

Magino Gold Project

Finan Township, Algoma District, Ontario

CONSTRUCTION ENVIRONMENTAL MANAGEMENT PLAN:

SECTION 14: INVASIVE SPECIES MANAGEMENT PLAN

PROJECT OFFICE:

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Management	14-A.1

EMP / OPERATIONAL STANDARD REVISION RECORD

EMP Name	Revision	Revision Date	Summary of Revision
	Number		
Invasive Species	V1	October 30, 2020	N/A
Management Plan			
Invasive Species	V2	November 13, 2020	Consistency Check
Management Plan			
Invasive Species	V3	January 15, 2021	Consistency Check,
Management Plan			addressed relevant
			authority comments,
			added checklist

LIST OF ACRONYMS

CEMP Construction Environmental Management Plan

EA Environmental Assessment

ECA Environmental Compliance Approval
EIS Environmental Impact Statement
EMP Environmental Management Plan

IAAC Impact Assessment Agency of Canada (formerly Canadian Environmental

Assessment Agency (CEAA))

14.1. Introduction

14.1.1. Purpose and Objectives

This *Invasive Species Management Plan* (the Plan) is one of the Environmental Management Plans (EMPs) that Prodigy Gold ('Prodigy') has developed for the Magino Gold Project ('the Project'), as per the Environmental Impact Statement (EIS) Commitments (posted to the Impact Assessment Agency of Canada's (IAAC) Registry in December 2018¹), as well as the Environmental Assessment (EA) conditions issued to Prodigy by the federal Minister of the Environment on January 24, 2019 in the Decision Statement². These EMPs form part of the *Construction Environmental Management Plan* (CEMP). Appendix 14-A includes a table with the EA condition and Prodigy's EIS Commitment related to invasive species management. This Plan has been developed in accordance with Prodigy's EA condition (6.4.2) and EIS Commitment (41). This Plan has been development in fulfillment of EIS Commitment 41.

Prodigy is committed to protecting the environment and safe of operations, and the health and safety of employees, contractors, and the communities in which Prodigy operates. The purpose of this Plan is to describe the processes to be implemented at the Project site (site) to manage the spread of invasive species during construction and operation of the Project.

14.1.2. Roles and Responsibilities

Role	Responsibility (See Section 14.3 Procedures for Details)		
Environmental Manager	 Responsibility (See Section 14.3 Procedures for Details) Responsible for directing all aspects of Prodigy's environmental programs for the Project and reports to the Mine Manager; Responsible for ensuring appropriate site personnel 		
	 (contractors and staff) are aware of CEMP and follow the guidance contained herein; Responsible for implementation of best management practices for the CEMP; 		
	 Issue directive to alter or suspend work activities if needed to ensure environmental protection; Responsible for ensuring that staff are familiar with the applicable regulatory and other requirements as outlined in this Plan and other sections of the CEMP with relevance to this Plan; 		

¹ Prodigy Gold Inc. December 2018. *Magino Project Commitments List*. https://iaac-aeic.gc.ca/050/documents/p80044/125783E.pdf

² Canadian Environmental Assessment Agency. January 2019. *Decision Statement Issued Under Section 54 of the Canadian Environmental Assessment Act, 2012 for the Magino Gold Project.* https://iaac-aeic.gc.ca/050/documents/p80044/126612E.pdf

Role	Responsibility (See Section 14.3 Procedures for Details)		
	Provide interpretation or guidance in the event of uncertainty		
	around permit requirements or other actions which may have		
	the potential for environmental harm;		
	 Responsible for communications to senior mine management 		
	and coordinating communications with Indigenous		
	communities and potentially affected members of the public;		
	 Responsible for ensuring required reporting has been 		
	completed and submitted to regulatory authorities; and		
	 Maintaining records relevant to the implementation of the 		
	conditions in the federal Decision Statement.		
Construction Mine	Responsible for ensuring all contractors and construction staff		
Manager	are aware of the requirements in the CEMP;		
	 Responsible for ensuring all contractors and construction staff 		
	are aware of and following best practices when handling		
	materials or when conducting work on-site;		
	 Responsible for coordinating communications with Prodigy 		
	senior management; and		
	 Responsible for ensuring that all staff are familiar with 		
	Environmental Compliance Approval (ECA) and appropriate		
	permitting.		
All employees/	 Follow best practices and appropriate guidance in this 		
contractors	document;		
	Responsible for following direction of Environmental Manager		
	and/or the Construction Manager as indicated in this Plan;		
	and		
	Responsible for ensuring they are familiar with the applicable		
	regulatory and other requirements as outlined in this Plan and		
	other sections of the CEMP with relevance to this Plan.		

14.1.3. Related Documents

This Plan has linkages to other EMPs that are related to invasive species including the following:

- 4: Wildlife and Vegetation Management Plan includes measures to mitigate the potential for environmental harms associated with terrestrial vegetation; and
- 5: Fish and Fish Habitat Management Plan provides guidance around undertaking Project works in and around water.

14.2. CONCERN

During the Project, machinery and staff may accidentally introduce non-native invasive species which may compete for resources and put strain on native species. Machinery and staff may also facilitate environments for further invasion by such non-native species.

14.3. PROCEDURES

The following protection measures will be implemented to manage invasive species. These measures have been committed to as part of the EA process or are conditions of Project approval. These measures are consistent with the direction in EA condition 6.4.2.

- Soil disturbance will be minimized to the extent practicable, with disturbed work areas seeded with a native species seed mix and cover crop as soon as possible post disturbance;
- During site rehabilitation activities, any reseeding which takes place with occur with an approved native seed mix which has been sourced from a commercial supplier to ensure that no invasive species are introduced to the site;
- Grading will use clean fill material to reduce the potential for introducing or spreading invasive or non-native species;
- Identified invasive or non-native species will be targeted for removal through manual, mechanical and/or chemical methods;
- Wherever possible, mechanical means such as mowing, tilling, digging or pulling will be preferred for vegetation control over chemical methods. The use of herbicides should only be considered where other control methods have proven ineffective in weed management:
 - Should herbicide application be selected as a method of invasive plant control, all herbicides must be applied by a licensed applicator in accordance with Ontario regulations;
- Ensure that machinery arrives on site in a clean condition and is maintained free of fluid leaks, invasive species and noxious weeds;
- Good housekeeping of vehicles will be implemented:
 - Heavy equipment will arrive at the site already washed and will be inspected so as to prevent invasive species to be inadvertently introduced into the Magino project area. A checklist to be used and signed off is provided in Appendix 14-B;
 - Vehicles and heavy equipment will stay on site roads to the extent practical;
 - During construction, prior to equipment entering areas where an access road has not yet been constructed, a visual inspection of machinery and equipment will be completed, with particular attention to inspecting the undersides, wheels, wheel arches, guards, radiator grills and other attachments as applicable; and
 - o If foreign material, seed or other plant materials are found, cleaning/removal will take place as per the Clean Equipment Protocol for Industry (2016) provided by the Canada-Ontario Invasive Species Centre and the Ontario Ministry of Natural Resources and Forestry at *ontarioinvasiveplants.ca*, by brushing, knocking or washing soil and debris from exterior surfaces of equipment. Removal will occur

at least 30 m away from a watercourse, water body or natural vegetation, with the material contained for removal.

All measures described herein are subject to revision according to any final environmental approval/permit conditions, where applicable.

14.4. Monitoring and Follow-up Programs

- Areas which have been disturbed as a result of construction activities, select areas
 adjacent to project roadways and those areas which have been recently revegetated will
 be monitored in the spring and late summer for invasive vegetation in coordination with
 site vegetation monitoring;
- Monitoring activities for invasive vegetation will include inspection within 30 m of targeted areas;
- Any observations of invasive vegetation will be recorded, including location with coordinates, the estimated extent of spread, and any identifying characteristics (or identification if known). The observations will also include photographs to aid with identification;
- Areas with confirmed observations of invasive vegetation will be marked and protected
 with temporary fencing and signage to avoid unintentional spread, if immediate
 removal of the plant and all parts (including roots, runners, etc.) is not possible. Plants
 which are not immediately removed will be documented and a timeline for removal
 established; and
- Removal will be through manual, mechanical and/or chemical methods and proper disposal.

14.5. RELEVANT EMP-SPECIFIC AUTHORIZATIONS AND PERMITS FOR THE PROJECT None.

14.6. REPORTING

Reporting of the above monitoring will consist of internal memoranda documenting the areas investigated which will be retained by the Project Environmental department. This information will be used to inform annual reporting in accordance with condition 6.4 of the EA Decision Statement, as well as any other reporting requirements which may be established under provincial or federal project approvals or other agreements.

14.7. FORMS

None.

APPENDIX 14-A: EA CONDITIONS/EIS COMMITMENTS RELATED TO INVASIVE SPECIES MANAGEMENT

The conditions in the federal EA approval received via the Decision Statement issued on January 24, 2019³ and commitments made by Prodigy in the Environmental Impact Statement (EIS) (December 2018⁴) include items relevant to invasive species management.

Table 14-A-1: Federal EA Conditions and EIS Commitments Related to Invasive Species Management

EA Conditions / EIS Commitments Related to Invasive Species			
Condition /	Action Required		
Commitment #			
EA Condition 6.4	"As part of the progressive reclamation referred to in condition 4.3, the Proponent shall:		
	6.4.1 identify, prior to the start of progressive reclamation and in consultation with Indigenous groups and relevant authorities, species of interest to Indigenous peoples to use for revegetation as part of the progressive reclamation; and 6.4.2 develop, prior to the start of progressive reclamation and in consultation with Indigenous groups and relevant authorities, and implement, during all phases of the Designated Project, measures to manage the spread of invasive species. The Proponent		
EIS Commitment	shall submit these measures to the Agency before implementing them." "The following additional mitigation measures have been identified to minimize any		
41	reduction in the quality / function of the retained portion of vegetation and habitat in the PS:		
	 Minimize the extent and width of construction and maintenance access roads and trails outside of the public bypass road. Apply wood chip material to created edges. This material will help retain soil moisture, promote germination of native seeds, and prevent weed spread. Undertake hazard tree management along the new edge as required. Prepare an Invasive Species Management Plan as part of an overall Environmental Management Plan." 		

³ Canadian Environmental Assessment Agency. January 2019. *Decision Statement Issued Under Section 54 of the Canadian Environmental Assessment Act, 2012 for the Magino Gold Project.* https://iaac-aeic.gc.ca/050/documents/p80044/126612E.pdf

⁴ Prodigy Gold Inc. December 2018. *Magino Project Commitments List*. https://iaac-aeic.gc.ca/050/documents/p80044/125783E.pdf

APPENDIX 14-B: INCOMING SITE VEHICLE INSPECTION CHECKLIST

Date:			
Contractor:			
Equipment ID / Type:			
Inspection Completed By:			
Signature:			
Inspection Item		Condition Acceptable	Action Required
Wh	eels / Tires		
Tracks	and Wheels		
WI	neel Wells		
Und	dercarriage		
Er	ngine Bay		
	nels – Sides / Doors		
	r Panels – Roof		
Exterior Panels – Rear			
Front / Grille			
Attachments (e.g. roof ra	ck, brush guard, steps/rails, etc.)		
		•	
Corrective Action To Be Taken:			
Corrective Action Completed			
Signature:			
Nate:			