

December 8, 2020

Nicolas Courville, Senior Enforcement Officer, Compliance and Enforcement Unit
Impact Assessment Agency of Canada
Sent via email: Nicolas.Courville@Canada.ca

Dear Mr. Courville,

Re: Hardrock Project – Conditions 4.6, 4.7 and 6.6.2 Follow-up Plans

GGM is pleased to provide you with follow-up plans and mitigation measures for the Hardrock Project to satisfy Conditions 4.6, 4.7 and 6.6.2 of the Decision Statement Issued under Section 54 of the *Canadian Environmental Assessment Act, 2012* dated December 10, 2018 (Decision Statement).

The Wildlife-Water Monitoring and Management Plan has been developed to satisfy Condition 4.6 of the Decision Statement:

4.6 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 development area. As a part of the implementation of the follow-up program, the Proponent shall:

4.6.1 monitor, at times migratory birds may be present in the project development area, the use by migratory birds of the tailings management facility, contact water collection ditches and collection ponds during all phases of the Designated Project until such time that water quality in these structures 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;

4.6.2 monitor, at times migratory birds may be present in the project development area, the use by migratory birds of the pit lake from the start of filling of the pit lake and until the end of decommissioning; and

4.6.3 if results of the monitoring referred to in conditions 4.6.1 or 4.6.2 indicate that migratory birds use the tailing management facility, the contact water collection ditches, the collection ponds or the pit lake, develop and implement deterrent measures pursuant to condition 2.7. The Proponent shall submit these measures to the Agency before implementing them.

The Migratory Birds Nest Management Plan, Barn Swallow Mitigation and Restoration Record, and Wildlife-Vehicle Monitoring and Management Plan have been developed to satisfy Condition 4.7 of the Decision Statement:

4.7 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 all mitigation measures to avoid harm to migratory birds, their eggs and nests, including the

mitigation measures used to comply with conditions 4.1 to 4.5. 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 4.2. 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:

- 4.7.1 conduct migratory bird surveys annually for the first five years following completion of construction to assess migratory bird use of the project development area. 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 within the project development area are required after the first five years following completion of construction and at what frequency and in which locations these additional surveys shall occur;*
- 4.7.2 monitor the effectiveness of the progressive reclamation referred to in condition 4.2, including the establishment of native plant species to create habitat for migratory birds, annually during operation and during the first five years of decommissioning and every five years thereafter until the Proponent has determined, in consultation with Indigenous groups and relevant authorities, that the performance indicators have been met;*
- 4.7.3 monitor barn swallow (*Hirundo rustica*) nesting activity and use of the artificial nesting structures referred to in condition 4.3 annually during the first three years following the installation of the nesting structures and at times barn swallow (*Hirundo rustica*) may be present in the project development area; and*
- 4.7.4 monitor collisions between vehicles associated with the Designated Project and migratory birds within the project development area during all phases of the Designated Project.*

The Invasive Plants Management Plan has been developed to satisfy Condition 6.6.2 of the Decision Statement:

6.6.2 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.

GGM has completed consultation with the Indigenous Communities on these plans, including Aroland First Nation, Animbiigoo Zaagi'igan Anishinaabek First Nation, Ginoogaming First Nation, Long Lake #58 First Nation, Métis Nation of Ontario, and Red Sky Métis Independent Nation. GGM provided a copy of the report to each community in October 2019, received and responded to written feedback, and discussed any questions or comments in meetings where required. The Indigenous Communities are satisfied with the plan. GGM has also consulted with the Ontario Ministry of Natural Resources and Forestry on these plans and Environment and Climate Change Canada on the Wildlife-Water Monitoring and Management Plan and Migratory Birds Nest Management Plan.

GGM trusts this meet the condition requirements. Should you have any questions please do not hesitate to contact Meghan Bertenshaw, Project Coordinator.

Sincerely,

<Original signed by>

Shane Hayes
Environmental Superintendent

Attached: Hardrock Project Wildlife-Water Monitoring and Management Plan
Hardrock Project Migratory Birds Nest Management Plan
Hardrock Project Barn Swallow Mitigation and Restoration Record
Hardrock Project Wildlife-Vehicle Monitoring and Management Plan
Hardrock Project Invasive Plants Management Plan

cc: iaac.compliance-conformite.aeic@canada.ca
Owais Khurshid, Impact Assessment Agency of Canada
Meghan Bertenshaw, GGM