual practices. Further details are provided below. Treasury Metals has made overtures to each community including Métis Nation of Ontario and collated all biophysical and traditional values/land and resource use information within the EIS to date. This information in turn has been sourced from engagement with Indigenous communities (open houses, presentations, meetings, calls, discussions), and secondary source information. All information received via engagement has been formally captured within the Stakeholder Engagement Report which is included in the revised EIS as appendix DD and summarized in Section 9 of the revised EIS. Treasury Metals as part of the responsible development of the Project as of December 18, 2017 announced that it has entered into a Memorandum of Understanding (MOU) with the MNO in relation to the Project. The MOU is a framework agreement with the MNO – including the Atikokan Métis Community Council, the Kenora Métis Community Council, the Northwest Métis Community Council and the Sunset Country Métis Community Council which represent the regional rights-bearing Métis communities (the "Métis Community") in the Treaty #3 area, including, the Métis traditional territories of Lake of the Woods, Lac Seul, Rainy River and Rainy Lake. This MOU is designed to foster a cooperative and productive ongoing relationship between the MNO and Treasury Metals and to assess any potential impacts of the Project on the MNO citizens. The MOU also provides the Métis Community with an opportunity to participate in the Project through employment, training and business development and ongoing consultation of key aspects of both the relationship and Project. Further to this the MOU document provides the framework of a TKLUS. The TKLUS is currently underway with TK aspects to be considered as part of the Projects development. Contacts have included telephone conversations, emails, letters, and in-person meetings. MOU also provides the Métis Community with an opportunity to participate in the Project through employment, training and business development and ongoing engagement of key aspects of both the relationship and Project. This engagement is inclusive of the in-design mitigation features as they directly relate to potential impacts to the Métis way-of-life and values identified in the TK/TLU within the Project area. It is Treasury Metals' intent to work with MNO to incorporate, mitigate, and avoid the values identified during this study as part of the EA process, but also the development of the Project. Treasury Metals has revised the EIS to include the following key changes with respect to traditional knowledge and traditional land and resource use:

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					• Traditional knowledge obtained from various Indigenous communities has been incorporated into each subsection of Section 5 (Existing Environment) (i.e. 5.1 Climate, 5.2 Air Quality, 5.3 Noise and Light, 5.4 Geology, 5.5 Terrain and Soil, 5.6 Hydrogeology, 5.7 Surface Hydrology, 5.8 Aquatic Resources, 5.9 Terrestrial Resources, 5.10 Migratory Birds,5.11 Species at Risk, and 5.12 Human Environment); • Traditional land and resource use is discussed for each Indigenous community including in Section 5.13.3; • The information presented in Section 5 of the revised EIS was essential to the effects assessment completed for Aboriginal peoples in Section 6.21 and specifically for each community in Section 6.22 of the revised EIS. It was also essential to the selection of Valued Components (VCs) as discussed in Section 6.1.3 of the revised EIS. Trails and travel ways were considered under the VCs "Harvesting of Plants", and "Cultural and Spiritual'. • All engagement activities to date are summarized in Section 9 of the revised EIS and provided in detail in Appendix DD. Engagement logs for all indigenous communities are attached to Appendix DD. • The executive summary has been updated to reflect the meaningful engagement activities with Métis Nation of Ontario. Based on the information shared with Treasury Metals by Métis Nation of Ontario, it is Treasury Metals understanding that MNO is specifically interested in the potential effects on the project on their ability to practice their traditional land and resource uses. From the engagement activities completed to date traditional land and resource uses include but are not limited to harvesting/gathering of plants, trapping of beaver, hunting of moose, and fishing. Treasury Metals has revised the EIS to reflect the valued TKLU information shared by MNO to date and will continue to work with this community to ensure that any potential impacts of the project on their traditional land and resource use are properly mitigated. Further to this based on the traditional knowledge and traditional land and resource use knowledge shared by all Indigenous communities including MNO to-date, the additional information obtained from the traditional knowledge/land use study (TKLUS) is not anticipated to result in substantial changes to the EIS, given the conservative approach already employed in the assessment of the effects of the project on Indigenous communities. Treasury Metals welcomes ongoing engagement and information it will further the understanding of traditional land and resource use and assist in ongoing monitoring and mitigation of potential effects with respect to the Project.
442	AC(1)-117	MNO	Environmental Impact Statement Executive Summary		**Information Request / Comment:** MNO requires involvement in the development and implementation of any Project closure plan developed by Treasury. **Response:**

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			9.10 Mine Closure		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 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

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					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. **Revised Response:** As part of the revised EIS, visual aesthetics was assessed as part of the following VCs for Aboriginal peoples (Indigenous communities): Harvesting/Gathering of Plants, Hunting and Trapping, Fishing, and Cultural and Spiritual. Further details included below. Treasury Metals has made overtures to each community including Métis Nation of Ontario and collated all biophysical and traditional values/land and resource use information within the EIS to date. This information in turn has been sourced from engagement with Indigenous communities (open houses, presentations, meetings, calls, discussions), and secondary source information. All information received via engagement has been formally captured within the Stakeholder Engagement Report which is included in the revised EIS as appendix DD and summarized in Section 9 of the revised EIS. Treasury Metals as part of the responsible development of the Project as of December 18, 2017 announced that it has entered into a Memorandum of Understanding (MOU) with the MNO in relation to the Project. The MOU is a framework agreement with the MNO – including the Atikokan Métis Community Council, the Kenora Métis Community Council, the Northwest Métis Community Council and the Sunset Country Métis Community Council which represent the regional rights-bearing Métis communities (the "Métis Community") in the Treaty #3 area, including, the Métis traditional territories of Lake of the Woods, Lac Seul, Rainy River and Rainy Lake. This MOU is designed to foster a cooperative and productive ongoing relationship between the MNO and Treasury Metals and to assess any potential impacts of the Project on the MNO citizens. The MOU also provides the Métis Community with an opportunity to participate in the Project through employment, training and business development and ongoing consultation of key aspects of both the relationship and Project. Further to this the MOU document provides the framework of a TKLUS. The TKLUS is currently underway with TK aspects to be considered as part of the Projects development. Contacts have included telephone conversations, emails, letters, and in-person meetings.. The MOU also provides the Métis Community with an opportunity to participate in the Project through employment, training and business development and ongoing engagement of key aspects of both the relationship and Project. This engagement is inclusive of the in-design mitigation features as they directly relate to potential impacts to the Métis way-of-life and values identified in the TK/TLU within the Project area. It is Treasury Metals' intent to work with MNO to incorporate, mitigate, and avoid the values identified during this study as part of the EA process, but also the

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					development of the Project. Treasury Metals has revised the EIS to include the following key changes with respect to traditional knowledge and traditional land and resource use: • Traditional knowledge obtained from various Indigenous communities has been incorporated into each subsection of Section 5 (Existing Environment) (i.e. 5.1 Climate, 5.2 Air Quality, 5.3 Noise and Light, 5.4 Geology, 5.5 Terrain and Soil, 5.6 Hydrogeology, 5.7 Surface Hydrology, 5.8 Aquatic Resources, 5.9 Terrestrial Resources, 5.10 Migratory Birds,5.11 Species at Risk, and 5.12 Human Environment); • Traditional land and resource use is discussed for each Indigenous community including in Section 5.13.3; • The information presented in Section 5 of the revised EIS was essential to the effects assessment completed for Aboriginal peoples in Section 6.21 and specifically for each community in Section 6.22 of the revised EIS. It was also essential to the selection of Valued Components (VCs) as discussed in Section 6.1.3 of the revised EIS. Visual aesthetics was assessed as part of the following VCs for Aboriginal peoples (Indigenous communities): Harvesting/Gathering of Plants, Hunting and Trapping, Fishing, and Cultural and Spiritual. • All engagement activities to date are summarized in Section 9 of the revised EIS and provided in detail in Appendix DD. Engagement logs for all Indigenous communities are attached to Appendix DD. • The executive summary has been updated to reflect the meaningful engagement activities with Métis Nation of Ontario. Based on the information shared with Treasury Metals by Métis Nation of Ontario, it is Treasury Metals understanding that MNO is specifically interested in the potential effects on the project on their ability to practice their traditional land and resource uses. From the engagement activities completed to date traditional land and resource uses include but are not limited to harvesting/gathering of plants, trapping of beaver, hunting of moose, and fishing. Treasury Metals has revised the EIS to reflect the valued TKLU information shared by MNO to date and will continue to work with this community to ensure that any potential impacts of the project on their traditional land and resource use are properly mitigated. Further to this based on the traditional knowledge and traditional land and resource use knowledge shared by all Indigenous communities including MNO to-date, the additional information obtained from the traditional knowledge/land use study (TKLUS) is not anticipated to result in substantial changes to the EIS, given the conservative approach already employed in the assessment of the effects of the project on Indigenous communities. Treasury Metals welcomes ongoing engagement and information it will further the understanding of traditional land and resource use and assist in ongoing monitoring and mitigation of potential effects with respect to the Project.

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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. **Revised Response:** The risk assessment completed for the EIS was considered screening level (Screening Level Risk Assessment) and therefore employed the most conservative input parameters available by Health Canada, and also the generic recommendations made by the Canadian Council of Ministers of the Environment and /or the Ontario Ministry of the Environment and Climate Change. This approach was employed to ensure the risk assessment was conducted by the most conservative means necessary so that any potential risk to the receptors would be identified at this preliminary stage of the project. Treasury Metals is committed to ongoing engagement with the Métis Nation of Ontario and in the event a more detailed risk assessment is required, than Treasury Metals would welcome any site-specific input from the Métis Nation of Ontario. Treasury Metals as part of the responsible development of the Project as of December 18, 2017 announced that it has entered into a Memorandum of Understanding (MOU) with the MNO in relation to the Project. The traditional knowledge and traditional land and resource use study are currently underway which would also provide valuable information in the event a detailed risk assessment is required. Based on the information shared with Treasury Metals by Métis Nation of Ontario, it is Treasury Metals understanding that MNO is specifically interested in the potential effects on the project on their ability to practice their traditional land and resource uses. From the engagement activities completed to date traditional land and resource uses include but are not limited to harvesting/gathering of plants, trapping of beaver, hunting of moose, and fishing. Treasury Metals has revised the EIS to reflect the valued TKLU information shared by MNO to date and will continue to work with this community to ensure that any potential impacts of the project on their traditional land and resource use are properly mitigated.
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

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					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 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

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					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 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. **Revised Response:** As part of the revised EIS, the Assessment of Alternatives (Appendix X) as revised to account potential or established Aboriginal and treaty rights, which for the purposed of the EIS are defined as the historic and current uses of lands and resources for traditional purposes by members of Indigenous communities. It is Treasury Metals' understanding that Aboriginal peoples are entitled to access to their lands according to their Aboriginal and Treaty #3 (1873) Rights, and Treasury Metals is committed to working with the Indigenous communities to ensure that the effects of the project on their traditional land and resource use or "aboriginal and treaty rights" are appropriately considered and protected. Treasury Metals has revised the EIS to include the following key changes with respect to traditional knowledge and traditional land and resource use:

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					• Traditional knowledge obtained from various Indigenous communities has been incorporated into each subsection of Section 5 (Existing Environment) (i.e. 5.1 Climate, 5.2 Air Quality, 5.3 Noise and Light, 5.4 Geology, 5.5 Terrain and Soil, 5.6 Hydrogeology, 5.7 Surface Hydrology, 5.8 Aquatic Resources, 5.9 Terrestrial Resources, 5.10 Migratory Birds,5.11 Species at Risk, and 5.12 Human Environment); • Traditional land and resource use is discussed for each Indigenous community including in Section 5.13.3; • The information presented in Section 5 of the revised EIS was essential to the effects assessment completed for Aboriginal peoples in Section 6.21 and specifically for each community in Section 6.22 of the revised EIS. It was also essential to the selection of Valued Components (VCs) as discussed in Section 6.1.3 of the revised EIS. • All engagement activities to date are summarized in Section 9 of the revised EIS and provided in detail in Appendix DD. Engagement logs for all indigenous communities are attached to Appendix DD. • The executive summary has been updated to reflect the meaningful engagement activities with Métis Nation of Ontario. Treasury Metals has made overtures to each community including Métis Nation of Ontario and collated all biophysical and traditional values/land and resource use information within the EIS to date. This information in turn has been sourced from engagement with Indigenous communities (open houses, presentations, meetings, calls, discussions), and secondary source information. All information received via engagement has been formally captured within the Stakeholder Engagement Report which is included in the revised EIS as appendix DD and summarized in Section 9 of the revised EIS. Treasury Metals as part of the responsible development of the Project as of December 18, 2017 announced that it has entered into a Memorandum of Understanding (MOU) with the MNO in relation to the Project. The MOU is a framework agreement with the MNO – including the Atikokan Métis Community Council, the Kenora Métis Community Council, the Northwest Métis Community Council and the Sunset Country Métis Community Council which represent the regional rights-bearing Métis communities (the "Métis Community") in the Treaty #3 area, including, the Métis traditional territories of Lake of the Woods, Lac Seul, Rainy River and Rainy Lake. This MOU is designed to foster a cooperative and productive ongoing relationship between the MNO and Treasury Metals and to assess any potential impacts of the Project on the MNO citizens. The MOU also provides the Métis Community with an opportunity to participate in the Project through employment, training and business development and ongoing consultation of key aspects of both the relationship and Project. Further to this the MOU document provides the framework of a TKLUS. The TKLUS is currently underway with TK aspects to be considered as part of the Projects development. Contacts have included telephone conversations, emails, letters, and in-person

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					meetings. The MOU also provides the Métis Community with an opportunity to participate in the Project through employment, training and business development and ongoing engagement of key aspects of both the relationship and Project. This engagement is inclusive of the in-design mitigation features as they directly relate to potential impacts to the Métis way-of-life and values identified in the TK/TLU within the Project area. It is Treasury Metals' intent to work with MNO to incorporate, mitigate, and avoid the values identified during this study as part of the EA process, but also the development of the Project. Based on the information shared with Treasury Metals by Métis Nation of Ontario, it is Treasury Metals understanding that MNO is specifically interested in the potential effects on the project on their ability to practice their traditional land and resource uses. From the engagement activities completed to date traditional land and resource uses include but are not limited to harvesting/gathering of plants, trapping of beaver, hunting of moose, and fishing. Treasury Metals has revised the EIS to reflect the valued TKLU information shared by MNO to date and will continue to work with this community to ensure that any potential impacts of the project on their traditional land and resource use are properly mitigated. Further to this based on the traditional knowledge and traditional land and resource use knowledge shared by all Indigenous communities including MNO to-date, the additional information obtained from the traditional knowledge/land use study (TKLUS) is not anticipated to result in substantial changes to the EIS, given the conservative approach already employed in the assessment of the effects of the project on Indigenous communities. Treasury Metals welcomes ongoing engagement and information it will further the understanding of traditional land and resource use and assist in ongoing monitoring and mitigation of potential effects with respect to the Project.
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 Treatment 2.3.7 Water Supply 2.3.8 Water Discharge Location	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. **Revised Response:** As part of the revised EIS, the Assessment of Alternatives (Appendix X) as revised to account potential or established Aboriginal and treaty rights, which for the purposes of the EIS are defined as the historic and current uses of lands and resources for traditional purposes by members of Indigenous communities. It is Treasury Metals' understanding that Aboriginal peoples are entitled to access to their lands according to their Aboriginal and Treaty #3 (1873) Rights, and Treasury Metals is committed to working with the Indigenous communities to ensure that the effects of the project on their traditional land and resource use or alternatively referred to as aboriginal and treaty rights are appropriately considered and protected. Treasury Metals has revised the EIS to include the following key changes with respect to traditional knowledge and traditional land and resource use: • Traditional knowledge obtained from various Indigenous communities has been

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			2.3.9 Watercourse Realignments 2.3.10 Infrastructure and Buildings 2.3.12 Non-hazardous Solid Waste Management		incorporated into each subsection of Section 5 (Existing Environment) (i.e. 5.1 Climate, 5.2 Air Quality, 5.3 Noise and Light, 5.4 Geology, 5.5 Terrain and Soil, 5.6 Hydrogeology, 5.7 Surface Hydrology, 5.8 Aquatic Resources, 5.9 Terrestrial Resources, 5.10 Migratory Birds,5.11 Species at Risk, and 5.12 Human Environment); • Traditional land and resource use is discussed for each Indigenous community including in Section 5.13.3; • The information presented in Section 5 of the revised EIS was essential to the effects assessment completed for Aboriginal peoples in Section 6.21 and specifically for each community in Section 6.22 of the revised EIS. It was also essential to the selection of Valued Components (VCs) as discussed in Section 6.1.3 of the revised EIS. • All engagement activities to date are summarized in Section 9 of the revised EIS and provided in detail in Appendix DD. Engagement logs for all indigenous communities are attached to Appendix DD. • The executive summary has been updated to reflect the meaningful engagement activities with Métis Nation of Ontario. Treasury Metals has made overtures to each community including Métis Nation of Ontario and collated all biophysical and traditional values/land and resource use information within the EIS to date. This information in turn has been sourced from engagement with Indigenous communities (open houses, presentations, meetings, calls, discussions), and secondary source information. All information received via engagement has been formally captured within the Stakeholder Engagement Report which is included in the revised EIS as appendix DD and summarized in Section 9 of the revised EIS. Treasury Metals as part of the responsible development of the Project as of December 18, 2017 announced that it has entered into a Memorandum of Understanding (MOU) with the MNO in relation to the Project. The MOU is a framework agreement with the MNO – including the Atikokan Métis Community Council, the Kenora Métis Community Council, the Northwest Métis Community Council and the Sunset Country Métis Community Council which represent the regional rights-bearing Métis communities (the "Métis Community") in the Treaty #3 area, including, the Métis traditional territories of Lake of the Woods, Lac Seul, Rainy River and Rainy Lake. This MOU is designed to foster a cooperative and productive ongoing relationship between the MNO and Treasury Metals and to assess any potential impacts of the Project on the MNO citizens. The MOU also provides the Métis Community with an opportunity to participate in the Project through employment, training and business development and ongoing consultation of key aspects of both the relationship and Project. Further to this the MOU document provides the framework of a TKLUS. The TKLUS is currently underway with TK aspects to be considered as part of the Projects development. Contacts have included telephone conversations, emails, letters, and in-person meetings. The MOU also provides the Métis Community with an opportunity to participate in the

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					Project through employment, training and business development and ongoing engagement of key aspects of both the relationship and Project. This engagement is inclusive of the in-design mitigation features as they directly relate to potential impacts to the Métis way-of-life and values identified in the TK/TLU within the Project area. It is Treasury Metals' intent to work with MNO to incorporate, mitigate, and avoid the values identified during this study as part of the EA process, but also the development of the Project. Based on the information shared with Treasury Metals by Métis Nation of Ontario, it is Treasury Metals understanding that MNO is specifically interested in the potential effects on the project on their ability to practice their traditional land and resource uses. From the engagement activities completed to date traditional land and resource uses include but are not limited to harvesting/gathering of plants, trapping of beaver, hunting of moose, and fishing. Treasury Metals has revised the EIS to reflect the valued TKLU information shared by MNO to date and will continue to work with this community to ensure that any potential impacts of the project on their traditional land and resource use are properly mitigated. Further to this based on the traditional knowledge and traditional land and resource use knowledge shared by all Indigenous communities including MNO to-date, the additional information obtained from the traditional knowledge/land use study (TKLUS) is not anticipated to result in substantial changes to the EIS, given the conservative approach already employed in the assessment of the effects of the project on Indigenous communities. Treasury Metals welcomes ongoing engagement and information it will further the understanding of traditional land and resource use and assist in ongoing monitoring and mitigation of potential effects with respect to the Project.
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

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					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 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. **Revised Response:** As stated in the EIS, Treasury Metals is committed that during operations, effluent discharged from the Project to Blackwater Creek will meet the Provincial Water Quality Objectives (PWQO) or background concentrations if background levels are above the PWQO. Where there is no PWQO for a parameter, the commitment will be to meet the Canadian Water Quality Guidelines (CWQG). For total mercury, the commitment will be that effluent discharged to Blackwater Creek will meet background concentrations for that watercourse. (Cmt_034] Background concentrations for Blackwater Creek are defined as the 75th percentile in accordance MOECC receiving water assessment policy. Detailed parameters will be determined through engagement with appropriate Provincial and Federal regulatory bodies A map has been provided as Figure 13.8.3-1 of the revised EIS that provides the twelve proposed surface water sampling locations. The sampling parameters and frequencies for each location have been provided as part of the surface water quality and quantity follow-up programs follow-up programs in Sections 13.8 and 13.9 of the revised EIS, respectively. Table 1 provides a summary of each sampling location, parameters and sampling frequencies proposed in the surface water quality follow-up program and Table 2 provides a summary of each sampling location, parameters and frequencies proposed in the surface water quantity follow-up program. These locations, parameters

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and frequencies are subject to later MOECC approval and may change with input from regulatory agencies.

Table 1: Summary of Surface Water Quality Follow-up Programs

Sample Location	Parameter Group	Frequency
SW-TL1A, SW-JCT, SW-2, SW-TL3, SW-4, SW-7, SW-8, SW-9	Group A Group B Group C	Monthly
SW-10, SW-11	Group A Group B	Monthly
SW-5, SW-6	Group A Group B Group C	Annually
Effluent Discharge	Group D	Thrice Weekly
	Group E	Weekly
	Group B Group F	Monthly

Parameter Listings:

Group A: pH, acidity, alkalinity, dissolved oxygen, chloride, conductivity, dissolved and total organic carbon, hardness, nitrate, nitrite, phosphate, sulphate, temperature (field), total and un-ionized ammonia, total dissolved solids, total suspended solids, turbidity.

Group B: Total ICP metals scan.

Group C: free cyanide, total cyanide, weak acid dissociable cyanide.

Group D: pH, total cyanide, total suspended solids

Group E: copper, lead, nickel, zinc, arsenic

Group F: Acute toxicity testing (Rainbow Trout and *Daphnia magna*)

Table 2: Summary of Surface Water Quantity Follow-up Programs

Sample Location	Parameter Group	Frequency
SW-JCTa	Flow Rate	Discrete
Discharge from irrigation ponds on Thunder Lake Tributaries 2 and 3	Flow Rate	Continuous when water taking occurs

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					Volume of Effluent Discharged into Blackwater Creek | Volume | Daily
452	AC(1)-126	MNO	Environmental Impact Statement 2.3.12 Non-hazardous Solid Waste Management	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-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. **Revised Response:** Appendix X has been revised to include an alternatives assessment for hazardous solid waste management, which has been summarized and incorporated in Section 2.3.13 of the revised EIS. The transportation of the material to an existing licensed facility remains 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	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. **Revised Response:** The preferred alternatives in the revised EIS includes information related to First Nations Reserves and Communities and/or Traditional Land Use as applicable. Hazardous Solid Waste Management In identifying the potential options for disposing of hazardous solid waste, Treasury Metals did

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			2.3.15 Explosives Storage Facility		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. The associated negative effects with disposal on-site would be more likely to impact Aboriginal peoples, public stakeholders and Treasury Metals. Therefore, Aboriginal rights and interests were inherently taken into account during the decision to dispose all hazardous solid waste off-site. However, this was not clearly identified in the alternatives assessment of hazardous solid waste management in Section 2.3.13 of the revised EIS. Text has been added to this revised subsection to incorporate Indigenous communities' related information. 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. Domestic Sewage Management Domestic sewage (black water) management was considered within the alternatives assessment as described in Appendix X. The selected preferred alternative is off-site treatment, which does not have a capacity constraint and allows for certainty that all domestic sewage will be handled in the proper manner, including during the period of variable domestic sewage needs presented though construction and initial operations. Additionally, disposal at a licensed, established, off-site treatment facility presents no anticipated environmental impacts other than vehicular traffic. The alternatives assessment for each Project component focused on potential impacts to environmental, economic, technical and socio-economic components. Included in the socio-economic evaluation for assessing domestic sewage were: • First Nations Reserves and Communities; • Spiritual and Ceremonial Sites; • Traditional Land Use; and • Aboriginal and Treaty Rights. However, this was not clearly identified in the alternatives assessment of domestic sewage management in Section 2.3.14 of the revised EIS. Text has been added to this subsection to incorporate Indigenous communities related information. Explosives Storage Facility Explosives will not be manufactured on site due to the small amounts required for the Project. Instead, Treasury Metals is currently engaging explosives suppliers and preliminary feedback suggests that a delivery of explosives from a regional storage site under the care and control of others as required will be practical and is preferred. Only a relatively low volume of explosives would need to be stored on-site. The location of the explosives storage facility was not considered as part of the alternatives assessment as it is

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					effectively dictated by the *Explosives Act* and the strict requirements of the Guidelines for Bulk Explosives Facilities Minimum Requirements from Natural Resources Canada. Following a review of minimum permissible distances that are published by Natural Resources Canada (*Explosives Act*), existing roads and traditional trails in the vicinity of the Project that present potential access points, only one suitable site for the explosives storage magazines was identified. Indigenous communities related information was used regarding traditional trails was used in identifying the preferred alternative. This was not clearly identified in the alternatives assessment of explosive storage facility management in Section 2.3.15 of the revised EIS. Text has been added to this subsection to incorporate Indigenous communities' related information.
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 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		**Information Request / Comment:**

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
			Impact Statement 2.4 Project Alternatives – Closure		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. **Revised Response:** As part of the revised EIS, the Assessment of Alternatives (Appendix X) as revised to account potential or established Aboriginal and treaty rights, which for the purposes of the EIS are defined as the historic and current uses of lands and resources for traditional purposes by members of Indigenous communities. It is Treasury Metals' understanding that Aboriginal peoples are entitled to access to their lands according to their Aboriginal and Treaty #3 (1873) Rights, and Treasury Metals is committed to working with the Indigenous communities to ensure that the effects of the project on their traditional land and resource use or alternatively referred to as aboriginal and treaty rights are appropriately considered and protected. Treasury Metals has revised the EIS to include the following key changes with respect to traditional knowledge and traditional land and resource use: • Traditional knowledge obtained from various Indigenous communities has been incorporated into each subsection of Section 5 (Existing Environment) (i.e. 5.1 Climate, 5.2 Air Quality, 5.3 Noise and Light, 5.4 Geology, 5.5 Terrain and Soil, 5.6 Hydrogeology, 5.7 Surface Hydrology, 5.8 Aquatic Resources, 5.9 Terrestrial Resources, 5.10 Migratory Birds,5.11 Species at Risk, and 5.12 Human Environment); • Traditional land and resource use is discussed for each Indigenous community including in Section 5.13.3; • The information presented in Section 5 of the revised EIS was essential to the effects

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					assessment completed for Aboriginal peoples in Section 6.21 and specifically for each community in Section 6.22 of the revised EIS. It was also essential to the selection of Valued Components (VCs) as discussed in Section 6.1.3 of the revised EIS. • All engagement activities to date are summarized in Section 9 of the revised EIS and provided in detail in Appendix DD. Engagement logs for all indigenous communities are attached to Appendix DD. • The executive summary has been updated to reflect the meaningful engagement activities with Métis Nation of Ontario. Treasury Metals has made overtures to each community including Métis Nation of Ontario and collated all biophysical and traditional values/land and resource use information within the EIS to date. This information in turn has been sourced from engagement with Indigenous communities (open houses, presentations, meetings, calls, discussions), and secondary source information. All information received via engagement has been formally captured within the Stakeholder Engagement Report which is included in the revised EIS as appendix DD and summarized in Section 9 of the revised EIS. Treasury Metals as part of the responsible development of the Project as of December 18, 2017 announced that it has entered into a Memorandum of Understanding (MOU) with the MNO in relation to the Project. The MOU is a framework agreement with the MNO – including the Atikokan Métis Community Council, the Kenora Métis Community Council, the Northwest Métis Community Council and the Sunset Country Métis Community Council which represent the regional rights-bearing Métis communities (the "Métis Community") in the Treaty #3 area, including, the Métis traditional territories of Lake of the Woods, Lac Seul, Rainy River and Rainy Lake. This MOU is designed to foster a cooperative and productive ongoing relationship between the MNO and Treasury Metals and to assess any potential impacts of the Project on the MNO citizens. The MOU also provides the Métis Community with an opportunity to participate in the Project through employment, training and business development and ongoing consultation of key aspects of both the relationship and Project. Further to this the MOU document provides the framework of a TKLUS. The TKLUS is currently underway with TK aspects to be considered as part of the Projects development. Contacts have included telephone conversations, emails, letters, and in-person meetings. The MOU also provides the Métis Community with an opportunity to participate in the Project through employment, training and business development and ongoing engagement of key aspects of both the relationship and Project. This engagement is inclusive of the in-design mitigation features as they directly relate to potential impacts to the Métis way-of-life and values identified in the TK/TLU within the Project area. It is Treasury Metals' intent to work with MNO to incorporate, mitigate, and avoid the values identified during this study as part of the EA process, but also the development of the Project. Based on the information shared with Treasury Metals by Métis Nation of Ontario, it is Treasury

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					Metals understanding that MNO is specifically interested in the potential effects on the project on their ability to practice their traditional land and resource uses. From the engagement activities completed to date traditional land and resource uses include but are not limited to harvesting/gathering of plants, trapping of beaver, hunting of moose, and fishing. Treasury Metals has revised the EIS to reflect the valued TKLU information shared by MNO to date and will continue to work with this community to ensure that any potential impacts of the project on their traditional land and resource use are properly mitigated. Further to this based on the traditional knowledge and traditional land and resource use knowledge shared by all Indigenous communities including MNO to-date, the additional information obtained from the traditional knowledge/land use study (TKLUS) is not anticipated to result in substantial changes to the EIS, given the conservative approach already employed in the assessment of the effects of the project on Indigenous communities. Treasury Metals welcomes ongoing engagement and information it will further the understanding of traditional land and resource use and assist in ongoing monitoring and mitigation of potential effects with respect to the Project.
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.*

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					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 2.4.3 Waste Rock Storage Area Closure	8.0 Alternative Means of Carrying out the Project	**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. 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	8.0 Alternative	**Information Request / Comment:**

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
			Impact Statement 2.4.6 Buildings and Equipment Closure	Means of Carrying out the Project	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 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		**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:

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
			Alternatives		• 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.
					Revised Response: Table 2.5-1 of the revised EIS lists each of the Project elements, and the alternatives considered. The table also highlights the alternative carried forward for evaluation and assessment of Project effects, along with the reasoning for the selection of that alternative. In cases where there was only one viable option, the reasoning for this has been provided in the table. Each of the Project elements identified in the questions were considered as part of the alternatives assessment presented in the revised EIS, as listed below: • Buildings and Equipment Closure — Section 2.4.6; • Waste Rock Storage Area Closure — Section 2.4.3; • Underground Closure — Section 2.4.2; • Hazardous Solid Waste Management — Section 2.3.13; and • Non-hazardous Solid Waste Management — Section 2.3.12. Building and Equipment Closure 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 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*

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. *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. Waste Rock Storage Area Closure 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

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					closure plan that is required pursuant to Ontario Regulation 240/00. Underground Closure 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. Hazardous Solid Waste Management 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. Non-hazardous Solid Waste Management Section 2.3.12 of the EIS does describe the alternatives considered for the management of non-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.
462	AC(1)-136	MNO	Environmental	9.1.1	**Information Request / Comment:**

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
			Impact Statement	Methodology	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 Statement	9.1.2 Biophysical Environment	**Information Request / Comment:** The existing baseline for ambient air quality was estimated using data from two MOE monitoring 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

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					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 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

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					(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:** 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	9.1.1 Methodology	**Information Request / Comment:** The baseline noise quality section does not take an ecosystem approach and consider traditional

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
			Statement 5.3.1 Baseline Noise Levels		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 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.

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
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 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.

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					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 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	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

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
			5.8.4.2 Fish Presence		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 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	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.

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
			Fish Habitat		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.
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

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					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.
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

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					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:** 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

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					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. **Revised Response:** As part of the revised EIS, the baseline vegetation section (5.9) was substantially revised as was the consideration of the study area. The EIS was revised to consider an ecosystem approach and include to traditional knowledge as well as traditional land and resource use. Treasury Metals has revised the EIS to include the following key changes with respect to traditional knowledge and traditional land and resource use: • Traditional knowledge obtained from various Indigenous communities has been incorporated into each subsection of Section 5 (Existing Environment) (i.e. 5.1 Climate, 5.2 Air Quality, 5.3 Noise and Light, 5.4 Geology, 5.5 Terrain and Soil, 5.6 Hydrogeology, 5.7 Surface Hydrology, 5.8 Aquatic Resources, 5.9 Terrestrial Resources, 5.10 Migratory

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					Birds,5.11 Species at Risk, and 5.12 Human Environment); • Traditional land and resource use is discussed for each Indigenous community including in Section 5.13.3; • The information presented in Section 5 of the revised EIS was essential to the effects assessment completed for Aboriginal peoples in Section 6.21 and specifically for each community in Section 6.22 of the revised EIS. It was also essential to the selection of Valued Components (VCs) as discussed in Section 6.1.3 of the revised EIS. Trails and travel ways were considered under the VCs "Harvesting of Plants", and "Cultural and Spiritual'. • All engagement activities to date are summarized in Section 9 of the revised EIS and provided in detail in Appendix DD. Engagement logs for all indigenous communities are attached to Appendix DD. • The executive summary has been updated to reflect the meaningful engagement activities with Métis Nation of Ontario. Treasury Metals has made overtures to each community including Métis Nation of Ontario and collated all biophysical and traditional values/land and resource use information within the EIS to date. This information in turn has been sourced from engagement with Indigenous communities (open houses, presentations, meetings, calls, discussions), and secondary source information. All information received via engagement has been formally captured within the Stakeholder Engagement Report which is included in the revised EIS as appendix DD and summarized in Section 9 of the revised EIS. Treasury Metals as part of the responsible development of the Project as of December 18, 2017 announced that it has entered into a Memorandum of Understanding (MOU) with the MNO in relation to the Project. The MOU is a framework agreement with the MNO – including the Atikokan Métis Community Council, the Kenora Métis Community Council, the Northwest Métis Community Council and the Sunset Country Métis Community Council which represent the regional rights-bearing Métis communities (the "Métis Community") in the Treaty #3 area, including, the Métis traditional territories of Lake of the Woods, Lac Seul, Rainy River and Rainy Lake. This MOU is designed to foster a cooperative and productive ongoing relationship between the MNO and Treasury Metals and to assess any potential impacts of the Project on the MNO citizens. The MOU also provides the Métis Community with an opportunity to participate in the Project through employment, training and business development and ongoing consultation of key aspects of both the relationship and Project. Further to this the MOU document provides the framework of a TKLUS. The TKLUS is currently underway with TK aspects to be considered as part of the Projects development. Contacts have included telephone conversations, emails, letters, and in-person meetings. MOU also provides the Métis Community with an opportunity to participate in the Project through employment, training and business development and ongoing engagement of key aspects

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					of both the relationship and Project. This engagement is inclusive of the in-design mitigation features as they directly relate to potential impacts to the Métis way-of-life and values identified in the TK/TLU within the Project area. It is Treasury Metals' intent to work with MNO to incorporate, mitigate, and avoid the values identified during this study as part of the EA process, but also the development of the Project. Based on the information shared with Treasury Metals by Métis Nation of Ontario, it is Treasury Metals understanding that MNO is specifically interested in the potential effects on the project on their ability to practice their traditional land and resource uses. From the engagement activities completed to date traditional land and resource uses include but are not limited to harvesting/gathering of plants, trapping of beaver, hunting of moose, and fishing. Treasury Metals has revised the EIS to reflect the valued TKLU information shared by MNO to date and will continue to work with this community to ensure that any potential impacts of the project on their traditional land and resource use are properly mitigated. Further to this based on the traditional knowledge and traditional land and resource use knowledge shared by all Indigenous communities including MNO to-date, the additional information obtained from the traditional knowledge/land use study (TKLUS) is not anticipated to result in substantial changes to the EIS, given the conservative approach already employed in the assessment of the effects of the project on Indigenous communities. Treasury Metals welcomes ongoing engagement and information it will further the understanding of traditional land and resource use and assist in ongoing monitoring and mitigation of potential effects with respect to the Project.
477	AC(1)-151	MNO	Environmental Impact Statement 5.9.2.2 Forest Compositions through to 5.9.2.4 Field Surveys	9.2.1 Biophysical Environment	**Information Request / Comment**: 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. **Revised Response:** As part of the revised EIS, the baseline vegetation section (5.9) which includes information regarding forestry was substantially revised and traditional knowledge with respect to forestry and the various Indigenous communities was included in Section 5.9.9 of the revised EIS. Treasury Metals has revised the EIS to include the following key changes with respect to traditional knowledge and traditional land and resource use: • Traditional knowledge obtained from various Indigenous communities has been incorporated into each subsection of Section 5 (Existing Environment) (i.e. 5.1 Climate, 5.2 Air Quality, 5.3 Noise and Light, 5.4 Geology, 5.5 Terrain and Soil, 5.6 Hydrogeology, 5.7 Surface Hydrology, 5.8 Aquatic Resources, 5.9 Terrestrial Resources, 5.10 Migratory Birds,5.11 Species at Risk, and 5.12 Human Environment); • Traditional land and resource use (including forestry) is discussed for each Indigenous community including in Section 5.13.3;

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					• The information presented in Section 5 of the revised EIS was essential to the effects assessment completed for Aboriginal peoples in Section 6.21 and specifically for each community in Section 6.22 of the revised EIS. It was also essential to the selection of Valued Components (VCs) as discussed in Section 6.1.3 of the revised EIS. Forestry was assessed as part of the valued component: Harvesting and Gathering of Plants as described on Section 6.1.3, and assessed in Section 6.21 of the revised EIS. • All engagement activities to date are summarized in Section 9 of the revised EIS and provided in detail in Appendix DD. Engagement logs for all indigenous communities are attached to Appendix DD. • The executive summary has been updated to reflect the meaningful engagement activities with Métis Nation of Ontario. Treasury Metals as part of the responsible development of the Project as of December 18, 2017 announced that it has entered into a Memorandum of Understanding (MOU) with the MNO in relation to the Project. The MOU is a framework agreement with the MNO – including the Atikokan Métis Community Council, the Kenora Métis Community Council, the Northwest Métis Community Council and the Sunset Country Métis Community Council which represent the regional rights-bearing Métis communities (the "Métis Community") in the Treaty #3 area, including, the Métis traditional territories of Lake of the Woods, Lac Seul, Rainy River and Rainy Lake. This MOU is designed to foster a cooperative and productive ongoing relationship between the MNO and Treasury Metals and to assess any potential impacts of the Project on the MNO citizens. The MOU also provides the Métis Community with an opportunity to participate in the Project through employment, training and business development and ongoing consultation of key aspects of both the relationship and Project. Further to this the MOU document provides the framework of a TKLUS. The TKLUS is currently underway with TK aspects to be considered as part of the Projects development. Contacts have included telephone conversations, emails, letters, and in-person meetings. MOU also provides the Métis Community with an opportunity to participate in the Project through employment, training and business development and ongoing engagement of key aspects of both the relationship and Project. This engagement is inclusive of the in-design mitigation features as they directly relate to potential impacts to the Métis way-of-life and values identified in the TK/TLU within the Project area. It is Treasury Metals' intent to work with MNO to incorporate, mitigate, and avoid the values identified during this study as part of the EA process, but also the development of the Project. Based on the information shared with Treasury Metals by Métis Nation of Ontario, it is Treasury Metals understanding that MNO is specifically interested in the potential effects on the project on their ability to practice their traditional land and resource uses. From the engagement activities completed to date traditional land and resource uses include but are not limited to harvesting/gathering of plants, trapping of beaver, hunting of moose, and fishing. Treasury Metals

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					has revised the EIS to reflect the valued TKLU information shared by MNO to date and will continue to work with this community to ensure that any potential impacts of the project on their traditional land and resource use are properly mitigated. Further to this based on the traditional knowledge and traditional land and resource use knowledge shared by all Indigenous communities including MNO to-date, the additional information obtained from the traditional knowledge/land use study (TKLUS) is not anticipated to result in substantial changes to the EIS, given the conservative approach already employed in the assessment of the effects of the project on Indigenous communities. Treasury Metals welcomes ongoing engagement and information it will further the understanding of traditional land and resource use and assist in ongoing monitoring and mitigation of potential effects with respect to the Project.
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.
					Revised Response: Since the time of the original EIS submission, Treasury Metals has participated in a number of meaningful engagement activities. Mostly notably, as of December 18, 2017 announced that it has entered into a Memorandum of Understanding (MOU) with the MNO in relation to the Project. Treasury Metals as revised the EIS substantially to reflect the traditional knowledge and traditional land and resource use information shared since the original EIS submission. Appendix DD was also substantially revised and Section 3.3.8 of the Stakeholder engagement report speaks specifically to information as it pertains to MNO. Traditional knowledge with respect to wetlands was included in Section 5.9.9 and 5.8.5 of the revised EIS. Traditional knowledge and traditional land and resource use were considered in the selection of valued components as described 6.1.3 of the revised EIS, and used in the effects assessment in Section 6.21 of the revised EIS. Potential effects of the project on the ability of the MNO to practice their traditional land and resource use are discussed in Section 6.22 of the revised EIS. 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. 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 wetlands

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					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".
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. **Revised Response:** Since the time of the original EIS submission, Treasury Metals has participated in a number of meaningful engagement activities. Mostly notably, as of December 18, 2017 announced that it has entered into a Memorandum of Understanding (MOU) with the MNO in relation to the Project. Treasury Metals as revised the EIS substantially to reflect the traditional knowledge and traditional land and resource use information shared since the original EIS submission. Appendix DD was also substantially revised and Section 3.3.8 of the Stakeholder engagement report speaks specifically to information as it pertains to MNO. Treasury Metals has revised the EIS to include the following key changes with respect to traditional knowledge and traditional land and resource use: • Traditional knowledge obtained from various Indigenous communities has been incorporated into each subsection of Section 5 (Existing Environment) (i.e. 5.1 Climate, 5.2 Air Quality, 5.3 Noise and Light, 5.4 Geology, 5.5 Terrain and Soil, 5.6 Hydrogeology, 5.7 Surface Hydrology, 5.8 Aquatic Resources, 5.9 Terrestrial Resources, 5.10 Migratory Birds,5.11 Species at Risk, and 5.12 Human Environment);

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					• Traditional land and resource use is discussed for each Indigenous community including the MNO in Section 5.13.3; • The information presented in Section 5 of the revised EIS was essential to the effects assessment completed for Aboriginal peoples in Section 6.21 and specifically for each community in Section 6.22 of the revised EIS. It was also essential to the selection of Valued Components (VCs) as discussed in Section 6.1.3 of the revised EIS. Trails and travel ways were considered under the VCs "Harvesting of Plants", and "Cultural and Spiritual'. • All engagement activities to date are summarized in Section 9 of the revised EIS and provided in detail in Appendix DD. Engagement logs for all indigenous communities are attached to Appendix DD. • The executive summary has been updated to reflect the meaningful engagement activities with Métis Nation of Ontario. In the revised EIS, a detailed description of study areas is provided for each discipline in Section 6.1.4- Selection of Study Areas. Wildlife and wildlife habitat study area information is provided in Section 6.1.4.12.
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 knowledge at all. Please revise this section to include an ecosystem approach and include traditional knowledge of the MNO. **Revised Response:** Since the time of the original EIS submission, Treasury Metals has participated in a number of meaningful engagement activities. Mostly notably, as of December 18, 2017 announced that it has entered into a Memorandum of Understanding (MOU) with the MNO in relation to the Project. Treasury Metals as revised the EIS substantially to reflect the traditional knowledge and traditional land and resource use information shared since the original EIS submission. Appendix DD was also substantially revised and Section 3.3.8 of the Stakeholder engagement report speaks specifically to

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					information as it pertains to MNO. Treasury Metals has revised the EIS to include the following key changes with respect to traditional knowledge and traditional land and resource use: • Traditional knowledge obtained from various Indigenous communities has been incorporated into each subsection of Section 5 (Existing Environment) (i.e. 5.1 Climate, 5.2 Air Quality, 5.3 Noise and Light, 5.4 Geology, 5.5 Terrain and Soil, 5.6 Hydrogeology, 5.7 Surface Hydrology, 5.8 Aquatic Resources, 5.9 Terrestrial Resources, 5.10 Migratory Birds,5.11 Species at Risk, and 5.12 Human Environment); • Traditional land and resource use is discussed for each Indigenous community including the MNO in Section 5.13.3; • The information presented in Section 5 of the revised EIS was essential to the effects assessment completed for Aboriginal peoples in Section 6.21 and specifically for each community in Section 6.22 of the revised EIS. It was also essential to the selection of Valued Components (VCs) as discussed in Section 6.1.3 of the revised EIS. Trails and travel ways were considered under the VCs "Harvesting of Plants", and "Cultural and Spiritual'. • All engagement activities to date are summarized in Section 9 of the revised EIS and provided in detail in Appendix DD. Engagement logs for all indigenous communities are attached to Appendix DD. • The executive summary has been updated to reflect the meaningful engagement activities with Métis Nation of Ontario. In the revised EIS, a detailed description of study areas is provided for each discipline in Section 6.1.4- Selection of Study Areas. Wildlife and wildlife habitat study area information is provided in Section 6.1.4.12 and migratory birds in 6.1.4.13.
481	AC(1)-155	MNO	Environmental Impact Statement 5.9.8 Significant Wildlife Habitat	7.2.1 Spatial Boundaries 9.1.1 Methodology	**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 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.

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					Revised Response: Since the time of the original EIS submission, Treasury Metals has participated in a number of meaningful engagement activities. Mostly notably, as of December 18, 2017 announced that it has entered into a Memorandum of Understanding (MOU) with the MNO in relation to the Project. Treasury Metals as revised the EIS substantially to reflect the traditional knowledge and traditional land and resource use information shared since the original EIS submission. Appendix DD was also substantially revised and Section 3.3.8 of the Stakeholder engagement report speaks specifically to information as it pertains to MNO. Treasury Metals has revised the EIS to include the following key changes with respect to traditional knowledge and traditional land and resource use: • Traditional knowledge obtained from various Indigenous communities has been incorporated into each subsection of Section 5 (Existing Environment) (i.e. 5.1 Climate, 5.2 Air Quality, 5.3 Noise and Light, 5.4 Geology, 5.5 Terrain and Soil, 5.6 Hydrogeology, 5.7 Surface Hydrology, 5.8 Aquatic Resources, 5.9 Terrestrial Resources, 5.10 Migratory Birds,5.11 Species at Risk, and 5.12 Human Environment); • Traditional land and resource use is discussed for each Indigenous community including the MNO in Section 5.13.3; • The information presented in Section 5 of the revised EIS was essential to the effects assessment completed for Aboriginal peoples in Section 6.21 and specifically for each community in Section 6.22 of the revised EIS. It was also essential to the selection of Valued Components (VCs) as discussed in Section 6.1.3 of the revised EIS. Trails and travel ways were considered under the VCs “Harvesting of Plants”, and “Cultural and Spiritual’. • All engagement activities to date are summarized in Section 9 of the revised EIS and provided in detail in Appendix DD. Engagement logs for all indigenous communities are attached to Appendix DD. • The executive summary has been updated to reflect the meaningful engagement activities with Métis Nation of Ontario. In the revised EIS, a detailed description of study areas is provided for each discipline in Section 6.1.4- Selection of Study Areas. Wildlife and wildlife habitat study area information is provided in Section 6.1.4.12.
482	AC(1)-156	MNO	Environmental Impact Statement		**Information Request / Comment:** Please identify how Section 10 of the EIS relates to Section 5.8.4.8 (Species at Risk and Species of Management Concern)

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					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.
					Revised Response: Since the time of the original EIS submission, Treasury Metals has participated in a number of meaningful engagement activities. Mostly notably, as of December 18, 2017 announced that it has

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					entered into a Memorandum of Understanding (MOU) with the MNO in relation to the Project. Treasury Metals as revised the EIS substantially to reflect the traditional knowledge and traditional land and resource use information shared since the original EIS submission. Appendix DD was also substantially revised and Section 3.3.8 of the Stakeholder engagement report speaks specifically to information as it pertains to MNO. Treasury Metals has revised the EIS to include the following key changes with respect to traditional knowledge and traditional land and resource use: • Traditional knowledge obtained from various Indigenous communities has been incorporated into each subsection of Section 5 (Existing Environment) (i.e. 5.1 Climate, 5.2 Air Quality, 5.3 Noise and Light, 5.4 Geology, 5.5 Terrain and Soil, 5.6 Hydrogeology, 5.7 Surface Hydrology, 5.8 Aquatic Resources, 5.9 Terrestrial Resources, 5.10 Migratory Birds,5.11 Species at Risk, and 5.12 Human Environment o Traditional knowledge with respect to species at risk is specifically included in Section 5.11.4 • Traditional land and resource use is discussed for each Indigenous community including the MNO in Section 5.13.3; • The information presented in Section 5 of the revised EIS was essential to the effects assessment completed for Aboriginal peoples in Section 6.21 and specifically for each community in Section 6.22 of the revised EIS. It was also essential to the selection of Valued Components (VCs) as discussed in Section 6.1.3 of the revised EIS. Trails and travel ways were considered under the VCs "Harvesting of Plants", and "Cultural and Spiritual'. • All engagement activities to date are summarized in Section 9 of the revised EIS and provided in detail in Appendix DD. Engagement logs for all indigenous communities are attached to Appendix DD. • The executive summary has been updated to reflect the meaningful engagement activities with Métis Nation of Ontario. In the revised EIS, a detailed description of study areas is provided for each discipline in Section 6.1.4- Selection of Study Areas.
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

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					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 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.
					Revised Response: The Stakeholder Engagement Report, included in the revised EIS as Appendix DD, has been revised to more fully disaggregate comments and engagement done with individual Indigenous peoples and communities. Section 3.3 of Appendix DD states that specifically Wabigoon Lake First Nation, Eagle Lake First Nation and Naotkamegwanning First Nation have made comments regarding Wild Rice as being a concern. As part of the engagement process Treasury Metals has entered into an agreement with the MNO which includes the completion of a TK/TLU study. The completion of this study will allow the validation of the results of the assessment completed within the Revised EIS. With respect to traditional uses of the land, including the ability of Aboriginal peoples to practice the harvesting of wild rice and other traditional uses of the land, all shared information has been added to Section 5.13 "Traditional Land Use" of the revised EIS. In addition, the traditional knowledge concerning wild rice and other plants traditionally harvested and collected has been added to Section 5.9 of the revised EIS. The effects of the project on the ability to practice traditional uses of the land, including the harvesting of wild rice and other plants are assessed in Section 6.21 and Section 6.22 provides a summary of the potential effects of the project on each indigenous community. The MNO are currently in the process of completing a TK/TLU study for Treasury Metals to use as part of the EA process, however based on primary and secondary information collected to date, Treasury Metals does not expect the findings of this report to significantly impact the result of the effects assessment as shown in Section 6.21 of the revised EIS. Treasury is committed to continued engagement with all indigenous communities to ensure that any potential effect of the project on their ability to practice their traditional use of the land is sufficiently off-set and that it does not have a meaningful impact on their traditional uses of the land. Based on the information shared with Treasury Metals by Métis Nation of Ontario, it is Treasury Metals understanding that MNO is specifically interested in the potential effects on the project on

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					their ability to practice their traditional land and resource uses. From the engagement activities completed to date traditional land and resource uses include but are not limited to harvesting/gathering of plants, trapping of beaver, hunting of moose, and fishing. Treasury Metals has revised the EIS to reflect the valued TKLU information shared by MNO to date and will continue to work with this community to ensure that any potential impacts of the project on their traditional land and resource use are properly mitigated. Further to this based on the traditional knowledge and traditional land and resource use knowledge shared by all Indigenous communities including MNO to-date, the additional information obtained from the traditional knowledge/land use study (TKLUS) is not anticipated to result in substantial changes to the EIS, given the conservative approach already employed in the assessment of the effects of the project on Indigenous communities. Treasury Metals welcomes ongoing engagement and information it will further the understanding of traditional land and resource use and assist in ongoing monitoring and mitigation of potential effects with respect to the Project.
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.
					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		**Information Request / Comment:** Please provide additional rationale as to why evening surveys were selected even though

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
			Statement 5.10.3.2 Animals		"…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.
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. **Revised Response**: As part of the revised EIS, spatial boundaries including for the human environment were reevaluated and are defined in detail in Section 6.1.4 of the revised EIS. With respect to the Human Environment, the spatial boundaries are inherently linked to the valued component being assessed. For example, when assessing the effects of the project on the potential effects of the project on the traditional land use of hunting, the spatial boundaries for potential impacts on moose habitat were examined. Treasury Metals has revised the EIS to include the following key changes with respect to traditional knowledge and traditional land and resource use: • Traditional knowledge obtained from various Indigenous communities has been incorporated into each subsection of Section 5 (Existing Environment) (i.e. 5.1 Climate, 5.2 Air Quality, 5.3 Noise and Light, 5.4 Geology, 5.5 Terrain and Soil, 5.6 Hydrogeology, 5.7 Surface Hydrology, 5.8 Aquatic Resources, 5.9 Terrestrial Resources, 5.10 Migratory

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					Birds,5.11 Species at Risk, and 5.12 Human Environment); • Traditional land and resource use (including forestry) is discussed for each Indigenous community including in Section 5.13.3; • The information presented in Section 5 of the revised EIS was essential to the effects assessment completed for Aboriginal peoples in Section 6.21 and specifically for each community in Section 6.22 of the revised EIS. It was also essential to the selection of Valued Components (VCs) as discussed in Section 6.1.3 of the revised EIS. Forestry was assessed as part of the valued component: Harvesting and Gathering of Plants as described on Section 6.1.3, and assessed in Section 6.21 of the revised EIS. • All engagement activities to date are summarized in Section 9 of the revised EIS and provided in detail in Appendix DD. Engagement logs for all indigenous communities are attached to Appendix DD. • The executive summary has been updated to reflect the meaningful engagement activities with Métis Nation of Ontario. Treasury Metals as part of the responsible development of the Project as of December 18, 2017 announced that it has entered into a Memorandum of Understanding (MOU) with the MNO in relation to the Project. Based on the information shared with Treasury Metals by Métis Nation of Ontario, it is Treasury Metals understanding that MNO is specifically interested in the potential effects on the project on their ability to practice their traditional land and resource uses. From the engagement activities completed to date traditional land and resource uses include but are not limited to harvesting/gathering of plants, trapping of beaver, hunting of moose, and fishing. Treasury Metals has revised the EIS to reflect the valued TKLU information shared by MNO to date and will continue to work with this community to ensure that any potential impacts of the project on their traditional land and resource use are properly mitigated. Further to this based on the traditional knowledge and traditional land and resource use knowledge shared by all Indigenous communities including MNO to-date, the additional information obtained from the traditional knowledge/land use study (TKLUS) is not anticipated to result in substantial changes to the EIS, given the conservative approach already employed in the assessment of the effects of the project on Indigenous communities. Treasury Metals welcomes ongoing engagement and information it will further the understanding of traditional land and resource use and assist in ongoing monitoring and mitigation of potential effects with respect to the Project.
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 demographics in the surrounding towns and communities. **Revised Response**:

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					In the revised EIS, Section 5.13.3 "Traditional Land and Resource Use" contains a sub-section titled Métis Nation of Ontario, where information regarding the current use of land and resources for traditional purposes is specifically described for the Métis Nation of Ontario. Since the time of the original EIS submission, Treasury Metals has participated in a number of meaningful engagement activities. Mostly notably, as of December 18, 2017 announced that it has entered into a Memorandum of Understanding (MOU) with the MNO in relation to the Project. Treasury Metals as revised the EIS substantially to reflect the traditional knowledge and traditional land and resource use information shared since the original EIS submission. Traditional knowledge regarding games species is located in Section 5.9.9 and Section 5.13.3. This information was used in the selection of the valued component "Hunting" described in section 6.1.3 of the Revised EIS, and used to assess the potential effects on Aboriginal Peoples in 6.21 of the revised EIS. An assessment of the ability of each Indigenous community, including the Métis Nation of Ontario, to practice their traditional land and resource use is provided in Section 6.22 of the revised EIS. Treasury Metals has revised the EIS to include the following key changes with respect to traditional knowledge and traditional land and resource use: • Traditional knowledge obtained from various Indigenous communities including Métis Nation of Ontario has been incorporated into each subsection of Section 5 (Existing Environment) (i.e. 5.1 Climate, 5.2 Air Quality, 5.3 Noise and Light, 5.4 Geology, 5.5 Terrain and Soil, 5.6 Hydrogeology, 5.7 Surface Hydrology, 5.8 Aquatic Resources, 5.9 Terrestrial Resources, 5.10 Migratory Birds,5.11 Species at Risk, and 5.12 Human Environment); • Traditional land and resource use is discussed for each Indigenous community including MNO is located in Section 5.13.3; • The information presented in Section 5 of the revised EIS was essential to the effects assessment completed for Aboriginal peoples in Section 6.21 and specifically for each community in Section 6.22 of the revised EIS. It was also essential to the selection of Valued Components (VCs) as discussed in Section 6.1.3 of the revised EIS. • All engagement activities to date are summarized in Section 9 of the revised EIS and provided in detail in Appendix DD. Engagement logs for all indigenous communities are attached to Appendix DD. • The executive summary has been updated to reflect the meaningful engagement activities with Métis Nation of Ontario. Based on the information shared with Treasury Metals by Métis Nation of Ontario, it is Treasury Metals understanding that MNO is specifically interested in the potential effects on the project on their ability to practice their traditional land and resource uses. From the engagement activities completed to date traditional land and resource uses include but are not limited to harvesting/gathering of plants, trapping of beaver, hunting of moose, caribou, deer, grouse, duck

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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>and geese, and fishing. Treasury Metals has revised the EIS to reflect the valued TKLU information shared by MNO to date and will continue to work with this community to ensure that any potential impacts of the project on their traditional land and resource use are properly mitigated.
Further to this based on the traditional knowledge and traditional land and resource use knowledge shared by all Indigenous communities including MNO to-date, the additional information obtained from the traditional knowledge/land use study (TKLUS) is not anticipated to result in substantial changes to the EIS, given the conservative approach already employed in the assessment of the effects of the project on Indigenous communities. Treasury Metals welcomes ongoing engagement and information it will further the understanding of traditional land and resource use and assist in ongoing monitoring and mitigation of potential effects with respect to the Project.</td></tr>
<tr><td>490</td><td>AC(1)-164</td><td>MNO</td><td>Environmental Impact Statement 5.11.2.1 Population</td><td>9.1.3 Human Environment</td><td><u>Information Request / Comment:</u>
This section of the EIS does not include specific details about the Métis population within the major 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.

<u>Revised Response</u>:
Treasury Metals has updated Section 5.12 in the revised EIS to include the 2016 Statistics Canada Census Profile data (http://www12.statcan.gc.ca/census-recensement/2016/dp-pd/prof/index.cfm?Lang=E) for key municipalities and towns (i.e. “major urban centers) surrounding the project site. Specific data included (but is not limited to) population, population demographics, Métis and other aboriginal status, Métis and other aboriginal languages spoken, employment status, annual income, and education levels of the population which includes those identified as Métis.

A summary of the 2016 Census is included as attachment TMI_490-AC(1)-164_Attachment_1 for Indigenous Communities, and TMI_490-AC(1)-164_Attachment_2 for cities, towns, municipalities, the province of Ontario, and Canada.

Specifically, TMI_490-AC(1)-164 requested population and median age 2016 Census Profile data for Métis population demographics for each region. The details of “other population demographics that are available” are provided in TMI_490-AC(1)-164_Attachment_1 and 2 due to the large size of the data set.

<table>
<tr><th>2016 Census Profile</th><th>Population 2016</th><th>Calculated % Métis</th><th>Average age of the population</th><th>Median age of the population</th></tr>
<tr><td>Wabigoon Lake 27, Indian reserve</td><td>168</td><td>0</td><td>37.1</td><td>39.2</td></tr>
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TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response				
					, Ontario				
					Wabauskang 21, Indian reserve, Ontario	70	0	34.8	33.5
					Lac Seul 28, Indian reserve, Ontario	974	0	29.2	26.5
					Whitefish Bay 32A, Indian reserve, Ontario	575	0	29.9	25.2
					Whitefish Bay 33A, Indian reserve, Ontario	96	0	28.2	26.4
					Whitefish Bay 34A, Indian reserve, Ontario	124	0	25.7	23.2
					Grassy Narrows (English River 21), Indian reserve, Ontario	638	0	29.7	27.3
					Eagle River & Vermilion Bay (Machin, Municipality), Ontario	971	13.38	45.8	50.6
					Sioux Lookout, Municipality, Ontario	5272	4.26	37.1	35.9
					Atikokan, Ontario	2753	9.44	46.2	50.3
					Kenora, District, Ontario	65533	5.75	37.6	36.5
					Rainy River, Ontario	20110	7.2	42.5	44.7

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response

Fort Frances, Ontario	7739	9.4	43.3	44.8	
Dryden, Ontario	5586	7.16	44.4	46.8	
Ontario [Province]	13,448,494	0.90	41	41	

This information is included in Section 5.13.2.1 of the revised EIS. The average median age of individuals living on the seven First Nation reserves was 29 years old (± 6.0 years, n=8), compared to the provincial and national averages of 41 years old.

As reported by Statistics Canada and presented in Table 5.13.2.1-1, the 2016 census data indicated that the percentage of the population identifying as a member of an indigenous community (i.e. First Nations, Métis, or Inuk (Inuit)) was substantially higher that the provincial and national average for all towns, cities, municipalities, and official First Nation reserves in the areas surrounding the Project.

Table 5.13.2.1-1 of the revised EIS as shown below:

Community	% Total Indigenous Identity	% First Nations	% Métis	%Inuk (Inuit)	% Non-Aboriginal identity
First Nation Reserve					
Wabigoon Lake 27,	95.24	95.24	0	0	5.95
Eagle Lake 27	98.21	98.21	0	0	4.46
Lac des Mille Lacs 22A1	No data				
Wabauskang 21	100.00	100.00	0	0	0.00
Lac Seul 28	98.05	98.05	0	0	1.54
Whitefish Bay 32A	98.26	98.26	0	0	1.74
Whitefish Bay 33A	98.96	98.96	0	0	0
Whitefish Bay 34A	96.77	96.77	0	0	0
Grassy Narrows (English River 21)	95.61	95.61	0	0	2.35
City, Town, Municipality					
Machin (includes Eagle Lake & Vermilion Bay)	22.66	9.27	13.39	0.00	74.15

<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>
<table>
<tr><td>Wabigoon</td><td>50.94</td><td>33.51</td><td>17.43</td><td>0.00</td><td>41.55</td></tr>
<tr><td>Kenora</td><td>48.20</td><td>42.40</td><td>5.75</td><td>0.05</td><td>50.08</td></tr>
<tr><td>Atikokan</td><td>13.98</td><td>4.54</td><td>9.44</td><td>0.00</td><td>82.64</td></tr>
<tr><td>Rainy River</td><td>26.40</td><td>19.19</td><td>7.21</td><td>0.00</td><td>71.41</td></tr>
<tr><td>Fort Frances</td><td>23.65</td><td>14.15</td><td>9.50</td><td>0.00</td><td>73.46</td></tr>
<tr><td>Sioux Lookout</td><td>36.32</td><td>31.87</td><td>4.27</td><td>0.19</td><td>61.55</td></tr>
<tr><td>Dryden</td><td>19.24</td><td>12.08</td><td>7.16</td><td>0.00</td><td>79.04</td></tr>
<tr><td>Thunder Bay</td><td>12.27</td><td>9.42</td><td>2.83</td><td>0.03</td><td>85.01</td></tr>
<tr><td>Provincial and National</td><td></td><td></td><td></td><td></td><td></td></tr>
<tr><td>Ontario</td><td>2.69</td><td>1.76</td><td>0.90</td><td>0.03</td><td>95.68</td></tr>
<tr><td>Canada</td><td>4.64</td><td>2.78</td><td>1.67</td><td>0.18</td><td>93.27</td></tr>
</table>
</td></tr>
<tr><td>491</td><td>AC(1)-165</td><td>MNO</td><td>Environmental Impact Statement 5.11.2.2 Education</td><td>9.1.3 Human Environment</td><td>
<u>Information Request / Comment:</u>
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.

<u>Revised Response</u>:
Treasury Metals has modified Section 5.12 in the revised EIS to include the 2016 Statistics Canada Census Profile data (http://www12.statcan.gc.ca/census-recensement/2016/dp-pd/prof/index.cfm?Lang=E) for key municipalities and towns (i.e. “major urban centers”) surrounding the project site. Specific data has been included (but is not limited to) population, population demographics, Métis and other aboriginal status, Métis and other aboriginal languages spoken, employment status, annual income, and education levels of the population which includes those identified as Métis.

A summary of the 2016 Census is included as attachment TMI_490-AC(1)-164_Attachment_1 for Indigenous Communities, and TMI_490-AC(1)-164_Attachment_2 for cities, towns, municipalities, the province of Ontario, and Canada.

TMI_491-AC(1)-164 requested 2016 Census Profile data for education levels for the Métis population demographics for each region. An abbreviated summary of this data is included below, however more detailed information is provided within the attachment (and Section 5.13 of the revised EIS).

<table>
<tr><td>2016 Census Profile</td><td>Population; 2016</td><td>% Métis</td><td>Total - Highest certificate; diploma or</td><td>No certificate; diploma or degree</td><td>Secondary (high) school</td><td>Postsecondary certificate;</td></tr>
</table>
</td></tr>
</table>

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response

			degree		diploma or equivalency	diploma or degree
Wabigoon Lake 27, Indian reserve , Ontario	168	0	140	45	25	70
Wabauskang 21, Indian reserve, Ontario	70	0	50	20	10	20
Lac Seul 28, Indian reserve, Ontario	974	0	665	330	160	175
Whitefish Bay 32A, Indian reserve, Ontario	575	0	385	160	90	135
Whitefish Bay 33A, Indian reserve, Ontario	96	0	65	40	10	10
Whitefish Bay 34A, Indian reserve, Ontario	124	0	80	35	15	25
Grassy Narrows (English River 21), Indian reserve, Ontario	638	0	450	290	60	95
Eagle River & Vermilion Bay (Machin, Municipality), Ontario	971	13	840	260	230	350
Sioux Lookout, Municipality Ontario	5272	4.2	4165	1020	1040	2105

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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><td>Atikokan, Ontario</td><td>2753</td><td>9.4</td><td>2345</td><td>540</td><td>725</td><td>1085</td></tr>
<tr><td>Kenora, District, Ontario</td><td>65533</td><td>5.7</td><td>50235</td><td>17695</td><td>12225</td><td>20310</td></tr>
<tr><td>Rainy River, District, Ontario</td><td>20110</td><td>7.2</td><td>16240</td><td>3955</td><td>4725</td><td>7560</td></tr>
<tr><td>Fort Frances, Ontario</td><td>7739</td><td>9.4</td><td>6320</td><td>1370</td><td>1880</td><td>3060</td></tr>
<tr><td>Dryden, Ontario</td><td>5586</td><td>7.1</td><td>4700</td><td>1070</td><td>1380</td><td>2250</td></tr>
<tr><td>Ontario [Province]</td><td>13448494</td><td>0.89</td><td>11038440</td><td>1935355</td><td>3026100</td><td>6076985</td></tr>
</table>
</td></tr>
<tr><td>492</td><td>AC(1)-166</td><td>MNO</td><td>Environmental Impact Statement 5.11.2.5 Crime and Justice</td><td>9.1.3 Human Environment</td><td>
<u>Information Request / Comment:</u>
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.

<u>Revised Response</u>:
Statistics Canada did not collect Crime and Justice Data as part of the 2016 census, and instead publishes a “Crime Severity Index by Province and Territory” which is not meaningful to the EIS or the particular project given the large size of Ontario and thus nonspecific nature of the data.

To assist in responding to this IR, Treasury Metals has reviewed the Ontario Provincial Police (OPP) 2016 Annual Report, and included all pertinent information into Section 5.1.2 of the revised EIS. The table below summarizes the Crime and Justice Data for the project area as published by the OPP for 2014 through 2016 which has been incorporated into Section 5.12 of the revised EIS.

The Goliath Project is located within the OPP North West Region. There are nine detachments that work collaboratively with First Nation police services and are directly involved in the administration and delivery of policing arrangements under the Ontario First Nations Policing Agreement. Several fly-in remote communities in the region maintain winter ice roads throughout the winter months to aid in their accessibility.

Ontario Provincial Police Summary Statistics for Crime and Justice for the North West Region- 2016, 2015, 2014
</td></tr>
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TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response

Crime and Justice Category	2016	2015	2014
Traffic-related Offences	30,326	32,511	33,494
Violent Crime Offences	2,441	2,307	2,391
Property Crime Offences	2,480	2,941	3,087
“Other” Criminal Offences	2,263	2,246	2,384
“Total” Criminal Code Offences	7,184	7,578	7,788
Drug Crime	419	442	670

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					Source: Ontario Provincial Police, 2016 Annual Report (/OPP2016AnnualReport-FINAL-Website-0717.pdf)
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. **Revised Response**: Treasury Metals has revised Section 5.12 in the revised EIS to include the 2016 Statistics Canada Censes Profile data (http://www12.statcan.gc.ca/census-recensement/2016/dp-pd/prof/index.cfm?Lang=E) for key municipalities and towns (i.e. "major urban centers) surrounding the project site. Specific data included (but is not limited to) population, population demographics, Métis and other aboriginal status, Métis and other aboriginal languages spoken, employment status, annual income, poverty or social issues, and education levels of the population which includes those identified as Métis. A summary of the 2016 Census is included as attachment TMI_490-AC(1)-164_Attachment_1 for Indigenous Communities, and TMI_490-AC(1)-164_Attachment_2 for cities, towns, municipalities, the province of Ontario, and Canada. Specifically, TMI_493-AC(1)-167 requested poverty or social issues information from the 2016 Census Profile data for Métis population demographics for each region. Details of the amount of income, employment / unemployment rates, and low-income levels are provided in the following three tables. Additional details of "other population demographics that are available" including socio-economic, poverty and social issues are provided in TMI_490-AC(1)-164_Attachment_1 and 2. This information has been included in Section 5.13 of the revised EIS Data with respect to medium income were only available for Lac Seul 28, Whitefish Bay 32A, and Grassy Narrows (English River 21), which reported $17,675, $19,947, and $9,696, respectively, which are all well below the Provincial and National statistics of $33,539 and $34,204, respectively. Employment data for the First Nation reserves as well as cities, towns and municipalities surrounding the Project are presented in Table 5.13.2.3-1. The average employment rate was lower on average on the seven First Nation reserves relative to the average rate in the towns, cities, and municipalities surrounding the Project site. The average employment rate on the First Nation

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response

reserves was 44% compared to 54% in the surrounding cities, towns, and municipalities. These statistics are lower than the Provincial and National averages of 60%.

Income statistics in 2015 for the population aged 15 years and over in private households - 100% data

	Population; 2016	% Métis	Total	Number of total income	Median total income among recipients ($)
Wabigoon Lake 27, Indian reserve , Ontario	168	0	140		
Wabauskang 21, Indian reserve, Ontario	70	0	50		
Lac Seul 28, Indian reserve, Ontario	974	0	665	625	17675
Whitefish Bay 32A, Indian reserve, Ontario	575	0	385	340	19947
Whitefish Bay 33A, Indian reserve, Ontario	96	0	65		
Whitefish Bay 34A, Indian reserve, Ontario	124	0	80		
Grassy Narrows (English River 21), Indian reserve, Ontario	638	0	450	400	9696
Eagle River & Vermilion Bay (Machin, Municipality), Ontario	971	13.39	830	790	37069
Sioux Lookout, Municipality, Ontario	5272	4.27	4165	4045	43173

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response

Atikokan, Ontario	2753	9.44	2325	2260	33225
Kenora, District, Ontario	65533	5.75	50235	47935	31431
Rainy River, District, Ontario	20110	7.21	16245	15660	33928
Fort Frances, Ontario	7739	9.50	6315	6130	36703
Dryden, Ontario	5586	7.16	4660	4550	35879
Ontario [Province]	13448494	0.90	11038440	10556935	33539

Population aged 15 years and over by Labour force status - 25% sample data

	Population 2016	% Métis	Participation rate	Employment rate	Unemployment rate
Wabigoon Lake 27, Indian reserve, Ontario	168	0	64.3	53.6	16.7
Wabauskang 21, Indian reserve, Ontario	70	0	60.7	53.6	11.6
Lac Seul 28, Indian reserve, Ontario	974	0	58.3	50.6	14.3
Whitefish Bay 32A, Indian reserve, Ontario	575	0	71.2	66.9	6.1
Whitefish Bay 33A, Indian reserve, Ontario	96	0	56	48.7	13.3
Whitefish Bay 34A, Indian reserve, Ontario	124	0	59.7	54.3	9.1
Grassy Narrows (English River 21), Indian	638	0	61.2	56.9	7.1

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response

reserve, Ontario						
Eagle River & Vermilion Bay (Machin, Municipality), Ontario	971	13.39	62.1	57.4	7.9
Sioux Lookout, Municipality, Ontario	5272	4.27	64.7	59.9	7.4
Atikokan, Ontario	2753	9.44	72.7	54.5	25
Kenora, District, Ontario	65533	5.75	59.4	38.3	36.7
Rainy River, District, Ontario	20110	7.21	59.7	45.5	21.7
Fort Frances, Ontario	7739	9.50	61.5	38.5	50
Dryden, Ontario	5586	7.16	62.5	43.8	20
Ontario [Province]	13448494	0.90	46.7	37.8	19

Low-income status in 2015 for the population in private households to whom low-income concepts are applicable

Census Profile	Population 2016	% Métis	Total	0 to 17 years	0 to 5 years	18 to 64 years	65 years and over
Wabigoon Lake 27, Indian reserve , Ontario	168	0					
Wabauskang 21, Indian reserve, Ontario	70	0					
Lac Seul 28, Indian reserve, Ontario	974	0	0	0	0	0	0
Whitefish Bay 32A, Indian reserve, Ontario	575	0	0	0	0	0	0
Whitefish Bay 33A, Indian reserve, Ontario	96	0					
Whitefish Bay 34A, Indian reserve, Ontario	124	0					

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response

Grassy Narrows (English River 21), Indian reserve, Ontario	638	0	0	0	0	0	0
Eagle River & Vermilion Bay (Machin, Municipality), Ontario	971	13.39	945	150	45	600	195
Sioux Lookout, Municipality, Ontario	5272	4.27	5200	1255	425	3400	540
Atikokan, Ontario	2753	9.44	2690	470	125	1625	595
Kenora, District, Ontario	65533	5.75	42175	8275	2620	26220	7685
Rainy River, District, Ontario	20110	7.21	17385	3510	1065	10345	3535
Fort Frances, Ontario	7739	9.50	7550	1535	445	4585	1435
Dryden, Ontario	5586	7.16	5435	990	305	3265	1180
Ontario [Province]	13448494	0.90	13184055	2656535	835000	8418960	2108560

Treasury Metals remains committed to engaging with Indigenous communities and understanding their traditional knowledge and traditional land use, including how these may be linked to socio-economic factors. In addition to the information included in the tables above and in TMI_490-AC(1)-164_Attachment_1 obtained from the 2016 Census, Treasury Metals has updated Section 5.12 of the revised EIS to include information regarding other social issues in addition to poverty, health and mental health, and crime and justice information obtained via a literature review of primary and secondary sources of traditional knowledge including those obtained and reported by the Canadian Mental Health Association (CMHA) and the Ontario Provincial Police. Crime and Justice is discussed in IR TMI_192-AC(1)-166 and also incorporated into Section 5.12.

The following is an example of information included into Section 5.12 of the Revised EIS.

<u>Health and Mental Health</u>

The CMHA indicates that across Canada, the self-rated health of Canadians declines from the most urban regions of the nation to the most rural and remote areas. Geographic location is thus a determinant in health. Residents of northern communities have elevated rates of being overweight,

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					smoking, arthritis / rheumatism and high blood pressure. Furthermore, individuals living in rural and northern areas have higher than average rates of major depressive disorder. Compared to the provincial average, residents of Northern Ontario also have higher self-reported rates of "fair or poor" mental health. Northern Ontarians also self-report higher rates of depression. Medication use is elevated in northern communities, and the hospitalization rate for Northern Ontario is twice that of the provincial rate. A recent analysis of the need for services and supports in rural and northern Ontario revealed that compared to urban areas, individuals living in northern and rural areas are in greater need of psychotherapy or counselling. Some of the key factors in these findings include: • Accessibility and access to health including metal health programs is reduced in northern locations. • Workforce recruitment and retention is a challenge in Northern Ontario. As shown in the Statistics Canada Census tables above, unemployment and low income rates are high in the communities surrounding the project site. • Lack of access to affordable housing is of concern. The CMHA indicated that in Ontario, there is limited access and availability of social services and supports, and access to affordable housing. • Cost of implementing social programs is high given the remoteness and therefore the number of programs is less in
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

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					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 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. **Revised Response**: For the purposes of the EIS, Aboriginal and Treaty Rights are defined as the historic and current uses of lands and resources for traditional purposes by members of Indigenous communities. It is Treasury Metals' understanding that Aboriginal peoples are entitled to access to their lands according to their Aboriginal and Treaty #3 (1873) Rights, and Treasury Metals is committed to working with the Indigenous communities to ensure that the effects of the project on their traditional land and resource use or alternatively referred to as aboriginal and treaty rights are appropriately considered and protected. Treasury Metals recognizes that Aboriginal people live, work, hunt, fish, trap, drink water, and gather/harvest throughout their lands and rely on them for their individual as well as their community's overall cultural, social, spiritual, physical, and economic well-being. Further to this Treasury recognizes that these traditional lands are inextricably connected to a community's identify and culture, inclusive of ceremonial and spiritual recognition. Treasury in respect to this recognizes the importance of assessing any impacts as these relate to traditional land and resource use activities and practices; and Treasury Metals acknowledges that the Project may impact these

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					availability or practices within the Project area, and is committed to working with all communities to identify, mitigate, and avoid, or otherwise minimize, these respective aspects. Treasury Metals has revised the EIS to include the following key changes with respect to traditional knowledge and traditional land and resource use: • Traditional knowledge obtained from various Indigenous communities has been incorporated into each subsection of Section 5 (Existing Environment) (i.e. 5.1 Climate, 5.2 Air Quality, 5.3 Noise and Light, 5.4 Geology, 5.5 Terrain and Soil, 5.6 Hydrogeology, 5.7 Surface Hydrology, 5.8 Aquatic Resources, 5.9 Terrestrial Resources, 5.10 Migratory Birds,5.11 Species at Risk, and 5.12 Human Environment); • Traditional land and resource use (including forestry) is discussed for each Indigenous community including in Section 5.13.3; • The information presented in Section 5 of the revised EIS was essential to the effects assessment completed for Aboriginal peoples in Section 6.21 and specifically for each community in Section 6.22 of the revised EIS. It was also essential to the selection of Valued Components (VCs) as discussed in Section 6.1.3 of the revised EIS. Forestry was assessed as part of the valued component: Harvesting and Gathering of Plants as described on Section 6.1.3, and assessed in Section 6.21 of the revised EIS. • All engagement activities to date are summarized in Section 9 of the revised EIS and provided in detail in Appendix DD. Engagement logs for all indigenous communities are attached to Appendix DD. • The executive summary has been updated to reflect the meaningful engagement activities with Métis Nation of Ontario. Treasury Metals has signed an MOU agreement with the Métis Nation of Ontario and looks forward to ongoing meaningful engagement with this community as well as others during all lifecycle stages of the proposed project.
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 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

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					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.
					Revised Response: For the purposes of the EIS, Aboriginal and Treaty Rights are defined as the historic and current uses of lands and resources for traditional purposes by members of Indigenous communities. It is Treasury Metals' understanding that Aboriginal peoples are entitled to access to their lands according to their Aboriginal and Treaty #3 (1873) Rights, and Treasury Metals is committed to working with the Indigenous communities to ensure that the effects of the project on their traditional land and resource use or alternatively referred to as aboriginal and treaty rights are appropriately considered and protected. Information regarding Traditional Land and Resource use (otherwise known as Aboriginal and Treaty Rights) is located in Section 5.13.5 of the revised EIS, and is separated by Indigenous community (Métis Nation of Ontario= 5.13.3.8). The potential effects of the project on the ability of the Métis Nation of Ontario to practice their traditional land and resource use is assessed in Section 6.21 and Section 6.22 of the Revised EIS. Treasury Metals recognizes that Aboriginal people live, work, hunt, fish, trap, drink water, and gather/harvest throughout their lands and rely on them for their individual as well as their community's overall cultural, social, spiritual, physical, and economic well-being. Further to this Treasury recognizes that these traditional lands are inextricably connected to a community's identify and culture, inclusive of ceremonial and spiritual recognition. Treasury in respect to this recognizes the importance of assessing any impacts as these relate to traditional land and resource use activities and practices; and Treasury Metals acknowledges that the Project may impact these availability or practices within the Project area, and is committed to working with all communities to identify, mitigate, and avoid, or otherwise minimize, these respective aspects. Treasury Metals has revised the EIS to include the following key changes with respect to traditional knowledge and traditional land and resource use: • Traditional knowledge obtained from various Indigenous communities has been incorporated into each subsection of Section 5 (Existing Environment) (i.e. 5.1 Climate,

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					5.2 Air Quality, 5.3 Noise and Light, 5.4 Geology, 5.5 Terrain and Soil, 5.6 Hydrogeology, 5.7 Surface Hydrology, 5.8 Aquatic Resources, 5.9 Terrestrial Resources, 5.10 Migratory Birds,5.11 Species at Risk, and 5.12 Human Environment); • Traditional land and resource use (including forestry) is discussed for each Indigenous community including in Section 5.13.3; • The information presented in Section 5 of the revised EIS was essential to the effects assessment completed for Aboriginal peoples in Section 6.21 and specifically for each community in Section 6.22 of the revised EIS. It was also essential to the selection of Valued Components (VCs) as discussed in Section 6.1.3 of the revised EIS. Forestry was assessed as part of the valued component: Harvesting and Gathering of Plants as described on Section 6.1.3, and assessed in Section 6.21 of the revised EIS. • All engagement activities to date are summarized in Section 9 of the revised EIS and provided in detail in Appendix DD. Engagement logs for all indigenous communities are attached to Appendix DD. • The executive summary has been updated to reflect the meaningful engagement activities with Métis Nation of Ontario. Treasury Metals has signed an MOU agreement with the Métis Nation of Ontario and looks forward to ongoing meaningful engagement with this community as well as others during all lifecycle stages of the proposed project. Based on the information shared with Treasury Metals by Métis Nation of Ontario, it is Treasury Metals understanding that MNO is specifically interested in the potential effects on the project on their ability to practice their traditional land and resource uses. From the engagement activities completed to date traditional land and resource uses include but are not limited to harvesting/gathering of plants, trapping of beaver, hunting of moose, and fishing. Treasury Metals has revised the EIS to reflect the valued TKLU information shared by MNO to date and will continue to work with this community to ensure that any potential impacts of the project on their traditional land and resource use are properly mitigated.
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. **Revised Response**: Treasury Metals has made overtures to each community including Métis Nation of Ontario and collated all biophysical and traditional values/land and resource use information within the EIS to date. This information in turn has been sourced from engagement with Indigenous communities (open houses, presentations, meetings, calls, discussions), and secondary source information. All

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					information received via engagement has been formally captured within the Stakeholder Engagement Report which is included in the revised EIS as appendix DD and summarized in Section 9 of the revised EIS. Treasury Metals as part of the responsible development of the Project as of December 18, 2017 announced that it has entered into a Memorandum of Understanding (MOU) with the MNO in relation to the Project. The MOU is a framework agreement with the MNO – including the Atikokan Métis Community Council, the Kenora Métis Community Council, the Northwest Métis Community Council and the Sunset Country Métis Community Council which represent the regional rights-bearing Métis communities (the "Métis Community") in the Treaty #3 area, including, the Métis traditional territories of Lake of the Woods, Lac Seul, Rainy River and Rainy Lake. This MOU is designed to foster a cooperative and productive ongoing relationship between the MNO and Treasury Metals and to assess any potential impacts of the Project on the MNO citizens. The MOU also provides the Métis Community with an opportunity to participate in the Project through employment, training and business development and ongoing consultation of key aspects of both the relationship and Project. Further to this the MOU document provides the framework of a TKLUS. The TKLUS is currently underway with TK aspects to be considered as part of the Projects development. Contacts have included telephone conversations, emails, letters, and in-person meetings. The MOU also provides the Métis Community with an opportunity to participate in the Project through employment, training and business development and ongoing engagement of key aspects of both the relationship and Project. This engagement is inclusive of the in-design mitigation features as they directly relate to potential impacts to the Métis way-of-life and values identified in the TK/TLU within the Project area. It is Treasury Metals' intent to work with MNO to incorporate, mitigate, and avoid the values identified during this study as part of the EA process, but also the development of the Project. Treasury Metals has revised the EIS to include the following key changes with respect to traditional knowledge and traditional land and resource use: • Traditional knowledge obtained from various Indigenous communities including Métis Nation of Ontario has been incorporated into each subsection of Section 5 (Existing Environment) (i.e. 5.1 Climate, 5.2 Air Quality, 5.3 Noise and Light, 5.4 Geology, 5.5 Terrain and Soil, 5.6 Hydrogeology, 5.7 Surface Hydrology, 5.8 Aquatic Resources, 5.9 Terrestrial Resources, 5.10 Migratory Birds,5.11 Species at Risk, and 5.12 Human Environment); • Traditional land and resource use is discussed for each Indigenous community including in Section 5.13.3; • The information presented in Section 5 of the revised EIS was essential to the effects assessment completed for Aboriginal peoples in Section 6.21 and specifically for each community in Section 6.22 of the revised EIS. It was also essential to the selection of Valued Components (VCs) as discussed in Section 6.1.3 of the revised EIS.

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					• All engagement activities to date are summarized in Section 9 of the revised EIS and provided in detail in Appendix DD. Engagement logs for all indigenous communities are attached to Appendix DD. • The executive summary has been updated to reflect the meaningful engagement activities with Métis Nation of Ontario. Based on the information shared with Treasury Metals by Métis Nation of Ontario, it is Treasury Metals understanding that MNO is specifically interested in the potential effects on the project on their ability to practice their traditional land and resource uses. From the engagement activities completed to date traditional land and resource uses include but are not limited to harvesting/gathering of plants, trapping of beaver, hunting of moose, and fishing. Treasury Metals has revised the EIS to reflect the valued TKLU information shared by MNO to date and will continue to work with this community to ensure that any potential impacts of the project on their traditional land and resource use are properly mitigated. Further to this based on the traditional knowledge and traditional land and resource use knowledge shared by all Indigenous communities including MNO to-date, the additional information obtained from the traditional knowledge/land use study (TKLUS) is not anticipated to result in substantial changes to the EIS, given the conservative approach already employed in the assessment of the effects of the project on Indigenous communities. Treasury Metals welcomes ongoing engagement and information it will further the understanding of traditional land and resource use and assist in ongoing monitoring and mitigation of potential effects with respect to the Project.
498	AC(1)-172	MNO	Environmental Impact Statement 5.11.5.1 Vegetation		**Information Request / Comment**: The statement that "First Nations communities and the public have not identified any specific plants 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.
					Revised Response: Treasury Metals has made overtures to each community including Métis Nation of Ontario and collated all biophysical and traditional values/land and resource use information within the EIS to date. This information in turn has been sourced from engagement with Indigenous communities (open houses, presentations, meetings, calls, discussions), and secondary source information. All information received via engagement has been formally captured within the Stakeholder Engagement Report which is included in the revised EIS as appendix DD and summarized in Section 9 of the revised EIS.

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					Since the time of the original EIS submission, a number of Indigenous communities include the MNO have shared with Treasury Metals that berries including but not limited to blueberries grow on the project site, as well as in the area. The harvesting of berries has also been identified as a traditional land and resource use. Treasury Metals has revised the EIS substantially to reflect the traditional knowledge and tradition land and resource information shared since the time of the original EIS submission. Treasury Metals has revised the EIS to include the following key changes with respect to traditional knowledge and traditional land and resource use: • Traditional knowledge obtained from various Indigenous communities including Métis Nation of Ontario has been incorporated into each subsection of Section 5 (Existing Environment) (i.e. 5.1 Climate, 5.2 Air Quality, 5.3 Noise and Light, 5.4 Geology, 5.5 Terrain and Soil, 5.6 Hydrogeology, 5.7 Surface Hydrology, 5.8 Aquatic Resources, 5.9 Terrestrial Resources, 5.10 Migratory Birds,5.11 Species at Risk, and 5.12 Human Environment). Traditional knowledge with respect to berries is specifically located in Section 5.8; • Traditional land and resource use is discussed for each Indigenous community including the Métis Nation of Ontario is located in Section 5.13.3; • The information presented in Section 5 of the revised EIS was essential to the effects assessment completed for Aboriginal peoples in Section 6.21 and specifically for each community in Section 6.22 of the revised EIS. It was also essential to the selection of Valued Components (VCs) as discussed in Section 6.1.3 of the revised EIS. Effects on berries are assessed under the VC Harvesting/Gathering of Plants. • All engagement activities to date are summarized in Section 9 of the revised EIS and provided in detail in Appendix DD. Engagement logs for all indigenous communities are attached to Appendix DD. • The executive summary has been updated to reflect the meaningful engagement activities with Métis Nation of Ontario. Based on the information shared with Treasury Metals by Métis Nation of Ontario, it is Treasury Metals understanding that MNO is specifically interested in the potential effects on the project on their ability to practice their traditional land and resource uses. From the engagement activities completed to date traditional land and resource uses include but are not limited to harvesting/gathering of plants, trapping of beaver, hunting of moose, and fishing. Treasury Metals has revised the EIS to reflect the valued TKLU information shared by MNO to date and will continue to work with this community to ensure that any potential impacts of the project on their traditional

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					land and resource use are properly mitigated. Further to this based on the traditional knowledge and traditional land and resource use knowledge shared by all Indigenous communities including MNO to-date, the additional information obtained from the traditional knowledge/land use study (TKLUS) is not anticipated to result in substantial changes to the EIS, given the conservative approach already employed in the assessment of the effects of the project on Indigenous communities. Treasury Metals welcomes ongoing engagement and information it will further the understanding of traditional land and resource use and assist in ongoing monitoring and mitigation of potential effects with respect to the Project.
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.
					Revised Response: Section 5.2.2.1 of Appendix EE – Country Foods Assessment to the Revised EIS gives a general overview of Blueberry habitat, and Treasury Metals highlights that the information in Appendix EE is not specific to traditional use of land and resources by Indigenous communities. Section 5.8 of the revised EIS provides a baseline assessment of vegetation in the project area including information about the growth of blueberries, and traditional knowledge regarding blueberry harvesting where available. Treasury recognizes that there will certainly be instances that blueberry picking areas will last much longer than the 4-6 years as described. Treasury Metals also recognizes that blueberries are not the only important plant or berry traditionally harvested and collected and the EIS has been revised to reflect all additional traditional knowledge obtained from the Indigenous communities surrounding the project. Section 5.13 of the revised EIS provides information regarding traditional land and resource use by the MNO including blueberry harvesting. The information presented in Section 5.9 and 5.13 of the revised ES was essential to the effects assessment completed for Aboriginal peoples in Section 6.21 and specifically for each community in Section 6.22 of the revised EIS. The potential effects of the project on harvesting of blueberries as a traditional land use, is assessed in Section 6.21 and summarized in Section 6.22. Specifically berries are assessed using the VC Harvesting/Gathering of Plants. Treasury Metals acknowledges that the Project may potentially impact the traditional land and resource use within the Project area, and is committed to working with all communities to identify, mitigate, and avoid these respective aspects in addition to

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					those aspects currently proposed within the EIS. Since the submission of the original EIS Treasury Metals has participated in meaningful engagement with the Métis Nation of Ontario and other Indigenous Communities surrounding the project. Treasury Metals as part of the responsible development of the Project as of December 18, 2017 announced that it has entered into a Memorandum of Understanding (MOU) with the MNO in relation to the Project. Treasury Metals looks forward to ongoing meaningful engagement with the Métis Nation of Ontario at all stages of the project.
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.
					Revised Response: Since the time of the original EIS submission, Treasury Metals has participated in a number of meaningful engagement activities. Mostly notably, as of December 18, 2017 announced that it has entered into a Memorandum of Understanding (MOU) with the MNO in relation to the Project. Treasury Metals as revised the EIS substantially to reflect the traditional knowledge and traditional land and resource use information shared since the original EIS submission. Traditional knowledge regarding the harvesting or gathering of various plants is located in Section 5.5.5 and Section 5.13.3. This information was used in the selection of the valued component "Harvesting/Gathering of Plants" described in section 6.1.3 of the Revised EIS, and used to assess the potential effects on Aboriginal Peoples in 6.21 of the revised EIS. An assessment of the ability of each Indigenous community, including the Métis Nation of Ontario, to practice their traditional land and resource use is provided in Section 6.22 of the revised EIS. Treasury Metals has revised the EIS to include the following key changes with respect to traditional knowledge and traditional land and resource use: • Traditional knowledge obtained from various Indigenous communities including Métis Nation of Ontario has been incorporated into each subsection of Section 5 (Existing Environment) (i.e. 5.1 Climate, 5.2 Air Quality, 5.3 Noise and Light, 5.4 Geology, 5.5 Terrain and Soil, 5.6 Hydrogeology, 5.7 Surface Hydrology, 5.8 Aquatic Resources, 5.9 Terrestrial Resources, 5.10 Migratory Birds,5.11 Species at Risk, and 5.12 Human Environment); • Traditional land and resource use is discussed for each Indigenous community including in Section 5.13.3; • The information presented in Section 5 of the revised EIS was essential to the effects

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					assessment completed for Aboriginal peoples in Section 6.21 and specifically for each community in Section 6.22 of the revised EIS. It was also essential to the selection of Valued Components (VCs) as discussed in Section 6.1.3 of the revised EIS. • All engagement activities to date are summarized in Section 9 of the revised EIS and provided in detail in Appendix DD. Engagement logs for all indigenous communities are attached to Appendix DD. • The executive summary has been updated to reflect the meaningful engagement activities with Métis Nation of Ontario. Treasury Metals looks forward to ongoing meaningful engagement with the Métis Nation of Ontario during all stages of the project.
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. **Revised Response**: Treasury Metals has unlinked the referenced figures from the existing environment section to Indigenous communities and is mindful that they presented an inaccurate picture of cultural foods and interests as MNO information is not presented. Since the time of the original EIS submission, Treasury Metals has participated in a number of meaningful engagement activities with the MNO and others and has revised the EIS to reflect this. Traditional knowledge with respect to cultural foods of Indigenous communities including the MNO is provided in Section 5.9.9 of the revised EIS.
502	AC(1)-176	MNO	Environmental Impact Statement 5.11.5.2 Hunting and Trapping	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 in the EIS guidelines. **Revised Response**: Since the time of the original EIS submission, Treasury Metals has participated in a number of meaningful engagement activities. Mostly notably, as of December 18, 2017 announced that it has entered into a Memorandum of Understanding (MOU) with the MNO in relation to the Project. Treasury Metals as revised the EIS substantially to reflect the traditional knowledge and traditional land and resource use information shared since the original EIS submission. Traditional knowledge regarding games species is located in Section 5.9.9 and Section 5.13.3. This information was used in the selection of the valued component "Hunting" described in section 6.1.3 of the Revised EIS, and used to assess the potential effects on Aboriginal Peoples in 6.21 of the revised EIS. An assessment of the ability of each Indigenous community, including the Métis Nation of Ontario, to practice their traditional land and resource use is provided in Section 6.22 of the revised EIS. Treasury Metals has revised the EIS to include the following key changes with respect to traditional

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					knowledge and traditional land and resource use: • Traditional knowledge obtained from various Indigenous communities including Métis Nation of Ontario has been incorporated into each subsection of Section 5 (Existing Environment) (i.e. 5.1 Climate, 5.2 Air Quality, 5.3 Noise and Light, 5.4 Geology, 5.5 Terrain and Soil, 5.6 Hydrogeology, 5.7 Surface Hydrology, 5.8 Aquatic Resources, 5.9 Terrestrial Resources, 5.10 Migratory Birds,5.11 Species at Risk, and 5.12 Human Environment); • Traditional land and resource use is discussed for each Indigenous community including MNO is located in Section 5.13.3; • The information presented in Section 5 of the revised EIS was essential to the effects assessment completed for Aboriginal peoples in Section 6.21 and specifically for each community in Section 6.22 of the revised EIS. It was also essential to the selection of Valued Components (VCs) as discussed in Section 6.1.3 of the revised EIS. • All engagement activities to date are summarized in Section 9 of the revised EIS and provided in detail in Appendix DD. Engagement logs for all indigenous communities are attached to Appendix DD. • The executive summary has been updated to reflect the meaningful engagement activities with Métis Nation of Ontario. Based on the information shared with Treasury Metals by Métis Nation of Ontario, it is Treasury Metals understanding that MNO is specifically interested in the potential effects on the project on their ability to practice their traditional land and resource uses. From the engagement activities completed to date traditional land and resource uses include but are not limited to harvesting/gathering of plants, trapping of beaver, hunting of moose, caribou, deer, grouse, duck and geese, and fishing. Treasury Metals has revised the EIS to reflect the valued TKLU information shared by MNO to date and will continue to work with this community to ensure that any potential impacts of the project on their traditional land and resource use are properly mitigated. Further to this based on the traditional knowledge and traditional land and resource use knowledge shared by all Indigenous communities including MNO to-date, the additional information obtained from the traditional knowledge/land use study (TKLUS) is not anticipated to result in substantial changes to the EIS, given the conservative approach already employed in the assessment of the effects of the project on Indigenous communities. Treasury Metals welcomes ongoing engagement and information it will further the understanding of traditional land and resource use and assist in ongoing monitoring and mitigation of potential effects with respect to the Project.
503	AC(1)-177	MNO	Environmental Impact Statement Table 5.11.8		**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

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			Table 5.11.9		requested this information. This shows significant gaps in the engagement process whereby MNO information was not considered and information requested was largely superficial. **Revised Response**: Treasury Metals has requested that the MNO provide information regarding hunting and trapping including the specific number of active Métis hunters as part of the TK/TLU study that MNO of preparing for use by Treasury Metals as part of the EA process. Based on preliminary primary and secondary sources of traditional knowledge and traditional land use, Treasury Metals does not anticipate the exact number of active Métis hunters to alter the outcomes of the effects assessment substantially. Since the filing of the EIS Treasury has continued to develop the relationship with the MNO and is now confident that the ongoing TK/TLU study will provide sufficient detail to substantiate the results of the assessment of effects to the environment due to the Project that are presented within the Revised EIS.
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. **Revised Response**: The EIS has been substantially revised since the original submission to reflect the meaningful engagement activities that have occurred and the traditional knowledge and traditional land and resource use information shared with Treasury Metals by the Indigenous communities surrounding the project including the Métis Nation of Ontario, All information received via engagement has been formally captured within the Stakeholder Engagement Report which is included in the revised EIS as appendix DD and summarized in Section 9 of the revised EIS. A more comprehensive understanding of the existing environment with respect to aquatic resources is provided in Section 5.8 of the revised EIS. Fishing as a traditional land and resource use is discussed in Section 5.13.3 of the revised EIS. The information presented in Section 5 of the revised EIS was essential to the effects assessment completed for Aboriginal peoples in Section 6.21 and specifically for each community in Section 6.22 of the revised EIS. It was also essential to the selection of Valued Components (VCs) as discussed in Section 6.1.3 of the revised EIS. Treasury Metals has signed an MOU agreement with the Métis Nation of Ontario and looks forward to ongoing meaningful engagement with this community as well as others during all lifecycle stages of the proposed project. Based on the information shared with Treasury Metals by Métis Nation of Ontario, it is Treasury Metals understanding that MNO is specifically interested in the potential effects on the project on their ability to practice their traditional land and resource uses. From the engagement activities completed to date traditional land and resource uses include but are not limited to harvesting/gathering of plants, trapping of beaver, hunting of moose, and fishing. Treasury Metals has revised the EIS to reflect the valued TKLU information shared by MNO to date and will continue to work with this community to ensure that any potential impacts of the project on their traditional land and resource use are properly mitigated. The VCs considered in the assessment of the potential effects of the project on Indigenous communities in Section 6.21 of the revised EIS are provided in Table 6.1.3.20-1 and as attachment TMI_505AC(1)-179_attachment_1.
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

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					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 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. **Revised Response**: Treasury Metals has made overtures to each community including Métis Nation of Ontario and collated all biophysical and traditional values/land and resource use information within the EIS to date. This information in turn has been sourced from engagement with Indigenous communities (open houses, presentations, meetings, calls, discussions), and secondary source information. All information received via engagement has been formally captured within the Stakeholder Engagement Report which is included in the revised EIS as appendix DD and summarized in Section 9 of the revised EIS. Most notably, Treasury Metals as part of the responsible development of the Project as of December 18, 2017 announced that it has entered into a Memorandum of Understanding (MOU) with the MNO in relation to the Project. Treasury Metals has revised the EIS to include the following key changes with respect to traditional knowledge and traditional land and resource use: • Traditional knowledge obtained from various Indigenous communities has been incorporated into each subsection of Section 5 (Existing Environment) (i.e. 5.1 Climate, 5.2 Air Quality, 5.3 Noise and Light, 5.4 Geology, 5.5 Terrain and Soil, 5.6 Hydrogeology, 5.7 Surface Hydrology, 5.8 Aquatic Resources, 5.9 Terrestrial Resources, 5.10 Migratory Birds,5.11 Species at Risk, and 5.12 Human Environment);

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					• Traditional land and resource use is discussed for each Indigenous community including in Section 5.13.3; • The information presented in Section 5 of the revised EIS was essential to the effects assessment completed for Aboriginal peoples in Section 6.21 and specifically for each community in Section 6.22 of the revised EIS. It was also essential to the selection of Valued Components (VCs) as discussed in Section 6.1.3 of the revised EIS. • All engagement activities to date are summarized in Section 9 of the revised EIS and provided in detail in Appendix DD. Engagement logs for all indigenous communities are attached to Appendix DD. • The executive summary has been updated to reflect the meaningful engagement activities with Métis Nation of Ontario. Based on the information shared with Treasury Metals by Métis Nation of Ontario, it is Treasury Metals understanding that MNO is specifically interested in the potential effects on the project on their ability to practice their traditional land and resource uses. From the engagement activities completed to date traditional land and resource uses include but are not limited to harvesting/gathering of plants, trapping of beaver, hunting of moose, caribou, deer, grouse, duck and geese, and fishing. Treasury Metals has revised the EIS to reflect the valued TKLU information shared by MNO to date and will continue to work with this community to ensure that any potential impacts of the project on their traditional land and resource use are properly mitigated. Further to this based on the traditional knowledge and traditional land and resource use knowledge shared by all Indigenous communities including MNO to-date, the additional information obtained from the traditional knowledge/land use study (TKLUS) is not anticipated to result in substantial changes to the EIS, given the conservative approach already employed in the assessment of the effects of the project on Indigenous communities. Treasury Metals welcomes ongoing engagement and information it will further the understanding of traditional land and resource use and assist in ongoing monitoring and mitigation of potential effects with respect to the Project.
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. **Revised Response**:

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					Treasury Metals has made overtures to each community including Métis Nation of Ontario and collated all biophysical and traditional values/land and resource use information within the EIS to date. This information in turn has been sourced from engagement with Indigenous communities (open houses, presentations, meetings, calls, discussions), and secondary source information. All information received via engagement has been formally captured within the Stakeholder Engagement Report which is included in the revised EIS as appendix DD and summarized in Section 9 of the revised EIS. Most notably, Treasury Metals as part of the responsible development of the Project as of December 18, 2017 announced that it has entered into a Memorandum of Understanding (MOU) with the MNO in relation to the Project. Part of this included the undertaking of a traditional knowledge and traditional land and resource study. Treasury Metals has revised the EIS to include the following key changes with respect to traditional knowledge and traditional land and resource use: • Traditional knowledge obtained from various Indigenous communities has been incorporated into each subsection of Section 5 (Existing Environment) (i.e. 5.1 Climate, 5.2 Air Quality, 5.3 Noise and Light, 5.4 Geology, 5.5 Terrain and Soil, 5.6 Hydrogeology, 5.7 Surface Hydrology, 5.8 Aquatic Resources, 5.9 Terrestrial Resources, 5.10 Migratory Birds,5.11 Species at Risk, and 5.12 Human Environment); • Traditional land and resource use is discussed for each Indigenous community including in Section 5.13.3; • The information presented in Section 5 of the revised EIS was essential to the effects assessment completed for Aboriginal peoples in Section 6.21 and specifically for each community in Section 6.22 of the revised EIS. It was also essential to the selection of Valued Components (VCs) as discussed in Section 6.1.3 of the revised EIS. • All engagement activities to date are summarized in Section 9 of the revised EIS and provided in detail in Appendix DD. Engagement logs for all indigenous communities are attached to Appendix DD. • The executive summary has been updated to reflect the meaningful engagement activities with Métis Nation of Ontario. Based on the information shared with Treasury Metals by Métis Nation of Ontario, it is Treasury Metals understanding that MNO is specifically interested in the potential effects on the project on their ability to practice their traditional land and resource uses. From the engagement activities completed to date traditional land and resource uses include but are not limited to harvesting/gathering of plants, trapping of beaver, hunting of moose, caribou, deer, grouse, duck and geese, and fishing. Treasury Metals has revised the EIS to reflect the valued TKLU information shared by MNO to date and will continue to work with this community to ensure that any potential impacts of the project on their traditional land and resource use are properly mitigated.

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					Further to this based on the traditional knowledge and traditional land and resource use knowledge shared by all Indigenous communities including MNO to-date, the additional information obtained from the traditional knowledge/land use study (TKLUS) is not anticipated to result in substantial changes to the EIS, given the conservative approach already employed in the assessment of the effects of the project on Indigenous communities. Treasury Metals welcomes ongoing engagement and information it will further the understanding of traditional land and resource use and assist in ongoing monitoring and mitigation of potential effects with respect to 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. **Revised Response**: 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…" has been removed from the revised EIS. 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). Therefore, the revised EIS was conducted in accordance with an "ecosystem approach". This approach is encompassed by 12 defining principals for an ecosystem approach. Treasury Metals has followed all 12 principles, with specific emphasis on Principal 11, which states "The ecosystem approach should consider all forms of relevant information, including scientific and indigenous and local knowledge, innovations and practices". This has been done by incorporating applicable available traditional knowledge into Section 5.0 of the revised EIS (Existing Environment) as well as other locations in the revised EIS; and by selecting valued components to be assessed that reflect concerns raised by Indigenous communities.

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					In January of 2018, Treasury Metals signed a Memorandum of Understanding with MNO and have agreed to fund a TK/TLU study. The information obtained from this study will incorporated into future project revisions in keeping with the ecosystem approach laid out by the CBD.
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. **Revised Response**: Since the time of the original EIS submission, Treasury Metals has participated in a number of meaningful engagement activities. Mostly notably, as of December 18, 2017 announced that it has entered into a Memorandum of Understanding (MOU) with the MNO in relation to the Project. Treasury Metals as revised the EIS substantially to reflect the traditional knowledge and traditional land and resource use information shared since the original EIS submission. Traditional knowledge regarding surface and groundwater quality and fish and fish habitat is located in Section 5.8.5 and Section 5.13.3. This information was used in the selection of the valued components for assessing Aboriginal peoples ("Human Health" "Fishing", and "Cultural and Spiritual") as described in section 6.1.3 of the Revised EIS, and used to assess the potential effects on Aboriginal Peoples in 6.21 of the revised EIS. An assessment of the ability of each Indigenous community, including the Métis Nation of Ontario, to practice their traditional land and resource use is provided in Section 6.22 of the revised EIS. Treasury Metals has revised the EIS to include the following key changes with respect to traditional knowledge and traditional land and resource use: • Traditional knowledge obtained from various Indigenous communities including Métis Nation of Ontario has been incorporated into each subsection of Section 5 (Existing Environment) (i.e. 5.1 Climate, 5.2 Air Quality, 5.3 Noise and Light, 5.4 Geology, 5.5 Terrain and Soil, 5.6 Hydrogeology, 5.7 Surface Hydrology, 5.8 Aquatic Resources, 5.9 Terrestrial Resources, 5.10 Migratory Birds,5.11 Species at Risk, and 5.12 Human Environment); • Traditional land and resource use is discussed for each Indigenous community including MNO is located in Section 5.13.3; • The information presented in Section 5 of the revised EIS was essential to the effects assessment completed for Aboriginal peoples in Section 6.21 and specifically for each community in Section 6.22 of the revised EIS. It was also essential to the selection of Valued Components (VCs) as discussed in Section 6.1.3 of the revised EIS.

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					• All engagement activities to date are summarized in Section 9 of the revised EIS and provided in detail in Appendix DD. Engagement logs for all indigenous communities are attached to Appendix DD. • The executive summary has been updated to reflect the meaningful engagement activities with Métis Nation of Ontario. Based on the information shared with Treasury Metals by Métis Nation of Ontario, it is Treasury Metals understanding that MNO is specifically interested in the potential effects on the project on their ability to practice their traditional land and resource uses. From the engagement activities completed to date traditional land and resource uses include but are not limited to harvesting/gathering of plants, trapping of beaver, hunting of moose, caribou, deer, grouse, duck and geese, and fishing. Treasury Metals has revised the EIS to reflect the valued TKLU information shared by MNO to date and will continue to work with this community to ensure that any potential impacts of the project on their traditional land and resource use are properly mitigated. Further to this based on the traditional knowledge and traditional land and resource use knowledge shared by all Indigenous communities including MNO to-date, the additional information obtained from the traditional knowledge/land use study (TKLUS) is not anticipated to result in substantial changes to the EIS, given the conservative approach already employed in the assessment of the effects of the project on Indigenous communities. Treasury Metals welcomes ongoing engagement and information it will further the understanding of traditional land and resource use and assist in ongoing monitoring and mitigation of potential effects with respect to the Project.
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 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

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					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. **Revised Response**: The methodology / procedure used in the development of the effects assessment is provided in Section 6.1 of the revised EIS, and more specifically, the methodology / procedure used in developing avoidance and mitigation measures is presented in Section 6.1.6. Avoidance measures are implemented as part of the Project design once the predicted effects of the Project are determined through modeling. Any predicted effects that remain following the implementation of avoidance measures will be further evaluated to determine the need for additional mitigation measures. In following with the EIS Guidelines, mitigation measures were incorporated into the mitigation table (Tables 6.23-1 through 6.23-20 of the revised EIS) if they were technically and economically feasible. While building the mitigation table, input from both Indigenous communities and public stakeholders were considered to focus our efforts in providing mitigation to aspects of the Project that were clearly of primary concern. An example of this was the large number of comments regarding the importance of water to Aboriginal peoples of the area, which resulted in the following commitments /mitigation measures: • Treasury Metals is committed that during operations, effluent discharged from the Project to Blackwater Creek will meet the Provincial Water Quality Objectives (PWQO) or background concentrations if background levels are above the PWQO. Where there is no PWQO for a parameter, the commitment will be to meet the Canadian Water Quality Guidelines (CWQG). For total mercury, the commitment will be that effluent discharged to Blackwater Creek will meet background concentrations for that watercourse. (Cmt_034] Background concentrations for Blackwater Creek are defined as the 75th percentile in accordance MOECC receiving water assessment policy. Detailed parameters will be determined through engagement with appropriate Provincial and Federal regulatory bodies. • During operations, excess water not required in the process will be treated to concentrations that meet Provincial Water Quality Objectives (PWQO) or Canadian Water Quality Guidelines (CWQG) for the protection of aquatic life, or background if background levels exceed the PWQO, prior to discharging to Blackwater Creek. In the case of mercury, effluent will be treated to meet the background concentrations in Blackwater Creek. [Mit_053]. • The pit lake will be monitored as it is filling to determine whether batch treatment will be

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					required to ensure the water meets PWQO, or background if background levels exceed the PWQO, prior to the discharge from the pit lake to a tributary of Blackwater Creek. [Mit_024]
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 6.2.1.8 Surface Water Quantity		**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 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.
					Revised Response: Since the time of the original EIS submission, Treasury Metals has participated in a number of meaningful engagement activities. Mostly notably, as of December 18, 2017 announced that it has

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					entered into a Memorandum of Understanding (MOU) with the MNO in relation to the Project. Treasury Metals as revised the EIS substantially to reflect the traditional knowledge and traditional land and resource use information shared since the original EIS submission. Appendix DD was also substantially revised and Section 3.3.8 of the Stakeholder engagement report speaks specifically to information as it pertains to MNO. Treasury Metals has revised the EIS to include the following key changes with respect to traditional knowledge and traditional land and resource use: • Traditional knowledge obtained from various Indigenous communities has been incorporated into each subsection of Section 5 (Existing Environment) (i.e. 5.1 Climate, 5.2 Air Quality, 5.3 Noise and Light, 5.4 Geology, 5.5 Terrain and Soil, 5.6 Hydrogeology, 5.7 Surface Hydrology, 5.8 Aquatic Resources, 5.9 Terrestrial Resources, 5.10 Migratory Birds,5.11 Species at Risk, and 5.12 Human Environment • Traditional land and resource use is discussed for each Indigenous community including the MNO in Section 5.13.3; • The information presented in Section 5 of the revised EIS was essential to the effects assessment completed for Aboriginal peoples in Section 6.21 and specifically for each community in Section 6.22 of the revised EIS. It was also essential to the selection of Valued Components (VCs) as discussed in Section 6.1.3 of the revised EIS. o Traditional knowledge gained via meaningful engagement with respect to wildlife and wildlife habitat presented in Section 5.8, 5.9, 5.10 and 5.11 was used in the VC selection described in Section 6.1.3 of the revised EIS and then in the effects assessment of the project in Section 6 (6.12- wildlife and wild life habitat , 6.13- migratory birds, 6.14- fish and fish habitat, 6.15- vegetation and wetlands, 6.21 Aboriginal Peoples, and 6.22 Indigenous Communities)of the EIS. • All engagement activities to date are summarized in Section 9 of the revised EIS and provided in detail in Appendix DD. Engagement logs for all indigenous communities are attached to Appendix DD. • The executive summary has been updated to reflect the meaningful engagement activities with Métis Nation of Ontario. Based on the information shared with Treasury Metals by Métis Nation of Ontario, it is Treasury Metals understanding that MNO is specifically interested in the potential effects on the project on their ability to practice their traditional land and resource uses. From the engagement activities completed to date traditional land and resource uses include but are not limited to harvesting/gathering of plants, trapping of beaver, hunting of moose, caribou, deer, grouse, duck

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					and geese, and fishing. Treasury Metals has revised the EIS to reflect the valued TKLU information shared by MNO to date and will continue to work with this community to ensure that any potential impacts of the project on their traditional land and resource use are properly mitigated. Further to this based on the traditional knowledge and traditional land and resource use knowledge shared by all Indigenous communities including MNO to-date, the additional information obtained from the traditional knowledge/land use study (TKLUS) is not anticipated to result in substantial changes to the EIS, given the conservative approach already employed in the assessment of the effects of the project on Indigenous communities. Treasury Metals welcomes ongoing engagement and information it will further the understanding of traditional land and resource use and assist in ongoing monitoring and mitigation of potential effects with respect to the Project.
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. **Revised Response**: Since the time of the original EIS submission, Treasury Metals has participated in a number of meaningful engagement activities. Mostly notably, as of December 18, 2017 announced that it has entered into a Memorandum of Understanding (MOU) with the MNO in relation to the Project. Treasury Metals as revised the EIS substantially to reflect the traditional knowledge and traditional

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					land and resource use information shared since the original EIS submission. Appendix DD was also substantially revised and Section 3.3.8 of the Stakeholder engagement report speaks specifically to information as it pertains to MNO. Treasury Metals has revised the EIS to include the following key changes with respect to traditional knowledge and traditional land and resource use: • Traditional knowledge obtained from various Indigenous communities has been incorporated into each subsection of Section 5 (Existing Environment) (i.e. 5.1 Climate, 5.2 Air Quality, 5.3 Noise and Light, 5.4 Geology, 5.5 Terrain and Soil, 5.6 Hydrogeology, 5.7 Surface Hydrology, 5.8 Aquatic Resources, 5.9 Terrestrial Resources, 5.10 Migratory Birds,5.11 Species at Risk, and 5.12 Human Environment • Traditional land and resource use is discussed for each Indigenous community including the MNO in Section 5.13.3; • The information presented in Section 5 of the revised EIS was essential to the effects assessment completed for Aboriginal peoples in Section 6.21 and specifically for each community in Section 6.22 of the revised EIS. It was also essential to the selection of Valued Components (VCs) as discussed in Section 6.1.3 of the revised EIS. o Traditional knowledge gained via meaningful engagement with respect to wildlife and wildlife habitat presented in Section 5.8, 5.9, 5.10 and 5.11 was used in the VC selection described in Section 6.1.3 of the revised EIS and then in the effects assessment of the project in Section 6 (6.12- wildlife and wild life habitat , 6.13- migratory birds, 6.14- fish and fish habitat, 6.15- vegetation and wetlands, 6.21 Aboriginal Peoples, and 6.22 Indigenous Communities)of the EIS. • All engagement activities to date are summarized in Section 9 of the revised EIS and provided in detail in Appendix DD. Engagement logs for all indigenous communities are attached to Appendix DD. • The executive summary has been updated to reflect the meaningful engagement activities with Métis Nation of Ontario. Based on the information shared with Treasury Metals by Métis Nation of Ontario, it is Treasury Metals understanding that MNO is specifically interested in the potential effects on the project on their ability to practice their traditional land and resource uses. From the engagement activities completed to date traditional land and resource uses include but are not limited to harvesting/gathering of plants, trapping of beaver, hunting of moose, caribou, deer, grouse, duck and geese, and fishing. Treasury Metals has revised the EIS to reflect the valued TKLU information shared by MNO to date and will continue to work with this community to ensure that any potential

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					impacts of the project on their traditional land and resource use are properly mitigated. Further to this based on the traditional knowledge and traditional land and resource use knowledge shared by all Indigenous communities including MNO to-date, the additional information obtained from the traditional knowledge/land use study (TKLUS) is not anticipated to result in substantial changes to the EIS, given the conservative approach already employed in the assessment of the effects of the project on Indigenous communities. Treasury Metals welcomes ongoing engagement and information it will further the understanding of traditional land and resource use and assist in ongoing monitoring and mitigation of potential effects with respect to the Project.
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.
					Revised Response: Since the time of the original EIS submission, Treasury Metals has participated in a number of meaningful engagement activities. Mostly notably, as of December 18, 2017 announced that it has entered into a Memorandum of Understanding (MOU) with the MNO in relation to the Project. Treasury Metals as revised the EIS substantially to reflect the traditional knowledge and traditional land and resource use information shared since the original EIS submission. Appendix DD was also substantially revised and Section 3.3.8 of the Stakeholder engagement report speaks specifically to information as it pertains to MNO. Treasury Metals has revised the EIS to include the following key changes with respect to traditional

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					knowledge and traditional land and resource use: • Traditional knowledge obtained from various Indigenous communities has been incorporated into each subsection of Section 5 (Existing Environment) (i.e. 5.1 Climate, 5.2 Air Quality, 5.3 Noise and Light, 5.4 Geology, 5.5 Terrain and Soil, 5.6 Hydrogeology, 5.7 Surface Hydrology, 5.8 Aquatic Resources, 5.9 Terrestrial Resources, 5.10 Migratory Birds,5.11 Species at Risk, and 5.12 Human Environment • Traditional land and resource use is discussed for each Indigenous community including the MNO in Section 5.13.3; • The information presented in Section 5 of the revised EIS was essential to the effects assessment completed for Aboriginal peoples in Section 6.21 and specifically for each community in Section 6.22 of the revised EIS. It was also essential to the selection of Valued Components (VCs) as discussed in Section 6.1.3 of the revised EIS. o Traditional knowledge gained via meaningful engagement with respect to wildlife and wildlife habitat presented in Section 5.8, 5.9, 5.10 and 5.11 was used in the VC selection described in Section 6.1.3 of the revised EIS and then in the effects assessment of the project in Section 6 (6.12- wildlife and wild life habitat, 6.13- migratory birds, 6.14- fish and fish habitat, 6.15- vegetation and wetlands, 6.21 Aboriginal Peoples, and 6.22 Indigenous Communities)of the EIS. • All engagement activities to date are summarized in Section 9 of the revised EIS and provided in detail in Appendix DD. Engagement logs for all indigenous communities are attached to Appendix DD. • The executive summary has been updated to reflect the meaningful engagement activities with Métis Nation of Ontario. Based on the information shared with Treasury Metals by Métis Nation of Ontario, it is Treasury Metals understanding that MNO is specifically interested in the potential effects on the project on their ability to practice their traditional land and resource uses. From the engagement activities completed to date traditional land and resource uses include but are not limited to harvesting/gathering of plants, trapping of beaver, hunting of moose, caribou, deer, grouse, duck and geese, and fishing. Treasury Metals has revised the EIS to reflect the valued TKLU information shared by MNO to date and will continue to work with this community to ensure that any potential impacts of the project on their traditional land and resource use are properly mitigated. Further to this based on the traditional knowledge and traditional land and resource use knowledge shared by all Indigenous communities including MNO to-date, the additional information obtained from the traditional knowledge/land use study (TKLUS) is not anticipated to result in substantial changes to the EIS, given the conservative approach already employed in the assessment of the

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					effects of the project on Indigenous communities. Treasury Metals welcomes ongoing engagement and information it will further the understanding of traditional land and resource use and assist in ongoing monitoring and mitigation of potential effects with respect to the Project.
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.
					Revised Response: Since the time of the original EIS submission, Treasury Metals has participated in a number of meaningful engagement activities. Mostly notably, as of December 18, 2017 announced that it has entered into a Memorandum of Understanding (MOU) with the MNO in relation to the Project. Treasury Metals as revised the EIS substantially to reflect the traditional knowledge and traditional land and resource use information shared since the original EIS submission. Traditional knowledge regarding (but not limited to) noise, aesthetics, flora, fauna, and fish was added into each subsection of Section 5- Existing Environment, which was in turn used in the valued component selection described in Section 6.1.3 of the revised EIS. The VCs were used in the revised assessment of potential effects of the projects which is located in Section 6.21 of the revised EIS. An assessment of the ability of each Indigenous community, including the Métis Nation of Ontario, to practice their traditional land and resource use is provided in Section 6.22 of the revised EIS. Treasury Metals has revised the EIS to include the following key changes with respect to traditional knowledge and traditional land and resource use: • Traditional knowledge obtained from various Indigenous communities including Métis Nation of Ontario has been incorporated into each subsection of Section 5 (Existing Environment) (i.e. 5.1 Climate, 5.2 Air Quality, 5.3 Noise and Light, 5.4 Geology, 5.5 Terrain and Soil, 5.6 Hydrogeology, 5.7 Surface Hydrology, 5.8 Aquatic Resources, 5.9 Terrestrial Resources, 5.10 Migratory Birds,5.11 Species at Risk, and 5.12 Human Environment); • Traditional land and resource use is discussed for each Indigenous community including MNO is located in Section 5.13.3; • The information presented in Section 5 of the revised EIS was essential to the effects assessment completed for Aboriginal peoples in Section 6.21 and specifically for each community in Section 6.22 of the revised EIS. It was also essential to the selection of Valued Components (VCs) as discussed in Section 6.1.3 of the revised EIS.

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					• All engagement activities to date are summarized in Section 9 of the revised EIS and provided in detail in Appendix DD. Engagement logs for all indigenous communities are attached to Appendix DD. • The executive summary has been updated to reflect the meaningful engagement activities with Métis Nation of Ontario. Based on the information shared with Treasury Metals by Métis Nation of Ontario, it is Treasury Metals understanding that MNO is specifically interested in the potential effects on the project on their ability to practice their traditional land and resource uses. From the engagement activities completed to date traditional land and resource uses include but are not limited to harvesting/gathering of plants, trapping of beaver, hunting of moose, caribou, deer, grouse, duck and geese, and fishing. Treasury Metals has revised the EIS to reflect the valued TKLU information shared by MNO to date and will continue to work with this community to ensure that any potential impacts of the project on their traditional land and resource use are properly mitigated. Further to this based on the traditional knowledge and traditional land and resource use knowledge shared by all Indigenous communities including MNO to-date, the additional information obtained from the traditional knowledge/land use study (TKLUS) is not anticipated to result in substantial changes to the EIS, given the conservative approach already employed in the assessment of the effects of the project on Indigenous communities. Treasury Metals welcomes ongoing engagement and information it will further the understanding of traditional land and resource use and assist in ongoing monitoring and mitigation of potential effects with respect to the Project.
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. **Revised Response**: As part of the IR responses and at the request of the Agency Treasury has also provided a Revised EIS. As part of the revised EIS recreational and tourism activities are now considered a traditional use of the land by the MNO (this is stated in Section 5.13.3). This information was considered when selecting the valued components (6.1.3) to be used in the assessment of effects on Aboriginal peoples (Section 6.21). The effects of the project on the ability of the MNO to exercise their treaty rights otherwise known as traditional land and resource use, is described in Section 6.22.
524	AC(1)-198	MNO	Environmental Impact Statement 6.3 Valued		**Information Request / Comment:** 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:

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
			Component Identification		• 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 Statement 6.3 Valued Component		**Information Request / Comment:** This section does not include a matrix which displays those VCs that were included/excluded from 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.

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
			Identification		**Revised 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. A detailed rationale for each VC has been provided in Section 6.1.3 of the revised EIS segregated by discipline. Additionally, VCs that were considered based on input from both Aboriginal peoples and public stakeholders but not included in the assessment have also been described in Section 6.1.3 of the revised EIS. An example of this is the Eastern Wolf (Section 6.1.3.11), which was identified by a number of Indigenous communities as a species of interest. Baseline surveys were conducted to identify any signs of Eastern Wolf activity in the Project area, along with a detailed literature review on sightings. As the closest recorded sighting was in Killarney Provincial Park (over 900 km away), Eastern Wolf was determined to not be present in the area and was therefore not included as a VC. The reference used in the original response to Information Request TMI_525-AC(1)-99 describing a section on "description of project effects and linkages" was inadvertently unclear. Section 6.0 of the revised EIS is the effects assessment completed for the Project, and is segregated by discipline for readability. Also in this section, under each discipline sub-heading, is a linkage diagram that links the various components of the Project and was designed to help the reviewer understand the connectivity between aspects of the environment that were considered as part of the assessment.
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

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 where blasting noise was considered as a separate VC in Section 6.4.
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.
					Revised Response: In developing the effects assessment presented in Section 6.0 of the revised EIS, specific consideration was given to linkages between disciplines. All applicable disciplines that link to Indigenous peoples has been shown in a linkage diagram under each discipline subsection in Section 6.0. Linkage diagrams for the disciplines identified by the reviewer, along with linkages to the assessment on Aboriginal peoples is provided below. Noise The noise linkage diagram is provided as Figure 6.4.1-1 of the revised EIS and links each noise related effect from the Project to applicable VCs in the effects assessment. This includes linkages to Aboriginal VCs presented in Section 6.21 of the revised EIS. Additionally, the effects assessment for noise directly influenced potential impacts Aboriginal peoples current land uses and traditional land uses. The VCs used in this assessment included ambient noise levels and noise disturbance of wildlife. The ambient noise level that was modelled was 40 dBA, which would be considered audible to humans. This could affect the enjoyment of the land by both Aboriginal and Non-aboriginal peoples while in the area around the Project in exceedance of 40 dBA. Noise disturbance on wildlife was modelled for 50 dBA, which studies have shown to be disruptive

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					to wildlife, especially migratory birds, causing changes in behavior or avoidance of the areas. This could have effects on both Aboriginal and Non-aboriginal peoples ability to hunt in the areas that are anticipated to exceed 50 dBA. Further details on the noise effects assessment can be found in Section 6.4 of the revised EIS. The spatial extent of the predicted noise effects identified through the effects assessment is presented in Figure 6.4.6-1 of the revised EIS. These areas identify where Aboriginal peoples current and traditional uses of the land may be affected by noise from the Project. Light The light linkage diagram is provided as Figure 6.5.1-1 of the revised EIS and links each light related effect from the Project to applicable VC in the effects assessment. This includes linkages to the wildlife and wildlife habitat VCs (Section 6.12 of the revised EIS) and Aboriginal peoples VCs (Section 6.21 of the revised EIS). The modelling of light effects (Section 6.5.4 of the revised EIS) shows that with the avoidance and mitigation measures (Sections 6.5.3 and 6.5.4 of the revised EIS), light trespass effects will be restricted to the operations area (Figure 6.5.6-1 of the revised EIS). Because access to the operations area would be restricted during the operating life of the mine (site preparation through closure), light from the Project is not anticipated to result in any additional effects to Aboriginal peoples use of the lands for traditional purposes. Air Quality The air quality linkage diagram is provided as Figure 6.6.1-1 of the revised EIS and links each air quality related effect from the Project to applicable VCs in the effects assessment. This includes linkages to Aboriginal VCs presented in Section 6.21 of the revised EIS. The spatial distribution of residual air quality effects identified through the effects assessment is presented in Figure 6.6.6-1 of the revised EIS. These areas identify where Aboriginal people current and traditional uses of the land may be affected by air quality effects from the Project. Wildlife and Wildlife Habitat The wildlife and wildlife habitat linkage diagram is provided as Figure 6.12.1-1 of the revised EIS and links each wildlife and wildlife related effect from the Project to applicable VCs in the effects assessment. This includes linkages to Aboriginal VCs presented in Section 6.21 of the revised EIS. Additionally, specific wildlife VCs and indicators were chosen for the assessment based on input and concerns raised by Indigenous communities. Specifically, this included moose as an indicator under ungulates, and beaver as an indicator under furbearers. The spatial distribution of residual effects to wildlife and wildlife habitat identified through the effects assessment is presented in Figure 6.12.6-1 of the revised EIS. These areas identify where Aboriginal people current and traditional uses of the land may be affected by wildlife and wildlife habitat effects from the Project. Wetlands and Vegetation The wetlands and vegetation linkage diagram is provided as Figure 6.15.1-1 of the revised EIS and links each wetlands and vegetation related effect from the Project to applicable VCs in the effects

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					assessment. This includes linkages to Aboriginal VCs presented in Section 6.21 of the revised EIS. The spatial distribution of residual effects to wetlands and vegetation identified through the effects assessment is presented in Figure 6.15.6-1 and Figure 6.15.6-2 of the revised EIS. These areas identify where Aboriginal peoples current and traditional uses of the land may be affected by Project effects to wetlands and vegetation. Aboriginal Peoples In addition to the above VC linkages to Aboriginal peoples current and traditional uses of the land, Figure 6.21.1-1 of the revised EIS provides the linkage diagram for Aboriginal peoples. This diagram provides the linkages of each VC used in the effects assessment that links to Aboriginal peoples VCs.
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 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

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					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:** 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

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					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: 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.

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					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 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. **Revised Response**: In response to the Round 1 information requests, 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. As part of the process to revise the EIS, Treasury Metals reviewed the valued components (VCs) used in the original EIS to determining whether they would be retained for use in the revised

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					EIS, expanded or revised. Section 6.1.3.15 of the revised EIS describes and justifies the following nine (9) valued components used for evaluating the effects of the Project on land use: • Land Use Planning and Policies; • Aggregate Operations; • Forestry; • Mineral Exploration; • Fishing - Recreational and Commercial; • Hunting; • Trapping; • Cottagers and Outfitters; and • Other Recreational Uses. In selecting these VCs, consideration was given to the EIS Guidelines for the Project. It should be noted that the EIS Guidelines for the Project do not specifically identify that VC "must represent a vulnerable component", rather the EIS Guidelines state the following, which is consistent with the VCs selected for evaluating effects on land use in the revised EIS: *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.*
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	**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.

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				of environmental impacts."	
537	AC(1)-211	MNO	Environmental Impact Statement 6.3.2.5 Aboriginal Peoples		**Information Request / Comment:** The title of this section minimizes the duty of the proponent to assess potential effects on Aboriginal rights and interests. 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. **Revised Response**: It should be noted that there was no requirement in the EIS Guidelines to use interaction matrices in the EIS. Interaction matrices are only one method that can be used for showing how the elements of the Project can interact with individual VCs. In Section 6 of the revised EIS, Treasury Metals provided a listing of the Project elements considered, and the potential effects of the Project for each of the disciplines by phase of the Project. As part of the discussion for each discipline, linkages diagrams have been used to show the relationships between Project elements and VCs, as well as between various disciplines. An example of one of these linkage diagrams has been reproduced in this response as Figure 1. Figure 1: Linkage Diagram for Noise

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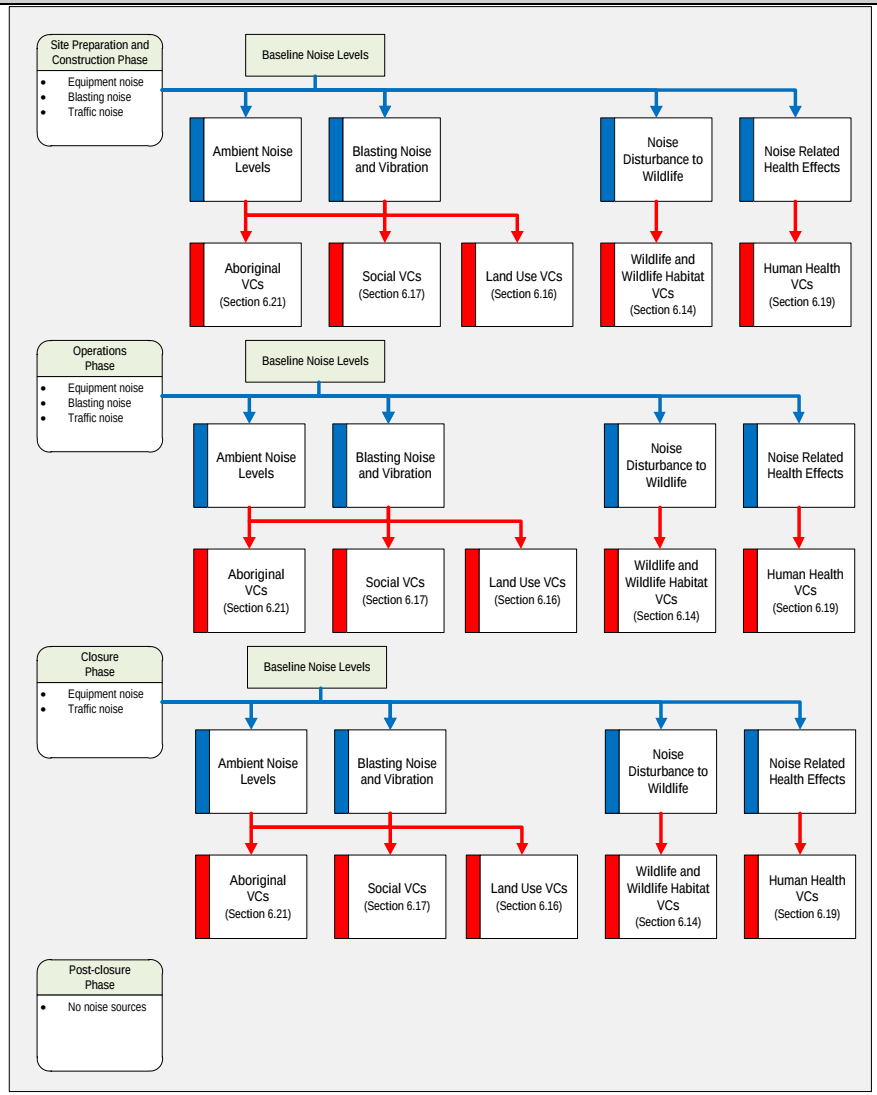

Note: The above figure is a reproduction of Figure 6.4.1.1 of the revised EIS.

A description of the process for the selection of valued components (VCs) and indicators is provided in Section 6.1.3 of the revised EIS. Each VC is then discussed evaluated in detail in subsections 6.2

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					through 6.21 of the revised EIS, as set out below in Table 1.

Table 1: Location inn Revised EIS for Selection of Valued Components, Project Elements and Potential Effects, and Linkages

Discipline	Summary	Location in Revised EIS
Terrain and Soils	Selection of VCs and indicators	Section 6.1.3.1
	Project elements considered by phase and potential effects of the Project	Section 6.2.1
	Linkage diagram	Figure 6.2.1-1
Geology and Geochemistry	Selection of VCs and indicators	Section 6.1.3.2
	Project elements considered by phase and potential effects of the Project	Section 6.3.1
	Linkage diagram	Figure 6.3.1-1
Noise	Selection of VCs and indicators	Section 6.1.3.3
	Project elements considered by phase and potential effects of the Project	Section 6.4.1
	Linkage diagram	Figure 6.4.1-1
Light	Selection of VCs and indicators	Section 6.1.3.4
	Project elements considered by phase and potential effects of the Project	Section 6.5.1
	Linkage diagram	Figure 6.5.1-1
Air Quality	Selection of VCs and indicators	Section 6.1.3.5
	Project elements considered by phase and potential effects of the Project	Section 6.6.1
	Linkage diagram	Figure 6.6.1-6
Climate	Selection of VCs and indicators	Section 6.1.3.6
	Project elements considered by phase and potential effects of the Project	Section 6.7.1
	Linkage diagram	Figure 6.7.1-1
Surface Water Quality	Selection of VCs and indicators	Section 6.1.3.7
	Project elements considered by phase and potential effects of the Project	Section 6.8.1
	Linkage diagram	Figure 6.8.1-1
Surface Water Quantity	Selection of VCs and indicators	Section 6.1.3.8
	Project elements considered by phase and potential effects of	Section 6.9.1

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						the Project	
						Linkage diagram	Figure 6.9.1-1
					Groundwater Quality	Selection of VCs and indicators	Section 6.1.3.9
						Project elements considered by phase and potential effects of the Project	Section 6.10.1
						Linkage diagram	Figure 6.10.1-1
					Groundwater Quantity	Selection of VCs and indicators	Section 6.1.3.10
						Project elements considered by phase and potential effects of the Project	Section 6.11.1
						Linkage diagram	Figure 6.11.1-1
					Wildlife and Wildlife Habitat	Selection of VCs and indicators	Section 6.1.3.11
						Project elements considered by phase and potential effects of the Project	Section 6.12.1
						Linkage diagram	Figure 6.12.1-1
					Migratory Birds	Selection of VCs and indicators	Section 6.1.3.12
						Project elements considered by phase and potential effects of the Project	Section 6.13.1
						Linkage diagram	Figure 6.13.1-1
					Fish and Fish Habitat	Selection of VCs and indicators	Section 6.1.3.13
						Project elements considered by phase and potential effects of the Project	Section 6.14.1
						Linkage diagram	Figure 6.14.1-1
					Wetlands and Vegetation	Selection of VCs and indicators	Section 6.1.3.14
						Project elements considered by phase and potential effects of the Project	Section 6.15.1
						Linkage diagram	Figure 6.15.1-1
					Land Use	Selection of VCs and indicators	Section 6.1.3.15
						Project elements considered by phase and potential effects of the Project	Section 6.16.1
						Linkage diagram	Figure 6.16.1-1
					Social	Selection of VCs and indicators	Section 6.1.3.16
						Project elements considered by phase and potential effects of the Project	Section 6.17.1
						Linkage diagram	Figure 6.17.1-1
					Economic Factors	Selection of VCs and indicators	Section 6.1.3.17

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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>
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<tr><td></td><td>Project elements considered by phase and potential effects of the Project</td><td>Section 6.18.1</td></tr>
<tr><td></td><td>Linkage diagram</td><td>Figure 6.18.1-1</td></tr>
<tr><td rowspan="3">Human Health</td><td>Selection of VCs and indicators</td><td>Section 6.1.3.18</td></tr>
<tr><td>Project elements considered by phase and potential effects of the Project</td><td>Section 6.19.1</td></tr>
<tr><td>Linkage diagram</td><td>Figure 6.19.1-1</td></tr>
<tr><td rowspan="3">Heritage Resources</td><td>Selection of VCs and indicators</td><td>Section 6.1.3.19</td></tr>
<tr><td>Project elements considered by phase and potential effects of the Project</td><td>Section 6.20.1</td></tr>
<tr><td>Linkage diagram</td><td>Figure 6.20.1-1</td></tr>
<tr><td rowspan="3">Aboriginal Peoples</td><td>Selection of VCs and indicators</td><td>Section 6.1.3.20</td></tr>
<tr><td>Project elements considered by phase and potential effects of the Project</td><td>Section 6.21.1</td></tr>
<tr><td>Linkage diagram</td><td>Figure 6.21.1-1</td></tr>
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<tr><td>539</td><td>AC(1)-213</td><td>MNO</td><td>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 Water Quantity

6.4.1.9 Groundwater Quality

6.4.1.10 Groundwater Quantity
6.4.1.13</td><td></td><td><u>Information Request / Comment:</u>
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
• 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</td></tr>
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TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
			Wetlands and Vegetation 6.4.2.1 Land Use 6.4.2.2 Social Factors 6.4.2.3 Economic Factors		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 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	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 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

<table>
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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.

<u>Revised Response</u>:

Treasury Metals has revised the EIS to specifically link potential effects of the project to Indigenous Communities including their “rights and interests” referred to below as their traditional land use. The table below summarizes the request, and where the request has been incorporated into the Revised EIS.

<table>
<tr><th>Effect</th><th>Section Number and Title in Revised EIS</th><th>Subsection in Revised EIS and Details to Answer IR</th></tr>
<tr><td>Noise</td><td>6.4 Noise</td><td>6.4.4 Predicted Effects
Figure 6.4.1-1: Noise Linkage Diagram demonstrates how the effects of noise during all project stages links to other valued components, specifically Indigenous communities including traditional land use, which is discussed in detail in Section 6.21 of the Revised EIS</td></tr>
<tr><td>Light</td><td>6.5 Light</td><td>6.5.4 Predicted Effects
Figure 6.5.1-1: Light Linkage Diagram demonstrates how the effects of Light during all project stages links to other valued components, specifically Indigenous communities including traditional land use, which is discussed in detail in Section 6.21 of the Revised EIS</td></tr>
<tr><td>Air quality</td><td>6.6 Air Quality</td><td>6.6.4 Predicted Effects
Figure 6.6.1-1: Air Quality Linkage Diagram demonstrates how the effects of Air Quality during all project stages links to other valued components, specifically Indigenous communities including traditional land use, which is discussed in detail in Section 6.21 of the Revised EIS</td></tr>
<tr><td>Wildlife and wildlife habitat</td><td>6.12 Wildlife and Wildlife Habitat</td><td>6.12.4 Predicted Effects
Figure 6.12.1-1: Wildlife and Wildlife Habitat Linkage Diagram demonstrates how the effects of Wildlife and wildlife habitat during all project stages links to other valued components, specifically Indigenous communities including traditional land use, which is</td></tr>
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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>
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<tr><td></td><td></td><td>discussed in detail in Section 6.21 of the Revised EIS.</td></tr>
<tr><td>Fish and fish habitat</td><td>6.14 Fish and Fish Habitat</td><td>6.14.4 Predicted Effects
Figure 6.14.1-1: Fish and Fish Habitat Linkage Diagram demonstrates how the effects of Fish and Fish Habitat during all project stages links to other valued components, specifically Indigenous communities including traditional land use, which is discussed in detail in Section 6.21 of the Revised EIS.</td></tr>
<tr><td>Wetlands and vegetation</td><td>6.15 Wetlands and Vegetation</td><td>6.14.4 Predicted Effects
Figure 6.15.1-1: Wetlands and Vegetation Linkage Diagram demonstrates how the effects of Wetlands and Vegetation during all project stages links to other valued components, specifically Indigenous communities including traditional land use, which is discussed in detail in Section 6.21 of the Revised EIS.</td></tr>
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</td></tr>
<tr><td>541</td><td>AC(1)-215</td><td>MNO</td><td>Environmental Impact Statement

6.4.1.7 Surface Water Quality</td><td></td><td><u>Information Request / Comment:</u>
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.

<u>Revised Response</u>:
As part of the process to respond to the Round 1 information requests, Treasury Metals have undertaken and complete and thorough analysis of the potential effects associated with a highly unlikely failure of the TSF. This analysis is included as an addendum to the revised information requests (TMI_246-AM(1)-04_Addendum_1). This analysis does not include consideration for any mitigation measures that would be implemented by Treasury Metals in the highly unlikely event that a TSF failure occurs to contain tailings that are deposited within Blackwater Creek and prevent the resuspension of tailings present in Blackwater Creek and the transport of re-suspended tailings to Wabigoon Lake.
The analysis (see TMI_246-AM(1)-04_Addendum_1) also goes on to evaluate the effects and consequence of contaminants that persist in the environment to affect fish, fisheries, wildlife, migratory birds, vegetation as well as the potential effects and consequence on members of Indigenous communities. The analysis includes identification of effects on the use of lands and resources for traditional purposes, as well as the health and economic effects for members of Indigenous communities.</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 feedback provided by the Agency with respect to the Round 1 information requests, it was suggested that Treasury Metals should provide an assessment of the potential effects of tailings storage facility (TSF) failure on fish and fish habitat, and to wild rice, and carry this assessment through to a significance determination.. It is important to point out that such a requirement is not consistent with the EIS Guidelines (CEAA, 2013) for the Project. Section 7.2.1 of the EIS Guidelines (CEAA, 2013) states the following: *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.* The EIS Guidelines (CEAA, 2013) for the project go on to state that the EIS should 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."* In order to move the EIS through the assessment process, Treasury Metals have undertaken an expanded evaluation of the effects associated with the highly unlikely scenario of a failure of the TSF. In keeping with the EIS Guidelines (CEAA, 2013), the expanded evaluation will focus on describing the "consequence" of the highly unlikely failure of the TSF. In describing the consequence of a TSF failure, the predicted effects to the environment will be characterized using the following descriptors: • Magnitude; • Extent; • Timing; • Duration; • Frequency; • Likelihood; and • Irreversibility. Although these descriptors appear similar to the ones used for determining the significance of residual adverse effects for the Project (presented in Section 8 of the revised EIS), they are evaluated and applied in a different and unique manner specifically for evaluating the consequence of the highly unlikely scenario of a failure of the TSF. The approach used is consistent with the requirements of the EIS Guidelines (CEAA, 2013). The use of the above specific nomenclature was to satisfy a specific request from the Agency.

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					The expanded TSF failure analysis (TMI_246-AM(1)-04_Addendum_1), includes a discussion of control and preventative measures (Section 2.2); mitigation measures (Section 4); and contingency and emergency response measures (Section 4). A fulsome effects assessment for the highly unlikely event of a TSF failure has been provided in Section 3. In keeping with the EIS Guidelines (CEAA, 2013), the consequence of a TSF failure is determined, rather than significance.
542	AC(1)-216	MNO	Environmental Impact Statement 6.4.1.11 Wildlife and Wildlife Habitat		**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 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

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					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 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

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					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 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

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					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 6.4.1.11 Wildlife and Wildlife Habitat		**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 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.

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					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.
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		**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.

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
			6.4.1.12 Fish and Fish Habitat		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.
					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

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					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 Statement 6.4.1.12 Fish and Fish Habitat		**Information Request / Comment:** The identification of four potential effects to fish and fish habitat deviates from assessment 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.

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					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 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. **Revised Response**: A fulsome assessment on the potential effects in the highly unlikely event of a TSF failure has been provided in Section 3 of TMI_246-AM(1)-04_Addendum_1 with a complete assessment on the potential effects Aboriginal peoples traditional land use, including the potential effects to Wabigoon Lake. In keeping with the EIS Guidelines (CEAA 2013), and expanded evaluation has been provided that includes a description of "consequence" of the highly unlikely failure of the TSF. In describing the consequence of a TSF failure, the predicted effects to the environment will be

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					characterized using the following descriptors: • Magnitude; • Extent • Timing • Duration • Frequency • Likelihood; and • Irreversibility. Although these descriptors appear similar to the ones used for determining the significance of residual adverse effects for the Project (presented in Section 8 of the revised EIS), they are evaluated and applied in a different and unique manner specifically for evaluating the consequence of the highly unlikely scenario of a failure of the TSF. The approach used is consistent with the requirements of the EIS Guidelines (CEAA, 2013). The use of the above specific nomenclature was to satisfy a specific request from the Agency. Detailed modelling of the effects of a TSF failure on the quality of water in Wabigoon Lake was included in Section 4.3.2 of the revised EIS, as well as Appendix GG-1 (TSF Failure Modelling). The material provided in Appendix GG-1 is quite detailed and involves a number of modeling components, resulting in determinations of expected water quality effects to Wabigoon Lake, relative to Provincial Water Quality Objectives (PWQO) for the potential of aquatic life, in the event that a TSF failure was to occur. The expanded TSF failure analysis (see TMI_246-AM(1)-04_Addendum_1) also goes on to evaluate the effects and consequence of contaminants that persist in the environment to affect fish, fisheries, wildlife, migratory birds, vegetation as well as the potential effects and consequence on members of Indigenous communities. The analysis includes identification of effects on the use of lands and resources for traditional purposes, as well as the health and economic effects for members of Indigenous communities. The expanded TSF failure analysis (TMI_246-AM(1)-04_Addendum_1), also includes a discussion of control and preventative measures (Section 2.2); mitigation measures (Section 4); and contingency and emergency response measures (Section 4). A fulsome effects assessment for the highly unlikely event of a TSF failure has been provided in Section 3. In keeping with the EIS Guidelines (CEAA, 2013), the consequence of a TSF failure is determined, rather than significance.
554	AC(1)-228	MNO	Environmental Impact Statement	2.3 Aboriginal Engagement 10.1.3 Effects of Changes to the	**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.

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
			6.4.2.1 Land Use	Environment	**Revised Response**: Since the time of the original EIS submission, Treasury Metals has participated in a number of meaningful engagement activities. Mostly notably, as of December 18, 2017 announced that it has entered into a Memorandum of Understanding (MOU) with the MNO in relation to the Project. Treasury Metals as revised the EIS substantially to reflect the traditional knowledge and traditional land and resource use information shared since the original EIS submission. As part of the IR responses and at the request of the Agency Treasury has also provided a Revised EIS. As part of the Revised EIS Section 6.16 (Land Use) has been updated to include the requested information. Specifically, the linkage diagrams in Figures 6.16.1-1 and 6.16.1-2 show the link from Other recreational uses and Aboriginal Peoples VCs. For the purposes of this EIS effects to rights held by aboriginal peoples have been defined as the ability to use the land for traditional purposes. In this fashion, the valued components assessed specifically for Aboriginal peoples are presented in Section 6.1.3 of the revised EIS and specifically presented in a summarized fashion in Table 6.1.3.20-2. An updated assessment of potential effects of the project on Aboriginal peoples is provided in Section 6.21 of the revised EIS and a discussion specific to the potential impacts of the project on the ability of the various indigenous communities to practice their Aboriginal treaty rights, otherwise known as traditional land and resource use is provided in Section 6.22 of the revised EIS. From the engagement activities completed to date traditional land and resource uses include but are not limited to harvesting/gathering of plants, trapping of beaver, hunting of moose, caribou, deer, grouse, duck and geese, and fishing. Treasury Metals has revised the EIS to reflect the valued TKLU information shared by MNO to date and will continue to work with this community to ensure that any potential impacts of the project on their traditional land and resource use are properly mitigated.
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.
					Revised Response: The request for revision to the response indicates that the original response addressed the Information Request / Comment TMI_555-AC(1)-229, but failed to clarify that the response was integrated into the revised EIS, and that all related elements of the EIS were updated. The original request for comment included two related parts. First, was a concern that the EIS did not adequately characterize potential effects to cultural heritage and archaeological values before moving to a discussion of potential direct residual effects. Second, was the sense that the absence

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					of identified archaeological values within the Local Study Area was the result of a flawed consultation process. We will address these concerns separately. Characterization of potential impacts to cultural heritage and archaeological values is discussed in Section 6.20 of the updated EIS. Potential effects are characterized as those effects that hold the potential to cause damage to cultural heritage values during four distinct phases of the project (Section 6.20.1). During site preparation and construction, potential effects include those resulting from clearing vegetation, soil and material remaining from earlier mine operations, as well as excavation and road construction involving significant earthmoving. Impacts arising from these activities include damage to surface and subsurface cultural deposits. During operations, material handling, including specifically waste rock and site footprint expansion are identified as potential impacts. During the closure phase, potential impacts will arise from site remediation activities. There are no potential impacts post-closure. Of these impacts, the most likely to damage or disturb cultural heritage or archaeological values are those associated with site preparation and construction; however, as noted in the archaeological assessment reports prepared for the EIS, the area of the proposed mine is extensively and intensively disturbed from earlier activities, and there is a low potential for any residual archaeological or cultural heritage values to remain in place in the Local Study Area. Effects prediction was completed for the Local Study Area by a licenced archaeologist, and is discussed in Section 6.20.2 of the revised EIS. This work focused on determining the potential for archaeological or other cultural heritage resources to be present within the area to be impacted by mine development and operation, and evaluating the risk to the resources from proposed activities. The archaeological assessment covered all parts of the proposed mine site and observed conditions and reported on those conditions in compliance with the direction set out in the Ministry of Tourism, Culture and Sport (MTCS) *Standards and Guidelines for Consultant Archaeologists*. This work included both a Stage 1 assessment, in which the archaeological potential of the property was evaluated based on background research and property inspection, and Stage 2 assessment, during which areas of archaeological potential that were not extensively or intensively disturbed were tested for the presence of archaeological resources. The Stage 1 and Stage 2 assessments did not identify archaeological potential in areas of extensive disturbance, and did not identify archaeological resources during fieldwork. The archaeological assessment reports are provided in Appendix U to the revised EIS, and were reviewed and found to be compliant by MTCS. Specific project effects avoidance measures were identified for avoiding or minimizing effects arising from continuance of the Project (Section 6.20.3). These measures include minimizing the overall footprint of the Project, restricting ground disturbing development activities to within the existing disturbed area, and maintaining a 50m buffer around any remaining watercourses within the Project area. Should ground disturbing activities extend into these buffers (water crossings, water

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					intake facilities), archaeological assessment and impact mitigation will be completed in advance of development. Predicted effects to archaeological and cultural heritage values on the property are discussed in Section 6.20.4. To summarize, the predicted effects will be operating on a land parcel that is beyond 500m from major watercourses or waterbodies, is low-lying and wet, and has extensive and intensive prior disturbance. These conditions signal low archaeological potential for the property. Further, the Project area is not a known historic settlement area or travel route, there are no registered archaeological sites within the area, and the former mine structures and MNR tree nursery do not constitute heritage values. At Stage 1 several small, intermittent streams were noted, and Stage 2 fieldwork was undertaken to establish the nature of these watercourses, and to test for archaeological resources. These areas, as well as a low rise that proved to be extensively disturbed were tested and no archaeological resources were identified. On the basis of the work completed, it was determined that the property held low archaeological potential, and that traditional occupation would have been focused on the larger lakes and rivers of the local area, including Thunder Lake and Wabigoon Lake. The potential that archaeological and cultural heritage resources are located away from the Project area is supported by the identification of a traditional canoe route between Wabigoon Lake, through Thunder Lake and Ghost Lake to access Rice Lake. Culturally important travel routes such as this, including the information shared by Elders that regarding campsites along the route, provide support to the archaeological potential criteria. While this canoe route lies beyond the area anticipated to be directly affected by the Project and should not be compromised, this information confirms the general approach taken in evaluating archaeological potential. Areas in close proximity to navigable waters represent areas of higher potential, while areas that are distant from navigable waterways, like the Project site, will have a lower archaeological potential. The second concern is that the absence of cultural heritage or archaeological values in the project area is the result of a flawed consultation process. As noted in the discussion above, the evaluation of archaeological potential is directed by consideration of landscape characteristics and cultural patterning across a landscape. The landscape characteristics of the project area, specifically the area where the mine development will be centered, include being more than 500m from undisturbed streams or lakes, consisting of low, wet ground, and exhibiting signs of extensive and intensive disturbance from earlier mine development and operation activities. Cultural patterning across the landscape includes consideration of archaeological site distributions across wider landscape areas. The patterning typical of northwestern Ontario includes a focus on navigable streams and waterbodies, especially those that provide for additional resource procurement benefits. Thus, Wabigoon and Thunder Lakes, being larger waterbodies, and Rice Lake, identified by Elders as being a source of wild rice, would draw focus onto these areas. Low, wet, inland areas, such as the

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					project area, would be less desirable for many habitation and resource procurement purposes, and would have seen considerably less use. This information was derived from MTCS data and direction on evaluating archaeological potential, information provided by Elders during Round 1 information requests and field studies by a licenced archaeologist (see Sections 6.20.4 and Appendix U). TMI is committed to the Identified Mitigation set out in Section 6.20.5. Mitigation of impacts to archaeological and cultural heritage values includes minimizing the project footprint, focusing to the extent possible of previously disturbed areas, and maintaining 50m buffers on all waterbodies. In addition to mitigation through avoidance, the Archaeological and Cultural Heritage Resource Management Plan will describe required responses to the unanticipated discovery of archaeological resources in the execution of the Project. This will include: direction to stop all work in the immediate vicinity of any finds until they have been investigated by a licenced archaeologist; requiring archaeological assessment of any new development activities within 300m of major waterbodies and historic travel routes, and; allowing no ground disturbance in previously undisturbed areas unless preceded by archaeological assessment. Finally, any discovery of human remains will be subject to the protocols set out under the Funeral, Burial and Cremation Services Act, which includes contacting the police and coroner, and Registrar of Cemeteries. Mitigation of the impact to remains that are not of forensic interest to the police will be determined through consultation with representatives of the deceased. Additional information on consultation with Aboriginal groups is contained in Section 6.21 of the Revised EIS. Further to the above protocols and discussion Treasury Metals as part of the responsible development of the Project as of December 18, 2017 announced that it has entered into a Memorandum of Understanding (MOU) with the MNO in relation to the Project. The MOU is a framework agreement with the MNO – including the Atikokan Métis Community Council, the Kenora Métis Community Council, the Northwest Métis Community Council and the Sunset Country Métis Community Council which represent the regional rights-bearing Métis communities (the "Métis Community") in the Treaty #3 area, including, the Métis traditional territories of Lake of the Woods, Lac Seul, Rainy River and Rainy Lake. This MOU is designed to foster a cooperative and productive ongoing relationship between the MNO and Treasury Metals and to assess any potential impacts of the Project on the MNO citizens. The MOU also provides the Métis Community with an opportunity to participate in the Project through employment, training and business development and ongoing engagement of key aspects of both the relationship and Project. A key aspect of this agreement is the completion of a traditional knowledge/land use study (TKLUS). The TKLUS will allow Treasury to provide context to historical, ceremonial, and cultural heritage values within the Project area. It is Treasury Metals intent to work with MNO to incorporate, mitigate, and avoid the values identified during this study as part of the EA process, but also the development of the Project.

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
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.
					Revised Response: Information related to the potential for exceedances of deleterious substances including the type of substance, the levels anticipated of each chemical parameters (substance) the predicted effects of the chemical parameters (substance) on the environment and, finally, the effects of the chemical parameters (substances) on Indigenous peoples is discussed in the revised EIS as part of Section 6, Effects and Mitigation. The table below summarizes the location in the revised EIS where this information can be located. Treasury Metals highlights that they are committed to ensuring all receiving waters surrounding the project are protected and have made the following commitments/ mitigation as described in Section 10 of the revised EIS: • During operations, effluent discharged from the Project to Blackwater Creek will meet the Provincial Water Quality Objectives (PWQO) or background concentrations if background levels are above the PWQO. Where there is no PWQO for a parameter, the commitment will be to meet the Canadian Water Quality Guidelines (CWQG). For total mercury, the commitment will be that effluent discharged to Blackwater Creek will meet background concentrations for that watercourse. Background concentrations for Blackwater Creek are defined as the 75th percentile in accordance MOECC receiving water assessment policy. Detailed parameters will be determined through engagement with appropriate Provincial and Federal regulatory bodies. [Cmt_034] • The pit lake will be monitored as it is filling to determine whether batch treatment will be required to ensure the water meets PWQO, or background if background levels exceed the PWQO, prior to the discharge from the pit lake to a tributary of Blackwater Creek.[Mit_024] • During operations, excess water not required in the process will be treated to concentrations that meet Provincial Water Quality Objectives (PWQO) or Canadian Water Quality Guidelines (CWQG) for the protection of aquatic life, or background if background levels exceed the PWQO, prior to discharging to Blackwater Creek. In the case of mercury, effluent will be treated to meet the background concentrations in Blackwater Creek. [Mit_053]

<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>
The PWQO are risk based standards derived for the protection of fresh water aquatic life including fish and fish habitat. As such, it is not expected that concentrations of deleterious substances would reach levels in the environment that could potentially cause harm to aquatic life, or to peoples or wildlife that might use aquatic life in any manner. .

Furthermore, the human health risk assessment (Appendix W) indicated that the project will not result in potential human health risks to workers, residents of members of local Indigenous Communities in exceedance of MOECC or Health Canada during operations or post-closure.
<table>
<tr><th>Information Requested,</th><th>Location in the Revised EIS</th><th>Relevant Tables</th></tr>
<tr><td>Surface Water Quality,
Substance: Metals</td><td>6.8</td><td>Table 6.8.2.4-2: Treated Effluent Discharge Quality
Table 6.8.4.2-1: Receiving Water Quality Results for TL1
Table 6.8.4.2-2: Receiving Water Quality Results for TL2
Table 6.8.4.2-3: Receiving Water Quality Results for TL3
Table 6.8.4.2-4: Receiving Water Quality Results for HB1
Table 6.8.4.2-5: Receiving Water Quality Results for LC1
Table 6.8.4.2-6: Receiving Water Quality Results for BW1
Table 6.8.4.2-7: Receiving Water Quality Results for BW2
Table 6.8.4.2-8: Receiving Water Quality Results for TL
Table 6.8.4.2-9: Receiving Water Quality Results for WL</td></tr>
<tr><td>Health Effects on Aboriginal People,
Substance: Metals</td><td>6.19, Appendix W</td><td>Table 6.16.4-1: Predicted Effects of the Project on Human Health</td></tr>
</table>
</td></tr>
</table>

<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>
<table>
<tr><td>Aboriginal Peoples</td><td>6.21</td><td>Table 6.21.5.1-1 Mitigation and Enhancement Measures for Aboriginal Peoples Effects</td></tr>
<tr><td>Other Substances from Spills and Releases- Substances may include: cyanide, petroleum hydrocarbons including gasoline and diesel fuel, lubricants and hydraulic oil</td><td>4.3.1</td><td>Table 4.3.1-1: Description, Prevention, and Responses to Potential Medium Environmental Residual Risk Failure Modes</td></tr>
<tr><td>Cyanide Management Plan
Substance: cyanide</td><td>12.5</td><td>NA</td></tr>
<tr><td>Emergency and Spill Response Management Plan
Substance may include: cyanide, petroleum hydrocarbons including gasoline and diesel fuel, lubricants and hydraulic oil</td><td>12.13</td><td>NA</td></tr>
</table>
</td></tr>
<tr><td>557</td><td>AC(1)-231</td><td>MNO</td><td>Environmental Impact Statement

6.4.2.5 Aboriginal Peoples</td><td></td><td><u>Information Request / Comment:</u>
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 provided that allows for this adjustment of the data.

On what basis was the grouses’ diet reduced?

<u>Response:</u>
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.</td></tr>
<tr><td>558</td><td>AC(1)-232</td><td>MNO</td><td>Environmental</td><td></td><td><u>Information Request / Comment:</u></td></tr>
</table>

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
			Impact Statement 6.4.2.5 Aboriginal Peoples		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 • 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
					Revised Response: A detailed hydrologic effects assessment on the local and regional study areas as a result of the Project has been completed for each phase of the Project and included in Section 6.9.4 of the revised EIS. This section states that there will be virtually no (negligible and within natural variations) predicted effects to Thunder Lake and Wabigoon Lake levels and only during the operations and the post-closure phases per Tables 6.9.4.2-4 (during operations) and 6.9.4.4-7 (during post-closure) of the revised EIS. These tables are also provided below.

<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>
Table 6.9.4.2-4: Changes in Surface Water Inflows to Lakes during Operations
<table>
<tr><th rowspan="2">Lake</th><th colspan="2">Total Surface Water Inflow (m³/s)</th><th rowspan="2">Change in Annual Surface Water Inflow (%)</th></tr>
<tr><th>Existing Conditions</th><th>Operations Phase</th></tr>
<tr><td>Thunder Lake</td><td>0.492</td><td>0.487</td><td>-1.01%</td></tr>
<tr><td>Wabigoon Lake</td><td>16.849</td><td>16.837</td><td>+0.07%</td></tr>
</table>
Table 6.9.4.4-7: Changes in Surface Water Inflows to Lakes during Post-closure
<table>
<tr><th rowspan="2">Lake</th><th colspan="2">Total Surface Water Inflow (m³/s)</th><th rowspan="2">Change in Annual Surface Water Inflow (%)</th></tr>
<tr><th>Existing Conditions</th><th>Operations Phase</th></tr>
<tr><td>Thunder Lake</td><td>0.492</td><td>0.490</td><td>-0.4</td></tr>
<tr><td>Wabigoon Lake</td><td>16.849</td><td>16.857</td><td>+0.005</td></tr>
</table>
These small changes in inflows to the lakes would not have a measurable effect on the lake levels and particularly as both Thunder Lake and Wabigoon Lake have control structure (not under the care and control of Treasury Metals), that control the water levels in the lakes.
</td></tr>
<tr><td rowspan="2">560</td><td rowspan="2">AC(1)-234</td><td rowspan="2">MNO</td><td rowspan="2">Environmental Impact Statement

6.4.2.5 Aboriginal Peoples</td><td rowspan="2">10.1.3 Effects of Changes to the Environment</td><td><u>Information Request / Comment:</u>
This section largely just repeats conclusions from other sections of the EIS and does not endeavor to actually relate the information to Aboriginal peoples.</td></tr>
<tr><td><u>Response:</u>
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 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</td></tr>
</table>

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					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. **Revised Response**: Since the time of the original EIS submission, Treasury Metals has participated in a number of meaningful engagement activities with a number of the Indigenous communities including the Métis Nation of Ontario. Notably, as of December 18, 2017 announced that it has entered into a Memorandum of Understanding (MOU) with the MNO in relation to the Project. Treasury Metals as revised the EIS substantially to reflect the traditional knowledge and traditional land and resource use information shared since the original EIS submission. Traditional knowledge regarding plants and berries and the ability to harvest/gather plants is located in Section 5.9.9 and Section 5.13.3 of the revised EIS. This information was used in the selection of the valued component "Harvesting/Gathering of Plants" described in section 6.1.3 of the Revised EIS, and used to assess the potential effects on Aboriginal Peoples in 6.21 of the revised EIS. An assessment of the ability of each Indigenous community, including the Métis Nation of Ontario, to practice their traditional land and resource use is provided in Section 6.22 of the revised EIS. Treasury Metals has revised the EIS to include the following key changes with respect to traditional knowledge and traditional land and resource use: • Traditional knowledge obtained from various Indigenous communities including Métis Nation of Ontario has been incorporated into each subsection of Section 5 (Existing Environment) (i.e. 5.1 Climate, 5.2 Air Quality, 5.3 Noise and Light, 5.4 Geology, 5.5 Terrain and Soil, 5.6 Hydrogeology, 5.7 Surface Hydrology, 5.8 Aquatic Resources, 5.9 Terrestrial Resources, 5.10 Migratory Birds,5.11 Species at Risk, and 5.12 Human Environment); • Traditional land and resource use is discussed for each Indigenous community including MNO is located in Section 5.13.3; • The information presented in Section 5 of the revised EIS was essential to the effects assessment completed for Aboriginal peoples in Section 6.21 and specifically for each community in Section 6.22 of the revised EIS. It was also essential to the selection of Valued Components (VCs) as discussed in Section 6.1.3 of the revised EIS.

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					• All engagement activities to date are summarized in Section 9 of the revised EIS and provided in detail in Appendix DD. Engagement logs for all indigenous communities are attached to Appendix DD. • The executive summary has been updated to reflect the meaningful engagement activities with Métis Nation of Ontario. Based on the information shared with Treasury Metals by Métis Nation of Ontario, it is Treasury Metals understanding that MNO is specifically interested in the potential effects on the project on their ability to practice their traditional land and resource uses. From the engagement activities completed to date traditional land and resource uses include but are not limited to harvesting/gathering of plants, trapping of beaver, hunting of moose, caribou, deer, grouse, duck and geese, and fishing. Treasury Metals has revised the EIS to reflect the valued TKLU information shared by MNO to date and will continue to work with this community to ensure that any potential impacts of the project on their traditional land and resource use are properly mitigated. Further to this based on the traditional knowledge and traditional land and resource use knowledge shared by all Indigenous communities including MNO to-date, the additional information obtained from the traditional knowledge/land use study (TKLUS) is not anticipated to result in substantial changes to the EIS, given the conservative approach already employed in the assessment of the effects of the project on Indigenous communities. Treasury Metals welcomes ongoing engagement and information it will further the understanding of traditional land and resource use and assist in ongoing monitoring and mitigation of potential effects with respect to the Project.
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 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

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					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. **Revised Response**: Treasury Metals has made overtures to each community including Métis Nation of Ontario and collated all biophysical and traditional values/land and resource use information within the EIS to date. This information in turn has been sourced from engagement with Indigenous communities (open houses, presentations, meetings, calls, discussions), and secondary source information. All information received via engagement has been formally captured within the Stakeholder Engagement Report which is included in the revised EIS as appendix DD and summarized in Section 9 of the revised EIS. Most notably, Treasury Metals as part of the responsible development of the Project as of December 18, 2017 announced that it has entered into a Memorandum of Understanding (MOU)

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					with the MNO in relation to the Project. Part of this included the undertaking of a traditional knowledge and traditional land and resource study. Treasury Metals has revised the EIS to include the following key changes with respect to traditional knowledge and traditional land and resource use: • Traditional knowledge obtained from various Indigenous communities has been incorporated into each subsection of Section 5 (Existing Environment) (i.e. 5.1 Climate, 5.2 Air Quality, 5.3 Noise and Light, 5.4 Geology, 5.5 Terrain and Soil, 5.6 Hydrogeology, 5.7 Surface Hydrology, 5.8 Aquatic Resources, 5.9 Terrestrial Resources, 5.10 Migratory Birds,5.11 Species at Risk, and 5.12 Human Environment); • Traditional land and resource use is discussed for each Indigenous community including in Section 5.13.3; • The information presented in Section 5 of the revised EIS was essential to the effects assessment completed for Aboriginal peoples in Section 6.21 and specifically for each community in Section 6.22 of the revised EIS. It was also essential to the selection of Valued Components (VCs) as discussed in Section 6.1.3 of the revised EIS. • All engagement activities to date are summarized in Section 9 of the revised EIS and provided in detail in Appendix DD. Engagement logs for all indigenous communities are attached to Appendix DD. • The executive summary has been updated to reflect the meaningful engagement activities with Métis Nation of Ontario. Based on the information shared with Treasury Metals by Métis Nation of Ontario, it is Treasury Metals understanding that MNO is specifically interested in the potential effects on the project on their ability to practice their traditional land and resource uses. From the engagement activities completed to date traditional land and resource uses include but are not limited to harvesting/gathering of plants, trapping of beaver, hunting of moose, caribou, deer, grouse, duck and geese, and fishing. Treasury Metals has revised the EIS to reflect the valued TKLU information shared by MNO to date and will continue to work with this community to ensure that any potential impacts of the project on their traditional land and resource use are properly mitigated. Further to this based on the traditional knowledge and traditional land and resource use knowledge shared by all Indigenous communities including MNO to-date, the additional information obtained from the traditional knowledge/land use study (TKLUS) is not anticipated to result in substantial changes to the EIS, given the conservative approach already employed in the assessment of the effects of the project on Indigenous communities. Treasury Metals welcomes ongoing engagement and information it will further the understanding of traditional land and resource use and assist in ongoing monitoring and mitigation of potential effects with respect to the Project The VCs considered in the assessment of the potential effects of the project on Indigenous communities in Section 6.21 of the revised EIS are provided in Table 6.1.3.20-1 nad as attachment

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					TMI_564-AC(1)-238_attachment_1.
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 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

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					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 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	**Information Request / Comment:** There is no assessment completed of the potential adverse impacts of each of the project components and physical activities.

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				and Related Interests	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. **Revised Response**: Section 7 Cumulative Effects of the revised EIS (April 2018) has been revised substantially to reflect a number of comments received as part of the Round 1 Information Request Process. Please refer to Section 7 of the revised EIS for full details. Details pertinent to this specific IR have been included for reference in order to achieve completeness. New figures have been included in the revised version of Section 7 in response to this particular IR and others. As part of the process to respond to the Round 1 information request, Treasury Metals have prepared an updated evaluation of cumulative effects. The updated cumulative effects assessment is presented in Section 7 of the revised EIS, and addresses specific issues identified in the Round 1 information request process, and follows the recommended process set out in the operation policy statement for evaluating cumulative effects (CEAA, 2014). The spatial boundaries used for evaluating cumulative effects are described in Section 7.3.2 of the revised EIS, and are defined in Table 7.3.2-1 for each of the VCs for which residual adverse effects were predicted. The spatial boundaries used are consistent with the refined study areas used for evaluating the effects of the Project, as described in Section 6.1.4 of the revised EIS. The following figures are provided in Section 7 of the revised EIS to show the relationships between the spatial boundaries used for evaluating cumulative effects and those current and certain or reasonably foreseeable projects evaluations: • Terrain and soils: Figure 7.3.2-1;

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					• Geology and geochemistry: Figure 7.3.2-1; • Noise: Figure 7.3.2-2; • Air quality: Figure 7.3.2-2; • Surface water quality: Figure 7.3.2-3; • Surface water quantity: Figure 7.3.2-3; • Ground water quality: Figure 7.3.2-3; • Ground water quantity: Figure 7.3.2-3; • Wildlife and wildlife habitat: Figure 7.3.2-4; • Migratory birds: : Figure 7.3.2-4; • Fish and fish habitat: Figure 7.3.2-4; • Wetlands and vegetation: Figure 7.3.2-4; • Land use: Figure 7.3.2-5; • Social factors: Figure 7.3.2-5; • Economic factors: Figure 7.3.2-5; and • Aboriginal peoples: Figure 7.3.2-6.
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.
					Revised Response: Since the time of the original EIS submission, Treasury Metals has participated in a number of meaningful engagement activities. Mostly notably, as of December 18, 2017 announced that it has entered into a Memorandum of Understanding (MOU) with the MNO in relation to the Project. Treasury Metals as revised the EIS substantially to reflect the traditional knowledge and traditional land and resource use information shared since the original EIS submission. Appendix DD was also substantially revised and Section 3.3.8 of the Stakeholder engagement report speaks specifically to information as it pertains to MNO. As part of the IR responses and at the request of the Agency Treasury has also provided a Revised

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					EIS. As part of the Revised EIS Section 6.16 (Land Use) has been updated to include the requested information. Specifically, the linkage diagrams in Figures 6.16.1-1 and 6.16.1-2 show the link from Other recreational uses and Aboriginal Peoples VCs. For the purposes of this EIS effects to rights held by aboriginal peoples have been defined as the ability to use the land for traditional purposes. In this fashion, the valued components assessed specifically for Aboriginal peoples are presented in Section 6.1.3 of the revised EIS and specifically presented in a summarized fashion in Table 6.1.3.20-2. An updated assessment of potential effects of the project on Aboriginal peoples is provided in Section 6.21 of the revised EIS and a discussion specific to the potential impacts of the project on the ability of the various indigenous communities to practice their Aboriginal treaty rights, otherwise known as traditional land and resource use is provided in Section 6.22 of the revised EIS. From the engagement activities completed to date traditional land and resource uses include but are not limited to harvesting/gathering of plants, trapping of beaver, hunting of moose, caribou, deer, grouse, duck and geese, and fishing. Treasury Metals has revised the EIS to reflect the valued TKLU information shared by MNO to date and will continue to work with this community to ensure that any potential impacts of the project on their traditional land and resource use are properly mitigated.
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

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					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; • 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

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					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 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		**Information Request / Comment:**

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			and Public Engagement 8.3.3 Aboriginal Communities		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 Information	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. 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. **Revised Response**: As part of the Round 1 IRs, the Agency requested that Treasury Metals expand and update the

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					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. A new table has been added to Section 9 (Table 9.6.13) of the revised EIS to provide details on how specific concerns from Indigenous communities were addressed. The table lists the concerns raised by each community, the engagement log identification number where the record can be found, the baseline study associated with the comment, the locations of how the concern was integrated into the existing environment (Section 5) and the effects assessment (Section 6), along with the mitigation measure and/or commitment made to address the concern raised.
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 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

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					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 8.9.1 Measures to Address Aboriginal Concerns	3.3 Integration of EA, Aboriginal and public engagement information	**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.
					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		**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

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
			Aboriginal Concerns		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 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 "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 located. What information from MNO was used in the determination? **Revised Response**: Since the time of the original EIS submission, Treasury Metals has participated in a number of meaningful engagement activities with a number of the Indigenous communities including the Métis Nation of Ontario. Notably, as of December 18, 2017 announced that it has entered into a Memorandum of Understanding (MOU) with the MNO in relation to the Project. Treasury Metals as revised the EIS substantially to reflect the traditional knowledge and traditional land and resource use information shared since the original EIS submission. Traditional knowledge regarding plants and berries and the ability to harvest/gather plants is located in Section 5.9.9 and Section 5.13.3 of the revised EIS. This information was used in the selection of the valued component "Harvesting/Gathering of Plants" described in section 6.1.3 of the Revised EIS, and used to assess the potential effects on Aboriginal Peoples in 6.21 of the revised EIS. An assessment of the ability of each Indigenous community, including the Métis Nation of Ontario, to practice their traditional land and resource use is provided in Section 6.22 of the revised EIS. Treasury Metals has revised the EIS to include the following key changes with respect to traditional knowledge and traditional land and resource use: • Traditional knowledge obtained from various Indigenous communities including Métis

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					Nation of Ontario has been incorporated into each subsection of Section 5 (Existing Environment) (i.e. 5.1 Climate, 5.2 Air Quality, 5.3 Noise and Light, 5.4 Geology, 5.5 Terrain and Soil, 5.6 Hydrogeology, 5.7 Surface Hydrology, 5.8 Aquatic Resources, 5.9 Terrestrial Resources, 5.10 Migratory Birds,5.11 Species at Risk, and 5.12 Human Environment); • Traditional land and resource use is discussed for each Indigenous community including MNO is located in Section 5.13.3; • The information presented in Section 5 of the revised EIS was essential to the effects assessment completed for Aboriginal peoples in Section 6.21 and specifically for each community in Section 6.22 of the revised EIS. It was also essential to the selection of Valued Components (VCs) as discussed in Section 6.1.3 of the revised EIS. • All engagement activities to date are summarized in Section 9 of the revised EIS and provided in detail in Appendix DD. Engagement logs for all indigenous communities are attached to Appendix DD. • The executive summary has been updated to reflect the meaningful engagement activities with Métis Nation of Ontario. Based on the information shared with Treasury Metals by Métis Nation of Ontario, it is Treasury Metals understanding that MNO is specifically interested in the potential effects on the project on their ability to practice their traditional land and resource uses. From the engagement activities completed to date traditional land and resource uses include but are not limited to harvesting/gathering of plants, trapping of beaver, hunting of moose, caribou, deer, grouse, duck and geese, and fishing. Treasury Metals has revised the EIS to reflect the valued TKLU information shared by MNO to date and will continue to work with this community to ensure that any potential impacts of the project on their traditional land and resource use are properly mitigated. Further to this based on the traditional knowledge and traditional land and resource use knowledge shared by all Indigenous communities including MNO to-date, the additional information obtained from the traditional knowledge/land use study (TKLUS) is not anticipated to result in substantial changes to the EIS, given the conservative approach already employed in the assessment of the effects of the project on Indigenous communities. Treasury Metals welcomes ongoing engagement and information it will further the understanding of traditional land and resource use and assist in ongoing monitoring and mitigation of potential effects with respect to the Project.
582	AC(1)-256	MNO	8.0 Aboriginal and Public Engagement 8.9.1 Measures to Address		**<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

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			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.
					Revised Response: The revised EIS is substantially different than the original submission with respect to the assessment of effects on Aboriginal peoples and the traditional land and resource use of Indigenous communities. A summary of key changes is included below. Any language regarding the effects of the project on private lands not having any impact on traditional land and resource use has been removed. For the purposes of the EIS, Aboriginal and Treaty Rights are defined as the historic and current uses of lands and resources for traditional purposes by members of Indigenous communities. It is Treasury Metals' understanding that Aboriginal peoples are entitled to access to their lands according to their Aboriginal and Treaty #3 (1873) Rights, and Treasury Metals is committed to working with the Indigenous communities to ensure that the effects of the project on their traditional land and resource use or alternatively referred to as aboriginal and treaty rights are appropriately considered and protected. A discussion of traditional land and resource use in terms of existing environment is provided in Section 5.13.3. An assessment of the effects of the project on traditional land and resource use is provided in Section 6.22 of the revised EIS Since the time of the original EIS submission, Treasury Metals has participated in a number of meaningful engagement activities with a number of the Indigenous communities including the Métis Nation of Ontario. Notably, as of December 18, 2017 announced that it has entered into a Memorandum of Understanding (MOU) with the MNO in relation to the Project. Treasury Metals as revised the EIS substantially to reflect the traditional knowledge and traditional land and resource use information shared since the original EIS submission. Traditional knowledge regarding plants and berries and the ability to harvest/gather plants is located in Section 5.9.9 and Section 5.13.3 of the revised EIS. This information was used in the selection of the valued component "Harvesting/Gathering of Plants" described in section 6.1.3 of the Revised EIS, and used to assess the potential effects on Aboriginal Peoples in 6.21 of the revised EIS. An assessment of the ability of each Indigenous community, including the Métis Nation of Ontario, to practice their traditional land and resource use is provided in Section 6.22 of the revised EIS. Treasury Metals has revised the EIS to include the following key changes with respect to traditional knowledge and traditional land and resource use: • Traditional knowledge obtained from various Indigenous communities including Métis Nation of Ontario has been incorporated into each subsection of Section 5 (Existing Environment) (i.e. 5.1 Climate, 5.2 Air Quality, 5.3 Noise and Light, 5.4 Geology, 5.5 Terrain and Soil, 5.6 Hydrogeology, 5.7 Surface Hydrology, 5.8 Aquatic Resources, 5.9 Terrestrial Resources, 5.10 Migratory Birds,5.11 Species at Risk, and 5.12 Human

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					Environment); • Traditional land and resource use is discussed for each Indigenous community including MNO is located in Section 5.13.3; • The information presented in Section 5 of the revised EIS was essential to the effects assessment completed for Aboriginal peoples in Section 6.21 and specifically for each community in Section 6.22 of the revised EIS. It was also essential to the selection of Valued Components (VCs) as discussed in Section 6.1.3 of the revised EIS. • All engagement activities to date are summarized in Section 9 of the revised EIS and provided in detail in Appendix DD. Engagement logs for all indigenous communities are attached to Appendix DD. • The executive summary has been updated to reflect the meaningful engagement activities with Métis Nation of Ontario. Based on the information shared with Treasury Metals by Métis Nation of Ontario, it is Treasury Metals understanding that MNO is specifically interested in the potential effects on the project on their ability to practice their traditional land and resource uses. From the engagement activities completed to date traditional land and resource uses include but are not limited to harvesting/gathering of plants, trapping of beaver, hunting of moose, caribou, deer, grouse, duck and geese, and fishing. Treasury Metals has revised the EIS to reflect the valued TKLU information shared by MNO to date and will continue to work with this community to ensure that any potential impacts of the project on their traditional land and resource use are properly mitigated. Further to this based on the traditional knowledge and traditional land and resource use knowledge shared by all Indigenous communities including MNO to-date, the additional information obtained from the traditional knowledge/land use study (TKLUS) is not anticipated to result in substantial changes to the EIS, given the conservative approach already employed in the assessment of the effects of the project on Indigenous communities. Treasury Metals welcomes ongoing engagement and information it will further the understanding of traditional land and resource use and assist in ongoing monitoring and mitigation of potential effects with respect to the Project.
583	AC(1)-257	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:** 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? **Revised Response**: The revised EIS is substantially different than the original submission with respect to the assessment of effects on Aboriginal peoples and the traditional land and resource use of Indigenous

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					communities. In the revised EIS trapping was included as a valued component I the assessment of Aboriginal peoples in Section 6.21 using the traditional knowledge gained via meaningful engagement since the time of the original EIS submission. The effects of the project on the ability of the Métis Nation of Ontario to practice trapping as part of their traditional use of the land is assessed in Section 6.22 of the revised EIS. A summary of key changes is included below. For the purposes of the EIS, Aboriginal and Treaty Rights are defined as the historic and current uses of lands and resources for traditional purposes by members of Indigenous communities. It is Treasury Metals' understanding that Aboriginal peoples are entitled to access to their lands according to their Aboriginal and Treaty #3 (1873) Rights, and Treasury Metals is committed to working with the Indigenous communities to ensure that the effects of the project on their traditional land and resource use or alternatively referred to as aboriginal and treaty rights are appropriately considered and protected. A discussion of traditional land and resource use in terms of existing environment is provided in Section 5.13.3. An assessment of the effects of the project on traditional land and resource use is provided in Section 6.22 of the revised EIS Since the time of the original EIS submission, Treasury Metals has participated in a number of meaningful engagement activities with a number of the Indigenous communities including the Métis Nation of Ontario. Notably, as of December 18, 2017 announced that it has entered into a Memorandum of Understanding (MOU) with the MNO in relation to the Project. Treasury Metals as revised the EIS substantially to reflect the traditional knowledge and traditional land and resource use information shared since the original EIS submission. Traditional knowledge regarding plants and berries and the ability to harvest/gather plants is located in Section 5.9.9 and Section 5.13.3 of the revised EIS. This information was used in the selection of the valued component "Harvesting/Gathering of Plants" described in section 6.1.3 of the Revised EIS, and used to assess the potential effects on Aboriginal Peoples in 6.21 of the revised EIS. An assessment of the ability of each Indigenous community, including the Métis Nation of Ontario, to practice their traditional land and resource use is provided in Section 6.22 of the revised EIS. Treasury Metals has revised the EIS to include the following key changes with respect to traditional knowledge and traditional land and resource use: • Traditional knowledge obtained from various Indigenous communities including Métis Nation of Ontario has been incorporated into each subsection of Section 5 (Existing Environment) (i.e. 5.1 Climate, 5.2 Air Quality, 5.3 Noise and Light, 5.4 Geology, 5.5 Terrain and Soil, 5.6 Hydrogeology, 5.7 Surface Hydrology, 5.8 Aquatic Resources, 5.9 Terrestrial Resources, 5.10 Migratory Birds,5.11 Species at Risk, and 5.12 Human Environment); • Traditional land and resource use is discussed for each Indigenous community including MNO is located in Section 5.13.3; • The information presented in Section 5 of the revised EIS was essential to the effects assessment completed for Aboriginal peoples in Section 6.21 and specifically for each

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					community in Section 6.22 of the revised EIS. It was also essential to the selection of Valued Components (VCs) as discussed in Section 6.1.3 of the revised EIS. • All engagement activities to date are summarized in Section 9 of the revised EIS and provided in detail in Appendix DD. Engagement logs for all indigenous communities are attached to Appendix DD. • The executive summary has been updated to reflect the meaningful engagement activities with Métis Nation of Ontario. Based on the information shared with Treasury Metals by Métis Nation of Ontario, it is Treasury Metals understanding that MNO is specifically interested in the potential effects on the project on their ability to practice their traditional land and resource uses. From the engagement activities completed to date traditional land and resource uses include but are not limited to harvesting/gathering of plants, trapping of beaver, hunting of moose, caribou, deer, grouse, duck and geese, and fishing. Treasury Metals has revised the EIS to reflect the valued TKLU information shared by MNO to date and will continue to work with this community to ensure that any potential impacts of the project on their traditional land and resource use are properly mitigated. Further to this based on the traditional knowledge and traditional land and resource use knowledge shared by all Indigenous communities including MNO to-date, the additional information obtained from the traditional knowledge/land use study (TKLUS) is not anticipated to result in substantial changes to the EIS, given the conservative approach already employed in the assessment of the effects of the project on Indigenous communities. Treasury Metals welcomes ongoing engagement and information it will further the understanding of traditional land and resource use and assist in ongoing monitoring and mitigation of potential effects with respect to the Project.
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. **Revised Response**:

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					The revised EIS is substantially different than the original submission with respect to the assessment of effects on Aboriginal peoples and the traditional land and resource use of Indigenous communities. The effects of the project on the ability of the Métis Nation of Ontario to practice their treaty rights is included in Section 6.22 of the revised EIS. A summary of key changes is included below. For the purposes of the revised EIS, Aboriginal and Treaty Rights are defined as the historic and current uses of lands and resources for traditional purposes by members of Indigenous communities. It is Treasury Metals' understanding that Aboriginal peoples are entitled to access to their lands according to their Aboriginal and Treaty #3 (1873) Rights, and Treasury Metals is committed to working with the Indigenous communities to ensure that the effects of the project on their traditional land and resource use or alternatively referred to as aboriginal and treaty rights are appropriately considered and protected. A discussion of traditional land and resource use in terms of existing environment is provided in Section 5.13.3. An assessment of the effects of the project on traditional land and resource use is provided in Section 6.22 of the revised EIS Since the time of the original EIS submission, Treasury Metals has participated in a number of meaningful engagement activities with a number of the Indigenous communities including the Métis Nation of Ontario. Notably, as of December 18, 2017 announced that it has entered into a Memorandum of Understanding (MOU) with the MNO in relation to the Project. Treasury Metals as revised the EIS substantially to reflect the traditional knowledge and traditional land and resource use information shared since the original EIS submission. Traditional knowledge regarding plants and berries and the ability to harvest/gather plants is located in Section 5.9.9 and Section 5.13.3 of the revised EIS. This information was used in the selection of the valued component "Harvesting/Gathering of Plants" described in section 6.1.3 of the Revised EIS, and used to assess the potential effects on Aboriginal Peoples in 6.21 of the revised EIS. An assessment of the ability of each Indigenous community, including the Métis Nation of Ontario, to practice their traditional land and resource use is provided in Section 6.22 of the revised EIS. Treasury Metals has revised the EIS to include the following key changes with respect to traditional knowledge and traditional land and resource use: • Traditional knowledge obtained from various Indigenous communities including Métis Nation of Ontario has been incorporated into each subsection of Section 5 (Existing Environment) (i.e. 5.1 Climate, 5.2 Air Quality, 5.3 Noise and Light, 5.4 Geology, 5.5 Terrain and Soil, 5.6 Hydrogeology, 5.7 Surface Hydrology, 5.8 Aquatic Resources, 5.9 Terrestrial Resources, 5.10 Migratory Birds,5.11 Species at Risk, and 5.12 Human Environment); • Traditional land and resource use is discussed for each Indigenous community including MNO is located in Section 5.13.3; • The information presented in Section 5 of the revised EIS was essential to the effects assessment completed for Aboriginal peoples in Section 6.21 and specifically for each

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					community in Section 6.22 of the revised EIS. It was also essential to the selection of Valued Components (VCs) as discussed in Section 6.1.3 of the revised EIS. • All engagement activities to date are summarized in Section 9 of the revised EIS and provided in detail in Appendix DD. Engagement logs for all indigenous communities are attached to Appendix DD. • The executive summary has been updated to reflect the meaningful engagement activities with Métis Nation of Ontario. Based on the information shared with Treasury Metals by Métis Nation of Ontario, it is Treasury Metals understanding that MNO is specifically interested in the potential effects on the project on their ability to practice their traditional land and resource uses. From the engagement activities completed to date traditional land and resource uses include but are not limited to harvesting/gathering of plants, trapping of beaver, hunting of moose, caribou, deer, grouse, duck and geese, and fishing. Treasury Metals has revised the EIS to reflect the valued TKLU information shared by MNO to date and will continue to work with this community to ensure that any potential impacts of the project on their traditional land and resource use are properly mitigated. Further to this based on the traditional knowledge and traditional land and resource use knowledge shared by all Indigenous communities including MNO to-date, the additional information obtained from the traditional knowledge/land use study (TKLUS) is not anticipated to result in substantial changes to the EIS, given the conservative approach already employed in the assessment of the effects of the project on Indigenous communities. Treasury Metals welcomes ongoing engagement and information it will further the understanding of traditional land and resource use and assist in ongoing monitoring and mitigation of potential effects with respect to the Project.
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 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

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					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 to Address Aboriginal Concerns		**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. Not having the expertise does not remove the issue.
					Response:

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					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. **Revised Response**: As part of the revised EIS, trails and travel ways are assessed as part of the valued components for Aboriginal peoples (Indigenous Communities) for their traditional land and resource use in terms of ability to harvest ,hunt and for cultural and spiritual practices. Further details are provided below. Treasury Metals has made overtures to each community including Métis Nation of Ontario and collated all biophysical and traditional values/land and resource use information within the EIS to date. This information in turn has been sourced from engagement with Indigenous communities (open houses, presentations, meetings, calls, discussions), and secondary source information. All information received via engagement has been formally captured within the Stakeholder Engagement Report which is included in the revised EIS as appendix DD and summarized in Section 9 of the revised EIS.

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					Treasury Metals as part of the responsible development of the Project as of December 18, 2017 announced that it has entered into a Memorandum of Understanding (MOU) with the MNO in relation to the Project. The MOU is a framework agreement with the MNO – including the Atikokan Métis Community Council, the Kenora Métis Community Council, the Northwest Métis Community Council and the Sunset Country Métis Community Council which represent the regional rights-bearing Métis communities (the "Métis Community") in the Treaty #3 area, including, the Métis traditional territories of Lake of the Woods, Lac Seul, Rainy River and Rainy Lake. This MOU is designed to foster a cooperative and productive ongoing relationship between the MNO and Treasury Metals and to assess any potential impacts of the Project on the MNO citizens. The MOU also provides the Métis Community with an opportunity to participate in the Project through employment, training and business development and ongoing consultation of key aspects of both the relationship and Project. Further to this the MOU document provides the framework of a TKLUS. The TKLUS is currently underway with TK aspects to be considered as part of the Projects development. Contacts have included telephone conversations, emails, letters, and in-person meetings. MOU also provides the Métis Community with an opportunity to participate in the Project through employment, training and business development and ongoing engagement of key aspects of both the relationship and Project. This engagement is inclusive of the in-design mitigation features as they directly relate to potential impacts to the Métis way-of-life and values identified in the TK/TLU within the Project area. It is Treasury Metals' intent to work with MNO to incorporate, mitigate, and avoid the values identified during this study as part of the EA process, but also the development of the Project. Treasury Metals has revised the EIS to include the following key changes with respect to traditional knowledge and traditional land and resource use: • Traditional knowledge obtained from various Indigenous communities has been incorporated into each subsection of Section 5 (Existing Environment) (i.e. 5.1 Climate, 5.2 Air Quality, 5.3 Noise and Light, 5.4 Geology, 5.5 Terrain and Soil, 5.6 Hydrogeology, 5.7 Surface Hydrology, 5.8 Aquatic Resources, 5.9 Terrestrial Resources, 5.10 Migratory Birds,5.11 Species at Risk, and 5.12 Human Environment); • Traditional land and resource use is discussed for each Indigenous community including MNO is provided in Section 5.13.3; • The information presented in Section 5 of the revised EIS was essential to the effects assessment completed for Aboriginal peoples in Section 6.21 and specifically for each community in Section 6.22 of the revised EIS. It was also essential to the selection of Valued Components (VCs) as discussed in Section 6.1.3 of the revised EIS. Trails and travel ways were considered under the VCs "Harvesting of Plants", and "Cultural and Spiritual'. • All engagement activities to date are summarized in Section 9 of the revised EIS and

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					provided in detail in Appendix DD. Engagement logs for all indigenous communities are attached to Appendix DD. • The executive summary has been updated to reflect the meaningful engagement activities with Métis Nation of Ontario. Based on the information shared with Treasury Metals by Métis Nation of Ontario, it is Treasury Metals understanding that MNO is specifically interested in the potential effects on the project on their ability to practice their traditional land and resource uses. From the engagement activities completed to date traditional land and resource uses include but are not limited to harvesting/gathering of plants, trapping of beaver, hunting of moose, and fishing. Treasury Metals has revised the EIS to reflect the valued TKLU information shared by MNO to date and will continue to work with this community to ensure that any potential impacts of the project on their traditional land and resource use are properly mitigated. Further to this based on the traditional knowledge and traditional land and resource use knowledge shared by all Indigenous communities including MNO to-date, the additional information obtained from the traditional knowledge/land use study (TKLUS) is not anticipated to result in substantial changes to the EIS, given the conservative approach already employed in the assessment of the effects of the project on Indigenous communities. Treasury Metals welcomes ongoing engagement and information it will further the understanding of traditional land and resource use and assist in ongoing monitoring and mitigation of potential effects with respect to the Project.
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	**Information Request / Comment:** 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 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

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					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 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	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

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
			Aboriginal Concerns		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 Commitments		**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 from Aboriginal Groups. **Revised Response**: To provide details on how specific concerns from Indigenous communities were addressed, a table has been added to Section 9 (Table 9.6.13) of the revised EIS (Public and Indigenous Engagement).In the table lists the concerns raised by individual Indigenous community, the engagement log identification number where the concern can be cross referenced, the baseline study associated with the concern, the locations of how the concern was integrated into the existing environment (Section 5) and the effects assessment (Section 6), along with the mitigation measure and/or commitment made to address the concern raised.

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
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, 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		**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?

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
			Table 10.1.1 Changes to the Project Since Initially Proposed		**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 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

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					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 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

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					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.
					Revised Response: For the purposes of the EIS, Aboriginal and Treaty Rights are defined as the historic and current uses of lands and resources for traditional purposes by members of Indigenous communities. It is Treasury Metals' understanding that Aboriginal peoples are entitled to access to their lands according to their Aboriginal and Treaty #3 (1873) Rights, and Treasury Metals is committed to working with the Indigenous communities to ensure that the effects of the project on their traditional land and resource use or alternatively referred to as aboriginal and treaty rights are appropriately considered and protected. The Revised EIS evaluated the potential effects of the Project on Aboriginal people to hunt, trap, fish, and practice other traditional uses of the land. Section 6 – Description of Project Effects describes the assessment as a whole with specific sections 6.16 and 6.21 to highlight the summaries of the assessment as they pertain to access and aboriginal peoples. The potential impacts on the project on the ability of each Indigenous community to exercise their Aboriginal and Treaty rights is assessed as part of Section 6.22 of the revised EIS Treasury Metals has revised the EIS to include the following key changes with respect to traditional knowledge and traditional land and resource use: • Traditional knowledge obtained from various Indigenous communities has been incorporated into each subsection of Section 5 (Existing Environment) (i.e. 5.1 Climate, 5.2 Air Quality, 5.3 Noise and Light, 5.4 Geology, 5.5 Terrain and Soil, 5.6 Hydrogeology, 5.7 Surface Hydrology, 5.8 Aquatic Resources, 5.9 Terrestrial Resources, 5.10 Migratory Birds,5.11 Species at Risk, and 5.12 Human Environment); • Traditional land and resource use is discussed for each Indigenous community including in Section 5.13.3;

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					• The information presented in Section 5 of the revised EIS was essential to the effects assessment completed for Aboriginal peoples in Section 6.21 and specifically for each community in Section 6.22 of the revised EIS. It was also essential to the selection of Valued Components (VCs) as discussed in Section 6.1.3 of the revised EIS. Trails and travel ways were considered under the VCs "Harvesting of Plants", and "Cultural and Spiritual'. • All engagement activities to date are summarized in Section 9 of the revised EIS and provided in detail in Appendix DD. Engagement logs for all indigenous communities are attached to Appendix DD. • The executive summary has been updated to reflect the meaningful engagement activities with Métis Nation of Ontario. Based on the information shared with Treasury Metals by Métis Nation of Ontario, it is Treasury Metals understanding that MNO is specifically interested in the potential effects on the project on their ability to practice their traditional land and resource uses. From the engagement activities completed to date traditional land and resource uses include but are not limited to harvesting/gathering of plants, trapping of beaver, hunting of moose, and fishing. Treasury Metals has revised the EIS to reflect the valued TKLU information shared by MNO to date and will continue to work with this community to ensure that any potential impacts of the project on their traditional land and resource use are properly mitigated. Further to this based on the traditional knowledge and traditional land and resource use knowledge shared by all Indigenous communities including MNO to-date, the additional information obtained from the traditional knowledge/land use study (TKLUS) is not anticipated to result in substantial changes to the EIS, given the conservative approach already employed in the assessment of the effects of the project on Indigenous communities. Treasury Metals welcomes ongoing engagement and information it will further the understanding of traditional land and resource use and assist in ongoing monitoring and mitigation of potential effects with respect to the Project. At the current time, based on primary and secondary information collected to date, it is Treasury Metals' opinion that any additional information relating to First Nations and Traditional Land will not significantly impact the result of the effects assessment of the revised EIS. Treasury is committed to continued engagement with all indigenous communities to ensure that any potential effect of the project on their ability to practice their traditional use of the land is sufficiently off-set and that it does not have a meaningful impact on their traditional uses of the land. This commitment is highlighted by MOU signed between the MNO and Treasury Metals to form a framework to foster a cooperative and productive relationship and to facilitate the assessment of any potential impacts of the Project on the MNO citizens.
599	AC(1)-272	MNO	Appendix DD: Aboriginal		**Information Request / Comment:** In reference to the private lands on which the Project is located, this section states "….any impacts

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			Engagement Report DD.2.1 History of the Goliath Gold Project		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.
					Revised Response: In responding to the Round 1 information requests, Treasury Metals have revised the EIS to address issues raised by the Agency, Indigenous communities and other stakeholders. The revised EIS endeavors to describe the potential effects of the Project in a methodical and scientifically sound manner. The description of the Project effects on Aboriginal peoples, including the Métis Nation of Ontario, are presented in Section 6.21 of the revised EIS. The revised approach for describing effects on Aboriginal peoples does not rely on land ownership and tenure for describing the effects on Aboriginal people; rather the approach looks at the potential effects of the Project on the following valued components (VCs): • Health effects; • Gathering of plant material; • Hunting and trapping; • Fishing; • Cultural and spiritual; and • Socio-economic effects. Using these VCs, the revised EIS describes how the Project may affect Aboriginal peoples' abilities to practice traditional uses of the land and resources. Treasury Metals recognizes that effects on traditional uses of the land can occur beyond the footprint of the Project, and are thus not tied exclusively to land ownership and tenure. Although land tenure and ownership does not define the potential effects of the Project, Table 1 provides a breakdown of the areas overprinted, or taken up, by the operations area of the Project. The operations area for the Project is 300.6 ha in size and is comprised of 275.4 ha of patent lands

<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>with surface rights held by Treasury Metals, and 34.2 ha of Crown land where Treasury Metals have leasehold to the surface and mineral rights. In addition, there are a section of Crown land where Treasury Metals have leasehold to surface and mineral rights that are not overprinted by the operations area, but that would not be readily accessible during the operating life of the Project for security and safety reasons. Treasury Metals is open to allowing Indigenous peoples access to the portions of these lands, along with portions of the former MNRF tree nursery for traditional purposes with prior consent and notification. For safety reasons, Treasury Metals would need to escort interested Indigenous peoples to those areas, allowing them controlled access. Additionally, only those practices that do not require the use of firearms would be allowed in these areas in order to ensure the safety of workers.

<table>
<tr><th colspan="2">Table 1: Land Tenure and Ownership for the Goliath Gold Project</th></tr>
<tr><th>Land Tenure</th><th>Areas</th></tr>
<tr><td>Operations Area</td><td>300.6 ha</td></tr>
<tr><td>• Patent land with surface and mineral rights held by Treasury Metals</td><td>200.8 ha</td></tr>
<tr><td>• Patent land with surface rights held by Treasury Metals and mineral rights leased from the Crown</td><td>74.6 ha</td></tr>
<tr><td>• Crown land with leasehold surface and mineral rights held by Treasury Metals</td><td>34.2 ha</td></tr>
</table>

This information is also presented in Figure 1.2.3-1 of the revised EIS, which is included in the responses as TMI_599-AC(1)-272_Figure_1.</td></tr>
<tr><td>600</td><td>AC(1)-273</td><td>MNO</td><td>Appendix DD: Aboriginal Engagement Report

DD.2.1 History of the Goliath Gold Project</td><td></td><td><u>Information Request / Comment:</u>
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.”

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.

<u>Response:</u>
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</td></tr>
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TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					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."
					Revised Response: As part of the revised EIS Treasury has updated Appendix DD to reflect the traditional knowledge and traditional land use by MNO. This information has been gathered from primary sources as well as from secondary sources. Section 3.3.8 of the Stakeholder engagement report speaks specifically to information as it pertains to MNO. To reflect the meaningful engagement to-date and ongoing, Treasury Metals has removed from the revised EIS, the language "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."
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

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					(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?
					Revised Response: To accompany the Round 1 information requests provided by the Agency, Treasury Metals is also submitting a revised EIS that incorporates the information provided to Treasury Metals through the engagement process. Treasury Metals is pleased that an MOU has been signed between Treasury Metals and MNO as of January 2018, further building our relationship. A TK/TLU study is being prepared by MNO to fully characterize the potential impacts of the Project on their traditional land uses, and ensure that their knowledge of the land is incorporated into future revisions of the project design. These iterations include Pre-Feasibility level studies, Feasibility Level studies, Detailed engineering for construction and any applicable provincial permitting aspects.Treasury has incorporated all applicable information obtained to date from all the Indigenous communities engaged with throughout the EIS, with an emphasis on Section 5 (Existing Environment), Section 6 (Effects Assessment) and Section 9 (Aboriginal and Public Engagement). All traditional land use practices identified by MNO that occur within the Project effects area have been assessed within the effects assessment to determine if there are potential Project impacts to MNO citizens per Section X.Y.Z
604	AC(1)-277	MNO	Appendix DD: Aboriginal Engagement Report		**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

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
			DD.6 Next Steps in Aboriginal Engagement		the MNO. **Revised Response**: As of January 2018, Treasury Metals and MNO have signed a Memorandum of Understanding with a TK/TLU underway in early 2018. This was a large step to open communications between Treasury Metals and MNO, which provides an avenue to discuss potential employment and business opportunities. It should be noted to MNO that Treasury Metals has committed that they will maintain a local hiring policy, including First Nation communities. The application of this policy is dependent upon the skills and workforce being available locally. (Cmt_003). Additionally, the mitigation measures in place (i.e. next steps) include to: Develop training and job transfer policies to support workforce development in the socio-economic study area (Mit_104), Develop training programs for unemployed and under employed residents and non-workers (Mit_105), and Treasury will maintain, where applicable, a local purchasing policy to purchase goods and services from local suppliers. This policy has the expectation that goods and services will be purchased locally assuming price, delivery and service is competitive with outside suppliers (Mit_116).
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 • 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

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					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; • 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

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					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 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.

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					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 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

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					• 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 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;

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					• 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: 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;

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					• 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 • 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

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					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 Socio-economic Conditions Current Use of Lands and Resources for Traditional Purposes		**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 **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

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					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 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		**Information Request / Comment:** Impact on People and the Community

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			Socio-Economic Conditions Accidents and Malfunctions		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 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.

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					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 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.

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					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 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

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					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 Project Description Accidents and Malfunctions		**Information Request / Comment:** Concerned about Management of Mine 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

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					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 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

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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. *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		**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

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			Purposes Aboriginal Health and Socio-Economic Conditions		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
					Revised Response: Treasury Metals respects the values and beliefs of local Indigenous communities. Treasury Metals thanks Eagle Lake First Nation for their comments and concerns, and wishes to improve our knowledge of the land from the Indigenous communities in the area. Traditional knowledge and traditional land uses provided by Indigenous communities to date has been incorporated in Section 5 (Existing Environment) and Section 6 (Effects Assessment) of the revised EIS to supplement the information obtained by Treasury Metals led studies. Nonetheless, Treasury Metals wishes to expand its knowledge in order to effectively characterize concerns and values of potentially effect Indigenous communities. Treasury Metals is looking forward to signing a Memorandum of Understanding with Eagle Lake First Nation as well as in discussions of funding the proposed TK/TLU study. Additionally, Treasury Metals would welcome a discussion of these comments during our next meeting with the Eagle Lake First Nation to try and address concerns raised in the information request.
617	AC(1)-290	Eagle Lake First Nation	Aboriginal Engagement Current Use of Lands and Resources for Traditional Purposes Aboriginal Health and Socio-Economic Conditions, Current Use of Lands and		**Information Request / Comment:** Key Questions for Treasury Metals Inc. and CEA Agency 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?

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			Resources for Traditional Purposes		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: <u>Relationships between First Nations and Mining</u> 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. <u>*Reason for 30 day Review Period*</u> 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)).

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					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 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. Project Revenue The value referred to in the question represents the Projected profit, in present day value, as

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					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. Protection of Groundwater 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. *Opportunities to Participate in Mining Act* This question is best posed to the Ministry of Northern Development and Mines (MNDM) who administer the Mining Act. *Impacts on Environment* 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. Assurances in the Event of Bankruptcy 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

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					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. *Environmental Assessment Process* 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. Funding for Closure 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. 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

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					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. 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.

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					• 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 Resources for Traditional Purposes Structure, site, or thing of historical, archaeological, paleontological or architectural significance to Aboriginal groups		**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 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

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					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.
					Revised Response: Treasury Metals has revised the EIS substantially in response to insight regarding traditional knowledge and traditional land use received from the surrounding indigenous communities including ELFN. The potential effects of the project on wild rice, archaeological sites, and Lola Nature Reserve are assessed in Section 6.21 of the revised EIS. The valued components assessed specifically for Aboriginal peoples are presented in Section 6.1 of the revised EIS. The assessment of potential effects on Aboriginal peoples in Section 6.21 included harvesting of plants (including wild rice), and cultural and spiritual activities (including archeological sites, and the Lola Nature Reserve). This assessment was conducted using traditional land and resource use information obtained from ELFN and summarized in Section 5.13 of the EIS. Traditional knowledge obtained from various Indigenous communities including Eagle Lake First Nation has been incorporated into each subsection of Section 5 (Existing Environment) (i.e. 5.1 Climate, 5.2 Air Quality, 5.3 Noise and Light, 5.4 Geology, 5.5 Terrain and Soil, 5.6 Hydrogeology, 5.7 Surface Hydrology, 5.8 Aquatic Resources, 5.9 Terrestrial Resources, 5.10 Migratory Birds,5.11 Species at Risk, and 5.12 Human Environment. The information presented in Section 5 of the revised EIS was essential to the effects assessment completed for Aboriginal peoples in Section 6.21 and specifically for each community in Section 6.22 of the revised EIS. It was also essential to the selection of Valued Components (VCs) as discussed in Section 6.1.3 of the revised EIS. All engagement activities to date are summarized in Section 9 of the revised EIS and provided in detail in Appendix DD. Engagement logs for all indigenous communities are attached to Appendix DD. It is Treasury Metals intent to work with all Indigenous and the public to incorporate, mitigate, and

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					avoid the values identified as part of the EA process, but also the development of the Project.
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 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

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					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 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

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					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 conditions		**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. 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

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					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. • 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.

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					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 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

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					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; • 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.

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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 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

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					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 • 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.
					Revised Response:

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					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 environmental 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 Province of Ontario has a robust environmental approvals process that will include review of the detailed designs / factors of safety etc. prior to issuance of approvals. • The process proposed for developing the TSF is one that has been demonstrated to be safe and reliable during other 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. Best Available Technology: Since the submission of the original EIS, the Project has undergone a number of refinements, including preparation of a revised Alternatives Assessment for the TSF which followed the MMER Schedule 2 guidance for the deposition of deleterious mine substance in waters frequented by fish. A summary of this alternatives assessment is provided in Section 2.3.6 of the revised EIS, with additional details provided in Appendix D-2. The revised Alternatives Assessment for the TSF considered nine (9) candidate locations and three potential tailings disposal technologies consisting of: • Conventional slurry tailings; • Thickened tailings (paste); and • Filtered tailings (dry stack); A list of the identified advantages and disadvantages for each candidate location and disposal technology included in the assessment is presented in Table 6-1 and a figure of the candidate locations is provided in Figure 5-1 of Appendix D-2. The assessment of the nine candidate locations and three disposal technologies resulted in the assessment of 27 options. Of these 27 options, four were carried forward to a Multiple Accounts Assessment (MAA) approach based on apparent fatal flaws in the other options. Of these 4 alternatives carried forward, one of them utilized filtered tailings deposition technology (dry stack). The MAA completed in the standard approach required by Environment and Climate Change Canada indicates that the alternatives must be characterized

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					from a technical, environmental, socio-economic and economic perspective. The result of the analysis (shown in Table 9-11 of Appendix D-2) indicates that the filtered stack alternatives (Alternative C) was given the second lowest score of the four alternatives. This includes the second lowest score for both environmental and socio-economic factors, the lowest score for economic and technical factors. While both conventional slurry and filtered stack tailings deposition technologies were assessed in the Alternatives Assessment in Appendix D-2, one of the major reasons filtered stack tailings deposition was not considered to be the best option for Treasury Metals is that the dust produced from filtered stack tailings piles are likely to exceed human health based criteria. This could require eviction / relocation of local residents from their homes for the Project to continue. It is Treasury Metals opinion that these known negative effects far outweigh the highly unlikely event of a TSF failure for conventional slurry tailings containment, as design and monitoring of the dams will follow all regulatory criteria to prevent such an event. Therefore, the Best Available Technology has been assessed in the Alternatives Assessment for the TSF and has indicated that, for the Goliath Gold Project, conventional slurry tailings deposition technology is the best option.
624	AC(1)-297	Eagle Lake First Nation	Aboriginal engagement Accidents and malfunctions Fish and Fish Habitat Aboriginal Health and Socio-Economic Conditions		**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 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.

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					• 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 Aboriginal Health and Socio-Economic Conditions		**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 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

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					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 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		**<u>Information Request / Comment:</u>** 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

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					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 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

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					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 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

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					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? • 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

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					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. 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

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					• 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 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

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					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 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		**Information Request / Comment:** Acid Rock Drainage

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			Aboriginal Health and Socio-Economic Conditions		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 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

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					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 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. Potential Segregation of PAG 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

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					for construction materials is discussed in more detail in TMI_46-MW(1)-08. Climate Change Consideration 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. Consideration of Traditional Knowledge 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.
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

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					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 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

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					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. • 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.

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					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 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

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					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 Socio-Economic Conditions		**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 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

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					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 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

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					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 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

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					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: 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

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					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 • 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		**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

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			Conditions		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 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

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					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 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

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					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. 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

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					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 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		**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

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			Conditions		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 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”.

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					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 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

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					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 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

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					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. *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.

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					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. *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.

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					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 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;

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					• 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 engagement Alternatives Assessment		**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? • 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

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					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 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

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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
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

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					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 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:**

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					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 Current Use of Lands and Resources for Traditional Purposes		**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 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.
					Revised Response: Treasury Metals has made overtures to each community including Naotkamegwanning First Nation and collated all biophysical and traditional values/land and resource use information within the EIS to date. This information in turn has been sourced from engagement with Indigenous communities (open houses, presentations, meetings, calls, discussions), and secondary source information. All information received via engagement has been formally captured within the Stakeholder Engagement Report which is included in the revised EIS as appendix DD and summarized in

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					Section 9 of the revised EIS. Treasury Metals has revised the EIS to include the following key changes with respect to traditional knowledge and traditional land and resource use: • Traditional knowledge obtained from various Indigenous communities has been incorporated into each subsection of Section 5 (Existing Environment) (i.e. 5.1 Climate, 5.2 Air Quality, 5.3 Noise and Light, 5.4 Geology, 5.5 Terrain and Soil, 5.6 Hydrogeology, 5.7 Surface Hydrology, 5.8 Aquatic Resources, 5.9 Terrestrial Resources, 5.10 Migratory Birds,5.11 Species at Risk, and 5.12 Human Environment); • Traditional land and resource use is discussed for each Indigenous community including Naotkamegwanning First Nation in Section 5.13.3; • The information presented in Section 5 of the revised EIS was essential to the effects assessment completed for Aboriginal peoples in Section 6.21 and specifically for each community in Section 6.22 of the revised EIS. It was also essential to the selection of Valued Components (VCs) as discussed in Section 6.1.3 of the revised EIS. • All engagement activities to date are summarized in Section 9 of the revised EIS and provided in detail in Appendix DD. Engagement logs for all indigenous communities are attached to Appendix DD. • The executive summary has been updated to reflect the meaningful engagement activities with Indigenous communities. Based on the information shared with Treasury Metals by Naotkamegwanning First Nation, it is Treasury Metals understanding that NFN is specifically interested in the potential effects on the project on their ability to practice their traditional land and resource uses. From the engagement activities completed to date traditional land and resource uses include but are not limited to hunting and trapping, fishing and cultural and spiritual values. Treasury Metals has revised the EIS to reflect the valued TKLU information shared by Naotkamegwanning First Nation to date and will continue to work with this community to ensure that any potential impacts of the project on their traditional land and resource use are properly mitigated. Further to this based on the traditional knowledge and traditional land and resource use knowledge shared by all Indigenous communities including Naotkamegwanning First Nation to-date, the additional information obtained from a formal traditional knowledge/land use study (TKLUS) is not anticipated to result in substantial changes to the EIS, given the conservative approach already employed in the assessment of the effects of the project on Indigenous communities. Treasury Metals is committed to continued engagement over the life of the project and is confident that any additional information shared with the company regarding traditional land uses will serve to validate the assessment completed as part of the Revised EIS and bolster the Project as it is developed.
644	AC(1)-317	Naotkamegwanning First Nation	Migratory Birds		**Information Request / Comment:** Key Potential Adverse Effects: From a preliminary analysis of the Project Description contained in

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			Wildlife		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 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

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					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, 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

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					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 Traditional Purposes t		**Information Request / Comment**: • Adverse effects on fishing due to "re-location" of fish-bearing segment of Blackwater Creek tributary;
					Revised 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 EIS are presented in Section 3.16 of the revised EIS. The preferred location for the process plant presented in the revised EIS will avoid the need to re-align the lower reaches of Blackwater Creek Tributary 2. However, as described in the revised EIS, there are two watercourses that will be overprinted as a result of the Project, namely Blackwater Creek Tributary 1 and Blackwater Creek Tributary 2. The upper reaches of Blackwater Creek Tributary 1 will be overprinted by the open pit mine. Additionally, the perimeter ditching around the operations area will collect most of the runoff from the catchment of Blackwater Creek Tributary 1, meaning the lower reaches of this watercourse will provide little or no fish habitat. The upper reaches of Blackwater Creek Tributary 2 will be overprinted by the tailings storage facility (TSF) and the minewater pond. The watercourses overprinted by the Project will require consideration under Fisheries Act section 35(2) or the Metal Mining Effluent Regulations Schedule 2 amendment, and will likely require some form of habitat offsetting to compensate for the lost habitat. An overall strategy to address fish habitat offsetting has been provided in Appendix II of the revised EIS, but specifics will be determined subsequently, in consultation with Fisheries and Oceans Canada (DFO), Environment Canada, Ontario Ministry of Natural Resources and Forestry (MNRF), and Indigenous communities. Table 1 lists the species of fish identified as resident in watercourses overprinted by the Project, namely Blackwater Creek Tributary 1 and Blackwater Creek Tributary 2. The table identifies these

<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>
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watercourses are home to a selection of non-game species that are not usually considered suitable targets for recreational, commercial or subsistence fishing opportunities, but could be suitable as baitfish. The overprinted watercourses are far enough removed from Wabigoon Lake as to offer no spawning opportunities to the game fish present in that waterbody.
<table>
<tr><th colspan="3">Table 1: Fish Species Present in Overprinted Watercourses</th></tr>
<tr><th>Common and Scientific Names</th><th>Blackwater Creek Tributary 1</th><th>Blackwater Creek Tributary 2</th></tr>
<tr><td>Northern Redbelly and Finescale Dace Chrosomus spp.</td><td>Yes</td><td>Yes</td></tr>
<tr><td>Brook Stickleback (Culaea inconstans)</td><td>Yes</td><td>Yes</td></tr>
<tr><td>Pearl Dace (Margariscus nachtriebe)</td><td>Yes</td><td>Yes</td></tr>
<tr><td>Fathead Minnow (Pimephales promelas)</td><td>Yes</td><td>—</td></tr>
<tr><td>White Sucker (Catostomus commersonii)</td><td>—</td><td>Yes</td></tr>
<tr><td>Shiner sp.</td><td>Yes</td><td>—</td></tr>
</table>
Note: Species based on baseline fish captures presented in Table 5.8.4.3-1 of the revised EIS.

The effects of the Project on fish and fish habitat in Blackwater Creek Tributary 1 and Blackwater Creek Tributary 2, are described in Section 6.14 of the revised EIS, and include the loss of habitat for the stream-resident fish that live in these watercourses, as well as mortality for those individual fish that cannot be successfully re-located to downstream sections during the site preparation and construction phase of the Project. As discussed above, some form of offsetting will be required to compensate for the lost habitat. However, the mortality of the stream-based fish that could not be re-located successfully will temporarily reduce the numbers of non-game fish available in Blackwater Creek Tributary 1 and Blackwater Creek Tributary 2.

The potential effects of the Project on commercial and recreational fishing are described in Section 6.16 (land use) of the revised EIS. While this section evaluates the potential for the Project to effect commercial and recreational fishery opportunities, the only residual adverse effects identified is the reduction of baitfish harvesting opportunities in Blackwater Creek Tributary 1 and Blackwater Creek Tributary 2.

The potential effects of the Project on fishing opportunities for Aboriginal peoples has been
</td></tr>
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TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					described in Section 6.22 of the revised EIS. This section identifies that the overprinting of Blackwater Creek Tributary 1 and Blackwater Creek Tributary 2 could result of the loss of baitfish in those watercourses, but would not adversely affect commercial, recreational of subsistence fishing in those streams as there were no game fish identified in either watercourse.
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

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					for fish and fish habitat are discussed in Section 13.14.
651	AC(1)-324	Naotkamegwanning First Nation	Current Use of Lands and Resources for Traditional Purposes Aboriginal Health and Socio-economic Conditions		**Information Request / Comment:** • 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

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					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 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.

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					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		**Information Request / Comment:** • Significance adverse effects on socio-economic conditions in the event of a catastrophic breach 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

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					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 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

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					EIS: • Direct soil contact and dust; • Food chain exposure; • 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.* **Revised Response**:

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					While no formal TK/TLU study has been completed Treasury Metals Treasury Metals has made overtures to each community including Naotkamegwanning First Nation and collated all biophysical and traditional values/land and resource use information within the EIS to date. This information in turn has been sourced from engagement with Indigenous communities (open houses, presentations, meetings, calls, discussions), and secondary source information. All information received via engagement has been formally captured within the Stakeholder Engagement Report which is included in the revised EIS as appendix DD and summarized in Section 9 of the revised EIS. Treasury Metals has revised the EIS to include the following key changes with respect to traditional knowledge and traditional land and resource use: • Traditional knowledge obtained from various Indigenous communities has been incorporated into each subsection of Section 5 (Existing Environment) (i.e. 5.1 Climate, 5.2 Air Quality, 5.3 Noise and Light, 5.4 Geology, 5.5 Terrain and Soil, 5.6 Hydrogeology, 5.7 Surface Hydrology, 5.8 Aquatic Resources, 5.9 Terrestrial Resources, 5.10 Migratory Birds,5.11 Species at Risk, and 5.12 Human Environment); • Traditional land and resource use is discussed for each Indigenous community including Naotkamegwanning First Nation in Section 5.13.3; • The information presented in Section 5 of the revised EIS was essential to the effects assessment completed for Aboriginal peoples in Section 6.21 and specifically for each community in Section 6.22 of the revised EIS. It was also essential to the selection of Valued Components (VCs) as discussed in Section 6.1.3 of the revised EIS. • All engagement activities to date are summarized in Section 9 of the revised EIS and provided in detail in Appendix DD. Engagement logs for all indigenous communities are attached to Appendix DD. • The executive summary has been updated to reflect the meaningful engagement activities with Indigenous communities. Based on the information shared with Treasury Metals by Naotkamegwanning First Nation, it is Treasury Metals understanding that NFN is specifically interested in the potential effects on the project on their ability to practice their traditional land and resource uses. From the engagement activities completed to date traditional land and resource uses include but are not limited to hunting and trapping, fishing and cultural and spiritual values. Treasury Metals has revised the EIS to reflect the valued TKLU information shared by Naotkamegwanning First Nation to date and will continue to work with this community to ensure that any potential impacts of the project on their traditional land and resource use are properly mitigated. Further to this based on the traditional knowledge and traditional land and resource use knowledge shared by all Indigenous communities including Naotkamegwanning First Nation to-date, the additional information obtained from a formal traditional knowledge/land use study (TKLUS) is not

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					anticipated to result in substantial changes to the EIS, given the conservative approach already employed in the assessment of the effects of the project on Indigenous communities. Treasury Metals is committed to continued engagement over the life of the project and is confident that any additional information shared with the company regarding traditional land uses will serve to validate the assessment completed as part of the Revised EIS and bolster the Project as it is developed.
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 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

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					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; **Revised Response**: While no formal TK/TLU study has been completed Treasury Metals Treasury Metals has made overtures to each community including Naotkamegwanning First Nation and collated all biophysical and traditional values/land and resource use information within the EIS to date. This information in turn has been sourced from engagement with Indigenous communities (open houses, presentations, meetings, calls, discussions), and secondary source information. All information received via engagement has been formally captured within the Stakeholder Engagement Report which is included in the revised EIS as appendix DD and summarized in Section 9 of the revised EIS. Treasury Metals has revised the EIS to include the following key changes with respect to traditional knowledge and traditional land and resource use: • Traditional knowledge obtained from various Indigenous communities has been incorporated into each subsection of Section 5 (Existing Environment) (i.e. 5.1 Climate, 5.2 Air Quality, 5.3 Noise and Light, 5.4 Geology, 5.5 Terrain and Soil, 5.6 Hydrogeology, 5.7 Surface Hydrology, 5.8 Aquatic Resources, 5.9 Terrestrial Resources, 5.10 Migratory Birds,5.11 Species at Risk, and 5.12 Human Environment); • Traditional land and resource use is discussed for each Indigenous community including Naotkamegwanning First Nation in Section 5.13.3; • The information presented in Section 5 of the revised EIS was essential to the effects assessment completed for Aboriginal peoples in Section 6.21 and specifically for each community in Section 6.22 of the revised EIS. It was also essential to the selection of Valued Components (VCs) as discussed in Section 6.1.3 of the revised EIS. • All engagement activities to date are summarized in Section 9 of the revised EIS and provided in detail in Appendix DD. Engagement logs for all indigenous communities are attached to Appendix DD. • The executive summary has been updated to reflect the meaningful engagement activities with Indigenous communities. Based on the information shared with Treasury Metals by Naotkamegwanning First Nation, it is Treasury Metals understanding that NFN is specifically interested in the potential effects on the project on their ability to practice their traditional land and resource uses. From the engagement

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					activities completed to date traditional land and resource uses include but are not limited to hunting and trapping, fishing and cultural and spiritual values. Treasury Metals has revised the EIS to reflect the valued TKLU information shared by Naotkamegwanning First Nation to date and will continue to work with this community to ensure that any potential impacts of the project on their traditional land and resource use are properly mitigated. Further to this based on the traditional knowledge and traditional land and resource use knowledge shared by all Indigenous communities including Naotkamegwanning First Nation to-date, the additional information obtained from a formal traditional knowledge/land use study (TKLUS) is not anticipated to result in substantial changes to the EIS, given the conservative approach already employed in the assessment of the effects of the project on Indigenous communities. Treasury Metals is committed to continued engagement over the life of the project and is confident that any additional information shared with the company regarding traditional land uses will serve to validate the assessment completed as part of the Revised EIS and bolster the Project as it is developed.
660	AC(1)-333	Naotkamegwanning First Nation	Current Use of Lands and Resources for Traditional Purposes Aboriginal Health and Socio-economic Conditions Aboriginal Physical and Cultural Heritage Structure, site, or thing of historical, archaeological, paleontological or architectural significance to Aboriginal groups		**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 significance. **Revised Response**: Treasury Metals has revised the EIS to include the following information in Section 5.13 of the revised EIS: 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 significance While no formal TK/TLU study has been completed Treasury Metals Treasury Metals has made overtures to each community including Naotkamegwanning First Nation and collated all biophysical and traditional values/land and resource use information within the EIS to date. This information in turn has been sourced from engagement with Indigenous communities (open houses, presentations, meetings, calls, discussions), and secondary source information. All information received via engagement has been formally captured within the Stakeholder Engagement Report which is included in the revised EIS as appendix DD and summarized in Section 9 of the revised

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					EIS. Treasury Metals has revised the EIS to include the following key changes with respect to traditional knowledge and traditional land and resource use: • Traditional knowledge obtained from various Indigenous communities has been incorporated into each subsection of Section 5 (Existing Environment) (i.e. 5.1 Climate, 5.2 Air Quality, 5.3 Noise and Light, 5.4 Geology, 5.5 Terrain and Soil, 5.6 Hydrogeology, 5.7 Surface Hydrology, 5.8 Aquatic Resources, 5.9 Terrestrial Resources, 5.10 Migratory Birds,5.11 Species at Risk, and 5.12 Human Environment); • Traditional land and resource use is discussed for each Indigenous community including Naotkamegwanning First Nation in Section 5.13.3; • The information presented in Section 5 of the revised EIS was essential to the effects assessment completed for Aboriginal peoples in Section 6.21 and specifically for each community in Section 6.22 of the revised EIS. It was also essential to the selection of Valued Components (VCs) as discussed in Section 6.1.3 of the revised EIS. • All engagement activities to date are summarized in Section 9 of the revised EIS and provided in detail in Appendix DD. Engagement logs for all indigenous communities are attached to Appendix DD. • The executive summary has been updated to reflect the meaningful engagement activities with Indigenous communities. Based on the information shared with Treasury Metals by Naotkamegwanning First Nation, it is Treasury Metals understanding that NFN is specifically interested in the potential effects on the project on their ability to practice their traditional land and resource uses. From the engagement activities completed to date traditional land and resource uses include but are not limited to hunting and trapping, fishing and cultural and spiritual values. Treasury Metals has revised the EIS to reflect the valued TKLU information shared by Naotkamegwanning First Nation to date and will continue to work with this community to ensure that any potential impacts of the project on their traditional land and resource use are properly mitigated. Further to this based on the traditional knowledge and traditional land and resource use knowledge shared by all Indigenous communities including Naotkamegwanning First Nation to-date, the additional information obtained from a formal traditional knowledge/land use study (TKLUS) is not anticipated to result in substantial changes to the EIS, given the conservative approach already employed in the assessment of the effects of the project on Indigenous communities. Treasury Metals is committed to continued engagement over the life of the project and is confident that any additional information shared with the company regarding traditional land uses will serve to validate the assessment completed as part of the Revised EIS and bolster the Project as it is developed.
661	AC(1)-334	Naotkamegwann			**Information Request / Comment:**

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
		ing First Nation			7. Absence of any suggested mitigation/avoidance and follow-up measures from NFN; and **Revised Response**: Since the filing of the EIS Treasury Metals has engaged each of the First Nations including Naotkamegwanning First Nation. The project effects and mitigation measures were specifically spoken to with technical representatives from NFN at the September 17, 2017 meeting in Dryden. During this meeting impacts and mitigation measures such as white noise backup alarms, in pit waste storage to limit surface footprint and effects, limiting of WRSA height and pit lake closure methods. Treasury has also discussed with NFN the mitigation measures to maintain access to the site and regional areas where possible when not creating a safety hazard due to the mine operations. These meaningful engagement activities have been captured throughout the revised EIS including Section 5 and 6. In addition, to ensure that Indigenous communities most affected by the Project have input into the effectiveness of the Environmental Management Plans and Follow-up Programs, Treasury Metals proposes to form an Environmental Management Committee. This is discussed in Section 12.22 of the revised EIS. This committee would be made up of members from Indigenous communities and would meet with representatives from Treasury Metals on a to-be-determined basis, possibly quarterly or at least semi-annually. Treasury Metals would present any reportable information on the management plans as well as the results of the follow-up programs. If exceedances or issues arise that show mitigation measures have not been as effective as expected, the potential for further actions would be discussed with the committee. The Environmental Management Committee would also provide a forum for discussing other environmental matters with the potentially affected Indigenous communities such as upcoming permits, additional TK that might have been collected since completion of the EA process, and any other environmental matters of relevance to the committee including financial support for operation of the committee. The company continues to maintain open communication with NFN and is agreeable to discuss any other mitigation measures that may help to develop the project.
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. **Revised Response**: While no formal TK/TLU study has been completed Treasury Metals Treasury Metals has made overtures to each community including Naotkamegwanning First Nation and collated all biophysical and traditional values/land and resource use information within the EIS to date. This information in turn has been sourced from engagement with Indigenous communities (open houses, presentations, meetings, calls, discussions), and secondary source information. All information received via engagement has been formally captured within the Stakeholder Engagement Report

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					which is included in the revised EIS as appendix DD and summarized in Section 9 of the revised EIS. Treasury Metals has revised the EIS to include the following key changes with respect to traditional knowledge and traditional land and resource use: • Traditional knowledge obtained from various Indigenous communities has been incorporated into each subsection of Section 5 (Existing Environment) (i.e. 5.1 Climate, 5.2 Air Quality, 5.3 Noise and Light, 5.4 Geology, 5.5 Terrain and Soil, 5.6 Hydrogeology, 5.7 Surface Hydrology, 5.8 Aquatic Resources, 5.9 Terrestrial Resources, 5.10 Migratory Birds,5.11 Species at Risk, and 5.12 Human Environment); • Traditional land and resource use is discussed for each Indigenous community including Naotkamegwanning First Nation in Section 5.13.3; • The information presented in Section 5 of the revised EIS was essential to the effects assessment completed for Aboriginal peoples in Section 6.21 and specifically for each community in Section 6.22 of the revised EIS. It was also essential to the selection of Valued Components (VCs) as discussed in Section 6.1.3 of the revised EIS. • All engagement activities to date are summarized in Section 9 of the revised EIS and provided in detail in Appendix DD. Engagement logs for all indigenous communities are attached to Appendix DD. • The executive summary has been updated to reflect the meaningful engagement activities with Indigenous communities. Based on the information shared with Treasury Metals by Naotkamegwanning First Nation, it is Treasury Metals understanding that NFN is specifically interested in the potential effects on the project on their ability to practice their traditional land and resource uses. From the engagement activities completed to date traditional land and resource uses include but are not limited to hunting and trapping, fishing and cultural and spiritual values. Treasury Metals has revised the EIS to reflect the valued TKLU information shared by Naotkamegwanning First Nation to date and will continue to work with this community to ensure that any potential impacts of the project on their traditional land and resource use are properly mitigated. Further to this based on the traditional knowledge and traditional land and resource use knowledge shared by all Indigenous communities including Naotkamegwanning First Nation to-date, the additional information obtained from a formal traditional knowledge/land use study (TKLUS) is not anticipated to result in substantial changes to the EIS, given the conservative approach already employed in the assessment of the effects of the project on Indigenous communities. Treasury Metals is committed to continued engagement over the life of the project and is confident that any additional information shared with the company regarding traditional land uses will serve to validate the assessment completed as part of the Revised EIS and bolster the Project as it is developed. As part of the ongoing engagement activities Naotkamegwanning First Nation and the Company

<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>have discussed engagement protocols and are in the process of developing a formal agreement. In response to the April 5th meeting hosted by CEAA the company extended a letter to each of the First Nations, including Naotkamegwanning First Nation to extend the offer of an environmental monitor to work with the Project on the part of the First Nations and provide the opportunity for a 3rd party review of technical information on the part of the First Nations.</td></tr>
<tr><td>663</td><td>AC(1)-336</td><td>Naotkamegwanning First Nation</td><td>Aboriginal Health and Socio-economic Conditions</td><td></td><td><u>Information Request / Comment</u>:
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

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.

<u>Revised Response</u>:
<table><tr><th>Naotkamegwanning First Nation IR Deficiency Identified</th><th><u>Treasury Metals' Response</u></th></tr><tr><td>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</td><td>Section 5.13 of the revised EIS has been updated extensively as part of the revised EIS submission.

Traditional knowledge obtained from various Indigenous communities has been incorporated into each subsection of Section 5 (Existing Environment) (i.e. 5.1 Climate, 5.2 Air Quality, 5.3 Noise and Light, 5.4</td></tr></table></td></tr>
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						Geology, 5.5 Terrain and Soil, 5.6 Hydrogeology, 5.7 Surface Hydrology, 5.8 Aquatic Resources, 5.9 Terrestrial Resources, 5.10 Migratory Birds,5.11 Species at Risk, and 5.12 Human Environment);
					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.	Revised socioeconomic baseline information for: • Wabigoon Lake 27, • Eagle Lake 27 • Lac des Mille Lacs 22A1 • Wabauskang 21, • Lac Seul 28 , • Whitefish Bay 32A (Naotkamegwanning First Nation), • Whitefish Bay 33A (Naotkamegwanning First Nation), • Whitefish Bay 34A (Naotkamegwanning First Nation), and • Grassy Narrows (English River 21) Is provided in Section 5.13.2 of the revised EIS
					The report sections related to First Nations are entirely desktop exercises that do not provide an adequate basis for assessing CEAA 2012)(c) effects.	Since the time of the original EIS submission, Treasury Metals has participated in a number of meaningful engagement activities. While no formal TK/TLU study has been completed Treasury Metals has made overtures to each community including Naotkamegwanning First Nation and collated all biophysical and traditional values/land and resource use information within the EIS to date. This information in turn has been sourced from

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						engagement with Indigenous communities (open houses, presentations, meetings, calls, discussions), and secondary source information. All information received via engagement has been formally captured within the Stakeholder Engagement Report which is included in the revised EIS as appendix DD and summarized in Section 9 of the revised EIS. Treasury Metals has revised the EIS to include the following key changes with respect to traditional knowledge and traditional land and resource use: • Traditional knowledge obtained from various Indigenous communities has been incorporated into each subsection of Section 5 (Existing Environment) (i.e. 5.1 Climate, 5.2 Air Quality, 5.3 Noise and Light, 5.4 Geology, 5.5 Terrain and Soil, 5.6 Hydrogeology, 5.7 Surface Hydrology, 5.8 Aquatic Resources, 5.9 Terrestrial Resources, 5.10 Migratory Birds,5.11 Species at Risk, and 5.12 Human Environment); • Traditional land and resource use is discussed for each Indigenous community including Naotkamegwanning First Nation in Section 5.13.3; • The information presented in Section 5 of the revised EIS was essential to the effects assessment completed for Aboriginal peoples in Section 6.21 and specifically for each	

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						community in Section 6.22 of the revised EIS. It was also essential to the selection of Valued Components (VCs) as discussed in Section 6.1.3 of the revised EIS. • All engagement activities to date are summarized in Section 9 of the revised EIS and provided in detail in Appendix DD. Engagement logs for all indigenous communities are attached to Appendix DD. • The executive summary has been updated to reflect the meaningful engagement activities with Indigenous communities.
					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.	All funding language has been revised to reflect a site-specific approach to the ongoing engagement and project status.
664	AC(1)-337	Naotkamegwanning First Nation	Aboriginal Physical and Cultural Heritage Structure, site, or thing of historical, archaeological, paleontological or architectural significance to Aboriginal		**<u>Information Request / Comment:</u>** 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 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]	

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			groups		[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 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

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					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 Health and Socio-economic Conditions Current Use of		**<u>Information Request / Comment:</u>** • 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, 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.

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			Lands and Resources for Traditional Purposes Aboriginal Engagement		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.
					Revised Response: Since the time of the original EIS submission, Treasury Metals has participated in a number of meaningful engagement activities. Treasury Metals as revised the EIS substantially to reflect the traditional knowledge and traditional land and resource use information shared since the original EIS submission. Traditional knowledge was added into each subsection of Section 5- Existing Environment, which was in turn used in the valued component selection described in Section 6.1.3 of the revised EIS. The VCs were used in the revised assessment of potential effects of the projects which is located in Section 6.21 of the revised EIS. An assessment of the ability of each Indigenous community, including the Naotkamegwanning First Nation, to practice their traditional land and resource use is provided in Section 6.22 of the revised EIS. Treasury Metals has revised the EIS to include the following key changes with respect to traditional knowledge and traditional land and resource use: • Any reference to the country foods assessment has been removed from the Indigenous communities section. Instead traditional knowledge and traditional land and resource use (otherwise referred to as Aboriginal and Treaty Rights) were used to assess cultural food consumption of indigenous communities. • Traditional knowledge obtained from various Indigenous communities has been incorporated into each subsection of Section 5 (Existing Environment) (i.e. 5.1 Climate, 5.2 Air Quality, 5.3 Noise and Light, 5.4 Geology, 5.5 Terrain and Soil, 5.6 Hydrogeology, 5.7 Surface Hydrology, 5.8 Aquatic Resources, 5.9 Terrestrial Resources, 5.10 Migratory Birds,5.11 Species at Risk, and 5.12 Human Environment);

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					• Traditional land and resource use is discussed for each Indigenous community including Naotkamegwanning First Nation in Section 5.13.3; • The information presented in Section 5 of the revised EIS was essential to the effects assessment completed for Aboriginal peoples in Section 6.21 and specifically for each community in Section 6.22 of the revised EIS. It was also essential to the selection of Valued Components (VCs) as discussed in Section 6.1.3 of the revised EIS. • All engagement activities to date are summarized in Section 9 of the revised EIS and provided in detail in Appendix DD. Engagement logs for all indigenous communities are attached to Appendix DD. • The executive summary has been updated to reflect the meaningful engagement activities with Indigenous communities. Based on the information shared with Treasury Metals by Naotkamegwanning First Nation, it is Treasury Metals understanding that NFN is specifically interested in the potential effects on the project on their ability to practice their traditional land and resource uses. From the engagement activities completed to date traditional land and resource uses include but are not limited to hunting and trapping, fishing and cultural and spiritual values. Treasury Metals has revised the EIS to reflect the valued TKLU information shared by Naotkamegwanning First Nation to date and will continue to work with this community to ensure that any potential impacts of the project on their traditional land and resource use are properly mitigated. Further to this based on the traditional knowledge and traditional land and resource use knowledge shared by all Indigenous communities including Naotkamegwanning First Nation to-date, the additional information obtained from a formal traditional knowledge/land use study (TKLUS) is not anticipated to result in substantial changes to the EIS, given the conservative approach already employed in the assessment of the effects of the project on Indigenous communities. Treasury Metals is committed to continued engagement over the life of the project and is confident that any additional information shared with the company regarding traditional land uses will serve to validate the assessment completed as part of the Revised EIS and bolster the Project as it is developed.
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

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					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. **Revised Response**: Since the time of the original EIS submission, Treasury Metals has participated in a number of meaningful engagement activities. Treasury Metals as revised the EIS substantially to reflect the traditional knowledge and traditional land and resource use information shared since the original EIS submission. Section 6.1.3 of the revised EIS demonstrates how information obtained via engagement was factored into the selection of valued components used in the assessment. Traditional knowledge was added into each subsection of Section 5- Existing Environment, which was in turn used in the valued component selection described in Section 6.1.3 of the revised EIS. The VCs were used in the revised assessment of potential effects of the projects which is located in Section 6.21 of the revised EIS. An assessment of the ability of each Indigenous community, including the Naotkamegwanning First Nation, to practice their traditional land and resource use is provided in Section 6.22 of the revised EIS. Treasury Metals has revised the EIS to include the following key changes with respect to traditional knowledge and traditional land and resource use: • Traditional knowledge obtained from various Indigenous communities has been incorporated into each subsection of Section 5 (Existing Environment) (i.e. 5.1 Climate, 5.2 Air Quality, 5.3 Noise and Light, 5.4 Geology, 5.5 Terrain and Soil, 5.6 Hydrogeology, 5.7 Surface Hydrology, 5.8 Aquatic Resources, 5.9 Terrestrial Resources, 5.10 Migratory Birds,5.11 Species at Risk, and 5.12 Human Environment); • Traditional land and resource use is discussed for each Indigenous community including Naotkamegwanning First Nation in Section 5.13.3; • The information presented in Section 5 of the revised EIS was essential to the effects assessment completed for Aboriginal peoples in Section 6.21 and specifically for each community in Section 6.22 of the revised EIS. It was also essential to the selection of Valued Components (VCs) as discussed in Section 6.1.3 of the revised EIS. • All engagement activities to date are summarized in Section 9 of the revised EIS and provided in detail in Appendix DD. Engagement logs for all indigenous communities are attached to Appendix DD. • The executive summary has been updated to reflect the meaningful engagement activities with Indigenous communities.
667	AC(1)-340	Naotkamegwanning First Nation	Current Use of Lands and Resources for Traditional		**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

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			Purposes		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;
					Revised Response: *Part 1- Effects Assessment on Aboriginal Peoples* Treasury Metals has substantially revised the EIS including the effects assessment to reflect the numerous meaningful engagement activities that have occurred since the submission of the original EIS. Treasury Metals has revised the EIS to include the following key changes with respect to traditional knowledge and traditional land and resource use: • Traditional knowledge obtained from various Indigenous communities has been incorporated into each subsection of Section 5 (Existing Environment) (i.e. 5.1 Climate, 5.2 Air Quality, 5.3 Noise and Light, 5.4 Geology, 5.5 Terrain and Soil, 5.6 Hydrogeology, 5.7 Surface Hydrology, 5.8 Aquatic Resources, 5.9 Terrestrial Resources, 5.10 Migratory Birds,5.11 Species at Risk, and 5.12 Human Environment); • Traditional land and resource use is discussed for each Indigenous community including Naotkamegwanning First Nation in Section 5.13.3; • The information presented in Section 5 of the revised EIS was essential to the effects assessment completed for Aboriginal peoples in Section 6.21 and specifically for each community in Section 6.22 of the revised EIS. It was also essential to the selection of Valued Components (VCs) as discussed in Section 6.1.3 of the revised EIS. • All engagement activities to date are summarized in Section 9 of the revised EIS and provided in detail in Appendix DD. Engagement logs for all indigenous communities are attached to Appendix DD. • The executive summary has been updated to reflect the meaningful engagement activities

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					with Indigenous communities. *Part 2- Prevalence of an implicit "go harvest elsewhere" argument made in section for "gathering of country foods and traditional plant materials* Any tone or language related to this that was present in the original EIS Has been removed from the revised EIS. Any potential effects of the project (or infringement) on traditional land and resource use is discussed in Section 6.22 of the Revised EIS using traditional knowledge and traditional land and resource use information presented in Section 5 (5.1 through 5.13) of the revised EIS.
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
					Revised Response: The effects on fish and habitat section of the EIS (Section 6.14 of the revised EIS) is a bio-physical assessment and only assesses the potential impacts to fish and fish habitat. As a result it does not address perception of risk. The perception that people may have about the fish in Blackwater Creek and Wabigoon Lake as a result of the Project does not negatively affect the fish or the habitat. That stated, Treasury Metals respects that the perception of risk to fish quality could potentially negatively affect commercial and recreational fisheries in Wabigoon Lake, which is why it has been included as an indicator in the Land Use section of the revised EIS (Section 6.16). Through extensive mitigation measures and commitments made by Treasury Metals regarding water quality leaving the site, there will not be any adverse effects to the fish quality as presented in Section 6.19 (Human Health) of the revised EIS. Additionally, Treasury Metals will make the water quality and fish quality result from the fish and fish habitat follow-up program available for review as needed in order to maintain transparency with local stakeholders and Aboriginal peoples. With these commitments and mitigation measures in place, it is Treasury Metals opinion that the perception of risk will be diminished. Therefore, perception of risk to fish in Wabigoon Lake was not carried forward to the determination of significance. To respond to other IRs raised by the Agency and other reviewers with respect to potential risk via the consumption of fish Treasury Metals updated the human health risk assessment and provided a detailed response and technical support in TMI-217-HE(1)-24. The revised assessment specifically included an assessment of baseline, project only, and total concentrations of lead, mercury, and methyl mercury in fish via ingestion by a toddler and adult receptor. The results detailed in Section 6.19 of the revised EIS indicate that: • The project will not result in health risks associated with ingesting fish from any surrounding water bodies including Blackwater Creek

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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 significant;
					Revised Response: Since the time of the original EIS submission, Treasury Metals has participated in a number of meaningful engagement activities including those with Naotkamegwanning First Nation (alternatively referred to by the Government of Canada as Whitefish Bay First Nation (WBFN)). Treasury Metals as revised the EIS substantially to reflect the traditional knowledge and traditional land and resource use information shared since the original EIS submission, this includes an updated Appendix II – fish compensation plan submitted as part of the revised EIS. Also Section 5, the existing environment has been revised to include information regarding the commercial fisheries near the project. Treasury Metals highlights that the only potential harm to fish habitat that requires offsetting will occur in two tributaries to Blackwater Creek, within and outside of the current proposed footprint. No measurable harm to fish or fish habitat is predicted to occur beyond those tributaries. Treasury Metals is aware that Naotkamegwanning First Nation holds commercial fishing licenses on Thunder Lake and Wabigoon Lake, (Revised Appendix DD and Section 5.8.5, Section 5,12.5 and Sectiion 5.13.3 of the revised EIS report) as well as Manitou Lake (WBFN engagement log attached to Appendix DD of revised EIS) and Blackwater Creek ((WBFN engagement log attached to appendix FF of revised EIS). Treasury Metals is aware of concern on the part of Whitefish Bay First Nation about potential impacts to water bodies (Thunder lake, Butler Lake, Wabigoon Lake, and others), and impacts to selling fish due to public perception (WBFN engagement log). Treasury Metals has revised the EIS to include the following key changes with respect to traditional knowledge and traditional land and resource use: • Traditional knowledge obtained from various Indigenous communities including Naotkamegwanning First Nation has been incorporated into each subsection of Section 5 (Existing Environment) (i.e. 5.1 Climate, 5.2 Air Quality, 5.3 Noise and Light, 5.4 Geology, 5.5 Terrain and Soil, 5.6 Hydrogeology, 5.7 Surface Hydrology, 5.8 Aquatic Resources, 5.9 Terrestrial Resources, 5.10 Migratory Birds,5.11 Species at Risk, and 5.12 Human Environment); • Traditional land and resource use is discussed for each Indigenous community including Naotkamegwanning First Nation is located in Section 5.13.3; • The information presented in Section 5 of the revised EIS was essential to the effects

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					assessment completed for Aboriginal peoples in Section 6.21 and specifically for each community including Naotkamegwanning First Nation in Section 6.22 of the revised EIS. It was also essential to the selection of Valued Components (VCs) as discussed in Section 6.1.3 of the revised EIS. • All engagement activities to date are summarized in Section 9 of the revised EIS and provided in detail in Appendix DD. Engagement logs for all indigenous communities are attached to Appendix DD. • The executive summary has been updated to reflect the meaningful engagement activities with Naotkamegwanning First Nation and other communities Based on the information shared with Treasury Metals by Naotkamegwanning First Nation, it is Treasury Metals understanding that Naotkamegwanning First Nation is specifically interested in the potential effects on the project on their ability to practice their traditional land and resource uses. From the engagement activities completed to date traditional land and resource uses include but are not limited to hunting and trapping, fishing and cultural and spiritual values. Treasury Metals has revised the EIS to reflect the valued TKLU information shared by Naotkamegwanning First Nation to date and will continue to work with this community to ensure that any potential impacts of the project on their traditional land and resource use are properly mitigated. Further to this based on the traditional knowledge and traditional land and resource use knowledge shared by all Indigenous communities including Naotkamegwanning First Nation to-date, the additional information obtained from a formal traditional knowledge/land use study (TKLUS) is not anticipated to result in substantial changes to the EIS, given the conservative approach already employed in the assessment of the effects of the project on Indigenous communities. However, it will however be incorporated into the Follow-Up and Monitoring for Fish and Fish Habitat. Treasury Metals welcomes ongoing engagement and information it will further the understanding of traditional land and resource use and assist in ongoing monitoring and mitigation of potential effects with respect to the Project.
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

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					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 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. **Revised Response**: Since the time of the original EIS submission, Treasury Metals has participated in a number of meaningful engagement activities. Treasury Metals as revised the EIS substantially to reflect the traditional knowledge and traditional land and resource use information shared since the original EIS submission. Traditional knowledge was added into each subsection of Section 5- Existing Environment, which was in turn used in the valued component selection described in Section 6.1.3 of the revised EIS. The VCs were used in the revised assessment of potential effects of the projects which is located in Section 6.21 of the revised EIS. An assessment of the ability of each Indigenous community, including the Naotkamegwanning First Nation, to practice their traditional land and resource use is provided in Section 6.22 of the revised EIS. Treasury Metals has revised the EIS to include the following key changes with respect to traditional

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					knowledge and traditional land and resource use: • Any reference to the country foods assessment has been removed from the Indigenous communities section. Instead traditional knowledge and traditional land and resource use (otherwise referred to as Aboriginal and Treaty Rights) were used to assess cultural food consumption of indigenous communities. • Traditional knowledge obtained from various Indigenous communities has been incorporated into each subsection of Section 5 (Existing Environment) (i.e. 5.1 Climate, 5.2 Air Quality, 5.3 Noise and Light, 5.4 Geology, 5.5 Terrain and Soil, 5.6 Hydrogeology, 5.7 Surface Hydrology, 5.8 Aquatic Resources, 5.9 Terrestrial Resources, 5.10 Migratory Birds,5.11 Species at Risk, and 5.12 Human Environment); • Traditional land and resource use is discussed for each Indigenous community including Naotkamegwanning First Nation in Section 5.13.3; • The information presented in Section 5 of the revised EIS was essential to the effects assessment completed for Aboriginal peoples in Section 6.21 and specifically for each community in Section 6.22 of the revised EIS. It was also essential to the selection of Valued Components (VCs) as discussed in Section 6.1.3 of the revised EIS. • All engagement activities to date are summarized in Section 9 of the revised EIS and provided in detail in Appendix DD. Engagement logs for all indigenous communities are attached to Appendix DD. • The executive summary has been updated to reflect the meaningful engagement activities with Indigenous communities. Based on the information shared with Treasury Metals by Naotkamegwanning First Nation, it is Treasury Metals understanding that NFN is specifically interested in the potential effects on the project on their ability to practice their traditional land and resource uses. From the engagement activities completed to date traditional land and resource uses include but are not limited to hunting and trapping, fishing and cultural and spiritual values. Treasury Metals has revised the EIS to reflect the valued TKLU information shared by Naotkamegwanning First Nation to date and will continue to work with this community to ensure that any potential impacts of the project on their traditional land and resource use are properly mitigated. Further to this based on the traditional knowledge and traditional land and resource use knowledge shared by all Indigenous communities including Naotkamegwanning First Nation to-date, the additional information obtained from a formal traditional knowledge/land use study (TKLUS) is not anticipated to result in substantial changes to the EIS, given the conservative approach already employed in the assessment of the effects of the project on Indigenous communities. Treasury Metals is committed to continued engagement over the life of the project and is confident that any additional information shared with the company regarding traditional land uses will serve to validate the assessment completed as part of the Revised EIS and bolster the Project as it is developed.

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673	AC(1)-345	Naotkamegwanning First Nation	Aboriginal Health and Socio-economic Conditions Aboriginal Physical and Cultural Heritage Current Use of Lands and Resources for Traditional Purposes		**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 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.
					Revised Response: Since the time of the original EIS submission, Treasury Metals has participated in a number of meaningful engagement activities. Treasury Metals as revised the EIS substantially to reflect the traditional knowledge and traditional land and resource use information shared since the original EIS submission. Traditional knowledge was added into each subsection of Section 5- Existing Environment, which was in turn used in the valued component selection described in Section 6.1.3 of the revised EIS. The VCs were used in the revised assessment of potential effects of the projects which is located in Section 6.21 of the revised EIS. An assessment of the ability of each Indigenous community, including the Naotkamegwanning First Nation, to practice their traditional land and resource use is provided in Section 6.22 of the revised EIS. Treasury Metals has revised the EIS to include the following key changes with respect to traditional knowledge and traditional land and resource use: • Any reference to the country foods assessment has been removed from the Indigenous communities section. Instead traditional knowledge and traditional land and resource use (otherwise referred to as Aboriginal and Treaty Rights) were used to assess cultural food consumption of indigenous communities. • Traditional knowledge obtained from various Indigenous communities has been incorporated into each subsection of Section 5 (Existing Environment) (i.e. 5.1 Climate, 5.2 Air Quality, 5.3 Noise and Light, 5.4 Geology, 5.5 Terrain and Soil, 5.6 Hydrogeology, 5.7 Surface Hydrology, 5.8 Aquatic Resources, 5.9 Terrestrial Resources, 5.10 Migratory Birds,5.11 Species at Risk, and 5.12 Human Environment); • Traditional land and resource use is discussed for each Indigenous community including

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					Naotkamegwanning First Nation in Section 5.13.3; • The information presented in Section 5 of the revised EIS was essential to the effects and mitigation assessment completed for Aboriginal peoples in Section 6.21 and specifically for each community in Section 6.22 of the revised EIS. It was also essential to the selection of Valued Components (VCs) as discussed in Section 6.1.3 of the revised EIS. • All engagement activities to date are summarized in Section 9 of the revised EIS and provided in detail in Appendix DD. Engagement logs for all indigenous communities are attached to Appendix DD. • The executive summary has been updated to reflect the meaningful engagement activities with Indigenous communities. Based on the information shared with Treasury Metals by Naotkamegwanning First Nation, it is Treasury Metals understanding that NFN is specifically interested in the potential effects on the project on their ability to practice their traditional land and resource uses. From the engagement activities completed to date traditional land and resource uses include but are not limited to hunting and trapping, fishing and cultural and spiritual values. Treasury Metals has revised the EIS to reflect the valued TKLU information shared by Naotkamegwanning First Nation to date and will continue to work with this community to ensure that any potential impacts of the project on their traditional land and resource use are properly mitigated. Further to this based on the traditional knowledge and traditional land and resource use knowledge shared by all Indigenous communities including Naotkamegwanning First Nation to-date, the additional information obtained from a formal traditional knowledge/land use study (TKLUS) is not anticipated to result in substantial changes to the EIS, given the conservative approach already employed in the assessment of the effects of the project on Indigenous communities. Treasury Metals is committed to continued engagement over the life of the project and is confident that any additional information shared with the company regarding traditional land uses will serve to validate the assessment completed as part of the Revised EIS and bolster the Project as it is developed. To ensure that Indigenous communities most affected by the Project have input into the effectiveness of the Environmental Management Plans and Follow-up Programs, Treasury Metals proposes to form an Environmental Management Committee. This committee would be made up of members from Indigenous communities and would meet with representatives from Treasury Metals on a to-be-determined basis, possibly quarterly or at least semi-annually. Treasury Metals would present any reportable information on the management plans as well as the results of the follow-up programs. If exceedances or issues arise that show mitigation measures have not been as effective as expected, the potential for further actions would be discussed with the committee. The Environmental Management Committee would also provide a forum for discussing other environmental matters with the potentially affected Indigenous communities such as upcoming permits, additional TK that might have been collected since completion of the EA process, and any other environmental matters of relevance to the committee including financial support for operation

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					of the committee.
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 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

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					Lake First Nation, but no reference is made to undertaking such studies with NFN or other Treaty 3 Nations involved in the EA. **Revised Response**: Treasury Metals' in no way meant to imply that the rights and interests of WBFN were unfounded or unwarranted. Further, Treasury acknowledges the potential impact to ability of WBFN to use the effected area for traditional purposes. Since the submission of the Original EIS Treasury Metals has continued to engage with WBFN. As part of the revised EIS Treasury has updated Appendix DD to reflect the traditional knowledge and traditional land use by WBFN. This information has been gathered from primary sources as well as from secondary sources. Section 3.3.3 of the Stakeholder engagement report speaks specifically to information as it pertains to WBFN. As part of the Revised EIS and in respect to traditional uses of the land, all shared information has been added in a disaggregated form to Section 5.13 "Traditional Land Use" of the revised EIS and subsequently used to develop the succeeding Sections of the report. The effects of the project on the ability to practice traditional uses of the land are assessed in Section 6.21 and Section 6.22 provides a summary of the potential effects of the project on each indigenous community. At the current time, based on primary and secondary information collected to date, it is Treasury Metals' opinion that any additional information relating to First Nations and Traditional Land will not significantly impact the result of the effects assessment of the revised EIS. Treasury is committed to continued engagement with all indigenous communities to ensure that any potential effect of the project on their ability to practice their traditional use of the land is sufficiently off-set and that it does not have a meaningful impact on their traditional uses of the land.
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

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					(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 • 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:** A fulsome analysis on the potential effects in the highly unlikely event of a TSF failure has been provided in Section 3 of TMI_246-AM(1)-04_Addendum_1, and includes a complete assessment on the potential effects Aboriginal peoples traditional land use, including the potential effects to Wabigoon Lake. The analysis describes the potential effects to Aboriginal peoples traditional land and resource use including effects to wild rice, water quality, commercial and recreational fisheries, wildlife and human health. The expanded TSF failure analysis (TMI_246-AM(1)-04_Addendum_1), includes a discussion of control and preventative measures (Section 2.2); mitigation measures (Section 4); and contingency and emergency response measures (Section 4), along with a description of the follow-up program (Section 5) and recovery strategy (Section 6) that would be put into place in the highly unlikely event of a TSF failure. Follow-up, contingency and emergency response measures, and recovery

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					strategies would all be developed by Treasury Metals in consultation with regulatory bodies and Indigenous communities. As noted by the reviewer, the EIS included detailed modelling of the effects of a TSF failure on the quality of water in Wabigoon Lake was included in Section 4.3.2 of the revised EIS, as well as Appendix GG-1 (TSF Failure Modelling). The material provided in Appendix GG-1 is quite detailed and involves a number of modeling components, resulting in determinations of expected water quality effects to Wabigoon Lake, relative to Provincial Water Quality Objectives (PWQO) for the potential of aquatic life, in the event that a TSF failure was to occur. Based on the conservative TSF failure model provided as Appendix GG-1 to the revised EIS, in the highly unlikely event of a TSF failure there would not be extensive contamination of Wabigoon Lake or Keplyn Bay. The model results show that water quality in Keplyn Bay would only exceed Provincial Water Quality Objectives (PWQO) for the protection of aquatic life for 12 parameters for a duration of a few weeks. Section 2.3 of TMI_246-AM(1)-04_Addendum_1 fully describes the results of the surface water quality modelling in the event of a TSF failure.
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). **Revised 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.

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					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 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

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					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.
					Revised Response: Section 7 Cumulative Effects of the revised EIS (April 2018) has been revised substantially to reflect a number of comments received as part of the Round 1 Information Request Process. Please refer to Section 7 of the revised EIS for full details. Details pertinent to this specific IR have been included for reference in order to achieve completeness. As part of the process to respond to the Round 1 information requests, Treasury Metals have prepared an updated cumulative effects assessment, which is presented in Section 7 of the revised EIS. The updated cumulative effects assessment considers the following existing and/or reasonably foreseeable projects: • Treasury Metals Inc. exploration program; • Highway 17; • Canadian Pacific rail line; • Forestry operations by Dryden Forest Management Company; • Domtar Corp.'s Dryden Pulp Mill; • Josephine Cone Mine Project; • Aggregate pits or quarries; • The 230 kV transmission line proposed by Wataynikaneyap Power; and • The development of local infrastructure and minor road upgrades in Dryden and Wabigoon The following 2 projects were identified by the Agency as being reasonably foreseeable; however, they are not really projects, as described below: • Proposed 1 to 5 MW power generation facility: This activity was only a potential alternative to provide power to the Goliath Gold Project (Section 2 of the EIS) and is not a unique project. Further, per Section 3 of the revised EIS, power for the Project will be provided from the existing 115 kV HydroOne transmission line that cross the Project site, adjacent to the processing plant. This generation facility has been included in the discussions of reasonably foreseeable projects provided in Section 7.2.2 of the revised

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					EIS for completeness, and to address the requirement set out in this information request. • Energy East Pipeline: TransCanada's Energy East Pipeline terminated by TransCanada Corporation in the fall of 2017. It has been included in the discussions of reasonably foreseeable projects provided in Section 7.2.2 of the revised EIS for completeness, and to address the requirement set out in this information request. A map showing the existing, certain and reasonably foreseeable physical activities identified used in the cumulative effects assessment has been provided as Figure 7.2.2-1 in the revised EIS (Attached to this IR for reference as TMI_679-AC(1)-351_Attachment_1). The figure shows the relative locations of the existing and reasonably foreseeable project to the Goliath Gold Project. The spatial extent for the updated evaluation of cumulative effects was done in accordance with the recommended process set out in the operation policy statement for evaluating cumulative effects (CEAA, 2014), and varies between valued components. The spatial boundaries used for evaluating cumulative effects are described in Section 7.3.2 of the revised EIS, and are defined in Table 7.3.2-1 for each of the VCs for which residual adverse effects were predicted. The spatial boundaries used are consistent with the refined study areas used for evaluating the effects of the Project, as described in Section 6.1.4 of the revised EIS. These spatial boundaries are illustrated in the following figures: • Terrain and soils: Figure 7.3.2-1; • Geology and geochemistry: Figure 7.3.2-1; • Noise: Figure 7.3.2-2; • Air quality: Figure 7.3.2-2; • Surface water quality: Figure 7.3.2-3; • Surface water quantity: Figure 7.3.2-3; • Ground water quality: Figure 7.3.2-3; • Ground water quantity: Figure 7.3.2-3; • Wildlife and wildlife habitat: Figure 7.3.2-4; • Migratory birds: : Figure 7.3.2-4; • Fish and fish habitat: Figure 7.3.2-4; • Wetlands and vegetation: Figure 7.3.2-4; • Land use: Figure 7.3.2-5; • Social factors: Figure 7.3.2-5; • Economic factors: Figure 7.3.2-5; and • Aboriginal peoples: Figure 7.3.2-6.

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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.
					Revised Response: Treasury Metals' in no way meant to imply that the rights and interests of WBFN were too far afield to be considered. Further, Treasury acknowledges the potential impact to ability of WBFN to use the effected area for traditional purposes. Since the time of the original EIS submission, Treasury Metals has participated in a number of meaningful engagement activities. Treasury Metals as revised the EIS substantially to reflect the traditional knowledge and traditional land and resource use information shared since the original EIS submission. Section 5.13 was added to the revised EIS which in 5.13.2 specifically focuses on Aboriginal Health and Socio-economic Conditions of all Indigenous Communities in the Project area including those of Naotkamegwanning First Nation. Furthermore the benefits to Canadians including Indigenous communities has been re-considered and is presented in Section 11 of the revised EIS. Traditional knowledge including that with respect to the human environment and fisheries was added into their respective subsection of Section 5- Existing Environment, which was in turn used in the valued component selection described in Section 6.1.3 of the revised EIS. The VCs were used in the revised assessment of potential effects of the projects which is located in Section 6.21 of the revised EIS. An assessment of the ability of each Indigenous community, including the Naotkamegwanning First Nation, to practice their traditional land and resource use is provided in Section 6.22 of the revised EIS. Treasury Metals has revised the EIS to reflect the valued TKLU information shared by Naotkamegwanning First Nation to date and will continue to work with this community to ensure that

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					any potential impacts of the project on their traditional land and resource use are properly mitigated. To ensure that Indigenous communities most affected by the Project have input into the effectiveness of the Environmental Management Plans and Follow-up Programs, Treasury Metals proposes to form an Environmental Management Committee. This committee would be made up of members from Indigenous communities and would meet with representatives from Treasury Metals on a to-be-determined basis, possibly quarterly or at least semi-annually. Treasury Metals would present any reportable information on the management plans as well as the results of the follow-up programs. If exceedances or issues arise that show mitigation measures have not been as effective as expected, the potential for further actions would be discussed with the committee. The Environmental Management Committee would also provide a forum for discussing other environmental matters with the potentially affected Indigenous communities such as upcoming permits, additional TK that might have been collected since completion of the EA process, and any other environmental matters of relevance to the committee including financial support for operation of the committee.
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

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					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 Health and Socio-economic Conditions		**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 environmental or socioeconomic effects." Such an event would have significant adverse effects on the natural environment, socio-economic conditions, and our treaty rights. **Revised Response**: A fulsome assessment has been complete to determine the potential effects of the highly unlikely event of a TSF failure, including the potential effects to Aboriginal peoples traditional land and resource use. This assessment focused on potential effects to water quality, fish and commercial and recreational fisheries, wildlife, migratory birds, vegetation and human health. Please refer to Section 3.7 of TMI_246-AM(1)-04_Addendum_1 for an expanded discussion of the potential effects to Aboriginal peoples in the highly unlikely event of a TSF failure. In keeping with the EIS Guidelines (CEAA 2013), and expanded evaluation has been provided that includes a description of "consequence" of the highly unlikely failure of the TSF. In describing the consequence of a TSF failure, the predicted effects to the environment will be characterized using the following descriptors: • Magnitude; • Extent • Timing • Duration • Frequency • Likelihood; and • Irreversibility. Although these descriptors appear similar to the ones used for determining the significance of residual adverse effects for the Project (presented in Section 8 of the revised EIS), they are evaluated and applied in a different and unique manner specifically for evaluating the consequence of the highly unlikely scenario of a failure of the TSF. The approach used is consistent with the requirements of the EIS Guidelines (CEAA, 2013). The use of the above specific nomenclature was to satisfy a specific request from the Agency. As detailed in TMI_246-AM(1)-04_Addendum_1, there would be potential effects to the use of the lands resources for traditional purposes as a result of a TSF failure, however, those effects would be of limited extend and duration, and largely reversible within a period of 1 to 2 years. With the exception of the effects of the flood wave on small-bodied, stream-resident fish and wildlife in Blackwater Creek downstream TSF, the magnitude of the effects would be "low" or "medium".

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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. **Revised Response**: Treasury Metals recognizes that Indigenous people including those part of the community of Naotkamegwanning First Nation live, work, hunt, fish, trap, and harvest throughout their lands and rely on them for their individual as well as their communities overall cultural, social, spiritual, physical, and economic well-being. Further to this Treasury recognizes that these lands are inextricably connected to a communities identify and culture, inclusive of ceremonial and spiritual recognition. Treasury in respect to this recognizes the importance of assessing any impact as it relates to traditional land use activities and practices. Treasury Metals acknowledges that the Project may impact these availability or practices within the Project area, and is committed to working with all communities to identify, mitigate, and avoid these respective aspects. Treasury Metals has made overtures to each community including Naotkamegwanning First Nation, and collated all biophysical and traditional values/land and recourse use information within the EIS to date. This information in turn has been sourced from engagement with Indigenous communities (open houses, presentations, meetings, calls, discussions), and secondary source information. All information received via engagement has been formally captured within the Stakeholder Engagement Report which is included in the revised EIS as appendix DD and summarized in Section 9 of the revised EIS. Treasury Metals has revised the EIS to include the following key changes with respect to traditional knowledge and traditional land and resource use: • Traditional knowledge obtained from various Indigenous communities including Naotkamegwanning First Nation has been incorporated into each subsection of Section 5 (Existing Environment(i.e. 5.1 Climate, 5.2 Air Quality, 5.3 Noise and Light, 5.4 Geology, 5.5 Terrain and Soil, 5.6 Hydrogeology, 5.7 Surface Hydrology, 5.8 Aquatic Resources, 5.9 Terrestrial Resources, 5.10 Migratory Birds,5.11 Species at Risk, and 5.12 Human Environment); • Traditional land and resource use is discussed for each Indigenous community including Naotkamegwanning First Nation in Section 5.13; • The information presented in Section 5 of the revised EIS was essential to the effects assessment completed for Indigenous peoples in Section 6.21 and specifically for each community in Section 6.22 of the revised EIS. It was also essential as part of the Valued Component selection process outlined in Section 6.1.3 of the revised EIS. Based on the information shared with Treasury Metals by Naotkamegwanning First Nation, it is Treasury Metals understanding that NFN is specifically interested in the potential effects on the

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					project on their ability to practice their traditional land and resource uses. From the engagement activities completed to date traditional land and resource uses include but are not limited to hunting and trapping, fishing and cultural and spiritual values. Treasury Metals has revised the EIS to reflect the valued TKLU information shared by Naotkamegwanning First Nation to date and will continue to work with this community to ensure that any potential impacts of the project on their traditional land and resource use are properly mitigated. Further to this based on the traditional knowledge and traditional land and resource use knowledge shared by all Indigenous communities including Naotkamegwanning First Nation to-date, the additional information obtained from a formal traditional knowledge/land use study (TKLUS) is not anticipated to result in substantial changes to the EIS, given the conservative approach already employed in the assessment of the effects of the project on Indigenous communities. Treasury Metals is committed to continued engagement over the life of the project and is confident that any additional information shared with the company regarding traditional land uses will serve to validate the assessment completed as part of the Revised EIS and bolster the Project as it is developed. To ensure that Indigenous communities most affected by the Project have input into the effectiveness of the Environmental Management Plans and Follow-up Programs, Treasury Metals proposes to form an Environmental Management Committee. This committee would be made up of members from Indigenous communities and would meet with representatives from Treasury Metals on a to-be-determined basis, possibly quarterly or at least semi-annually. Treasury Metals would present any reportable information on the management plans as well as the results of the follow-up programs. If exceedances or issues arise that show mitigation measures have not been as effective as expected, the potential for further actions would be discussed with the committee. The Environmental Management Committee would also provide a forum for discussing other environmental matters with the potentially affected Indigenous communities such as upcoming permits, additional TK that might have been collected since completion of the EA process, and any other environmental matters of relevance to the committee including financial support for operation of the committee.
684	AC(1)-356	Naotkamegwanning First Nation	Aboriginal Health and Socio-economic Conditions Aboriginal Engagement Aboriginal Physical and Cultural Heritage Current Use of		**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 **Revised Response**:

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			Lands and Resources for Traditional Purposes		A. A full assessment of potential social and economic effects from the Project is presented in the revised EIS, in Section 6.17 and Section 6.18 respectively. B. A full assessment of potential human health effects from the Project are presented in Section 6.19 and Appendix W of the revised EIS. C. A full assessment of potential Project effects to the current land and resource use for traditional purposes is presented in Section 6.21 of the revised EIS. D. A full assessment of potential effects to cultural heritage resources is presented in Section 6.20 of the revised EIS.
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	Naotkamegwanning First Nation	Cumulative effects		**Information Request / Comment:** 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:

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					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. **Revised Response**: For the purposes of the EIS, Aboriginal and Treaty Rights are defined as the historic and current uses of lands and resources for traditional purposes by members of Indigenous communities. It is Treasury Metals' understanding that Aboriginal peoples are entitled to access to their lands according to their Aboriginal and Treaty #3 (1873) Rights, and Treasury Metals is committed to working with the Indigenous communities to ensure that the effects of the project on their traditional land and resource use or alternatively referred to as aboriginal and treaty rights are appropriately considered and protected. A discussion of traditional land and resource use in terms of existing environment is provided in Section 5.13.3. An assessment of the effects of the project on traditional land and resource use is provided in Section 6.22 of the revised EIS. Treasury Metals has made overtures to each community including Wabauskang First Nation, and collated all biophysical and traditional values/land and recourse use information within the EIS to date. This information in turn has been sourced from engagement with Indigenous communities (open houses, presentations, meetings, calls, discussions), and secondary source information. All information received via engagement has been formally captured within the Stakeholder Engagement Report which is included in the revised EIS as appendix DD and summarized in

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					Section 9 of the revised EIS. Treasury Metals has revised the EIS to include the following key changes with respect to traditional knowledge and traditional land and resource use: • Traditional knowledge obtained from various Indigenous communities including Wabauskang First Nation has been incorporated into each subsection of Section 5 (Existing Environment(i.e. 5.1 Climate, 5.2 Air Quality, 5.3 Noise and Light, 5.4 Geology, 5.5 Terrain and Soil, 5.6 Hydrogeology, 5.7 Surface Hydrology, 5.8 Aquatic Resources, 5.9 Terrestrial Resources, 5.10 Migratory Birds,5.11 Species at Risk, and 5.12 Human Environment); • Traditional land and resource use is discussed for each Indigenous community including Wabauskang First Nation in Section 5.13; • The information presented in Section 5 of the revised EIS was essential to the effects assessment completed for Indigenous peoples in Section 6.21 and specifically for each community in Section 6.22 of the revised EIS. It was also essential as part of the Valued Component selection process outlined in Section 6.1.3 of the revised EIS. Based on the current information shared by Wabauskang First Nation, it Treasury Metals understanding that this community is specifically interested in the potential effects on the Project on their ability to practice their traditional land and resource uses, this includes but is not limited to potential effects on surface water quality, or surface water contamination, but harvest activities terrestrial and aquatic species (hunting, and baitfish). Treasury Metals has revised the EIS to reflect the valued traditional knowledge shared by Wabauskang First Nation and will continue to work with this community to ensure that any potential impacts of the Project on their traditional land and resource use are properly mitigated.
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 **Revised Response**: For the purposes of the EIS, Aboriginal and Treaty Rights are defined as the historic and current uses of lands and resources for traditional purposes by members of Indigenous communities. It is Treasury Metals' understanding that Aboriginal peoples are entitled to access to their lands according to their Aboriginal and Treaty #3 (1873) Rights, and Treasury Metals is committed to working with the Indigenous communities to ensure that the effects of the project on their traditional land and resource use or alternatively referred to as aboriginal and treaty rights are appropriately considered and protected. A discussion of traditional land and resource use in terms of existing

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					environment is provided in Section 5.13.3. An assessment of the effects of the project on traditional land and resource use is provided in Section 6.22 of the revised EIS Treasury Metals has made overtures to each community including Wabauskang First Nation, and collated all biophysical and traditional values/land and recourse use information within the EIS to date. This information in turn has been sourced from engagement with Indigenous communities (open houses, presentations, meetings, calls, discussions), and secondary source information. All information received via engagement has been formally captured within the Stakeholder Engagement Report which is included in the revised EIS as appendix DD and summarized in Section 9 of the revised EIS. Treasury Metals has revised the EIS to include the following key changes with respect to traditional knowledge and traditional land and resource use: • Traditional knowledge obtained from various Indigenous communities including Wabauskang First Nation has been incorporated into each subsection of Section 5 (Existing Environment(i.e. 5.1 Climate, 5.2 Air Quality, 5.3 Noise and Light, 5.4 Geology, 5.5 Terrain and Soil, 5.6 Hydrogeology, 5.7 Surface Hydrology, 5.8 Aquatic Resources, 5.9 Terrestrial Resources, 5.10 Migratory Birds,5.11 Species at Risk, and 5.12 Human Environment); • Traditional land and resource use is discussed for each Indigenous community including Wabauskang First Nation in Section 5.13; • The information presented in Section 5 of the revised EIS was essential to the effects assessment completed for Indigenous peoples in Section 6.21 and specifically for each community in Section 6.22 of the revised EIS. It was also essential as part of the Valued Component selection process outlined in Section 6.1.3 of the revised EIS. Based on the current information shared by Wabauskang First Nation, it Treasury Metals understanding that this community is specifically interested in the potential effects on the Project on their ability to practice their traditional land and resource uses, this includes but is not limited to potential effects on surface water quality, or surface water contamination, but harvest activities terrestrial and aquatic species (hunting, and baitfish). Treasury Metals has revised the EIS to reflect the valued traditional knowledge shared by Wabauskang First Nation and will continue to work with this community to ensure that any potential impacts of the Project on their traditional land and resource use are properly mitigated. Treasury is committed to continued engagement with all Indigenous communities to ensure that any potential effect of the project on their ability to practice their traditional use of the land is sufficiently off-set and that it does not have a meaningful impact on their traditional uses of the land. Based on the current amount of traditional land and recourse information and traditional knowledge information shared with Treasury Metals by the various Indigenous communities, it is Treasury's opinion that it would not cause substantial changes to the findings presented in the revised EIS.

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					With respect to: Annex B – Goliath Gold Project IR-1 Companion Sheet, As stated in Section 3.2.4 of Appendix DD, the Indigenous engagement report, Treasury Metals has history of communications with Wabauskang First Nation (WFN) beginning in 2012. As of March 28, 2018 there have been 164 records of engagement with WFN. These records focus on drilling/exploration information, permitting information including EIS and supporting documentation, and discussion packages regarding potential impacts and effects documentation, and community open house. Contacts have included telephone conversations, emails, letters, and in-person meetings. There have been 10 formal and informal in-person meetings.
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 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

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					• 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.
780	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: • 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.

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					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 First Nation			**Information Request / Comment:** 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

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					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 • 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)

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					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 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 1: Climate Data Sources used in EIS

Station	Dryden	Dryden A	Sioux Lookout
Period of Record	1914–1997	1970–2005	1938–2007
Latitude	49.78°	49.83°	50.12°
Longitude	-92.83°	-92.75°	-91.9°
Elevation (masl)	371.9	412.7	383.1
Distance (km)	~16	12.9	~65

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

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					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
783	AC(1)-364	Wabauskang First Nation			**Information Request / Comment:** Hydrology 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.

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					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. 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:

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					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) • 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

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					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 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:

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					• 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 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			**Information Request / Comment:**

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		First Nation			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 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

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					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. - 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.

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					• 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. • 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.

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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: 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

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					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. **Revised Response**: For the purposes of the EIS, Aboriginal and Treaty Rights are defined as the historic and current uses of lands and resources for traditional purposes by members of Indigenous communities. It is Treasury Metals' understanding that Aboriginal peoples are entitled to access to their lands according to their Aboriginal and Treaty #3 (1873) Rights, and Treasury Metals is committed to working with the Indigenous communities to ensure that the effects of the project on their traditional land and resource use or alternatively referred to as aboriginal and treaty rights are appropriately considered and protected. A discussion of traditional land and resource use in terms of existing environment is provided in Section 5.13.3. An assessment of the effects of the project on traditional land and resource use is provided in Section 6.22 of the revised EIS. Treasury Metals has made overtures to each community including Wabauskang First Nation, and collated all biophysical and traditional values/land and recourse use information within the EIS to date. This information in turn has been sourced from engagement with Indigenous communities (open houses, presentations, meetings, calls, discussions), and secondary source information. All information received via engagement has been formally captured within the Stakeholder Engagement Report which is included in the revised EIS as appendix DD and summarized in Section 9 of the revised EIS. Treasury Metals has revised the EIS to include the following key changes with respect to traditional knowledge and traditional land and resource use: • Traditional knowledge obtained from various Indigenous communities including Wabauskang First Nation has been incorporated into each subsection of Section 5 (Existing Environment(i.e. 5.1 Climate, 5.2 Air Quality, 5.3 Noise and Light, 5.4 Geology, 5.5 Terrain and Soil, 5.6 Hydrogeology, 5.7 Surface Hydrology, 5.8 Aquatic Resources, 5.9 Terrestrial Resources, 5.10 Migratory Birds,5.11 Species at Risk, and 5.12 Human Environment); • Traditional land and resource use is discussed for each Indigenous community including Wabauskang First Nation in Section 5.13; • The information presented in Section 5 of the revised EIS was essential to the effects assessment completed for Indigenous peoples in Section 6.21 and specifically for each community in Section 6.22 of the revised EIS. It was also essential as part of the Valued Component selection process outlined in Section 6.1.3 of the revised EIS. Based on the current information shared by Wabauskang First Nation, it Treasury Metals understanding that this community is specifically interested in the potential effects on the Project on

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					their ability to practice their traditional land and resource uses, this includes but is not limited to potential effects on surface water quality, or surface water contamination, but harvest activities terrestrial and aquatic species (hunting, and baitfish). Treasury Metals has revised the EIS to reflect the valued traditional knowledge shared by Wabauskang First Nation and will continue to work with this community to ensure that any potential impacts of the Project on their traditional land and resource use are properly mitigated. Treasury is committed to continued engagement with all Indigenous communities to ensure that any potential effect of the project on their ability to practice their traditional use of the land is sufficiently off-set and that it does not have a meaningful impact on their traditional uses of the land. Based on the current amount of traditional land and recourse information and traditional knowledge information shared with Treasury Metals by the various Indigenous communities, it is Treasury's opinion that it would not cause substantial changes to the findings presented in the revised EIS.
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

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					was a detailed economic review.
					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

<table>
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<tr><td></td><td></td><td></td><td></td><td></td><td>classified as unacceptable for the Hartman Lake option.

<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.</td></tr>
<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.</td></tr>
</table>

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					In the highly unlikely event of a TSF failure, the liquid present within the TSF (supernatant water, 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

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					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. 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.

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					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

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					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. 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

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					number of measures to protect water quality (Section 3.8 of the revised EIS), and as a result, protect 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.

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					• 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. • 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.

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798	AC(1)-379	Wabauskang First Nation			**Information Request / Comment:** 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

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					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.
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

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					to aspects of its development.
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		**Summary of Comment / Rationale:** Project design list does not include design for continual remediation for LOM

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			4.0 Project Overview page 11		**Information Request / Comment:**
					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

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					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 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

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					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 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

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					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 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

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					• 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 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. **Revised Response**: Treasury Metals appreciates that members of Indigenous communities have concerns related to potential effects of seepage from the Project. Issues related to seepage from on-site facilities, such as the TSF, will be fully covered under the Water Management Plan. An outline of the Water Management Plan is provided in Section 12.3 of the revised EIS. A draft of the Plan, which will: describe describes the procedures to manage potential water effects (such as seepage); clearly state the roles and responsibilities of key site and company personnel with respect to water

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					management; and will describe the measures and controls that aim to limit any adverse environmental effects such as seepage from the TSF, will be issued for comments and will be finalized fully considering input from Indigenous communities, including Wabauskang First Nation. The design of the Project will also help manage seepage. A seepage collection system will be constructed around the TSF and around the operations area to capture seepage from on-site facilities such as the TSF and waste rock storage area (WRSA). During operations, any seepage not be collected by the system, will be captured by the groundwater drawdown and will be drawn into the open pit and underground mine by dewatering activities. To the extent possible, collected waters, including seepage, will be used in the process. Excess waters not required in the process will be treated to meet PWQO or background levels prior to release into Blackwater Creek. There would be no effect to Thunder Lake from seepage during operations. At the end of mining, dewatering activities will ceases and the open pit will be allowed to fill with water. Once flooded, the groundwater will return to near pre-development conditions and the groundwater modelling indicates that a small amount of seepage from the WRSA and TSF will leave the site (Table 6.8.2.6-2 of the revised EIS). The effects of seepage on surface water quality was modelled during the post-closure phase and the results were used to identify the need for mitigation measures. For example, initial plans called for the use of a dry cover for the closure of the TSF. However, the modelling identified that a wet cover for the TSF would better manage the higher than initially anticipated acid generation rates identified in additional geochemical modelling, and ensure that the surface water quality for all adjacent waterbodies, including Thunder Lake, would continue to remain at the current levels, or would meet the PWQO for the protection of aquatic life or background. With the mitigation provided with a wet cover for the TSF, there were no predicted impacts of seepage to water quality in Thunder Lake or its tributaries following closure. Although Treasury Metals have predicted that seepage from the site would not impact the quality of water in Thunder Lake, a follow-up program is planned that will measure the conditions in the environment once activities start to ensure the effects are in line with the predictions. The groundwater quality follow-up program (Section 13.10 of the revised EIS) will act as an early warning system able to detect changes in groundwater quality due to seepage from the Project, long before the seepage reaches any of the tributaries to Thunder Lake, or Thunder Lake. This program will be used to confirm the groundwater modelling results, and if necessary, implement contingency procedures should monitoring suggest the conditions are not as expected. By monitoring changes in groundwater quality, Treasury Metals will have sufficient advance notice to implement contingency procedures long before seepage from the site could affect the quality of water in Thunder Lake Treasury Metals will also implement a follow-up program for surface water quality (Section 13.8 of the revised EIS). This program will be used to confirm the surface water quality modelling results, and if necessary, implement contingency procedures should monitoring suggest the conditions are not as expected.
809	AC(1)-390	Wabauskang	Executive		**Summary of Comment / Rationale:**

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		First Nation	Summary 4.6 Tailings Storage Facility (TSF) page 38/ 39		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 • 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

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					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, 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.
811	AC(1)-392	Wabauskang First Nation	Executive Summary 4.7 Water Management page 42		**Summary of Comment / Rationale:** Provide effluent water quality parameters after treatment? **Information Request / Comment:** Need to know the predicted water quality after treatment prior to discharge to Black Water Creek? **Response:** 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

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					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 1: Treated Effluent Discharge Quality

Parameter	Effluent Concentration (mg/L)	Basis for Discharge Level
Aluminum (filtered)	0.075	PWQO (1)
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

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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

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? **Revised Response**: Yes, the fuel be kept in double walled tanks and according to MOECC regulations and industry best practices. This will ensure that fuel related chemicals will be stored safety and appropriately to prevent releases to the environment and to ensure the safety of human health and wildlife. Full

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					details regarding fuel and chemical management are provided in Section 3.9 of the revised EIS.
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? **Revised Response**: Yes, the fuel be kept in double walled tanks and according to MOECC regulations and industry best practices. This will ensure that fuel related chemicals will be stored safety and appropriately to prevent releases to the environment and to ensure the safety of human health and wildlife. Full details regarding fuel and chemical management are provided in Section 3.9 of the revised EIS.
814	AC(1)-395	Wabauskang First Nation	Executive Summary 4.13 Closure and Decommissioning page 50		**Summary of Comment / Rationale:** 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

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					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 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

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					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 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:** As part of the environmental assessment, and development process, environmental management plans for the Project. 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 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. Rather that develop a management plan for the construction phase only, 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. 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:

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					• 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
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? **Revised 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

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 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? **Revised Response**: TMI_818 and TMI_836 have been changed to reflect that the environmental management plans will be developed through all phases of the development of the Goliath Gold Project as opposed to developing phase specific plans. An overview of the environmental management plan for the Project was provided in Section 12 of the original EIS. The text has been expanded upon in Section 12 of the revised EIS to include a listing and description of each of the following management plans, which will be prepared prior to

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					development and implemented as part of the Goliath Gold Project, revised as appropriate over the mine life: • 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. The plans will be prepared and finalized prior to the start of constructions activities, as part of the ongoing engineering and permitting activities. Treasury Metals proposes to provide the draft plans for First Nation review prior to finalization. Since the filing of the EIS, the conceptual closure plan has been refined, and the updated version is included as Appendix KK to the revised EIS. Prior to construction commencing, Treasury Metals will file a certified closure plan and post financial assurances with the Ministry of Northern Development and Mines (MNDM) for the full amount of final reclamation. 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 in the format preferred by the MNDM.
819	AC(1)-400	Wabauskang	Executive		**Summary of Comment / Rationale:**

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
		First Nation	Summary 6.0 Description of the Environment page 64		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 of the Environment page 64		**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 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.

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					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 of the Environment page 66		**Summary of Comment / Rationale:** **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:**

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / 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 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,

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					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 of the Environment page 67		**Summary of Comment / Rationale:** Inadequate wildlife baseline studies **Information Request / Comment:** 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

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					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 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	Executive		**Summary of Comment / Rationale:**

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		First Nation	Summary 6.0 Description of the Environment page 68		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. **Revised Response**: For the purposes of the EIS, Aboriginal and Treaty Rights are defined as the historic and current uses of lands and resources for traditional purposes by members of Indigenous communities. It is Treasury Metals' understanding that Aboriginal peoples are entitled to access to their lands according to their Aboriginal and Treaty #3 (1873) Rights, and Treasury Metals is committed to working with the Indigenous communities to ensure that the effects of the project on their traditional land and resource use or alternatively referred to as aboriginal and treaty rights are appropriately considered and protected. A discussion of traditional land and resource use in terms of existing environment is provided in Section 5.13.3. An assessment of the effects of the project on traditional land and resource use is provided in Section 6.22 of the revised EIS Treasury Metals has made overtures to each community including Wabauskang First Nation, and collated all biophysical and traditional values/land and recourse use information within the EIS to date. This information in turn has been sourced from engagement with Indigenous communities (open houses, presentations, meetings, calls, discussions), and secondary source information. All information received via engagement has been formally captured within the Stakeholder Engagement Report which is included in the revised EIS as appendix DD and summarized in Section 9 of the revised EIS. Treasury Metals has revised the EIS to include the following key changes with respect to traditional knowledge and traditional land and resource use: • Traditional knowledge obtained from various Indigenous communities including Wabauskang First Nation has been incorporated into each subsection of Section 5 (Existing Environment(i.e. 5.1 Climate, 5.2 Air Quality, 5.3 Noise and Light, 5.4 Geology, 5.5 Terrain and Soil, 5.6 Hydrogeology, 5.7 Surface Hydrology, 5.8 Aquatic Resources, 5.9 Terrestrial Resources, 5.10 Migratory Birds,5.11 Species at Risk, and 5.12 Human Environment); • Traditional land and resource use is discussed for each Indigenous community including Wabauskang First Nation in Section 5.13; • The information presented in Section 5 of the revised EIS was essential to the effects assessment completed for Indigenous peoples in Section 6.21 and specifically for each community in Section 6.22 of the revised EIS. It was also essential as part of the Valued

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					Component selection process outlined in Section 6.1.3 of the revised EIS. Based on the current information shared by Wabauskang First Nation, it Treasury Metals understanding that this community is specifically interested in the potential effects on the Project on their ability to practice their traditional land and resource uses, this includes but is not limited to potential effects on surface water quality, or surface water contamination, but harvest activities terrestrial and aquatic species (hunting, and baitfish). Treasury Metals has revised the EIS to reflect the valued traditional knowledge shared by Wabauskang First Nation and will continue to work with this community to ensure that any potential impacts of the Project on their traditional land and resource use are properly mitigated. Treasury is committed to continued engagement with all Indigenous communities to ensure that any potential effect of the project on their ability to practice their traditional use of the land is sufficiently off-set and that it does not have a meaningful impact on their traditional uses of the land. Based on the current amount of traditional land and recourse information and traditional knowledge information shared with Treasury Metals by the various Indigenous communities, it is Treasury's opinion that it would not cause substantial changes to the findings presented in the revised EIS.
826	AC(1)-407	Wabauskang First Nation	Executive Summary 6.0 Description of the Environment page 68		**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. 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.

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					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 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:**

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 6.9 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 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

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					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 page 81		**Summary of Comment / Rationale:** Inadequate wildlife baseline studies **Information Request / Comment:** The change in landscape with the development of a gold mine for animals requires more 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

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					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 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 the training component of the EMS-(CEMP/OEMP) **Response:** Treasury Metals agrees that cultural awareness does not belong in the listing of environmental

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					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 • 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

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					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 **Revised 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 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. Rather than develop phase specific plans, Treasury Metals intends to develop a

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					comprehensive list of management plans that will be implemented through all phases of the development of the Goliath Gold Project. 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.
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 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:**

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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>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.</td></tr>
<tr><td>835</td><td>AC(1)-416</td><td>Wabauskang First Nation</td><td>Alternatives Description 2.3 Project Alternatives-Construction and Operations page 32</td><td></td><td><u>Summary of Comment / Rationale:</u>
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?

<u>Information Request / Comment:</u>
Request for further investigation & information

<u>Response:</u>
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 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
Indicator Categories | Summary Ratings
Wabigoon | Thunder | Hartman Lake | Tree Nursery | Blackwater</td></tr>
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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>
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<tr><th></th><th>Lake</th><th>Lake</th><th></th><th>Ponds</th><th>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>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>Revised Response</u>:
As part of the environmental assessment, and development process, environmental management plans for the Project. 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 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.

Rather that develop a management plan for the construction phase only, 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. 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
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TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					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 • Cyanide Management Plan • Dam Safety Management Plan • Mine Rock Management Plan • Explosives Management Plan • Health and Safety Management Plan
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

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					• 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. 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

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					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.
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:**

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 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) • 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.

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					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 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

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					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 Resources page 69		**Summary of Comment / Rationale:** Figure 5.8.2 -Why were no sediment samples taken on Thunder Creek? Only one year of sediment sampling baseline **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		**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

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			Resources page 75		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 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

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					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 5.8 Aquatic Resources page 94		**Summary of Comment / Rationale:** 9 wetlands are potentially being disturbed will there be a wetland compensation plan developed? **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

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					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 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

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					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. 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

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					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 *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

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					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 First Nation	Effects Assessment and Mitigation 6.4 Effects Assessment page 68		**Summary of Comment / Rationale:** Why is the follow up and monitoring to only monitor the health of wild rice populations periodically 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

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					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 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

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					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 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.

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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 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

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					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 for the Project page 1		**Summary of Comment / Rationale:** No commitment to a complete list of Project specific EMP's **Information Request / Comment:** **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

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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.
857	AC(1)-438	Wabauskang First Nation	Conceptual Closure 11.4 Post-Closure Site Conditions page 7		**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? **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		**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.

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			12.2 Objectives and Context page 1		**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 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

TMI #	Agency Reference #	Parties Asking Questions	Reference to EIS	Reference to EIS Guideline	Comment / Information Request / Response
					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 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.