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August 26, 2020

Sent via E-mail

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Indigenous Services Canada: daniel.benoit@canada.ca; charles.marcoux@canada.ca

Dear Federal Review Team Members,

SUBJECT: Request for Technical Review of the Lynn Lake Gold Project (the Project) Environmental Impact Statement (EIS)

The Impact Assessment Agency of Canada (the Agency) is initiating the technical review of the EIS. Pursuant to section 20 of the *Canadian Environmental Assessment Act, 2012* (CEAA 2012), the Agency requests your department make available the specialist or expert knowledge or information to enable the review of the Project and its predicted environmental effects, focusing on areas of departmental mandate.

In particular, the Agency requests that your department provide advice on the following:

- the sufficiency of baseline data and appropriateness of methodologies to predict effects;
- the mitigation measures proposed by the proponent;
- the level of certainty in the conclusions reached by the proponent on the effects;
- the manner in which significance of the environmental effects, as they pertain to your department's mandate, have been determined (i.e., the scientific merit of the information presented and the validity of the proponent's methodologies and conclusions);
- the follow-up program proposed by the proponent; and
- whether additional information is required from the proponent to complete the technical review.

Please submit your comments by October 10, 2020.

Supporting Tools

The objective of the EIS technical review is to ensure the EIS is scientifically and technically accurate, to confirm that the proponent's conclusions are supported by a defensible rationale, and to identify any areas that require clarification or additional work in relation to the assessment of environmental effects as defined in section 5 of CEAA 2012.

Attachment 1: EIS Technical Review Template and Instructions is provided to assist your department's technical review of the EIS. Provide your department's comments and suggestions for information required from the proponent to complete the technical review.

Attachment 2: A document titled "Advice to the Proponent" is provided should your department have advice for the proponent that would not be considered an information request.

Attachment 3: A document titled "Advice to the Agency" is provided to allow departments to provide responses/comments to key questions the Agency will be considering in its recommendation to the Minister of Environment and Climate Change and in preparation of draft potential conditions.

Please ensure that questions, advice, and recommendations are concise, focused, explained, and are linked to your departmental mandate. You may also note areas where the Agency or the proponent should seek advice from other experts, such as the Province.

Additional Information

The summary of the EIS is available on the Canadian Impact Assessment Registry website and on September 1, 2020, the EIS for this Project will be available. A copy of the EIS Guidelines may also be found on the Registry site: <https://iaac-aeic.gc.ca/050/evaluations/document/132480>

The public and Indigenous groups will be invited to comment during the public comment period, which will begin on August 26, 2020 and end on October 10, 2020. The Agency is planning public open houses and consultation activities, and encourages departments to be part of the planning process and to attend. Please anticipate requests for your departments' participation.

Important Note

In accordance with CEAA 2012, comments received and other documents submitted or generated to inform the environmental assessment are part of the project file. Accordingly, information submitted to the Agency that is relevant to the environmental assessment of the Project is available to the public upon request and may also be posted on the online public registry under reference number 80140. The Agency will remove personal information, such as signatures, prior to public disclosure. Should you provide any documents that contain confidential or sensitive information that you believe should not be made public, please contact me.

If you have any questions regarding consultation or the technical review, please contact me directly at (587)-338-7191 or melissa.pinto@canada.ca.

Sincerely,

<original signed by>

Melissa Pinto
Project Manager

Attachment 1: EIS Technical Review Template and Instructions

Attachment 2: Advice to the Proponent

Attachment 3: Advice to the Agency



Attachment 1
Lynn Lake Gold Project
Information Requirements from Environmental Impact Statement Technical Review

On August 26, 2020 the Impact Assessment Agency of Canada commenced the technical review of the Environmental Impact Statement for the Lynn Lake Gold Project. The table below is to assist in the preparation of Information Requests that support full understanding of the Project’s potential for significant adverse environmental effects and potential impacts to rights.

Lynn Lake Gold Project - Technical Review Information Requirements August 2020

Reference IR#	Expert Dept. or group	EIS Guideline Reference	EIS Reference	Context and Rationale	The Proponent is Required to ...
Topic or Valued Component (e.g. Project Overview; Environmental Assessment Methodology; Fish Habitat; etc.)					
Nation or department name – IR number (Ro e.g. IAAC-01	Nation or department Name e.g. IAAC	Reference the section(s) of the EIS Guidelines that relate to your comment, concern, or information request. e.g. Part 2, Section 7.1.5 Fish and Fish Habitat	Reference the section(s) of the EIS that speak to your comment, concern, or information request.	Identify what the EIS Guidelines require and/or the link to the <i>Canadian Environmental Assessment Act, 2012</i> (section 5 or section 19). Briefly identify what the EIS presents and the information gap, inconsistency, or challenge. Explain why filling that information gap is necessary to understanding potential significant adverse environmental effects to areas of federal jurisdiction or impacts to rights.	Describe the information required. Focus on the essential information, explanation, or justification required.

Attachment 2
Advice to the proponent

Departmental number	Reference to EIS	Context and Rationale	Advice to the Proponent
(e.g. HC-01)	Identify which section(s) of the EIS report and appendices are related to the comment (Volume, section, page number).	Provide the context of why you are providing the advice to the proponent.	Provide specific advice to the Proponent that would not be considered an information request to help determine the sufficiency of the EIS. This may include the guidance or standard advice related to your departmental mandate. Make clear whether this information pertains to the environmental assessment or the regulatory phase.

Attachment 3
Advice to the Agency

Table 1: Advice for the Agency’s consideration in its recommendation to the Minister of Environment and Climate Change and preparation of draft potential conditions

Questions	Responses/Comments
<ul style="list-style-type: none"> • Has the proponent described all project components and activities in sufficient detail to understand all relevant project-environment interactions? If not, identify what additional information is needed. 	
<ul style="list-style-type: none"> • Were the study areas sufficient to predict potential effects from all relevant project-environment interactions, and to consider the effects within a local and regional context? • Is the baseline information sufficient to characterize the existing environment, predict potential effects and obtain monitoring objectives? If not, identify what additional information is needed. 	
Alternatives Assessment	
<ul style="list-style-type: none"> • Has the proponent adequately described the criteria it used to determine the technically and economically feasible alternative means? • Has the proponent listed the potential effects to valued components (VCs) within your mandate that could be affected by the technically and economically feasible alternative means? • Has the proponent adequately described why it chose each preferred alternative means? • Are there other alternative means that could have been presented? If so, please describe. 	
Environmental Effects Assessment	
<ul style="list-style-type: none"> • Has the proponent clearly described all relevant pathways of effects to be taken into account under section 5 of CEAA 2012? • Has the proponent identified all potential effects to VCs, including species at risk, within your mandate? • Were all potential receptors considered? 	
<ul style="list-style-type: none"> • Were the methodologies used by the proponent appropriate to collect baseline data and predict effects, why or why not? • Has the proponent explicitly addressed the degree of scientific uncertainty related to the data and methods used within the assessment? If there are unaccounted for scientific uncertainties, describe them and indicate the options for increasing certainty in the predictions. 	
<ul style="list-style-type: none"> • Are the predicted effects described in objective and reasonable terms (e.g., beneficial or adverse, temporary or permanent, reversible or irreversible)? 	

Questions	Responses/Comments
<ul style="list-style-type: none"> Has the proponent adequately assessed the potential cumulative environmental effects, including using appropriate temporal and spatial boundaries, examining physical activities that have been and will be carried out, and proposing mitigation and follow-up program requirements? Provide rationale. 	
<ul style="list-style-type: none"> Has the proponent adequately described the potential for environmental effects caused by accidents and malfunctions, including the types of accidents and malfunctions, their likelihood and severity and the associated potential environmental effects? If not, identify what additional information is needed. 	
<ul style="list-style-type: none"> Are you satisfied with the proponent’s assessment of effects of the environment on the Project? Has the proponent characterized the likelihood and severity appropriately? Provide rationale. 	
<ul style="list-style-type: none"> Has the proponent sufficiently described and characterized the project activities and components as they relate to federal decisions within your mandate? If not, identify what additional information is needed. Are changes to the environment, as they relate to federal decisions within your mandate, sufficiently described? If not, identify what additional information is needed. 	
Mitigation	
<ul style="list-style-type: none"> Has the degree of uncertainty regarding the effectiveness of the proposed mitigation measures been described? If not, identify what information is needed. Is it clear how each proposed mitigation measure links to each potential pathway of effect? 	
<ul style="list-style-type: none"> Would you propose different or additional mitigation measures? If so, provide a description of the mitigation measure(s), with rationale. 	
<ul style="list-style-type: none"> Which of the proposed mitigation measures and/or project design elements do you consider to be necessary to reduce the likelihood of significant adverse environmental effects? Provide rationale. 	
Residual Adverse Environmental Effects	
<ul style="list-style-type: none"> Are the identification and documentation of residual environmental effects described by the proponent adequate? If not, what are the aspects for which there is uncertainty and, where possible, indicate how these residual effects can be best described. If there is uncertainty, what are the options for increasing certainty? 	
<ul style="list-style-type: none"> Did the proponent provide a sufficiently precise, ideally quantitative, description of the residual environmental effects related to your mandate? Identify any areas that are insufficient. 	
Determination of Significance	
<ul style="list-style-type: none"> Are the conclusions on significance in the EIS supported by the analysis that is provided? 	

Questions	Responses/Comments
<ul style="list-style-type: none"> Are the proponent’s proposed criteria for assessing significance appropriate? This includes how the criteria were characterized, ranked, and weighted. Provide rationale. Where the proponent has <i>not</i> used one of the Agency’s recommended key criteria (magnitude, geographic extent, duration, frequency, reversibility, and social/ecological context), has a rationale been provided? 	
<ul style="list-style-type: none"> Were appropriate methodologies used in developing the conclusions on significance? 	
<ul style="list-style-type: none"> Do you agree with the proponent’s analysis and conclusions on significance? Provide rationale. 	
Monitoring and Follow-up	
<ul style="list-style-type: none"> Does the proposed monitoring and follow-up program verify the predictions of the environmental assessment as they relate to section 5? Please explain additional monitoring or follow-up needed to address uncertainty in the effects assessment. 	
<ul style="list-style-type: none"> Does the proposed monitoring and follow-up program verify the effectiveness of proposed mitigations as they relate to section 5? Please explain additional monitoring or follow-up needed to address uncertainty in the proposed mitigation. 	
<ul style="list-style-type: none"> Is the objective of the follow-up program clear and measurable? Does the follow-up program include sufficient detail, and technical merit, for the Agency to achieve the stated objective through a condition (e.g., sufficient baseline dataset, monitoring plans, acceptable thresholds of change, contingency procedures)? 	
<ul style="list-style-type: none"> Are you aware of any federal or provincial authorizations or regulations that will achieve the same follow-up program objective(s)? If so, how do these achieve the objective(s)? 	
Additional comments, views, advice	
<ul style="list-style-type: none"> Provide any other comments. 	