



Magino Gold Project

2020 ANNUAL REPORT TO THE IMPACT ASSESSMENT AGENCY OF CANADA (IAAC)

**REPORTING PERIOD JANUARY TO DECEMBER 2020, AS PER EA
DECISION STATEMENT CONDITIONS 2.9 AND 2.10**

**INCLUDES SCHEDULE OF DECISION STATEMENT CONDITIONS (AS PER
DECISION STATEMENT CONDITION 9.1), AND SCHEDULE OF ALL
ACTIVITIES (AS PER DECISION STATEMENT CONDITION 9.2)**

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LIST OF ACRONYMS

Batchewana First Nation	BFN
Canadian Environmental Assessment Agency	CEAA
Construction Environmental Management Plan	CEMP
Environment and Climate Change Canada	ECCC
Environmental Assessment	EA
Environmental Compliance Approval	ECA
Environmental Impact Statement	EIS
Fisheries and Oceans Canada	DFO
Fugitive Dust Best Management Practices Plan	FDBMPP
Garden River First Nation	GRFN
Geographic Information Systems	GIS
Health Canada	HC
Impact Assessment Agency of Canada	IAAC
<i>Metal and Diamond Mining Effluent Regulations</i>	MDMER
Métis Nation of Ontario	MNO
Michipicoten First Nation	MFN
Missanabie Cree First Nation	MCFN
Natural Resources Canada	NRCan
Ontario Ministry of Energy, Northern Development and Mines	ENDM
Ontario Ministry of Environment, Conservation and Parks	MECP
Ontario Ministry of Natural Resources and Forestry	MNRF
Red Sky Métis Independent Nation	RSMIN
Transport Canada	TC

EXECUTIVE SUMMARY – ENGLISH

Prodigy Gold, Inc. (Prodigy), a subsidiary of Argonaut Gold, is in the process of developing the Magino Gold Project (the Project) located approximately 40 kilometres (km) northeast of Wawa, Ontario, in Finan Township, Algoma District. The site is accessed via Goudreau Road from the Township of Dubreuilville. The Project includes the construction, operation and closure of an open pit gold mine, with approximately 150 million tonnes (Mt) of ore and approximately 430 Mt of mine rock and associated infrastructure.

Federal environmental assessment (EA) approval was received via the Decision Statement issued on January 24, 2019. This Annual Report is submitted in compliance with condition 2.9 of the Decision Statement, and describes activities undertaken by Prodigy to comply with each of the conditions in the Decision Statement during the reporting period January to December 2020.

The parent company of Prodigy, Argonaut Gold, announced a formal decision to construct on October 14, 2020 with construction set to begin in early 2021. During the 2020 pre-construction period, Prodigy continued to consult with each of the Indigenous groups and regulatory agencies associated with the Project. Notable aspects of the 2020 report include:

- Prodigy developed draft documents in support of EA conditions related to follow-up programs, monitoring and management plans, details related to conditions focused on construction and operations phase activities. As part of consultations on the documents, Prodigy provided drafts to Indigenous groups and relevant authorities in November and additional detail in December. Drafts were also provided to the IAAC at this time. Prodigy reviewed all comments received on the drafts; written responses describing how the comments were/would be considered and/or addressed were provided in early 2021. Prodigy initiated making appropriate revisions to the documents based on comments received from various regulatory agencies. Comments from Indigenous communities were not received.
- With respect to EA condition 3.14 (Fish and Fish Habitat), approval under Schedule 2 of the *Metal and Diamond Mining Effluent Regulations* was received from the Governor in Council on May 18, 2020. The final *Fish Habitat Compensation Plan/Offset Plan* was submitted as part of the *Fisheries Act* authorization application process in 2020. The Plan provided previously to Indigenous groups as well as Environment and Climate Change Canada (ECCC) was also provided to the IAAC in November 2020.
- There were no accidents or malfunctions during the reporting period. The Project remained subject to an existing provincial *Closure Plan* as well as existing reporting requirements prior to the filing of an updated *Closure Plan* in December 2020.

EXECUTIVE SUMMARY / SOMMAIRE — FRANÇAIS

Prodigy Gold, Inc. (Prodigy), une filiale d'Argonaut Gold, élabore le projet Magino Gold (le Projet) situé à environ 40 kilomètres au nord-est de Wawa (Ontario), dans le comté de Finan du district d'Algoma. Il est possible d'accéder au site par la route Goudreau à partir du comté de Dubreuilville. Le Projet comprend la construction, l'exploitation et la fermeture d'une mine d'or à ciel ouvert, laquelle comprend environ 150 millions de tonnes (Mt) de minerai et environ 430 Mt de roches de mine et d'infrastructure connexe.

L'évaluation environnementale (EE) fédérale a été approuvée dans la déclaration de décision présentée le 24 janvier 2019. Le présent rapport annuel est présenté conformément à la condition 2.9 de la déclaration de décision. Il décrit les activités menées par Prodigy afin de respecter chacune des conditions énumérées dans la déclaration de décision pendant la période visée par le rapport, soit des mois de janvier à décembre 2020.

La société mère de Prodigy, Argonaut Gold, a annoncé sa décision officielle de construction le 14 octobre 2020. Les travaux de construction étaient prévus être lancés au début de l'année 2021. Pendant la période préalable à la construction, en 2020, Prodigy a continué de consulter chacun des groupes autochtones et organismes de réglementation liés au Projet. Voici certains faits saillants indiqués dans le rapport de 2020 :

- Prodigy a créé des documents provisoires à l'appui des conditions indiquées dans l'évaluation environnementale en ce qui concerne les programmes de suivi, la surveillance et les plans de gestion. Ces documents présentent aussi des détails sur les conditions axées sur les activités menées pendant la phase de construction et d'exploitation. Dans le cadre des consultations sur les documents, Prodigy a présenté des versions provisoires aux groupes autochtones et autorités pertinentes en novembre, et fourni des détails supplémentaires en décembre. Des versions provisoires ont aussi été présentées à l'Agence d'évaluation d'impact du Canada (AEIC) à ce moment. Prodigy a examiné tous les commentaires formulés sur les versions provisoires, et présenté une réponse écrite, au début de l'année 2021, afin d'expliquer comment les commentaires avaient été ou serait pris en considération ou gérés. Prodigy a commencé à apporter les révisions appropriées aux documents en fonction des commentaires formulés par divers organismes de réglementation. Aucune communauté autochtone n'a présenté de commentaires.
- En ce qui concerne la condition 3.14 (Poisson et habitat du poisson) de l'évaluation environnementale, le gouverneur en conseil a donné son approbation en vertu de l'annexe 2 du *Règlement sur les effluents des mines de métaux et des mines de diamants* le 18 mai 2020. Le *plan définitif de compensation de l'habitat du poisson* a été présenté dans le cadre du processus de demande d'autorisation en vertu de la *Loi sur les pêches* en 2020. Le plan présenté précédemment aux groupes autochtones et à Environnement et Changement climatique Canada a également été présenté à l'AEIC en novembre 2020.

Aucun accident et aucun défaut de fonctionnement n'est survenu au cours de la période visée par le rapport. Le Projet demeurerait assujéti à un *Plan de clôture* provincial existant et à des exigences existantes en matière d'établissement de rapport avant de présenter un *Plan de clôture* mis à jour, en décembre 2020.

1. INTRODUCTION

Prodigy Gold, Inc. (Prodigy), a subsidiary of Argonaut Gold, is developing the Magino Gold Project (the Project) located approximately 40 kilometres (km) northeast of Wawa, Ontario, in Finan Township, Algoma District. Figure 1 shows the location of the Project. The site is accessed via Goudreau Road from the Township of Dubreuilville. The Project includes the construction, operation and closure of an open pit gold mine, with approximately 150 million tonnes (Mt) of ore and approximately 430 Mt of mine rock and associated infrastructure. The open pit mine will be situated in the same location as a past-producing underground mine, and as such the Project is considered a brownfield site.

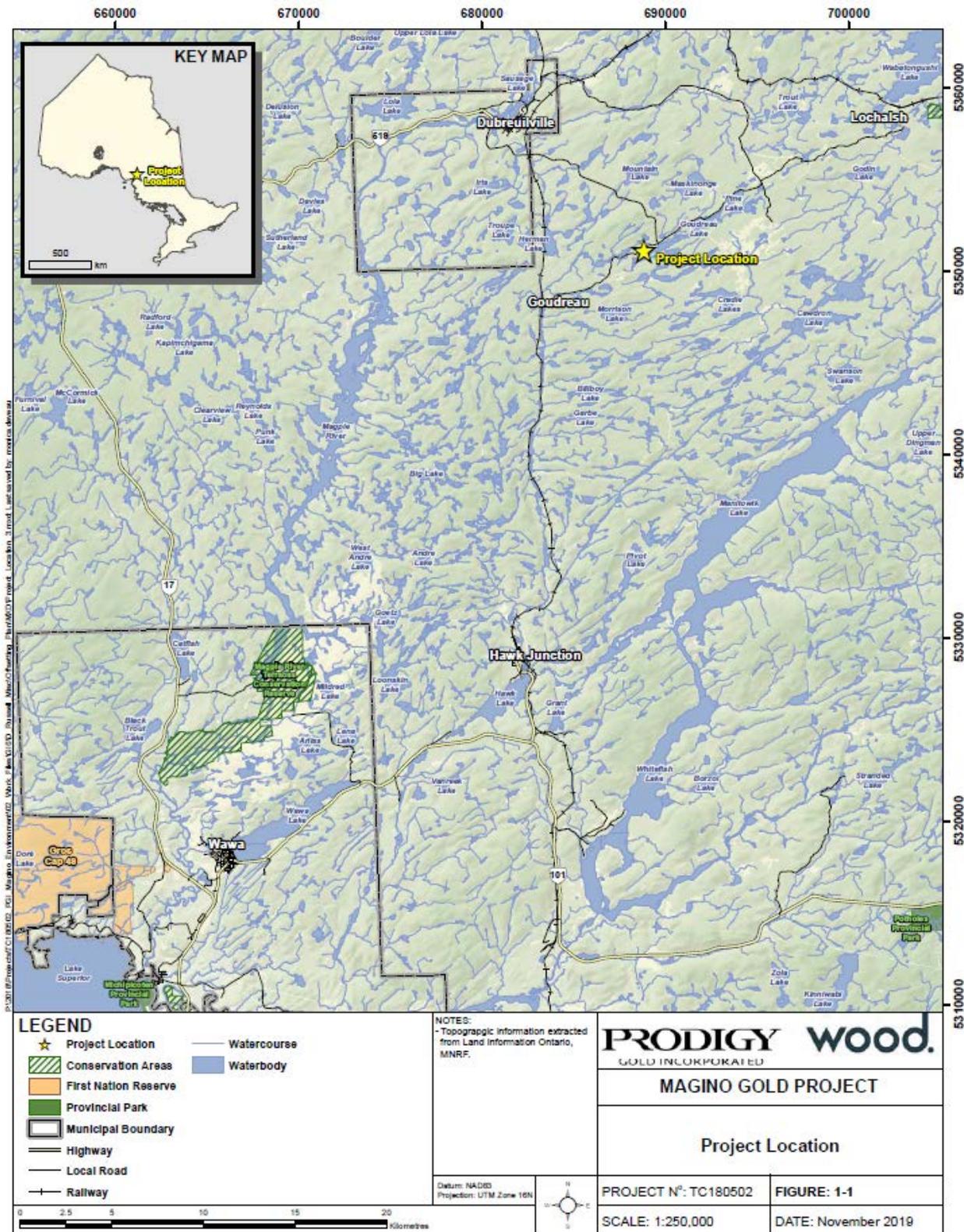
Federal environmental assessment (EA) approval was received via the Decision Statement issued on January 24, 2019. The Statement of Completion (Category B) made under the Ontario Ministry of Natural Resources and Forestry's (MNRF's) Class Environmental Assessment for Resource Stewardship and Facility Development Projects (or Class EA-RSFD) for the Project was issued on March 12, 2019. The Project remained in the pre-construction phase during 2020. The parent company of Prodigy, Argonaut Gold, announced a formal decision to construct on October 14, 2020 with construction set to begin in early 2021. The Project remained in the pre-construction phase for all of 2020.

This Annual Report is submitted in compliance with condition 2.9 of the federal EA Decision Statement. Prodigy's annual reporting to the Agency will also be reflected as part of Argonaut Gold's overall social responsibility and sustainability program. The Annual Report describes activities undertaken by Prodigy to comply with each of the conditions in the Decision Statement during the reporting period January 1 to December 31, 2020. The report is organized so that each section heading addresses a set of conditions as they are laid out in the Decision Statement itself.

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Figure 1: Magino Gold Project Location



2. CONDITIONS AND COMPLIANCE REPORTING

Activities taken by Prodigy in 2020 to comply with each of the federal EA Decision Statement conditions (January 24, 2019) are described below.

A. General Conditions

A-1 Qualified Individuals / Best Practices

"2.1 The Proponent shall ensure that its actions in meeting the conditions set out in this Decision Statement during all phases of the Designated Project are considered in a careful and precautionary manner, promote sustainable development, are informed by the best information and knowledge available at the time the Proponent takes action, including community and Indigenous traditional knowledge, are based on methods and models that are recognized by standard-setting bodies, are undertaken by qualified individuals, and have applied the best available economically and technically feasible technologies."

Response: During the 2020 pre-construction period, Prodigy continued to engage the services of several reputable consulting companies to provide the qualified professionals (e.g. R.P.Bio., P. Eng., P. Geo.) to implement all activities according to requirements. Several technologies including Geographic Information Systems (GIS) were expanded as part of the pre-construction Environmental Management System development.

A-2 Consultation

"2.2 The Proponent shall, where consultation is a requirement of a condition set out in this Decision Statement:

- 2.2.1 provide a written notice of the opportunity for the party or parties being consulted to present their views and information on the subject of the consultation;*
- 2.2.2 provide all information available and relevant on the scope and the subject matter of the consultation and a period of time taking into account the views of the party or parties being consulted, not to be less than 15 days, to prepare their views and information;*
- 2.2.3 undertake an impartial consideration of all views and information presented by the party or parties being consulted on the subject matter of the consultation; and*
- 2.2.4 advise in a timely manner the party or parties being consulted on how the views and information received have been considered by the Proponent.*

2.3 The Proponent shall, where consultation with Indigenous groups is a requirement of a condition set out in this Decision Statement, communicate with each Indigenous group with respect to the manner to satisfy the consultation requirements referred to in condition 2.2, including methods of notification, the type of information and the period of time to be provided when seeking input, the process to be used by the Proponent to undertake impartial consideration of all views and information presented on the subject of the consultation, and the period of time and the means to advise Indigenous groups of how their views and information were considered by the Proponent."

Response: Consultation with Indigenous groups with respect to the specific individual conditions of the Decision Statement is described as applicable in the other sections of this Annual Report. Prodigy consulted with the following parties on the development of follow-up programs, plans, and measures required under the EA conditions.

Party Consulted	Date Information Provided by Prodigy	Date Input Requested By
Michipicoten First Nation (MFN)	Nov 2, 2020	Dec 3, 2020, 2021
	Dec 23, 2020	Jan 22, 2021
Missanabie Cree First Nation (MCFN)	Nov 2, 2020	Dec 3, 2020, 2021
	Dec 23, 2020	Jan 22, 2021
Batchewana First Nation (BFN)	Nov 2, 2020	Dec 3, 2020, 2021
	Dec 23, 2020	Jan 22, 2021
Métis Nation of Ontario (MNO)	Nov 2, 2020	Dec 3, 2020, 2021
	Dec 23, 2020	Jan 22, 2021
Red Sky Métis Independent Nation (RSMIN)	Nov 2, 2020	Dec 3, 2020, 2021
	Dec 23, 2020	Jan 22, 2021
Garden River First Nation (GRFN)	Nov 2, 2020	Dec 3, 2020, 2021
	Dec 23, 2020	Jan 22, 2021
Impact Assessment Agency of Canada (IAAC)	Nov 16, 2020, <i>additional detail Dec 8, 2020</i>	Dec 23, 2020
Fisheries and Oceans Canada (DFO)	Nov 19, 2020, <i>additional detail Dec 8, 2020</i>	Dec 23, 2020
Natural Resources Canada (NRCan)	Nov 19, 2020, <i>additional detail Dec 8, 2020</i>	Dec 23, 2020
Environment and Climate Change Canada (ECCC)	Nov 24, 2020, Nov 25, 2020, <i>additional detail Dec 8, 2020</i>	Dec 23, 2020
Health Canada (HC)	Nov 25, 2020, <i>additional detail provided by IAAC after Dec 8, 2020</i>	Dec 23, 2020
Transport Canada (TC)	Nov 25, 2020	Dec 23, 2020
Ontario Ministry of Natural Resources and Forestry (MNRF)	Nov 19, 2020, <i>additional detail Dec 8, 2020</i>	Advised that documents to be finalized week of Dec 14, 2020
Ontario Ministry of Environment, Conservation and Parks (MECP)	Nov 19, 2020, <i>additional detail Dec 8, 2020</i>	Advised that documents to be finalized week of Dec 14, 2020
Ontario Ministry of Energy, Northern Development, and Mines (ENDM)	Nov 19, 2020, <i>additional detail Dec 8, 2020</i>	Advised that documents to be finalized week of Dec 14, 2020

Parties were provided copies of the draft plans, programs and measures via email. Consultations with Indigenous groups on the development of the follow-up programs, plans and measures took place in a manner consistent with bilateral agreements.

Prodigy reviewed all comments received on the draft follow-up programs, plans, and measures in 2020 and provided responses in writing describing how the comments were/would be considered and/or addressed in 2021. Prodigy initiated making appropriate revisions to the final versions, based on the comments received on the draft follow-up programs, plans and measures received from various regulatory agencies. Comments from Indigenous communities were not received.

A-3 Follow-up and Adaptive Management

“2.4 The Proponent shall, where a follow-up program is a requirement of a condition set out in this Decision Statement, determine, as part of the development of each follow-up program and in consultation with the party or parties being consulted during the development, the following information:

- 2.4.1 the methodology, location, frequency, timing and duration of monitoring associated with the follow-up program;*
- 2.4.2 the scope, content and frequency of reporting of the results of the follow-up program;*
- 2.4.3 the levels of environmental change relative to baseline conditions that would require the Proponent to implement modified or additional mitigation measure(s), including instances where the Proponent may require Designated Project activities to be stopped; and*
- 2.4.4 the technically and economically feasible mitigation measures to be implemented by the Proponent if monitoring conducted as part of the follow-up program shows that the levels of environmental change referred to in condition 2.4.3 have been reached or exceeded and the timing for implementing the modified or additional mitigation measures.”*

Response: Drafts of the follow-up programs as described in EA condition 2.4 were developed in 2020, as summarized below. See section A-2 above and the respective sections pertaining to the related EA conditions for additional details about the consultations carried out on the specific individual follow-up programs.

#	EA Condition/Annual Report Section	EA Condition Requirement for Follow-up Program to Determine/Verify ¹ :	Topic
1	3.16/Section B. Fish and Fish Habitat	The effectiveness of the mitigation measures as it pertains to the adverse environmental effects on fish and fish habitat, including spawning habitat, caused by blasting	Fish, fish habitat, blasting
2	3.17, Section B. Fish and Fish Habitat	The effectiveness of the mitigation measures for the salvage and relocation of fish and as it pertains to the incidental capture of fish by entrainment and impingement from the Designated Project	Fish salvage, relocation, incidental capture of fish
3	3.18, Section B. Fish and Fish Habitat	The accuracy of the environmental assessment and to determine the effectiveness of the mitigation measures as it pertains to adverse environmental effects on fish and fish habitat caused by changes in water and sediment quality in Otto Lake and Herman Lake	Fish, fish habitat, changes in water and sediment quality
4	3.19, Section B. Fish and Fish Habitat	The accuracy of the environmental assessment and to determine the effectiveness of the mitigation measures as it pertains to the adverse environmental effects on fish and fish habitat in Otto Lake, Herman Lake and	Fish, fish habitat, changes in groundwater quality

¹ See the Decision Statement for the full EA condition; excerpts are shown in this table

#	EA Condition/Annual Report Section	EA Condition Requirement for Follow-up Program to Determine/Verify ¹ :	Topic
		Goudreau Lake from changes in groundwater quality caused by the Designated Project	
5	4.4, Section C. Migratory Birds	The accuracy of the environmental assessment as it pertains to the use by migratory birds of surface water facilities in the project study area.	Migratory birds, surface water facilities
6	4.5, Section C. Migratory Birds	The effectiveness of the mitigation measures to avoid harm to migratory birds, their eggs, and nests, including the mitigation measures used to comply with conditions 4.1 to 4.3	Migratory birds, eggs, nests
7	5.3, Section D. Health of Indigenous Peoples	The accuracy of the environmental assessment and to determine the effectiveness of the mitigation measures as it pertains to the adverse environmental effects on the health of Indigenous Peoples caused by increased concentration of air contaminants, including total suspended particulates, particulate matter (PM 10), fine particulate matter (PM 2.5), sulphur dioxide, nitrogen dioxide and cadmium	Health of Indigenous Peoples, air contaminants
8	5.4, Section D. Health of Indigenous Peoples	The accuracy of the environmental assessment and to determine the effectiveness of mitigation measures as it pertains to the adverse environmental effects on health of Indigenous Peoples caused by contamination of water and fish	Health of Indigenous Peoples, contamination of water and fish
9	6.5, Section E. Current Use of Lands and Resources for Traditional Purposes	The accuracy of the environmental assessment as it pertains to the adverse environmental effects of the Designated Project on the current use of lands and resources for traditional purposes caused by changes in the use of the project study area by mammals, including black bear (<i>Ursus americanus</i>) and moose (<i>Alces alces</i>).	Current use of lands and resources for traditional purposes, use of project study area by mammals
10	6.6, Section E. Current Use of Lands and Resources for Traditional Purposes	The accuracy of the environmental assessment and determine the effectiveness of mitigation measures, including the mitigation measures referred to in conditions 6.1 to 6.4, as it pertains to the adverse environmental effects of the Designated Project on the current use of lands and resources for traditional purposes.	Current use of lands and resources
11	7.2, Section F. Wetlands	The effectiveness of restoration referred to in condition 7.1	Restoration
12	7.3, Section F. Wetlands	The accuracy of the environmental assessment as it pertains to the presence of snapping turtle (<i>Chelydra</i>	Snapping turtles, eggs

#	EA Condition/Annual Report Section	EA Condition Requirement for Follow-up Program to Determine/Verify ¹ :	Topic
		serpentina) or snapping turtle eggs within the project study area	

“2.5 The Proponent shall maintain the information referred to in condition 2.4 during the implementation of each follow-up program in consultation with the party or parties being consulted during the development of each follow-up program.

2.6 The Proponent shall provide the follow-up programs referred to in conditions 3.16, 3.17, 3.18, 3.19, 4.4, 4.5, 5.3, 5.4, 6.5, 6.6, 7.2 and 7.3 to the Agency and to the party or parties being consulted during the development of each follow-up program prior to the implementation of each follow-up program. The Proponent shall also provide any update(s) to the Agency and to the party or parties being consulted during the development of each follow-up program within 30 days of the follow-up program being updated.

2.7 The Proponent shall, where a follow-up program is a requirement of a condition set out in this Decision Statement and in consultation with the party or parties being consulted during the development of the follow-up program:

- 2.7.1 conduct the follow-up program according to the information determined pursuant to condition 2.4;*
- 2.7.2 undertake monitoring and analysis to verify the accuracy of the environmental assessment as it pertains to the particular condition and/or to determine the effectiveness of any mitigation measure(s);*
- 2.7.3 determine whether modified or additional mitigation measures are required based on the monitoring and analysis undertaken pursuant to condition 2.7.2; and*
- 2.7.4 if modified or additional mitigation measures are required pursuant to condition 2.7.3, develop and implement these mitigation measures in a timely manner and monitor them pursuant to condition 2.7.2.*

2.8 Where consultation with Indigenous groups is a requirement of a follow-up program, the Proponent shall discuss with each Indigenous group opportunities for their participation in the development and implementation of the follow-up program, including the analysis of the follow-up results and whether modified or additional mitigation measures are required, as set out in condition 2.7.”

Response: The Magino Gold Project remained in the pre-construction phase in 2020. As described in section A-2 above, drafts of the follow-up programs required by the conditions of the Decision Statement were provided to the parties being consulted in November and December 2020, prior to their implementation. As the follow-up programs required by the conditions of the Decision Statement were not finalized for implementation in 2020, there was no specific action on EA conditions 2.5 and 2.7 during 2020.

A-4 Annual Reporting

“2.9 The Proponent shall, commencing in the reporting year during which the Proponent begins the implementation of the conditions set out in this Decision Statement, prepare an annual report that sets out:

- 2.9.1 the activities undertaken by the Proponent in the reporting year to comply with each of the conditions set out in this Decision Statement;*
- 2.9.2 how the Proponent complied with condition 2.1;*
- 2.9.3 for conditions set out in this Decision Statement for which consultation is a requirement, how the Proponent considered any views and information that the Proponent received during or as a result of the consultation;*
- 2.9.4 the information referred to in conditions 2.4 and 2.5 for each follow-up program;*
- 2.9.5 the results of the follow-up program requirements identified in conditions 3.16, 3.17, 3.18, 3.19, 4.4, 4.5, 5.3, 5.4, 6.5, 6.6, 7.2 and 7.3;*
- 2.9.6 any modified or additional mitigation measures implemented or proposed to be implemented by the Proponent, as determined under condition 2.7;*
- 2.9.7 any change(s) to the Designated Project in the reporting year for which the Proponent determined that condition 2.14 did not apply.*

2.10 The Proponent shall submit to the Agency the annual report referred to in condition 2.9, including a plain language executive summary in both official languages, no later than March 31 following the reporting year to which the annual report applies.”

Response: This Annual Report is submitted in compliance with conditions 2.9 and 2.10 of the federal EA Decision Statement issued on January 24, 2019. The 2019 Annual Report was submitted to the IAAC in March 2020.

A-5 Information Sharing

“2.11 The Proponent shall publish on the Internet, or any medium which is publicly available, the annual reports and the executive summaries referred to in conditions 2.9 and 2.10, the offsetting plan(s) referred to in condition 3.14, the reports related to accidents and malfunctions referred to in conditions 8.4.2 and 8.4.3, the communication plans referred to in conditions 6.1 and 8.5, the schedules referred to in conditions 9.1, and 9.2, and any update(s) or revision(s) to the above documents, upon submission of these documents to the parties referenced in the respective conditions. The Proponent shall keep these documents publicly available for 25 years following the end of operation, or until the end of decommissioning of the Designated Project, whichever comes first. The Proponent shall notify the Agency and Indigenous groups of the availability of these documents within 48 hours of their publication.

2.12 When the development of a plan is a requirement of a condition set out in this Decision Statement, the Proponent shall submit the plan to the Agency prior to construction, unless otherwise required through the condition.”

Response: In 2020, information sharing activities were completed for the following documents as required by EA conditions 2.11 and 2.12. Published documents are found at:

<https://www.argonautgold.com/English/assets/development/magino/default.aspx>.

- The 2019 Annual Report, including the executive summary (English and French), was published in April 2020; the IAAC, BFN, GRFN, MNO, MFN, MCFN, and RSMIN were notified of the posting by email.

- The schedules referenced in EA conditions 9.1 (Schedule of Decision Statement Conditions) and 9.2 (Schedule of All Activities) were published in October 2020; the IAAC, MFN, MCFN, BFN, MNO, GRFN, and RSMIN were notified of the posting by email in October 2020.
- The offsetting plan and communications plans were in development/pending approval, and as described in section A-2, drafts were submitted to the IAAC in 2020 during the pre-construction phase. As the plans were draft/pending approval, they were not published in 2020.
- There were no accidents or malfunctions in 2020. Therefore, no related reports were submitted or published in 2020.

A-6 Change of Proponent

“2.13 The Proponent shall notify the Agency and Indigenous groups in writing no later than 30 days after the day on which there is a transfer of ownership, care, control or management of the Designated Project in whole or in part.”

Response: There was no transfer of ownership, care, control or management of the Designated Project in whole or in part; as such, no related notifications were made in 2020.

A-7 Change to the Designated Project

“2.14 The Proponent shall consult with Indigenous groups, Pic Mobert First Nation and relevant authorities prior to initiating any changes to the Designated Project that may result in adverse environmental effects, and shall notify the Agency in writing no later than 60 days prior to initiating the change(s).

2.15 In notifying the Agency pursuant to condition 2.14, the Proponent shall provide the Agency with a description of the potential adverse environmental effects of the change(s) to the Designated Project, the proposed mitigation measures and follow-up requirements to be implemented by the Proponent and the results of the consultation with Indigenous groups, Pic Mobert First Nation and relevant authorities.”

Response: There was no change to the Designated Project that may result in adverse environmental effects; as such, no related notifications were made in 2020.

B. Fish and Fish Habitat

“3.1 The Proponent shall develop, prior to construction, and implement, during all phases of the Designated Project, measures to control erosion and sedimentation within the project study area. The Proponent shall submit these measures to the Agency before implementing them. Among other measures, the Proponent shall:

- 3.1.1 Use ditches and diversion berms to maintain stream bank stability; and*
- 3.1.2 Use physical barriers to reduce runoff from disturbed areas.”*

3.2 The Proponent shall comply with the Metal and Diamond Mining Effluent Regulations and the pollution prevention provisions of the Fisheries Act.

3.3: The Proponent shall collect, during construction and operation, contact water for reuse in Designated Project activities, and treat excess contact water that cannot be reused.

3.4 The Proponent shall control the flow at which excess water referred to in condition 3.3 is discharged to limit disturbance of lake bed material.”

Response: Prodigy developed the draft measures required by EA condition 3.1 in 2020, and committed to finalizing them before construction in 2021. See section A-2 for additional consultation details. As the measures remained draft, they were not implemented during 2020. As the Magino Gold Project remained in the pre-construction phase, there was no specific action on EA conditions 3.2 through 3.4 or associated sub-conditions during 2020.

“3.5 The Proponent shall install, prior to operation, and use a cyanide destruction circuit during operation to reduce cyanide concentrations in tailings before the tailings are directed to the tailings management facility.”

Response: As the Magino Gold Project remained in the pre-construction phase, there was no specific action on EA condition 3.5 during 2020. Figure 6-19 (‘Gold Extraction Process Flowsheet’) in the Environmental Impact Statement (2017) includes a cyanide destruction circuit.

“3.6 The Proponent shall, after the end of operation and until the open-pit lake is filled, collect and direct contact water to the open-pit lake.”

3.7 The Proponent shall, prior to operation, implement seepage control measures at the tailings management facility and maintain these measures during operation and decommissioning.

3.8 The proponent shall not connect the open-pit lake until such time as water in the open-pit lake complies with the pollution prevention provisions of the Fisheries Act.

3.9 The Proponent shall treat water taking into account the Canadian Council of Ministers of the Environment’s Canadian Water Quality Guidelines for Protection of Aquatic Life.”

Response: As the Magino Gold Project remained in the pre-construction phase, there was no specific action on EA conditions 3.6 through 3.9 during 2020.

“3.10 The Proponent shall develop, prior to the start of blasting activities in or near water and in consultation with Indigenous groups, and implement, during blasting activities in or near water, mitigation measures to avoid or prevent adverse effects to fish and fish habitat from the use of explosives in a manner consistent with the Fisheries Act and its regulations. When developing these measures, the Proponent shall take into account Fisheries and Oceans Canada’s Measures to avoid causing harm to fish and fish habitat including aquatic species to risk as it pertains to the use of explosives in or near water. The Proponent shall submit these measures to the Agency before implementing them.”

Response: Prodigy developed, in consultation with Indigenous groups, draft measures as required in EA condition 3.10 in 2020. See section A-2 for additional consultation details. The Magino Gold Project remained in the pre-construction phase; as such, no implementation as required by EA condition 3.10 occurred during 2020.

“3.11 The Proponent shall conduct in-water construction activities during timing windows of least risk for the area, unless otherwise agreed to by relevant federal and provincial authorities. If in-water construction activities cannot be conducted during identified timing windows of least risk, the Proponent shall develop and implement additional mitigation measures, in consultation with Indigenous groups and Fisheries and Oceans Canada, to protect fish during sensitive life stages.”

“3.12 The Proponent shall salvage and relocate fish prior to conducting any Designated Project activity requiring removal of fish habitat in a manner consistent with any license issued under the Fisheries Act and its

regulations. The Proponent shall salvage and relocate fish in consultation with Indigenous groups and to the satisfaction of Fisheries and Oceans Canada and other relevant authorities.”

“3.13 The Proponent shall design, install and operate the water intake structures in Goudreau Lake in a manner which reduces the incidental capture of fish by entrainment and impingement through the use of an appropriately sized fish screen, taking into account Fisheries and Oceans Canada's Freshwater Intake End-of-Pipe Fish Screen Guideline and in a manner consistent with the Fisheries Act and its regulations.”

Response: As the Magino Gold Project remained in the pre-construction phase, there was no specific action on EA conditions 3.11 and 3.12 during 2020. Prodigy developed a draft *Fish and Fish Habitat Management Plan* in 2020 (part of the broader *Construction Environmental Management Plan (CEMP)*). The *Fish Habitat Compensation Plan / Offset Plan* required by EA condition 3.14 was an appendix to the draft *Fish and Fish Habitat Management Plan*). The *Fish and Fish Habitat Management Plan* included direction to meet the requirements of EA condition 3.13. See section A-2 for additional consultation details.

“3.14 The Proponent shall develop, to the satisfaction of Fisheries and Oceans Canada and Environment and Climate Change Canada and in consultation with Indigenous groups, any offsetting plan(s) related to any residual serious harm to fish associated with the carrying out of the Designated Project. The Proponent shall implement the plan. The Proponent shall submit any approved offsetting plan(s) to the Agency prior to implementation.”

Response: Prodigy has developed a single Plan document (November 2019) in compliance with the requirements for both the *Metal and Diamond Mining Effluent Regulations (MDMER) Schedule 2 Fish Habitat Compensation Plan* and *Fisheries Act Paragraph 35(2)(b) Authorization Offset Plan* to mitigate any residual serious harm to fish associated with the carrying out of the Project. The Plan was developed in coordination with the DFO, MNRF, and ECCC and in consultation with Indigenous groups, as previously described in the 2019 Annual Report (March 2020) to the IAAC.

Approval of the Schedule 2 authorization was received from the Governor in Council on May 18, 2020. The Plan was submitted as part of the *Fisheries Act* authorization application process in 2020. This Plan was provided to the IAAC in November 2020.

“3.15 The Proponent shall, for any fish habitat offsetting measure(s) proposed in any offsetting plan(s) referred to in condition 3.14 that may cause adverse environmental effects not considered in the environmental assessment, develop and implement, following consultation with Indigenous groups, Fisheries and Oceans Canada and Environment and Climate Change Canada, measures to mitigate those effects. The Proponent shall submit these measures to the Agency before implementing them.”

Response:

The *Fish Habitat Compensation Plan/Offset Plan* accounts for measures to mitigate potential impacts arising from implementation of the Plan, and authorization received under the *Fisheries Act* requires monitoring and reporting of the effectiveness of the implementation of the Plan. No additional adverse environmental effects not considered in the EA were identified for fish habitat offsetting measures in the Plan referred to in EA condition 3.14.

“3.16 The Proponent shall develop, prior to the start of blasting activities in or near water and in consultation with Indigenous groups and relevant authorities, a follow-up program to determine the effectiveness of the mitigation measures as it pertains to the adverse environmental effects on fish and fish habitat, including spawning habitat, caused by blasting. The Proponent shall implement the follow-up program during blasting activities. As part of the implementation of the follow-up program, the Proponent shall:

- 3.16.1 Monitor instantaneous pressure and particle velocity during the first blasting event;”*
- 3.16.2 If results of the monitoring referred to in condition 3.16.1 indicate an instantaneous pressure change greater than 100 kiloPascals in the swimbladder of fish or that blasting produces a peak particle velocity greater than 13 millimetre per second in a spawning bed, develop, prior to the next blasting event and in consultation with relevant authorities, modified or additional mitigation measures pursuant to condition 2.7 in order to protect fish and fish habitat, including spawning habitat; and”*
- 3.16.3 Implement the modified or additional mitigation measures referred to in condition 3.16.2 during all subsequent blasting events. The Proponent shall submit these measures to the Agency before implementing them.”*

Response: Prodigy developed, in consultation with Indigenous groups and relevant authorities, a draft follow-up program as required in EA condition 3.16 as part of the *Fish and Fish Habitat Management Plan* during 2020. See section A-2 for additional consultation details. The draft follow-up program was provided for review to the following parties:

- Indigenous groups November 2, 2020;
- The IAAC November 16, 2020;
- DFO, NRCan, MNRF, ENDM, and MECP November 19, 2020; and
- ECCC, TC, and HC November 25, 2020.

As the Magino Gold Project remained in the pre-construction phase and the follow-up program was not yet finalized, there was no program implementation during 2020.

“3.17 The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to determine the effectiveness of the mitigation measures for the salvage and relocation of fish and as it pertains to the incidental capture of fish by entrainment and impingement from the Designated Project. The Proponent shall implement the follow-up program during all phases of the Designated Project.”

Response: Prodigy developed, in consultation with Indigenous groups and relevant authorities, a draft follow-up program as required in EA condition 3.17 as part of the *Fish and Fish Habitat Management Plan* during 2020. See section A-2 for additional consultation details. The draft program was provided for review/comment to the following parties:

- Indigenous groups November 2, 2020;
- The IAAC November 16, 2020;
- DFO, NRCan, MNRF, ENDM, and MECP November 19, 2020; and
- ECCC, TC, and HC November 25, 2020.

As the program was not yet finalized, there was no implementation during 2020.

“3.18 The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to verify the accuracy of the environmental assessment and to determine the effectiveness of the mitigation measures as it pertains to adverse environmental effects on fish and fish habitat caused by changes in water and sediment quality in Otto Lake and Herman Lake. The Proponent shall implement the follow-up program during all phases of the Designated Project, including the environmental effects monitoring requirements set out in Schedule 5 of the Metal and Diamond Mining Effluent Regulations.”

Response: In 2020, Prodigy developed, in consultation with Indigenous groups and relevant authorities, a draft follow-up program as required in EA condition 3.18. *The Surface Water Monitoring Plan* (Appendix 6-D of the *Surface Water Monitoring Plan*) fulfills the requirements related to the follow-up program, as well as other obligations. See section A-2 for additional consultation details. The draft program was provided for review/comment to the following parties²:

- Indigenous groups November 2, 2020;
- The IAAC November 16, 2020;
- DFO, NRCAN, MNRF, ENDM, and MECP November 19, 2020³; and
- ECCC, TC, and HC November 25, 2020.

As the program was not yet finalized, there was no implementation during 2020.

“As part of the implementation of the follow-up program, the Proponent shall:

- 3.18.1 Monitor, at least quarterly, concentrations of total phosphorus, mercury, copper, silver, sulphate and ammonia in water during operation;*
- 3.18.2 Monitor, at least annually, concentrations of copper, arsenic, cadmium, manganese, mercury and total phosphorus in sediments during operation;*
- 3.18.3 Monitor fish health through fish tissue sampling and fish population studies. Monitoring shall include lower trophic level indicator species and shall include monitoring of fish abundance, fish population structure and other fish health metrics that shall be determined in consultation in Indigenous groups and relevant authorities. The Proponent shall conduct monitoring for one year prior to operation and at least twice a year for the first three years of operation and shall:*
 - 3.18.3.1 If the results of monitoring during the first three years of operation demonstrate that no adverse environmental effects to fish and fish habitat from Designated Project activities are occurring, continue monitoring every three years after the first three years for a duration that shall be determined in consultation with Indigenous groups and relevant authorities; or*
 - 3.18.3.2 If the results of monitoring during the first three years of operation demonstrate that adverse environmental effects to fish and fish habitat from Designated Project activities are occurring, determine, in consultation with Indigenous groups and relevant authorities, with what frequency and for what duration additional monitoring shall occur;*

² A correction to the draft Surface Water Monitoring Plan in response to a concern from the Agency was provided to federal authorities on December 23, 2020.

³ A version with minor updates was also provided to these authorities on December 23, 2020 and subsequently provided to all parties consulted on the follow-up program.

3.18.4 Monitor nutrient levels, algae abundance, and dissolved oxygen levels. In doing so the Proponent shall:

3.18.4.1 Conduct monitoring one year prior to operation;

3.18.4.2 Conduct monitoring at least twice a year for the first three years of operation and:

3.18.4.2.1 If the results of the monitoring referred to in condition 3.18.4.2 demonstrate a statistically significant change with the results of monitoring referred to in condition 3.18.4.1, conduct a fish habitat utilization survey to verify that these changes do not cause adverse environmental effects to fish and fish habitat. The Proponent shall determine the methodology, the frequency and the duration of this survey in consultation with Indigenous groups and relevant authorities.

3.18.4.3 After the third year of operation, the Proponent shall:

3.18.4.3.1 Continue monitoring of nutrient levels, algae abundance and dissolved oxygen levels every three years for a duration that shall be determined in consultation with Indigenous groups and relevant authorities, if the results of monitoring referred to in condition 3.18.4.2 demonstrate that no adverse environmental effects to fish and fish habitat from Designated Project activities are occurring; or

3.18.4.3.2 Continue monitoring at a frequency and duration that shall be determined in consultation with Indigenous groups and relevant authorities, if the results of monitoring referred to in condition 3.18.4.2 demonstrate that adverse environmental effects to fish and fish habitat from Designated Project activities are occurring.

3.18.5 if results of the monitoring referred to in conditions 3.18.1, 3.18.2, 3.18.3 or 3.18.4 or the results of the fish habitat utilization survey referred to in condition 3.18.4.2.1 demonstrate that modified or additional mitigation measures are required to protect fish and fish habitat from changes to water and sediment quality, develop and implement modified or additional mitigation measures pursuant to condition 2.7, which shall include, at a minimum, the installation and use of an effluent treatment facility. The Proponent shall submit these measures to the Agency before implementing them.”

Response: As the follow-up program was not yet finalized, there was no implementation during 2020. There was no specific action on EA conditions 3.18.1 through 3.18.5 during 2020.

“3.19 The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to verify the accuracy of the environmental assessment and to determine the effectiveness of the mitigation measures as it pertains to the adverse environmental effects on fish and fish habitat in Otto Lake, Herman Lake and Goudreau Lake from changes in groundwater quality caused by the Designated Project. The Proponent shall implement the follow-up program during all phases of the Designated Project in consultation with Indigenous groups. As part of the implementation of the follow-up program, the Proponent shall...”

Response: During 2020, Prodigy developed, in consultation with Indigenous groups and relevant authorities, a draft follow-up program to meet the requirements of EA condition 3.19. The *Groundwater Monitoring Plan* (Appendix 6-F of the *Water Management Plan*) fulfills the requirements related to the follow-up program, as well as other obligations. See section A-2 for additional consultation details. The draft program was provided for review/comment to the following parties:

- Indigenous groups November 2, 2020;

- The IAAC November 16, 2020;
- DFO, NRCan, MNR, ENDM, and MECP November 19, 2020; and
- ECCC, TC, and HC November 25, 2020.

As the program was not yet finalized, there was no implementation during 2020.

“3.19.1 Monitor groundwater quality using as benchmarks the comparative standards for water quality identified by the Proponent in Table 7-54 of the Environmental Impact Statement; and”

Response:

The existing baseline groundwater quality monitoring program continued during 2020. Additional monitoring sites were proposed in the course of Environmental Compliance Approval discussions with the MECP. This updated monitoring program is expected to be initiated in 2021.

“3.19.2 If the results of the monitoring referred to in condition 3.19.1 demonstrate that modified or additional mitigation measures are required to mitigate adverse environmental effects on fish and fish habitat of changes in groundwater quality caused by the Designated Project, develop and implement modified or additional mitigation measures pursuant to condition 2.7. The Proponent shall submit these measures to the Agency before implementing them.”

Response: As the Magino Gold Project was still in the pre-construction phase in 2020, there was no specific action on EA condition 3.19.2.

C. Migratory Birds

“4.1 The Proponent shall carry out the Designated Project in a manner that protects migratory birds and avoids harming, killing or disturbing migratory birds or destroying, disturbing or taking their nests or eggs. In this regard, the Proponent shall take into account Environment and Climate Change Canada's Avoidance Guidelines and the risk of incidental take. The Proponent's actions when carrying out the Designated Project shall be in compliance with the Migratory Birds Convention Act, 1994, the Migratory Birds Regulations and with the Species at Risk Act.

4.2 The Proponent shall control lighting required during all phases of the Designated Project, including direction, timing and intensity, to avoid adverse environmental effects on migratory birds, while meeting health and safety requirements.

4.3 The Proponent shall undertake, in consultation with Indigenous groups and relevant authorities, progressive reclamation of the project study area. The Proponent shall identify, prior to the start of progressive reclamation and in consultation with Indigenous groups and relevant authorities, plant species native to the area of the Designated Project to use for revegetation as part of the progressive reclamation, including species suitable to create habitat for migratory birds.”

Response:

As the Magino Gold Project remained in the pre-construction phase, there was no specific action on EA conditions 4.1 and 4.2 during 2020. Regarding EA condition 4.3, Prodigy identified possible native species for revegetation in the draft *Closure Plan*, which was provided to Indigenous groups for review in June 2020. Prodigy also identified possible berry species for inclusion in revegetation where possible to acquire, as part of the *Wildlife and Vegetation Management Plan* during 2020. See section A-2 for additional consultation details. The draft plan was provided for review/comment to Indigenous groups November 2, 2020.

“4.4 The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to verify the accuracy of the environmental assessment as it pertains to the use by migratory birds of surface water facilities in the project study area. As part of the implementation of the follow-up program, the Proponent shall:”

Response: Prodigy developed, in consultation with Indigenous groups and relevant authorities, a draft follow-up program as required in EA condition 4.4 as part of the *Wildlife and Vegetation Management Plan* during 2020. See section A-2 for additional consultation details. The draft program was provided for review/comment to the following parties:

- Indigenous groups November 2, 2020;
- The IAAC November 16, 2020;
- DFO, NRCan, MNRF, ENDM, and MECP November 19, 2020; and
- ECCC, TC, and HC November 25, 2020.

“4.4.1 Monitor, at times migratory birds may be present in the project study area, the use by migratory birds of the tailings management facility and the water quality control pond during all phases of the Designated Project until such time that water quality in the tailings management facility and the water quality control pond meet legislative requirements and water quality objectives. The water quality objectives are to be established using an ecological risk based approach, developed in consultation with Indigenous groups and relevant authorities;

4.4.2 Monitor, at times migratory birds may be present in the project study area, the use by migratory birds of the open-pit lake during decommissioning. The Proponent shall determine, in consultation with indigenous groups and relevant authorities, the frequency and duration of the monitoring during decommissioning; and

4.4.3 If results of the monitoring referred to in conditions 4.4.1 or 4.4.2 indicate that migratory birds use the tailings management facility, the water quality control pond or the open-pit lake, develop, in consultation with Indigenous groups, and implement deterrence measures pursuant to condition 2.7. The Proponent shall submit these measures to the Agency before implementing them.”

Response: As the Magino Gold Project remained in the pre-construction phase, there was no specific action on EA conditions 4.4.1 through 4.4.3 during 2020.

“4.5 The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to verify the accuracy of the environmental assessment and to determine the effectiveness of the mitigation measures to avoid harm to migratory birds, their eggs, and nests, including the mitigation measures used to comply with conditions 4.1 to 4.3. As part of the development of the

follow-up program, the Proponent shall identify performance indicators that shall be used by the Proponent to evaluate the effectiveness of the progressive reclamation referred to in condition 4.3. The Proponent shall implement the follow-up program during all phases of the Designated Project.”

Response: Prodigy developed, in consultation with Indigenous groups and relevant authorities, a draft follow-up program as required in EA condition 4.5 as part of the *Wildlife and Vegetation Management Plan* during 2020. See section A-2 for additional consultation details. The draft program was provided for review/comment to the following parties:

- Indigenous groups November 2, 2020;
- The IAAC November 16, 2020;
- DFO, NRCan, MNRF, ENDM, and MECP November 19, 2020; and
- ECCC, TC, and HC November 25, 2020.

As the program was not yet finalized, there was no implementation during 2020.

“As part of the implementation of the follow-up program, the Proponent shall:

- 4.5.1 Conduct migratory bird surveys annually for the first three years following completion of construction to assess changes in migratory bird populations caused by the Designated Project. The Proponent shall determine the methodology for the migratory bird surveys in consultation with Indigenous groups and relevant authorities. The Proponent shall determine, in consultation with Indigenous groups and relevant authorities and based on the results of the initial surveys, if additional surveys are required after the first three years following completion of construction and at what frequency and in which locations these additional surveys shall occur; and*
- 4.5.2 Monitor the effectiveness of the progressive reclamation referred to in condition 4.3, including the establishment of native plant species to create habitat for migratory birds, annually during operation and during the first three years of decommissioning and every five years thereafter. The Proponent shall monitor the effectiveness of the progressive reclamation referred to in condition 4.3 until the Proponent has determined, in consultation with Indigenous groups and relevant authorities, that the performance indicators have been met.”*

Response: As the Magino Gold Project remained in the pre-construction phase, there was no specific action on EA conditions 4.5.1 and 4.5.2 during 2020.

D. Health of Indigenous Peoples

“5.1 The Proponent shall develop, prior to construction, measures to mitigate emissions of dust and fugitive particulate generated by the Designated Project, including dust associated with mine vehicles on roads located within the property boundary, that take into account the standards and criteria set out in the Canadian Council of Ministers of the Environment's Canadian Ambient Air Quality Standards and Ontario's Ambient Air Quality Criteria. The Proponent shall submit these measures to the Agency before implementing them. The Proponent shall implement these measures during construction, operation and the first three years of decommissioning.”

Response: A *Fugitive Dust Best Management Practices Plan* (FDBMPP) was developed for the Project as a component of the Environmental Compliance Approval (ECA) (Air) application submitted to the MECP and also provided to five Indigenous groups for their review and comment in October, 2019. Prodigy

identified measures consistent as required in EA condition 5.1 and consistent with the FDBMPP as part of the draft *Air / Atmospheric Environment Management Plan* in 2020. The measures as part of the draft *Air / Atmospheric Environment Management Plan* were provided to the following parties:

- Indigenous groups November 2, 2020;
- The IAAC November 16, 2020;
- DFO, NRCan, MNRF, ENDM, and MECP November 19, 2020; and
- ECCC, TC, and HC November 25, 2020.

As the Magino Gold Project remained in the pre-construction phase, there was no implementation of the measures required in EA condition 5.1 during 2020.

“5.2 The Proponent shall undertake reagent handling and ore processing activities in an enclosed space equipped with a dust collection system.”

Response: As the Magino Gold Project remained in the pre-construction phase, there was no specific action on EA condition 5.2 during 2020.

“5.3 The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to verify the accuracy of the environmental assessment and to determine the effectiveness of the mitigation measures as it pertains to the adverse environmental effects on the health of Indigenous Peoples caused by increased concentration of air contaminants, including total suspended particulates, particulate matter (PM₁₀), fine particulate matter (PM_{2.5}), sulphur dioxide, nitrogen dioxide and cadmium. As part of the follow-up program, the Proponent shall:

5.3.1 Identify, prior to construction, monitoring locations for air contaminants within areas used by Indigenous groups for traditional purposes for which maximum concentrations of air contaminants were predicted by the Proponent during the environmental assessment, as identified in Appendix N of the final response to Information Request 01 (Canadian Environmental Assessment Registry Reference Number 80044, Document Number 26);”

Response: Prodigy developed, in consultation with Indigenous groups and relevant authorities, a draft follow-up program as required in EA condition 5.3 as part of the *Air / Atmospheric Environment Management Plan* during 2020. See section A-2 for additional consultation details. Additional detail was later provided and relevant content compiled in a separate draft Air Quality Follow-up Program document. The draft follow-up program was provided for review/comment to the following parties:

- Indigenous groups November 2, 2020 (standalone draft December 23, 2020);
- The IAAC November 16, 2020 (standalone draft December 8, 2020);
- DFO, NRCan, MNRF, ENDM, and MECP November 19, 2020 (standalone draft December 8, 2020); and
- ECCC, TC, and HC November 25, 2020 (standalone draft December 8, 2020 to ECCC; IAAC distributed to HC).

The draft Air Quality Follow-up Program outlined an air quality monitoring program, in which monitoring locations were identified in accordance with EA condition 5.3.1.

“5.3.2 Monitor, during construction, operation and the first three years of decommissioning, air contaminants at the monitoring locations identified pursuant to condition 5.3.1, using as benchmarks the standards and criteria set out in the Canadian Council of Ministers of the Environment’s Canadian Ambient Air Quality Standards and Ontario’s Ambient Air Quality Criteria. The Proponent shall monitor fine particulate matter (PM_{2.5}) in real-time, particulate matter (PM₁₀) and cadmium at a minimum every 6 days and total suspended particulates, sulphur dioxide and nitrogen dioxide at a frequency that shall allow the Proponent to monitor adverse environmental effects on human health. The Proponent shall determine the frequency of monitoring for total suspended particulates, Sulphur dioxide and nitrogen dioxide in consultation with Indigenous groups and relevant authorities during the development of the follow-up program;

5.3.3 Notify the Agency and Indigenous groups in writing within 24 hours of any exceedance(s) observed by the Proponent during monitoring referred to in condition 5.3.2 of 1-hour limits or 24-hour limits of the standards and criteria set out in the Canadian Council of Ministers of the Environment’s Canadian Ambient Air Quality Standards and Ontario’s Ambient Air Quality Criteria, except for fine particulate matter (PM_{2.5}); and

5.3.4 Determine, in consultation with Indigenous groups and relevant authorities, the thresholds for concentration of fine particulate matter (PM_{2.5}) above which the Proponent shall notify Indigenous groups.”

Response: As the Magino Gold Project remained in the pre-construction phase, there was no specific action on EA conditions 5.3.2 through 5.3.4 during 2020. EA condition 5.3.4 has been addressed as part of the Air Quality Follow-up Program and related consultations described above for EA condition 5.3.

“5.4 The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to verify the accuracy of the environmental assessment and to determine the effectiveness of mitigation measures as it pertains to the adverse environmental effects on health of Indigenous Peoples caused by contamination of water and fish.

As part of the follow-up program, the Proponent shall:

5.4.1 Identify, prior to construction, fish species that shall be monitored, waterbodies where Indigenous use is expected and where contaminants shall be monitored;”

Response: During 2020, Prodigy developed, in consultation with Indigenous groups and relevant authorities, a draft follow-up program as required in EA condition 5.4. The *Surface Water Monitoring Plan* (Appendix 6-D of the *Surface Water Monitoring Plan*) fulfills the requirements related to the follow-up program, as well as other obligations. See section A-2 for additional consultation details. The draft program was provided for review/comment to the following parties⁴:

- Indigenous groups November 2, 2020;
- The IAAC November 16, 2020;
- DFO, NRCAN, MNRF, ENDM, and MECP November 19, 2020; and
- ECCC, TC, and HC November 25, 2020.

⁴ A correction to the draft Surface Water Monitoring Plan in response to a comment from the Agency was provided to federal authorities on December 23, 2020.

The draft *Surface Water Monitoring Plan* identified fish species to be monitored, waterbodies where Indigenous use is expected and where contaminants will be monitored as required in EA condition 5.4.1.

"As part of the follow-up program, the Proponent shall:...

- 5.4.2 Monitor mercury, methylmercury, cobalt, lead and arsenic in surface water in Otto Lake and other downstream waterbodies identified pursuant to condition 5.4.1 during all phases of the Designated Project;"*
- 5.4.3 Monitor mercury, methylmercury, cobalt, lead and arsenic in surface water in Goudreau Lake and other downstream waterbodies identified pursuant to condition 5.4.1 during decommissioning;"*
- 5.4.4 Monitor mercury, methylmercury, lead, arsenic and cobalt in fish tissue in Otto Lake and other downstream waterbodies identified pursuant to condition 5.4.1 every three years during all phases of the Designated Project, starting the first year of construction, and every five years after the end of decommissioning. The Proponent shall determine, in consultation with Indigenous groups and relevant authorities, if additional monitoring must be implemented after the end of decommissioning; and"*
- 5.4.5 monitor mercury, methylmercury, lead, arsenic and cobalt in fish tissue in Goudreau Lake and other downstream waterbodies identified pursuant to condition 5.4.1 every three years starting at the beginning of decommissioning and for a duration that shall be determined in consultation with Indigenous groups and relevant authorities."*

Response: As the program was not yet finalized, there was no specific action on EA conditions 5.4.2 through 5.4.5 during 2020.

E. Current Use of Lands and Resources for Traditional Purposes

"6.1 The Proponent shall develop, prior to construction and in consultation with Indigenous groups, a communication plan to share information related to the Designated Project and the adverse environmental effects of the Designated Project with Indigenous groups. The Proponent shall implement and maintain the communication plan up-to-date during all phases of the Designated Project. The communication plan shall include procedures, including timing and methods, for sharing information on the following:

- 6.1.1 the location and timing of Designated Project activities that may affect quality of experience to Indigenous uses of lands for traditional purposes caused by changes in dust, noise or light within the property boundary and that may permanently or temporarily affect navigation within the project study area;*
- 6.1.2 the results of the follow-up program referred to in conditions 3.16, 3.17, 3.18, 3.19, 4.4, 4.5, 5.3, 5.4, 6.5, 6.6, 7.2, and 7.3, including any potential health risks, in plain language, and the modified or additional mitigation measures developed and implemented by the Proponent pursuant to condition 2.7 for each follow-up program.*

6.2 The Proponent shall develop, as part of the communication plan referred to in condition in 6.1, procedures for Indigenous groups to provide feedback to the Proponent about adverse environmental effects caused by the Designated Project related to access to and use of lands for traditional purposes, and procedures for the Proponent to document and respond in a timely manner to the feedback received and demonstrate how issues have been addressed, including through the implementation of additional or modified mitigation measures. The Proponent shall implement these procedures during all phases of the Designated Project.

Response: Prodigy developed, in consultation with Indigenous groups, a draft communication plan as required in EA condition 6.1 as part of the *Indigenous Engagement Plan* during 2020. See section A-2 for additional consultation details. The draft plan was provided for review/comment to Indigenous groups (November 2, 2020) and shared with the following parties:

- The IAAC November 16, 2020;
- DFO, NRCan, MNRF, ENDM, and MECP November 19, 2020; and
- ECCC, TC, and HC November 25, 2020.

The draft *Indigenous Engagement Plan* identified procedures for Indigenous groups to provide feedback, and for Prodigy to document, respond to feedback, and demonstrate how issues have been addressed as required in EA condition 6.2. In addition, Prodigy prepared a draft *Traditional Use of Lands and Resources Management Plan* in 2020, in accordance with Environmental Impact Statement (EIS) Commitments and EA conditions, which was provided for review/comment to Indigenous groups (November 2, 2020).

6.3 The Proponent shall develop, prior to construction and in consultation with Indigenous groups, a Historic Resources Management Plan for structures, sites, or things of historical, archaeological, paleontological, or architectural significance. The Proponent shall implement the plan during all phases of the Designated Project. As part of the plan, for any previously unidentified structures, sites or things of historical, archaeological, paleontological or architectural significance discovered within the property boundary by the Proponent or brought to the attention of the Proponent by an Indigenous group or another party during any phase of the Designated project, the Proponent shall:

- 6.3.1 immediately halt work at the location of the discovery, except for actions required to be undertaken to protect the integrity of the discovery;*
- 6.3.2 delineate an area with a radius of at least 30 metres around the discovery as a no-work zone and monitor any work conducted within 50 metres around the discovery;*
- 6.3.3 conduct an assessment at the location of the discovery;*
- 6.3.4 inform the Agency and Indigenous groups within 24 hours of the discovery, and allow Indigenous groups to monitor and participate in the archeological work; and*
- 6.3.5 consult Indigenous groups and relevant authorities on the manner by which to comply with all applicable legislative or legal requirements and associated regulations and protocols respecting the discovery, recording, transferring and safekeeping of previously unidentified structures, sites or things of historical, archaeological, paleontological or architectural significance.*

Response: Prodigy developed, in consultation with Indigenous groups, a draft *Historic Resources Management Plan* as required in EA condition 6.3 during 2020. See section A-2 for additional consultation details. The draft plan was provided for review/comment to Indigenous groups (November 2, 2020) and shared with the following parties:

- The IAAC November 16, 2020;
- DFO, NRCan, MNRF, ENDM, and MECP November 19, 2020; and
- ECCC, TC, and HC November 25, 2020.

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 shall submit these measures to the Agency before implementing them.*

Response: Regarding EA condition 6.4.1, Prodigy identified possible native species for revegetation in the draft *Closure Plan*, which was provided to Indigenous groups for review in June 2020. Prodigy also identified possible berry species for inclusion in revegetation where possible to acquire, as part of the *Wildlife and Vegetation Management Plan* during 2020. See section A-2 for additional consultation details. The draft plan was provided for review/comment to Indigenous groups November 2, 2020. Prodigy developed, in consultation with Indigenous groups and relevant authorities, draft measures as required in EA condition 6.4.2 as part of the draft *Invasive Species Management Plan* during 2020. In addition, Prodigy developed, in consultation with Indigenous groups and relevant authorities, protection measures to mitigate environmental harms associated with terrestrial vegetation (e.g., for revegetation /rehabilitation activities) as part of the draft *Wildlife and Vegetation Management Plan* during 2020. See section A-2 for additional consultation details. The draft measures/Plans were provided for review/comment to the following parties:

- Indigenous groups November 2, 2020;
- The IAAC November 16, 2020;
- DFO, NRCan, MNRF, ENDM, and MECP November 19, 2020; and
- ECCC, TC, and HC November 25, 2020.

As the measures were not yet finalized, there was no implementation during 2020.

*6.5 The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, and implement, during all phases of the Designated Project, a follow-up program to verify the accuracy of the environmental assessment as it pertains to the adverse environmental effects of the Designated Project on the current use of lands and resources for traditional purposes caused by changes in the use of the project study area by mammals, including black bear (*Ursus americanus*) and moose (*Alces alces*). As part of the development of the follow-up program, the Proponent shall identify, in consultation with Indigenous groups and relevant authorities, species of mammals, in addition to black bear (*Ursus americanus*) and moose (*Alces alces*), that shall be monitored. If the results of the monitoring indicate that these mammal species use the property, the Proponent shall implement modified or additional mitigation measures pursuant to condition 2.7 to prevent the identified species of mammals from accessing Designated Project components.*

Response: In 2020, Prodigy developed, in consultation with Indigenous groups and relevant authorities, a draft follow-up program as required in EA condition 6.5 as part of the draft *Wildlife and Vegetation Management Plan*. See section A-2 for additional consultation details. The draft program/Plan was provided for review/comment to the following parties:

- Indigenous groups November 2, 2020;
- The IAAC November 16, 2020;
- DFO, NRCan, MNRF, ENDM, and MECP November 19, 2020; and
- ECCC, TC, and HC November 25, 2020.

As the program was not yet finalized, there was no implementation during 2020.

6.6 The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, and implement during all phases of the Designated Project, a follow-up program to verify the accuracy of the environmental assessment and determine the effectiveness of mitigation measures, including the mitigation measures referred to in conditions 6.1 to 6.4, as it pertains to the adverse environmental effects of the Designated Project on the current use of lands and resources for traditional purposes. The Proponent shall implement the follow-up program during all phases of the Designated Project."

Response: Prodigy developed, in consultation with Indigenous groups and relevant authorities, a draft follow-up program as required in EA condition 6.6 as part of the draft *Traditional Use of Lands and Resources Management Plan* during 2020. See section A-2 for additional consultation details. The draft program/Plan was provided for review/comment to the following parties:

- Indigenous groups November 2, 2020;
- The IAAC November 16, 2020;
- DFO, NRCan, MNRF, ENDM, and MECP November 19, 2020; and
- ECCC, TC, and HC November 25, 2020.

As the program was not yet finalized, there was no implementation during 2020.

F. Wetlands

“7.1 The Proponent shall restore a minimum of 40 hectares of wetland within the property boundary. The Proponent shall determine, in consultation with Environment and Climate Change Canada, methods for restoration that are technically and economically feasible and that are appropriate for the project study area.”

Response: As the Magino Gold Project remained in the pre-construction phase, there was no specific action on EA condition 7.1 during 2020. As restoration of the wetland area will be done as part of the reclamation of the Tailings Management Facility at closure, specific planning or action related to this EA condition will be initiated toward the end of the operations phase.

“7.2 The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to determine the effectiveness of restoration referred to in condition 7.1. As part of the development of the follow-up program, the Proponent shall identify performance indicators that shall be used by the Proponent to evaluate the effectiveness of the restoration. The Proponent shall monitor the effectiveness of the restoration from the start of the restoration until performance indicators are met.”

Response: Prodigy developed, in consultation with Indigenous groups and relevant authorities, a draft follow-up program as required in EA condition 7.2 as part of the draft *Wildlife and Vegetation Management Plan* during 2020. See section A-2 for additional consultation details. The draft program was provided for review/comment to the following parties:

- Indigenous groups November 2, 2020;
- The IAAC November 16, 2020;
- DFO, NRCan, MNRF, ENDM, and MECP Nov 19ember, 2020; and
- ECCC, TC, and HC November 25, 2020.

As the Magino Gold Project remained in the pre-construction phase, there was no monitoring related to this follow-up program during 2020. As restoration of the wetland area under EA condition 7.1 will be done as part of the reclamation of the Tailings Management Facility at closure, specific planning or action related to this EA condition will be initiated toward the end of the operations phase.

*“7.3 The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to verify the accuracy of the environmental assessment as it pertains to the presence of snapping turtle (*Chelydra serpentina*) or snapping turtle eggs within the project study area. The Proponent shall implement the follow-up program during construction and operation. If the Proponent observes snapping turtle or snapping turtle eggs, the Proponent shall develop, in consultation with Indigenous groups and relevant authorities, modified or additional mitigation measures pursuant to condition 2.7, which shall include, at a minimum, the installation of exclusion fences around snapping turtle habitat, if technically feasible, or the relocation of snapping turtles outside of the project study area. The Proponent shall submit these measures to the Agency before implementing them.”*

Response: Prodigy developed, in consultation with Indigenous groups and relevant authorities, a draft follow-up program and measures related to snapping turtles as required in EA condition 7.3 as part of the draft *Wildlife and Vegetation Management Plan* during 2020. See section A-2 for additional consultation details. The draft program and measures were provided for review/comment to the following parties:

- Indigenous groups November 2, 2020;
- The IAAC November 16, 2020;
- DFO, NRCan, MNRF, ENDM, and MECP November 19, 2020; and
- ECCC, TC, and HC November 25, 2020.

As the Magino Gold Project remained in the pre-construction phase, there was no implementation during 2020.

G. Accidents and Malfunctions

“8.1 The Proponent shall take all reasonable measures to prevent accidents and malfunctions that may result in adverse environmental effects.”

Response: As the Magino Gold Project remained in the pre-construction phase, there was no specific action on EA condition 8.1 during 2020. Prior to the filing of an updated *Closure Plan* for the Magino Gold Project in December 2020 (prior to construction), the site was under the previous provincial *Closure Plan* and subject to reporting requirements for existing authorizations.

“8.2 The Proponent shall, prior to construction, consult with Indigenous groups and relevant authorities on the measures to be implemented to prevent accidents and malfunctions.

8.3 The Proponent shall, prior to construction and in consultation with Indigenous groups and relevant authorities, develop an accident and malfunction response plan in relation to the Designated Project. The accident and malfunction plan shall include:

- 8.3.1 the types of accidents and malfunctions that may cause adverse environmental effects;*
- 8.3.2 the measures to be implemented in response to each type of accident and malfunction referred to in condition 8.3.1 to mitigate any adverse environmental effect(s) caused by the accident or malfunction; and*
- 8.3.3 the role of Indigenous groups in the implementation of the accident and malfunction plan.”*

Response: Prodigy developed, in consultation with Indigenous groups and relevant authorities, a draft *Accident and Malfunction Response Plan* as required in EA conditions 8.2 and 8.3 during 2020. See section A-2 for additional consultation details. The draft plan was provided for review/comment to the following parties:

- Indigenous groups November 2, 2020;
- The IAAC November 16, 2020;
- DFO, NRCan, MNRF, ENDM, and MECP November 19, 2020; and
- ECCC, TC, and HC November 25, 2020.

“8.4 In the event of an accident or malfunction with the potential to cause adverse environmental effects, the Proponent shall immediately implement the measures appropriate to the accident or malfunction as described in the accident and malfunction response plan referred to in condition 8.3.2 and shall:

8.4.1 Notify, as soon as possible, Indigenous groups and relevant authorities of the accident or malfunction, and notify the Agency in writing no later than 24 hours following the accident or malfunction. For the notification to Indigenous groups and the Agency, the Proponent shall specify:

8.4.1.1 the date the accident or malfunction occurred;

8.4.1.2 a description of the accident or malfunction;

8.4.1.3 a list of any substances potentially released in the environment as a result of the accident or malfunction.

8.4.2 Submit a written report to the Agency no later than 30 days after the day on which the accident or malfunction occurred. The written report shall include:

8.4.2.1 a detailed description of the accident or malfunction and of its adverse environmental effects and any associated potential health risks;

8.4.2.2 a description of the measures that were taken by the Proponent to mitigate the adverse environmental effects caused by the accident or malfunction;

8.4.2.3 any view(s) from Indigenous groups and advice from relevant authorities received with respect to the accident or malfunction, its adverse environmental effects, the associated potential health risks and the measures taken by the Proponent to mitigate these adverse environmental effects;

8.4.2.4 a description of any residual adverse environmental effects and any modified or additional measures required by the Proponent to mitigate residual adverse environmental effects; and

8.4.2.5 details concerning the implementation of the accident or malfunction response plan referred to in condition 8.3.

8.4.3 Submit a written report to the Agency no later than 90 days after the day on which the accident or malfunction occurred that includes a description of changes made to avoid a subsequent occurrence of the accident or malfunction and of the modified or additional measure(s) implemented by the Proponent to mitigate and monitor residual adverse environmental effects and to carry out any required progressive reclamation, taking into account the information submitted in the written report pursuant to condition 8.4.2. The report shall include all additional views from Indigenous groups and advice from relevant authorities received by the Proponent since the views and advice referred to in condition 9.4.2.3 were received by the Proponent.”

Response: In 2020, the Magino Gold Project remained in the pre-construction phase; there were no accidents or malfunctions in 2020, and therefore no specific action on EA conditions 8.4.1 through 8.4.3 during 2020.

“8.5 The Proponent shall develop a communication plan in consultation with Indigenous groups. The Proponent shall develop the communication plan prior to construction and shall implement and keep it up to date during all phases of the Designated Project. The plan shall include:

- 8.5.1 the types of accident and malfunction requiring the Proponent to notify the respective Indigenous groups;*
- 8.5.2 the manner by which Indigenous groups shall be notified by the Proponent of an accident or malfunction and of any opportunities for the Indigenous groups to assist in the response to the accident or malfunction; and*
- 8.5.3 the contact information of the representatives of the Proponent that the Indigenous groups may contact and of the representatives of the respective Indigenous groups to which the Proponent provides notification.”*

Response: Prodigy developed, in consultation with Indigenous groups, a draft *Communication Plan* as required in EA condition 8.5 as part of the draft *Accident and Malfunction Response Plan* during 2020. See section A-2 for additional consultation details. The draft plan, including the *Communication Plan* for accidents and malfunctions, was provided for review/comment to Indigenous groups (November 2, 2020) and shared with the following parties:

- The IAAC November 16, 2020;
- DFO, NRCan, MNRF, ENDM, and MECP November 19, 2020; and
- ECCC, TC, and HC November 25, 2020.

It is noted that the *Indigenous Engagement Plan* (EA condition 6.1, above) provides supporting information for the *Communication Plan* in the *Accident and Malfunction Response Plan*⁵. As the *Communication Plan* was draft, there was no implementation during 2020.

H. Schedules

“9.1 The Proponent shall submit to the Agency a schedule for all conditions set out in this Decision Statement no later than 60 days prior to the start of construction. This schedule shall detail all activities planned to fulfill each condition set out in this Decision Statement and the commencement and estimated completion month(s) and year(s) for each of these activities.

9.2 The Proponent shall submit to the Agency a schedule outlining all activities required to carry out all phases of the Designated Project no later than 60 days prior to the start of construction. The schedule shall indicate the commencement and estimated completion month(s) and year(s) and duration of each of these activities.

⁵ The *Indigenous Engagement Plan* provides information on the Indigenous groups to be notified, with a single master ‘Indigenous Community Contact List’ as Appendix 2.3 of the CEMP. The contact list provides key information for both elected leadership, key staff, and their technical experts/consultants; it is to be utilized for various communications with Indigenous groups and is updated periodically as necessary. Using this approach to the contact list will ensure that there are no errors or omissions that may occur if the list is included as part of multiple sections/Plans within the CEMP.

9.3 The Proponent shall submit to the Agency in writing an update to schedules referred to in conditions 9.1 and 9.2 every year no later than March 31, until completion of all activities referred to in each schedule.

9.4 The Proponent shall provide to the Agency revised schedules if any change is made to the initial schedules referred to in conditions 9.1 and 9.2 or to any subsequent update(s) referred to in condition 9.3, upon revision of the schedules.

9.5 The Proponent shall provide Indigenous groups with the schedules referred to in conditions 9.1 and 9.2 and the updates or revisions to the initial schedules pursuant to condition 9.3 and 9.4 at the same time the Proponent provides these documents to the Agency.”

Response: In October 2020, Prodigy submitted the initial versions of the two schedules (*Schedule of Decision Statement Conditions, EA Condition 9.1; and Schedule of All Activities, EA Condition 9.2*) to the IAAC in advance of construction, as required in EA conditions 9.1 and 9.2.

In accordance with EA condition 9.5, Prodigy also provided the initial schedules to Indigenous groups (MFN, MCFN, BFN, MNO, GRFN, and RSMIN) in October 2020.

As required in EA condition 9.3, Prodigy is submitting the update to these two schedules by March 31, 2021 as part of this Annual Report in Appendices B and C.

No revisions were made to the initial October 2020 schedules later in 2020; as such, no revised schedules were provided to the IAAC in 2020 under EA condition 9.4.

I. Record Keeping

“10.1 The Proponent shall maintain all records relevant to the implementation of the conditions set out in this Decision Statement. The Proponent shall retain the records and make them available to the Agency throughout construction and operation and for 25 years following the end of operation or until the end of decommissioning of the Designated Project, whichever comes first. The Proponent shall provide the aforementioned records to the Agency upon demand within a timeframe specified by the Agency.

10.2 The Proponent shall retain all records referred to in condition 10.1 at a facility in Canada and shall provide the address of the facility to the Agency. The Proponent shall notify the Agency at least 30 days prior to any change to the physical location of the facility where the records are retained, and shall provide to the Agency the address of the new location.

10.3 The Proponent shall notify the Agency of any change to the contact information of the Proponent included in this Decision Statement.”

Response: Prodigy has maintained all records relevant to the implementation of the conditions set out in the January 24, 2019 Decision Statement. In 2020, these records were retained at Argonaut Gold’s Toronto office:

First Canadian Place
100 King St. W., Suite 5700
Toronto, Ontario
M5X 1C7 Canada

These records were also maintained at the Project site office:

3 Dree Road
PO Box 209
Dubreuilville, Ontario
P0S 1B0 Canada

There was no change in the physical location of the facility(ies) where records are retained, or in the contact information for Prodigy noted in the Decision Statement (Kyle Stanfield, Director Environment and Community Relations).

APPENDIX A: CONCORDANCE TABLE - EA CONDITIONS (JANUARY 2019) VS. ANNUAL REPORT SECTIONS

January 24, 2019 EA Conditions: Applicable Sections	EA Condition(s)	Annual Report Section
General Conditions		
Qualified Individuals / Best Practices	Condition 2.1	Section 2.A-1
Consultation	Conditions 2.2-2.3	Section 2.A-2
Follow-up and Adaptive Management	Conditions 2.4-2.8	Section 2.A-3
Annual Reporting	Conditions 2.9-2.10	Section 2.A-4
Information Sharing	Conditions 2.11-2.12	Section 2.A-5
Change of Proponent	Condition 2.13	Section 2.A-6
Change to the Designated Project	Conditions 2.14-2.15	Section 2.A-7
Fish and Fish Habitat	Conditions 3.1-3.19	Section 2.B
Migratory Birds	Conditions 4.1-4.5	Section 2.C
Health of Indigenous Peoples	Conditions 5.1-5.4	Section 2.D
Current Use of Lands and Resources for Traditional Purposes	Conditions 6.1-6.6	Section 2.E
Wetlands	Conditions 7.1-7.3	Section 2.F
Accidents and Malfunctions	Conditions 8.1-8.5	Section 2.G
Schedules	Conditions 9.1-9.5	Section 2.H, Appendices B and C
Record Keeping	Conditions 10.1-10.3	Section 2.I

APPENDIX B: SCHEDULE OF DECISION STATEMENT CONDITIONS (EA CONDITION 9.1)

Table 1: Schedule of Key Project Milestones

Project Phase	Years	Estimated Duration
Construction	2 years	February 2021 – January 2023 (construction)
Operation	15 years	January 2023 – December 2038
Decommissioning (i.e., Active Closure)	3 years	January 2039 – December 2041
Abandonment (i.e., Post-Closure)	Approximately 50 years; includes 7 years of Active Monitoring until closure objectives are satisfied (in addition to Active Monitoring undertaken during Decommissioning) followed by Passive Abandonment	January 2042 – December 2048 (Active Monitoring); January 2042-December 2091 (full Abandonment including Passive Abandonment)

Table 2: Magino Gold Project Decision Statement Condition Implementation Schedule– EA Condition 9.1

Magino Gold Project Decision Statement Condition Implementation Schedule – EA Condition 9.1				
Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
	General Conditions			
	Qualified Individuals / Best Practices			
2.1	“The Proponent shall ensure that its actions in meeting the conditions set out in this Decision Statement during all phases of the Designated Project are considered in a careful and precautionary manner, promote sustainable development, are informed by the best information and knowledge available at the time the Proponent takes action, including community and Indigenous traditional knowledge, are based on methods and models that are recognized by standard-setting bodies, are undertaken by qualified individuals, and have applied the best available economically and technically feasible technologies.”	January 2019	End of all Project phases (on or about December 2091)	
	Consultation			
2.2	<p>“The Proponent shall, where consultation is a requirement of a condition set out in this Decision Statement:</p> <p>2.2.1 provide a written notice of the opportunity for the party or parties being consulted to present their views and information on the subject of the consultation;</p> <p>2.2.2 provide all information available and relevant on the scope and the subject matter of the consultation and a period of time taking into account the views of</p>	January 2019	End of all Project phases (on or about December 2091)	Prodigy has continued to consult with stakeholders and Indigenous communities on conditions and related topics since the Decision Statement was issued by the IAAC.

Magino Gold Project Decision Statement Condition Implementation Schedule – EA Condition 9.1				
Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
	<p>the party or parties being consulted, not to be less than 15 days, to prepare their views and information;</p> <p>2.2.3 undertake an impartial consideration of all views and information presented by the party or parties being consulted on the subject matter of the consultation; and</p> <p>2.2.4 advise in a timely manner the party or parties being consulted on how the views and information received have been considered by the Proponent.”</p>			
2.3	<p>“The Proponent shall, where consultation with Indigenous groups is a requirement of a condition set out in this Decision Statement, communicate with each Indigenous group with respect to the manner to satisfy the consultation requirements referred to in condition 2.2, including methods of notification, the type of information and the period of time to .be provided when seeking input, the process to be used by the Proponent to undertake impartial consideration of all views and information presented on the subject of the consultation, and the period of time and the means to advise Indigenous groups of how their views and information were considered by the Proponent.”</p>	January 2019	End of all Project phases (on or about December 2091)	
Follow-up and Adaptive Management				
2.4	<p>“The Proponent shall, where a follow-up program is a requirement of a condition set out in this Decision Statement, determine, as part of the development of each follow-up program and in consultation with the</p>	October 2020	January 2021	

Magino Gold Project Decision Statement Condition Implementation Schedule – EA Condition 9.1				
Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
	<p>party or parties being consulted during the development, the following information:</p> <p>2.4.1 the methodology, location, frequency, timing and duration of monitoring associated with the follow-up program;</p> <p>2.4.2 the scope, content and frequency of reporting of the results of the follow-up program;</p> <p>2.4.3 the levels of environmental change relative to baseline conditions that would require the Proponent to implement modified or additional mitigation measure(s), including instances where the Proponent may require Designated Project activities to be stopped; and</p> <p>2.4.4 the technically and economically feasible mitigation measures to be implemented by the Proponent if monitoring conducted as part of the follow-up program shows that the levels of environmental change referred to in condition 2.4.3 have been reached or exceeded and the timing for implementing the modified or additional mitigation measures.”</p>			
2.5	<p>“The Proponent shall maintain the information referred to in condition 2. 4 during the implementation of each follow-up program in consultation with the party or</p>	January 2021	End of all Project phases (on or about December 2091)	

Magino Gold Project Decision Statement Condition Implementation Schedule – EA Condition 9.1				
Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
	parties being consulted during the development of each follow-up program.”			
2.6	“The Proponent shall provide the follow-up programs referred to in conditions 3.16, 3.17, 3.18, 3.19, 4.4, 4.5, 5.3, 5.4, 6.5, 6.6, 7.2 and 7.3 to the Agency and to the party or parties being consulted during the development of each follow-up program prior to the implementation of each follow-up program. The Proponent shall also provide any update(s) to the Agency and to the party or parties being consulted during the development of each follow-up program within 30 days of the follow-up program being updated.”	January 2021	On or about January 2024-	Updates to be provided if/when necessary
2.7	<p>“The Proponent shall, where a follow-up program is a requirement of a condition set out in this Decision Statement and in consultation with the party or parties being consulted during the development of the follow-up program:</p> <p>2.7.1 conduct the follow-up program according to the information determined pursuant to condition 2.4;</p> <p>2.7.2 undertake monitoring and analysis to verify the accuracy of the environmental assessment as it pertains to the particular condition and/or to determine the effectiveness of any mitigation measure(s);</p> <p>2.7.3 determine whether modified or additional mitigation measures are required based on the</p>	no sooner than February 2021	On or about December 2048	<p>Follow up programs have been developed and outline the requirements for monitoring and implementation of mitigations.</p> <p>Follow-up programs allow for adaptive management to ensure mitigations where required are changed or amended to manage the identified impact</p>

Magino Gold Project Decision Statement Condition Implementation Schedule – EA Condition 9.1				
Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
	<p>monitoring and analysis undertaken pursuant to condition 2.7.2; and</p> <p>2.7.4 if modified or additional mitigation measures are required pursuant to condition 2.7.3, develop and implement these mitigation measures in a timely manner and monitor them pursuant to condition 2.7.2.”</p>			Project follow-up programs will verify the accuracy of the EA and describe the process for mitigating any additional effects identified during monitoring
2.8	<p>“Where consultation with Indigenous groups is a requirement of a follow-up program, the Proponent shall discuss with each Indigenous group opportunities for their participation in the development and implementation of the follow-up program, including the analysis of the follow-up results and whether modified or additional mitigation measures are required, as set out in condition 2.7”</p>	October 2020	On or about December 2038	
Annual Reporting				
2.9	<p>“The Proponent shall, commencing in the reporting year during which the Proponent begins the implementation of the conditions set out in this Decision Statement, prepare an annual report that sets out:</p> <p>2.9.1 the activities undertaken by the Proponent in the reporting year to comply with each of the conditions set out in this Decision Statement;</p> <p>2.9.2 how the Proponent complied with condition 2.1;</p>	January 2019	On or about December 2041	

Magino Gold Project Decision Statement Condition Implementation Schedule – EA Condition 9.1				
Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
	<p>2.9.3 for conditions set out in this Decision Statement for which consultation is a requirement, how the Proponent considered any views and information that the Proponent received during or as a result of the consultation;</p> <p>2.9.4 the information referred to in conditions 2.4 and 2.5 for each follow-up program;</p> <p>2.9.5 the results of the follow-up program requirements identified in conditions 3.16, 3.17, 3.18,3.19, 4.4, 4.5, 5.3, 5.4, 6.5, 6.6, 7.2 and 7.3;</p> <p>2.9.6 any modified or additional mitigation measures implemented or proposed to be implemented by the Proponent, as determined under condition 2.7;</p> <p>2.9.7 any change(s) to the Designated Project in the reporting year for which the Proponent determined that condition 2.14 did not apply.”</p>			
2.10	“The Proponent shall submit to the Agency the annual report referred to in condition 2.9, including a plain language executive summary in both official languages, no later than March 31 following the reporting year to which the annual report applies.”	March 2020 (2019 Annual Report)	On or about December 2041	The first annual report for 2019 was submitted in March 2020; the 2020 annual report was submitted in March 2021.
	Information Sharing			
2.11	“The Proponent shall publish on the Internet, or any medium which is publicly available, the annual reports	April 2020 (2019 Annual Report)	On or about December 2063	Documents are/will be published on the Prodigy

Magino Gold Project Decision Statement Condition Implementation Schedule – EA Condition 9.1				
Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
	and the executive summaries referred to in conditions 2.9 and 2.10, the offsetting plan(s) referred to in condition 3.14, the reports related to accidents and malfunctions referred to in conditions 8.4.2 and 8.4.3, the communication plans referred to in conditions 6.1 and 8.5, the schedules referred to in conditions 9.1, and 9.2, and any update(s) or revision(s) to the above documents, upon submission of these documents to the parties referenced in the respective conditions. The Proponent shall keep these documents publicly available for 25 years following the end of operation, or until the end of decommissioning of the Designated Project, whichever comes first. The Proponent shall notify the Agency and Indigenous groups of the availability of these documents within 48 hours of their publication.”			Gold website at https://www.argonautgold.com/English/assets/development/magino/default.aspx as they are submitted to the IAAC
2.12	“When the development of a plan is a requirement of a condition set out in this Decision Statement, the Proponent shall submit the plan to the Agency prior to construction, unless otherwise required through the condition.”	November 2020	January 2021	
Change of Proponent				
2.13	“The Proponent shall notify the Agency and Indigenous groups in writing no later than 30 days after the day on which there is a transfer of ownership, care, control or management of the Designated Project in whole or in part.”	As required	End of all Project phases (on or about December 2021)	No transfer has occurred to date
Change to the Designated Project				

Magino Gold Project Decision Statement Condition Implementation Schedule – EA Condition 9.1				
Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
2.14	“The Proponent shall consult with Indigenous groups, Pic Mobert First Nation and relevant authorities prior to initiating any changes to the Designated Project that may result in adverse environmental effects, and shall notify the Agency in writing no later than 60 days prior to initiating the change(s).”	As required	End of all Project phases (on or about December 2091)	No changes to the Designated Project that may result in adverse environmental effects have been proposed/initiated to date
2.15	“In notifying the Agency pursuant to condition 2.14, the Proponent shall provide the Agency with a description of the potential adverse environmental effects of the change(s) to the Designated Project, the proposed mitigation measures and follow-up requirements to be implemented by the Proponent and the results of the consultation with Indigenous groups, Pic Mobert First Nation and relevant authorities.”	As required	End of all Project phases (on or about December 2091)	No changes to the Designated Project that may result in adverse environmental effects have been proposed/initiated to date
Fish and Fish Habitat				
3.1	“The Proponent shall develop, prior to construction, and implement, during all phases of the Designated Project, measures to control erosion and sedimentation within the project study area. The Proponent shall submit these measures to the Agency before implementing them. Among other measures, the Proponent shall:	October 2020	On or about December 2041	
	3.1.1 use ditches and diversion berms to maintain stream bank stability; and	February 2021		
	3.1.2 use physical barriers to reduce runoff from disturbed areas.”	February 2021		

Magino Gold Project Decision Statement Condition Implementation Schedule – EA Condition 9.1				
Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
3.2	“The Proponent shall comply with the Metal and Diamond Mining Effluent Regulations and the pollution prevention provisions of the Fisheries Act.”	February 2021	End of all Project phases (on or about December 2091)	
3.3	“The Proponent shall collect, during construction and operation, contact water for reuse in Designated Project activities, and treat excess contact water that cannot be reused.”	March 2021	On or about December 2038	
3.4	“The Proponent shall control the flow at which excess water referred to in condition 3.3 is discharged to limit disturbance of lake bed material.”	On or about February 2021	On or about December 2038	
3.5	“The Proponent shall install, prior to operation, and use a cyanide destruction circuit during operation to reduce cyanide concentrations in tailings before the tailings are directed to the tailings management facility.”	Q4 2022	On or about December 2038	
3.6	“The Proponent shall, after the end of operation and until the open-pit lake is filled, collect and direct contact water to the open-pit lake.”	On or about January 2039	On or about December 2088	
3.7	“The Proponent shall, prior to operation, implement seepage control measures at the tailings management facility and maintain these measures during operation and decommissioning.”	Q4 2022	On or about December 2041	
3.8	“The proponent shall not connect the open-pit lake until such time as water in the open-pit lake complies with the pollution prevention provisions of the <i>Fisheries Act</i> .”	June 2039	June 2082	Corresponds to 43 years of pit filling, commencing at the end of operations phase. May start up to 3 years earlier, if mining stops and only ore stockpile processing is happening at end of life

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3.9	“The Proponent shall treat water taking into account the Canadian Council of Ministers of the Environment’s <i>Canadian Water Quality Guidelines for Protection of Aquatic Life</i> .”	Q1 2023	On or about December 2038	
3.10	“The Proponent shall develop, prior to the start of blasting activities in or near water and in consultation with Indigenous groups, and implement, during blasting activities in or near water, mitigation measures to avoid or prevent adverse effects to fish and fish habitat from the use of explosives in a manner consistent with the <i>Fisheries Act</i> and its regulations. When developing these measures, the Proponent shall take into account Fisheries and Oceans Canada’s Measures to avoid causing harm to fish and fish habitat including aquatic species at risk as it pertains to the use of explosives in or near water. The Proponent shall submit these measures to the Agency before implementing them.”	October 2020	On or about December 2038	
3.11	“The Proponent shall conduct in-water construction activities during timing windows of least risk for the area, unless otherwise agreed to by relevant federal and provincial authorities. If in-water construction activities cannot be conducted during identified timing windows of least risk, the Proponent shall develop and implement additional mitigation measures, in consultation with Indigenous groups and Fisheries and Oceans Canada, to protect fish during sensitive life stages.”	February 2021	On or about January 2023	
3.12	“The Proponent shall salvage and relocate fish prior to conducting any Designated Project activity requiring	October 2020	December 2021	

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	removal of fish habitat in a manner consistent with any license issued under the <i>Fisheries Act</i> and its regulations. The Proponent shall salvage and relocate fish in consultation with Indigenous groups and to the satisfaction of Fisheries and Oceans Canada and other relevant authorities.”			
3.13	“The Proponent shall design, install and operate the water intake structures in Goudreau Lake in a manner which reduces the incidental capture of fish by entrainment and impingement through the use of an appropriately sized fish screen, taking into account Fisheries and Oceans Canada's Freshwater Intake End-of-Pipe Fish Screen Guideline and in a manner consistent with the <i>Fisheries Act</i> and its regulations.”	August 2022	On or about March 2041	
3.14	“The Proponent shall develop, to the satisfaction of Fisheries and Oceans Canada and Environment and Climate Change Canada and in consultation with Indigenous groups, any offsetting plan(s) related to any residual serious harm to fish associated with the carrying out of the Designated Project. The Proponent shall implement the plan. The Proponent shall submit any approved offsetting plan(s) to the Agency prior to implementation.”	January 2019	On or about January 2033	Contingency measures to be implemented and additional monitoring to be undertaken if monitoring at the end of 10 years following construction indicates that compensation/offset measures are not completed as specified in the plans, and/or are not functioning as predicted.
3.15	“The Proponent shall, for any fish habitat offsetting measure(s) proposed in any offsetting plan(s) referred to in condition 3.14 that may cause adverse	N/A	N/A	No measures are proposed in plan(s) referred to in EA

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	environmental effects not considered in the environmental assessment, develop and implement, following consultation with Indigenous groups, Fisheries and Oceans Canada and Environment and Climate Change Canada, measures to mitigate those effects. The Proponent shall submit these measures to the Agency before implementing them.”			condition 3.14 that may cause adverse environmental effects not considered in the environmental assessment
3.16	<p>“The Proponent shall develop, prior to the start of blasting activities in or near water and in consultation with Indigenous groups and relevant authorities, a follow-up program to determine the effectiveness of the mitigation measures as it pertains to the adverse environmental effects on fish and fish habitat, including spawning habitat, caused by blasting. The Proponent shall implement the follow-up program during blasting activities. As part of the implementation of the follow-up program, the Proponent shall:</p> <p>3.16.1 monitor instantaneous pressure and particle velocity during the first blasting event;</p> <p>3.16.2 if results of the monitoring referred to in condition 3.16.1 indicate an instantaneous pressure change greater than 100 kiloPascals in the swimbladder of fish or that blasting produces a peak particle velocity greater than 13 millimetre per second in a spawning bed, develop, prior to the next blasting event and in consultation with relevant authorities, modified or additional mitigation measures pursuant to condition</p>	October 2020	On or about January 2023	Prodigy Gold has consulted on the development and implementation of all required plans, follow-up programs and measures, and is committed to ongoing engagement on implementation. Plans outline requirements for monitoring and implementation of mitigations to manage environmental effects. Project follow-up programs verify the accuracy of the EA and describe the process for mitigating additional effects identified during the monitoring.

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	<p>2.7 in order to protect fish and fish habitat, including spawning habitat; and</p> <p>3.16.3 implement the modified or additional mitigation measures referred to in condition 3.16.2 during all subsequent blasting events. The Proponent shall submit these measures to the Agency before implementing them.”</p>			
3.17	<p>“The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to determine the effectiveness of the mitigation measures for the salvage and relocation of fish and as it pertains to the incidental capture of fish by entrainment and impingement from the Designated Project. The Proponent shall implement the follow-up program during all phases of the Designated Project.”</p>	October 2020	On or about December 2038	<p>Prodigy Gold has consulted on the development and implementation of all required plans, follow-up programs and measures, and is committed to ongoing engagement on implementation. Plans outline requirements for monitoring and implementation of mitigations to manage environmental effects. Project follow-up programs verify the accuracy of the EA and describe the process for mitigating additional</p>

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Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
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				<p>effects identified during the monitoring.</p> <p>Contingency measures to be implemented and additional monitoring to be undertaken if monitoring at the end of 10 years following construction indicates that compensation/offset measures are not completed as specified in the plans, and/or are not functioning as predicted.</p>
3.18	<p>“The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to verify the accuracy of the environmental assessment and to determine the effectiveness of the mitigation measures as it pertains to adverse environmental effects on fish and fish habitat caused by changes in water and sediment quality in Otto Lake and Herman Lake. The Proponent shall implement the follow-up program during all phases of the Designated Project, including the environmental effects monitoring requirements set out in Schedule 5 of the <i>Metal and Diamond Mining Effluent Regulations</i>. As part of the implementation of the follow-up program, the Proponent shall:</p>	October 2020	On or about December 2041	<p>Prodigy Gold has consulted on the development and implementation of all required plans, follow-up programs and measures, and is committed to ongoing engagement on implementation. Plans outline requirements for monitoring and implementation of mitigations to manage</p>

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Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
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	3.18.1 monitor, at least quarterly, concentrations of total phosphorus, mercury, copper, silver, sulphate and ammonia in water during operation;	On or about January 2023	On or about December 2038	environmental effects. Project follow-up programs verify the accuracy of the EA and describe the process for mitigating additional effects identified during the monitoring.
	3.18.2 monitor, at least annually, concentrations of copper, arsenic, cadmium, manganese, mercury and total phosphorus in sediments during operation;	On or about January 2023	On or about December 2038	
	3.18.3 monitor fish health through fish tissue sampling and fish population studies. Monitoring shall include lower trophic level indicator species and shall include monitoring of fish abundance, fish population structure and other fish health metrics that shall be determined in consultation with Indigenous groups and relevant authorities. The Proponent shall conduct monitoring for one year prior to operation and at least twice a year for the first three years of operation and shall:	On or about June 2021	On or about December 2038	
	3.18.3.1 if the results of monitoring during the first three years of operation demonstrate that no adverse environmental effects to fish and fish habitat from Designated Project activities are occurring, continue monitoring every three years after the first three years for a duration that shall be determined in consultation with Indigenous groups and relevant authorities; or	On or about January 2023	On or about December 2028 (at a minimum; duration to be determined in consultation with Indigenous groups and relevant authorities)	

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	3.18.3.2 if the results of monitoring during the first three years of operation demonstrate that adverse environmental effects to fish and fish habitat from Designated Project activities are occurring, determine, in consultation with Indigenous groups and relevant authorities, with what frequency and for what duration additional monitoring shall occur;	On or about January 2023	On or about December 2025 (at a minimum; determine duration in consultation with Indigenous groups and relevant authorities)	
	3.18.4 monitor nutrient levels, algae abundance, and dissolved oxygen levels. In doing so the Proponent shall:	On or about January 2022	On or about January 2023	
	3.18.4.1 conduct monitoring one year prior to operation;			
	3.18.4.2 conduct monitoring at least twice a year for the first three years of operation and:	On or about January 2023	On or about December 2025	
	3.18.4.2.1 if the results of the monitoring referred to in condition 3.18.4.2 demonstrate a statistically significant change with the results of monitoring referred to in condition 3.18.4.1, conduct a fish habitat utilization survey to verify that these changes do not cause adverse environmental effects to fish and fish habitat. The Proponent shall determine the methodology, the frequency and the duration of this survey in consultation with Indigenous groups and relevant authorities.	On or about January 2023	After December 2025 (survey duration to be determined in consultation with Indigenous groups and relevant authorities)	

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	<p>3.18.4.3 after the third year of operation, the Proponent shall:</p> <p>3.18.4.3.1 continue monitoring of nutrient levels, algae abundance and dissolved oxygen levels every three years for a duration that shall be determined in consultation with Indigenous groups and relevant authorities, if the results of monitoring referred to in condition 3.18.4.2 demonstrate that no adverse environmental effects to fish and fish habitat from Designated Project activities are occurring; or</p>	After December 2025	On or about December 2028 (at a minimum, duration to be determined in consultation with Indigenous groups and relevant authorities)	
	<p>3.18.4.3.2 continue monitoring at a frequency and duration that shall be determined in consultation with Indigenous groups and relevant authorities, if the results of monitoring referred to in condition 3.18.4.2 demonstrate that adverse environmental effects to fish and fish habitat from Designated Project activities are occurring.</p>	After December 2025	December 2025 (at a minimum; duration to be determined in consultation with Indigenous groups and relevant authorities)	
	<p>3.18.5 if results of the monitoring referred to in conditions 3.18.1, 3.18.2, 3.18.3 or 3.18.4 or the results of the fish habitat utilization survey referred to in condition 3.18.4.2.1 demonstrate that modified or additional mitigation measures are required to protect fish and fish habitat from changes to water and sediment quality, develop and implement modified or additional mitigation measures pursuant to condition 2.7, which shall include, at a minimum, the installation and use of an effluent treatment facility. The Proponent</p>	On or about January 2023	After December 2029 (at a minimum across the four conditions referenced, to be determined based on the length of time needed to develop and implement the modified or	

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	shall submit these measures to the Agency before implementing them.”		additional mitigation measures)	
3.19	<p>“The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to verify the accuracy of the environmental assessment and to determine the effectiveness of the mitigation measures as it pertains to the adverse environmental effects on fish and fish habitat in Otto Lake, Herman Lake and Goudreau Lake from changes in groundwater quality caused by the Designated Project. The Proponent shall implement the follow-up program during all phases of the Designated Project in consultation with Indigenous groups. As part of the implementation of the follow-up program, the Proponent shall:</p> <p>3.19.1 monitor groundwater quality using as benchmarks the comparative standards for water quality identified by the Proponent in Table 7-54 of the Environmental Impact Statement; and</p> <p>3.19.2 if the results of the monitoring referred to in condition 3.19.1 demonstrate that modified or additional mitigation measures are required to mitigate adverse environmental effects on fish and fish habitat of changes in groundwater quality caused by the Designated Project, develop and implement modified or additional mitigation measures pursuant to condition</p>	October 2020	On or about December 2045 (at a minimum, monitoring program will be re-assessed to determine groundwater monitoring requirements, and to be determined based on the length of time needed to develop and implement the modified or additional mitigation measures)	Prodigy Gold has consulted on the development and implementation of all required plans, follow-up programs and measures, and is committed to ongoing engagement on implementation. Plans outline requirements for monitoring and implementation of mitigations to manage environmental effects. Project follow-up programs verify the accuracy of the EA and describe the process for mitigating additional effects identified during the monitoring.

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	2.7. The Proponent shall submit these measures to the Agency before implementing them.”			
	Migratory Birds			
4.1	“The Proponent shall carry out the Designated Project in a manner that protects migratory birds and avoids harming, killing or disturbing migratory birds or destroying, disturbing or taking their nests or eggs. In this regard, the Proponent shall take into account Environment and Climate Change Canada's <i>Avoidance Guidelines</i> and the risk of incidental take. The Proponent's actions when carrying out the Designated Project shall be in compliance with the <i>Migratory Birds Convention Act, 1994</i> , the <i>Migratory Birds Regulations</i> and with the <i>Species at Risk Act</i> .”	February 2021	On or about December 2048	
4.2	“The Proponent shall control lighting required during all phases of the Designated Project, including direction, timing and intensity, to avoid adverse environmental effects on migratory birds, while meeting health and safety requirements.”	February 2021	On or about December 2048	
4.3	“The Proponent shall undertake, in consultation with Indigenous groups and relevant authorities, progressive reclamation of the project study area. The Proponent shall identify, prior to the start of progressive reclamation and in consultation with Indigenous groups and relevant authorities, plant species native to the area of the Designated Project to use for revegetation as part of the progressive reclamation, including species suitable to create habitat for migratory birds.”	June 2021	On or about December 2038	

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4.4	“The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to verify the accuracy of the environmental assessment as it pertains to the use by migratory birds of surface water facilities in the project study area. As part of the implementation of the follow-up program, the Proponent shall:	October 2020	January 2021	Prodigy Gold has consulted on the development and implementation of all required plans, follow-up programs and measures, and is committed to ongoing engagement on implementation. Plans outline requirements for monitoring and implementation of mitigations to manage environmental effects. Project follow-up programs verify the accuracy of the EA and describe the process for mitigating additional effects identified during the monitoring.
	4.4.1 monitor, at times migratory birds may be present in the project study area, the use by migratory birds of the tailings management facility and the water quality control pond during all phases of the Designated Project until such time that water quality in the tailings management facility and the water quality control pond meet legislative requirements and water quality objectives. The water quality objectives are to be established using an ecological risk based approach, developed in consultation with Indigenous groups and relevant authorities;	January 2022	December 2041	
	4.4.2 monitor, at times migratory birds may be present in the project study area, the use by migratory birds of the open-pit lake during decommissioning. The Proponent shall determine, in consultation with indigenous groups and relevant authorities, the frequency and duration of the monitoring during decommissioning; and	On or about January 2039	On or about December 2041	
	4.4.3 if results of the monitoring referred to in conditions 4.4.1 or 4.4.2 indicate that migratory birds use the tailings management facility, the water quality control pond or the open-pit lake, develop, in	On or about January 2023	December 2041	

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	consultation with Indigenous groups, and implement deterrence measures pursuant to condition 2.7. The Proponent shall submit these measures to the Agency before implementing them”			
4.5	“The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to verify the accuracy of the environmental assessment and to determine the effectiveness of the mitigation measures to avoid harm to migratory birds, their eggs, and nests, including the mitigation measures used to comply with conditions 4.1 to 4.3. As part of the development of the follow-up program, the Proponent shall identify performance indicators that shall be used by the Proponent to evaluate the effectiveness of the progressive reclamation referred to in condition 4.3. The Proponent shall implement the follow-up program during all phases of the Designated Project. As part of the implementation of the follow-up program, the Proponent shall:	October 2020	On or about December 2045	Prodigy Gold has consulted on the development and implementation of all required plans, follow-up programs and measures, and is committed to ongoing engagement on implementation. Plans outline requirements for monitoring and implementation of mitigations to manage environmental effects. Project follow-up programs verify the accuracy of the EA and describe the process for mitigating additional effects identified during the monitoring.
	4.5.1 conduct migratory bird surveys annually for the first three years following completion of construction to assess changes in migratory bird populations caused by the Designated Project. The Proponent shall determine the methodology for the migratory bird surveys in consultation with Indigenous groups and relevant authorities. The Proponent shall determine, in consultation with Indigenous groups and relevant authorities and based on the results of the initial	On or about January 2023	On or about December 2025 (at a minimum, to be determined in consultation with Indigenous groups and relevant authorities and	

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	surveys, if additional surveys are required after the first three years following completion of construction and at what frequency and in which locations these additional surveys shall occur; and		based on the results of the initial surveys)	
	4.5.2 monitor the effectiveness of the progressive reclamation referred to in condition 4.3, including the establishment of native plant species to create habitat for migratory birds, annually during operation and during the first three years of decommissioning and every five years thereafter. The Proponent shall monitor the effectiveness of the progressive reclamation referred to in condition 4.3 until the Proponent has determined, in consultation with Indigenous groups and relevant authorities, that the performance indicators have been met.”	On or about January 2023	On or about December 2046 (at a minimum, until it has been determined, in consultation with Indigenous groups and relevant authorities, that the performance indicators have been met)	
Health of Indigenous Peoples				
5.1	“The Proponent shall develop, prior to construction, measures to mitigate emissions of dust and fugitive particulate generated by the Designated Project, including dust associated with mine vehicles on roads located within the property boundary, that take into account the standards and criteria set out in the Canadian Council of Ministers of the Environment's <i>Canadian Ambient Air Quality Standards</i> and Ontario's <i>Ambient Air Quality Criteria</i> . The Proponent shall submit these measures to the Agency before implementing them. The Proponent shall implement these measures	October 2020	On or about December 2041	

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	during construction, operation and the first three years of decommissioning. “			
5.2	“The Proponent shall undertake reagent handling and ore processing activities in an enclosed space equipped with a dust collection system. “	On or about January 2023	On or about December 2038	
5.3	“The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to verify the accuracy of the environmental assessment and to determine the effectiveness of the mitigation measures as it pertains to the adverse environmental effects on the health of Indigenous Peoples caused by increased concentration of air contaminants, including total suspended particulates, particulate matter (PM ₁₀), fine particulate matter (PM _{2.5}), sulphur dioxide, nitrogen dioxide and cadmium. As part of the follow-up program, the Proponent shall:	October 2020	January 2021	Prodigy Gold has consulted on the development and implementation of all required plans, follow-up programs and measures, and is committed to ongoing engagement on implementation. Plans outline requirements for monitoring and implementation of mitigations to manage environmental effects. Project follow-up programs verify the accuracy of the EA and describe the process for mitigating additional effects identified during the monitoring.
	5.3.1 identify, prior to construction, monitoring locations for air contaminants within areas used by Indigenous groups for traditional purposes for which maximum concentrations of air contaminants were predicted by the Proponent during the environmental assessment, as identified in Appendix N of the final response to Information Request 01 (Canadian Environmental Assessment Registry Reference Number 80044, Document Number 26);	January 2021	January 2021	
	5.3.2 monitor, during construction, operation and the first three years of decommissioning, air contaminants at the monitoring locations identified pursuant to	February 2021	On or about December 2041	

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	condition 5.3.1, using as benchmarks the standards and criteria set out in the Canadian Council of Ministers of the Environment's <i>Canadian Ambient Air Quality Standards</i> and Ontario's <i>Ambient Air Quality Criteria</i> . The Proponent shall monitor fine particulate matter (PM _{2.5}) in real-time, particulate matter (PM ₁₀) and cadmium at a minimum every 6 days and total suspended particulates, sulphur dioxide and nitrogen dioxide at a frequency that shall allow the Proponent to monitor adverse environmental effects on human health. The Proponent shall determine the frequency of monitoring for total suspended particulates, sulphur dioxide and nitrogen dioxide in consultation with Indigenous groups and relevant authorities during the development of the follow-up program;			
	5.3.3 notify the Agency and Indigenous groups in writing within 24 hours of any exceedance(s) observed by the Proponent during monitoring referred to in condition 5.3.2 of 1-hour limits or 24-hour limits of the standards and criteria set out in the Canadian Council of Ministers of the Environment's <i>Canadian Ambient Air Quality Standards</i> and Ontario's <i>Ambient Air Quality Criteria</i> , except for fine particulate matter (PM _{2.5}); and	February 2021	On or about December 2041	
	5.3.4 determine, in consultation with Indigenous groups and relevant authorities, the thresholds for concentration of fine particulate matter (PM _{2.5}) above which the Proponent shall notify Indigenous groups. “	October 2020	January 2021	
5.4	“The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant	October 2020	January 2021	Prodigy Gold has consulted on the

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	authorities, a follow-up program to verify the accuracy of the environmental assessment and to determine the effectiveness of mitigation measures as it pertains to the adverse environmental effects on health of Indigenous Peoples caused by contamination of water and fish. As part of the follow-up program, the Proponent shall:			development and implementation of all required plans, follow-up programs and measures, and is committed to ongoing engagement on implementation. Plans outline requirements for monitoring and implementation of mitigations to manage environmental effects. Project follow-up programs verify the accuracy of the EA and describe the process for mitigating additional effects identified during the monitoring.
	5.4.1 identify, prior to construction, fish species that shall be monitored, waterbodies where Indigenous use is expected and where contaminants shall be monitored;	October 2020	January 2021	
	5.4.2 monitor mercury, methylmercury, cobalt, lead and arsenic in surface water in Otto Lake and other downstream waterbodies identified pursuant to condition 5.4.1 during all phases of the Designated Project;	On or about February 2021	On or about December 2041(Monitoring for background and receiver monitoring locations will be re-assessed after the 10-year sampling period.)	
	5.4.3 monitor mercury, methylmercury, cobalt, lead and arsenic in surface water in Goudreau Lake and other downstream waterbodies identified pursuant to condition 5.4.1 during decommissioning;	On or about December 2038	On or about December 2041	
	5.4.4 monitor mercury, methylmercury, lead, arsenic and cobalt in fish tissue in Otto Lake and other downstream waterbodies identified pursuant to condition 5.4.1 every three years during all phases of the Designated Project, starting the first year of	February 2021	On or about December 2046 (at a minimum; additional monitoring to be determined in	

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	construction, and every five years after the end of decommissioning. The Proponent shall determine, in consultation with Indigenous groups and relevant authorities, if additional monitoring must be implemented after the end of decommissioning; and		consultation with Indigenous groups and relevant authorities)	
	5.4.5 monitor mercury, methylmercury, lead, arsenic and cobalt in fish tissue in Goudreau Lake and other downstream waterbodies identified pursuant to condition 5.4.1 every three years starting at the beginning of decommissioning and for a duration that shall be determined in consultation with Indigenous groups and relevant authorities. “	On or about January 2039	On or about December 2041 (at a minimum, duration to be determined in consultation with Indigenous groups and relevant authorities)	
	Current Use of Lands and Resources for Traditional Purposes			
6.1	<p>“The Proponent shall develop, prior to construction and in consultation with Indigenous groups, a communication plan to share information related to the Designated Project and the adverse environmental effects of the Designated Project with Indigenous groups. The Proponent shall implement and maintain the communication plan up-to-date during all phases of the Designated Project. The communication plan shall include procedures, including timing and methods, for sharing information on the following:</p> <p>6.1.1 the location and timing of Designated Project activities that may affect quality of experience to</p>	October 2020	End of all Project phases (on or about December 2091)	Monitoring will be re-assessed following the period of Active Monitoring to determine if further action is needed as described in the <i>Closure Plan</i>

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	<p>Indigenous uses of lands for traditional purposes caused by changes in dust, noise or light within the property boundary and that may permanently or temporarily affect navigation within the project study area;</p> <p>6.1.2 the results of the follow-up program referred to in conditions 3.16, 3.17, 3.18, 3.19, 4.4, 4.5, 5.3, 5.4, 6.5, 6.6, 7.2, and 7.3, including any potential health risks, in plain language, and the modified or additional mitigation measures developed and implemented by the Proponent pursuant to condition 2.7 for each follow-up program. “</p>			
6.2	<p>“The Proponent shall develop, as part of the communication plan referred to in condition in 6.1, procedures for Indigenous groups to provide feedback to the Proponent about adverse environmental effects caused by the Designated Project related to access to and use of lands for traditional purposes, and procedures for the Proponent to document and respond in a timely manner to the feedback received and demonstrate how issues have been addressed, including through the implementation of additional or modified mitigation measures. The Proponent shall implement these procedures during all phases of the Designated Project. “</p>	October 2020	End of all Project phases (on or about December 2091)	
6.3	<p>“The Proponent shall develop, prior to construction and in consultation with Indigenous groups, a Historic Resources Management Plan for structures, sites, or things of historical, archaeological, paleontological, or</p>	September 2019	End of all Project phases (on or about December 2091)	

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	<p>architectural significance. The Proponent shall implement the plan during all phases of the Designated Project. As part of the plan, for any previously unidentified structures, sites or things of historical, archaeological, paleontological or architectural significance discovered within the property boundary by the Proponent or brought to the attention of the Proponent by an Indigenous group or another party during any phase of the Designated project, the Proponent shall:</p> <p>6.3.1 immediately halt work at the location of the discovery, except for actions required to be undertaken to protect the integrity of the discovery;</p> <p>6.3.2 delineate an area with a radius of at least 30 metres around the discovery as a no-work zone and monitor any work conducted within 50 metres around the discovery;</p> <p>6.3.3 conduct an assessment at the location of the discovery;</p> <p>6.3.4 inform the Agency and Indigenous groups within 24 hours of the discovery, and allow Indigenous groups to monitor and participate in the archeological work; and</p>			

Magino Gold Project Decision Statement Condition Implementation Schedule – EA Condition 9.1				
Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
	6.3.5 consult Indigenous groups and relevant authorities on the manner by which to comply with all applicable legislative or legal requirements and associated regulations and protocols respecting the discovery, recording, transferring and safekeeping of previously unidentified structures, sites or things of historical, archaeological, paleontological or architectural significance. “			
6.4	<p>“As part of the progressive reclamation referred to in condition 4.3, the Proponent shall:</p> <p>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</p> <p>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 shall submit these measures to the Agency before implementing them.”</p>	As early as June 2020	End of all Project phases (on or about December 2091)	
6.5	“The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, and implement, during all phases of the Designated Project, a follow-up program to verify the accuracy of the environmental assessment as it pertains	October 2020	End of all Project phases	Prodigy Gold has consulted on the development and implementation of all required plans, follow-up

Magino Gold Project Decision Statement Condition Implementation Schedule – EA Condition 9.1				
Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
	to the adverse environmental effects of the Designated Project on the current use of lands and resources for traditional purposes caused by changes in the use of the project study area by mammals, including black bear (<i>Ursus americanus</i>) and moose (<i>Alces alces</i>). As part of the development of the follow-up program, the Proponent shall identify, in consultation with Indigenous groups and relevant authorities, species of mammals, in addition to black bear (<i>Ursus americanus</i>) and moose (<i>Alces alces</i>), that shall be monitored. If the results of the monitoring indicate that these mammal species use the property, the Proponent shall implement modified or additional mitigation measures pursuant to condition 2.7 to prevent the identified species of mammals from accessing Designated Project components.”			programs and measures, and is committed to ongoing engagement on implementation. Plans outline requirements for monitoring and implementation of mitigations to manage environmental effects. Project follow-up programs verify the accuracy of the EA and describe the process for mitigating additional effects identified during the monitoring.
6.6	“The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, and implement during all phases of the Designated Project, a follow-up program to verify the accuracy of the environmental assessment and determine the effectiveness of mitigation measures, including the mitigation measures referred to in conditions 6.1 to 6.4, as it pertains to the adverse environmental effects of the Designated Project on the current use of lands and resources for traditional purposes. The Proponent shall implement the follow-up program during all phases of the Designated Project.”	October 2020	End of all Project phases (on or about December 2091)	Prodigy Gold has consulted on the development and implementation of all required plans, follow-up programs and measures, and is committed to ongoing engagement on implementation. Plans outline requirements for monitoring and

Magino Gold Project Decision Statement Condition Implementation Schedule – EA Condition 9.1				
Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
				implementation of mitigations to manage environmental effects. Project follow-up programs verify the accuracy of the EA and describe the process for mitigating additional effects identified during the monitoring.
	Wetlands			
7.1	“The Proponent shall restore a minimum of 40 hectares of wetland within the property boundary. The Proponent shall determine, in consultation with Environment and Climate Change Canada, methods for restoration that are technically and economically feasible and that are appropriate for the project study area.”	To be confirmed	December 2041	As restoration of the wetland area will be done as part of the reclamation of the Tailings Management Facility at closure, specific planning or action related to this EA condition will be initiated toward the end of the operations phase.
7.2	“The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to determine the effectiveness of restoration referred to in condition 7.1. As part of the development of the follow-up program, the Proponent shall identify performance indicators that shall be used by the Proponent to evaluate the effectiveness of the restoration. The Proponent shall	October 2020	December 2045	Prodigy Gold has consulted on the development and implementation of all required plans, follow-up programs and measures, and is committed to

Magino Gold Project Decision Statement Condition Implementation Schedule – EA Condition 9.1				
Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
	monitor the effectiveness of the restoration from the start of the restoration until performance indicators are met.”			ongoing engagement on implementation. Plans outline requirements for monitoring and implementation of mitigations to manage environmental effects. Project follow-up programs verify the accuracy of the EA and describe the process for mitigating additional effects identified during the monitoring.
7.3	“The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to verify the accuracy of the environmental assessment as it pertains to the presence of snapping turtle (<i>Chelydra serpentina</i>) or snapping turtle eggs within the project study area. The Proponent shall implement the follow-up program during construction and operation. If the Proponent observes snapping turtle or snapping turtle eggs, the Proponent shall develop, in consultation with Indigenous groups and relevant authorities, modified or additional mitigation measures pursuant to condition 2.7, which shall include, at a minimum, the installation of exclusion fences around snapping turtle habitat, if	October 2020	On or about December 2038	Prodigy Gold has consulted on the development and implementation of all required plans, follow-up programs and measures, and is committed to ongoing engagement on implementation. Plans outline requirements for monitoring and implementation of mitigations to manage

Magino Gold Project Decision Statement Condition Implementation Schedule – EA Condition 9.1				
Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
	technically feasible, or the relocation of snapping turtles outside of the project study area. The Proponent shall submit these measures to the Agency before implementing them.”			environmental effects. Project follow-up programs verify the accuracy of the EA and describe the process for mitigating additional effects identified during the monitoring.
Accidents and Malfunctions				
8.1	“The Proponent shall take all reasonable measures to prevent accidents and malfunctions that may result in adverse environmental effects.”	February 2021	End of all Project phases (on or about December 2091)	
8.2	“The Proponent shall, prior to construction, consult with Indigenous groups and relevant authorities on the measures to be implemented to prevent accidents and malfunctions.”	October 2020	On or before January 2021	
8.3	<p>“The Proponent shall, prior to construction and in consultation with Indigenous groups and relevant authorities, develop an accident and malfunction response plan in relation to the Designated Project. The accident and malfunction plan shall include:</p> <p>8.3.1 the types of accidents and malfunctions that may cause adverse environmental effects;</p> <p>8.3.2 the measures to be implemented in response to each type of accident and malfunction referred to in</p>	October 2020	January 2021	Prodigy Gold has consulted on the development and implementation of all required plans, follow-up programs and measures, and is committed to ongoing engagement on implementation.

Magino Gold Project Decision Statement Condition Implementation Schedule – EA Condition 9.1				
Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
	condition 8.3.1 to mitigate any adverse environmental effect(s) caused by the accident or malfunction; and 8.3.3 the role of Indigenous groups in the implementation of the accident and malfunction plan.”			
8.4	<p>“In the event of an accident or malfunction with the potential to cause adverse environmental effects, the Proponent shall immediately implement the measures appropriate to the accident or malfunction as described in the accident and malfunction response plan referred to in condition 8.3.2 and shall:</p> <p>8.4.1 notify, as soon as possible, Indigenous groups and relevant authorities of the accident or malfunction, and notify the Agency in writing no later than 24 hours following the accident or malfunction. For the notification to Indigenous groups and the Agency, the Proponent shall specify:</p> <p>8.4.1.1 the date the accident or malfunction occurred;</p> <p>8.4.1.2 a description of the accident or malfunction;</p> <p>8.4.1.3 a list of any substances potentially released in the environment as a result of the accident or malfunction.</p>	February 2021 (to be implemented as required)	End of all Project phases (on or about December 2091)	This condition will be implemented if/when accidents or malfunctions occur.

Magino Gold Project Decision Statement Condition Implementation Schedule – EA Condition 9.1				
Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
	<p>8.4.2 submit a written report to the Agency no later than 30 days after the day on which the accident or malfunction occurred. The written report shall include:</p> <p>8.4.2.1 a detailed description of the accident or malfunction and of its adverse environmental effects and any associated potential health risks;</p> <p>8.4.2.2 a description of the measures that were taken by the Proponent to mitigate the adverse environmental effects caused by the accident or malfunction;</p> <p>8.4.2.3 any view(s) from Indigenous groups and advice from relevant authorities received with respect to the accident or malfunction, its adverse environmental effects, the associated potential health risks and the measures taken by the Proponent to mitigate these adverse environmental effects;</p> <p>8.4.2.4 a description of any residual adverse environmental effects and any modified or additional measures required by the Proponent to mitigate residual adverse environmental effects; and</p> <p>8.4.2.5 details concerning the implementation of the accident or malfunction response plan referred to in condition 8.3</p>			

Magino Gold Project Decision Statement Condition Implementation Schedule – EA Condition 9.1				
Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
	8.4.3 submit a written report to the Agency no later than 90 days after the day on which the accident or malfunction occurred that includes a description of changes made to avoid a subsequent occurrence of the accident or malfunction and of the modified or additional measure(s) implemented by the Proponent to mitigate and monitor residual adverse environmental effects and to carry out any required progressive reclamation, taking into account the information submitted in the written report pursuant to condition 8.4.2. The report shall include all additional views from Indigenous groups and advice from relevant authorities received by the Proponent since the views and advice referred to in condition 9.4.2.3 were received by the Proponent.” [It is understood that the reference to 9.4.2.3 should be 8.4.2.3; this is an error in the original Decision Statement. There is no condition 9.4.2.3.]			
8.5	<p>“The Proponent shall develop a communication plan in consultation with Indigenous groups. The Proponent shall develop the communication plan prior to construction and shall implement and keep it up to date during all phases of the Designated Project. The plan shall include:</p> <p>8.5.1 the types of accident and malfunction requiring the Proponent to notify the respective Indigenous groups;</p>	October 2020	January 2021	

Magino Gold Project Decision Statement Condition Implementation Schedule – EA Condition 9.1				
Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
	<p>8.5.2 the manner by which Indigenous groups shall be notified by the Proponent of an accident or malfunction and of any opportunities for the Indigenous groups to assist in the response to the accident or malfunction; and</p> <p>8.5.3 the contact information of the representatives of the Proponent that the Indigenous groups may contact and of the representatives of the respective Indigenous groups to which the Proponent provides notification.”</p>			
Schedules				
9.1	“The Proponent shall submit to the Agency a schedule for all conditions set out in this Decision Statement no later than 60 days prior to the start of construction. This schedule shall detail all activities planned to fulfill each condition set out in this Decision Statement and the commencement and estimated completion month(s) and year(s) for each of these activities.”	October 2020	October 2020	The initial version of this schedule was submitted in October 2020. This document is the annual update.
9.2	“The Proponent shall submit to the Agency a schedule outlining all activities required to carry out all phases of the Designated Project no later than 60 days prior to the start of construction. The schedule shall indicate the commencement and estimated completion month(s) and year(s) and duration of each of these activities.”	October 2020	October 2020	
9.3	“The Proponent shall submit to the Agency in writing an update to schedules referred to in conditions 9.1 and 9.2 every year no later than March 31, until completion of all activities referred to in each schedule.”	March 2021	On or about December 2048	An initial version of the two schedules was submitted in October 2020. This document is an

Magino Gold Project Decision Statement Condition Implementation Schedule – EA Condition 9.1				
Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
				update of the Schedule of EA conditions (EA condition 9.1). Subsequent versions of both schedules will continue to be incorporated into the annual reports
9.4	“The Proponent shall provide to the Agency revised schedules if any change is made to the initial schedules referred to in conditions 9.1 and 9.2 or to any subsequent update(s) referred to in condition 9.3, upon revision of the schedules.”	As required	On or about December 2048	
9.5	“The Proponent shall provide Indigenous groups with the schedules referred to in conditions 9.1 and 9.2 and the updates or revisions to the initial schedules pursuant to condition 9.3 and 9.4 at the same time the Proponent provides these documents to the Agency.”	October 2020	On or about December 2048	
Record Keeping				
10.1	“The Proponent shall maintain all records relevant to the implementation of the conditions set out in this Decision Statement. The Proponent shall retain the records and make them available to the Agency throughout construction and operation and for 25 years following the end of operation or until the end of decommissioning of the Designated Project, whichever comes first. The Proponent shall provide the	January 2019	On or about December 2063	

Magino Gold Project Decision Statement Condition Implementation Schedule – EA Condition 9.1				
Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
	aforementioned records to the Agency upon demand within a timeframe specified by the Agency.”			
10.2	“The Proponent shall retain all records referred to in condition 10.1 at a facility in Canada and shall provide the address of the facility to the Agency. The Proponent shall notify the Agency at least 30 days prior to any change to the physical location of the facility where the records are retained, and shall provide to the Agency the address of the new location.”	January 2019	On or about December 2063	
10.3	“The Proponent shall notify the Agency of any change to the contact information of the Proponent included in this Decision Statement.”	As required	End of all Project phases (on or about December 2091)	No change to this information

APPENDIX C: SCHEDULE OF ALL ACTIVITIES (EA CONDITION 9.2)

See also *Table 1: Schedule of Key Project Milestones* in Appendix B for additional reference information.

Table 3: Magino Gold Project Schedule of All Activities for All Project Phases – EA Condition 9.2

Magino Gold Project Schedule of All Activities for All Project Phases – EA Condition 9.2					
#	Activity Description	Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Estimated Duration (Months /Years)	Relevant Notes
Construction (2 years – February 2021 – January 2023)					
1	Clearing, grubbing and site grading required for the construction of the following project components:	February 2021	December 2021	4 months	No clearing during May 15 – August 31.
2	the open pit;	February 2021	July 2021	6 months	
3	the tailings and mine rock management facilities and associated water management systems;	February 2021	September 2021	6 months	
4	the ore stockpile areas;	February 2021	May 2021	4 months	
5	processing plant area, including the ore stockpile, conveyor and all associated infrastructure, including reagent storage area and truck shop;	February 2021	May 2021	4 months	
6	the explosives storage area; and	February 2021	August 2021	7 months	
7	worker accommodation area.	February 2021	May 2021	4 months	
8	Building the public bypass road would be built with aggregate and overburden sourced from on-site material, and with side ditches and culverts at creek crossings. The public bypass road would be built to the grade of a primary forest road in accordance with Ontario Ministry of Natural Resources and Forestry guidance, and be subject to provincial approval under the <i>Provincial Lands Act</i> .	April 2021	January 2023	2 years	There will be a temporary by-pass road in place while the permanent one is in construction
9	Constructing of a drainage channel north of Water Body 10 to enhance flow and drainage.	April 2021	November 2022	2 years	

Magino Gold Project Schedule of All Activities for All Project Phases – EA Condition 9.2					
Activity		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Estimated Duration (Months /Years)	Relevant Notes
#	Description				
10	Constructing of a channel to connect the outflow of Spring Lake to the lower reach of McVeigh Creek, south of the bypass road.	April 2021	November 2022	2 years	
11	Decommissioning historical mine components (buildings, non-mine waste landfill, existing tailings management facility).	February 2021	January 2023	2 years	Building decommissioning will be initiated during construction,
12	Draining waterbodies to be overprinted by the project footprint, including Lovell Lake, Webb Lake, part of McVeigh Creek and tributaries, waterbodies 1, 2, 3, 4, 5 and 10.	September 2021	September 2023	~ 2 years	
Operation (15 years –January 2023 to December 2038)					
13	Extracting ore from the open pit (this would occur over an estimated 17-year period).	February 2021	December 2038	17 years	Includes pre-stripping (during construction phase)
14	Drilling and blasting zones of rock,	April 2021	December 2038	17 years	
15	Removing the material and hauling it in trucks to the processing plant, stockpile areas and mine rock management facility,	March 2021	March 2040	19 years	
16	Dewatering the open pit.	May 2021	December 2038	17 Years	
17	Stockpiling of overburden, low-grade ore and waste rock.	April 2021	December 2038	17 Years	
18	Storing and using of explosives.	March 2021	December 2038	17 Years	
19	Processing ore: Raw ore material extracted from the open pit or transferred from the ore stockpile will be processed through a crusher and a grinding circuit. A	January 2023	March 2040	17 Years	

Magino Gold Project Schedule of All Activities for All Project Phases – EA Condition 9.2					
Activity		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Estimated Duration (Months /Years)	Relevant Notes
#	Description				
	leaching and refining process would finely grind the ore and extract gold using cyanide and other reagents. Smelting to produce gold doré would then occur following the use of an electro- winning circuit.				
20	Water-taking from Goudreau Lake to supply potable and process water.	June 2022	March 2040	18 Years	
21	Managing mine water (effluent, runoff and seepage) and sewage.	March 2021	March 2040	19 years	
22	Operating roads including mine haul and service roads, potable and process water infrastructure, sewage treatment system, on-site back-up power system, and accommodation facilities.	March 2021	March 2040	19 years	
23	Rehabilitating the site progressively.	June 2025	June 2040	15 Years	
	Decommissioning (i.e., Active Closure, 3 years January 2039 to December 2041)				
24	Removing project components that support ore extraction, processing and transport.	February 2038	December 2041	4 years	
25	Draining of tailings water to the open pit.	January 2041	December 2083	3 years	
26	Removing of discharge and piping systems in the tailings management facility.	January 2039	December 2041	45 years	
27	Grading of surfaces and placement of overburden and soil on portions of the tailings and mine rock management facilities, followed by selective seeding to initiate revegetation.	May 2039	October 2041	2 years	
28	Constructing wildlife access ramps on the tailings and mine rock management facilities.	May 2039	December 2041	2 years	
29	Revegetating the project footprint.	May 2039	October 2041	2 years	

Magino Gold Project Schedule of All Activities for All Project Phases – EA Condition 9.2					
Activity		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Estimated Duration (Months /Years)	Relevant Notes
#	Description				
	Abandonment (50 years, including 7 years of Active Monitoring (in addition to Active Monitoring undertaken during Decommissioning) followed by Passive Abandonment January 2042 to December 2091)				
30	Monitoring of environmental conditions (e.g. water quality in water quality control pond, seepage collection ponds and open pit) to determine when direct release to the surrounding environment would be acceptable.	January 2023	December 2083	61 years	These are expected to occur continually throughout operations and pit flooding
31	Monitoring of success of site rehabilitation plan.	May 2036 [SEE #23]	December 2080 [for monitoring of pit filling]	45 years	Same – some monitoring of progressive reclamation through operations as well
32	Maintaining of the water quality control pond to receive drainage from the tailings and mine rock management facilities in perpetuity.	January 2023	December 2041	19 years	To be maintained throughout operations and closure
33	Filling the open pit through natural runoff and groundwater flows. Natural filling would be supplemented with pumped water from Goudreau Lake at the same rate as freshwater taking during operations (1680 cubic metres per day). This would take approximately 43 years.	Jan 2037	Dec 2080	44 years	
34	Connecting of the open pit lake with Goudreau Lake, upon demonstration that open pit lake water quality monitoring is suitable for discharge.	June 2080	June 2081	1 year	