

June 27, 2022

Conor Anderson, Project Manager
Impact Assessment Agency of Canada
600-55 York Street
Toronto ON M5J 1R7
Sent via email: springpolegoldmine-minedorspringpole@iaac-aeic.gc.ca

RE: Springpole Gold Project - Extension Request to Remain under CEAA 2012

To Mr. Anderson,

First Mining Gold (FMG) received final Environmental Impact Statement (EIS) Guidelines ([EIS Guidelines](#)) for the Springpole Gold Project (the Project) pursuant to the *Canadian Environmental Assessment Act, 2012* (CEAA 2012) on June 19, 2018. Since that time, FMG has been working to progress the EIS for the Project to meet the requirements of the EIS Guidelines, in consultation with the Impact Assessment Agency of Canada (the Agency), Indigenous communities and other stakeholders.

FMG understands that the deadline to submit certain required information and studies for the Project, as described in a letter from the Agency dated May 18, 2021, is August 28, 2022. Pursuant to Section 181(2.1) of the *Impact Assessment Act*, FMG hereby requests: (i) an extension of the August 28, 2022 deadline to provide required information and studies until December 31, 2025; and (ii) that the Agency continue its consideration of the Project pursuant to CEAA 2012. This request includes contingency time to allow for uncertainty and potential unidentified issues as the Project moves through the environmental assessment (EA) process. In support of this extension request, FMG provides the below Project progress update since the issuance of the EIS Guidelines and an explanation of how the additional time requested will be utilized to provide all the required information and studies.

1. Workplan to Complete Required Studies

In order to continue to build relationships and provide transparency on the Project, FMG committed to publishing a [draft EIS](#) which was made available in June 2022. The draft EIS is a key progress milestone for FMG and provides a comprehensive description of the Project concept, thereby providing an opportunity for the Project to be considered and reviewed holistically, which will better support ongoing traditional knowledge and land use studies. The additional feedback gathered from government agencies, Indigenous communities and other stakeholders through this process will be considered and incorporated into decision-making for a final EIS.

Based on the extensive work carried out to date to advance the EIS and ongoing planning, FMG has compiled a workplan that explains how FMG plans to provide the Agency with all the required information and studies by the end of the extension. Please refer to the attached Tables 1 and 2 for this workplan, which includes an expected timeline for completing key activities and milestones, as well as a timeline that incorporates contingency to allow for potential unidentified issues to be addressed. Where activities in the workplan relate

to the engagement and consultation activities, baseline studies and coordination with the provincial EA process, additional detail is provided in the following text.

2. Engagement Activities Completed to Date and Effects of the COVID-19 Pandemic on Project Progress

Since the EIS Guidelines were issued, FMG has engaged government agencies, Indigenous communities and other stakeholders on the Project, including on the Project concept, baseline environmental studies, valued components and alternatives assessments.

FMG has allowed for additional time to provide meaningful opportunities to Indigenous communities to participate in the EA process, with consideration of their interest and desired level of involvement. FMG has worked with the Shared Territory Protocol Nations (STPN) of Cat Lake First Nation, Slate Falls Nation and Lac Seul First Nation to establish a 'Springpole Environment Committee' that has been the primary communication, information sharing and feedback mechanism for input into the EIS. Discussions regarding the establishment of this committee started in 2020 and the committee was officially established in May 2021, after substantial discussion as well as delays due to COVID 19. The Committee participated in the review of baseline environmental data in 2021. FMG has received a request from these Nations for support for an Anishinaabe-led impact assessment and discussions about the scope and mechanics of this assessment are underway. FMG expects that any potential risks related to the timeline associated with this process are incorporated into the contingency timeline presented in Table 1 and Table 2b.

Advancements with other communities have also occurred over the past few years, significantly in 2021 with the establishment of a Process Agreement with Mishkeegogamang Ojibway First Nation (MOFN) as well as the signing of a consultation agreement with the Métis Nation of Ontario (MNO). MOFN has been advancing traditional knowledge and land use studies for the Project in which delivery has been delayed by approximately 6 months to date due to a COVID-19 outbreak in the community. MNO completed a Traditional Knowledge and Land Use Study for the Project in March 2022 but has noted that they may wish to continue data collection which FMG has agreed to fund. FMG has also been advancing discussions for participation in the EA process with the Ojibway Nation of Saugeen and Wabauskang First Nation. FMG has shared a draft Consultation Plan with the Ojibway Nation of Saugeen who have also experienced challenges due to the impact of COVID-19 on community capacity. FMG continues to reach out to Pikangikum First Nation on a regular basis to share information regarding the Project and assessment work.

Baseline studies for the Project are publicly available on the FMG EA portal website, along with additional material and resources to support the understanding of the studies. In September and November 2021, FMG held open house meetings in local communities and held technical review meetings to discuss the baseline studies completed to date, present findings and receive feedback. FMG also hosted members of Cat Lake First Nation and Lac Seul First Nation for a tour of the Project site on October 27, 2021. FMG supported the funding of technical advisors for local Indigenous communities to review and provide comments on Project information distributed through the EA process. FMG received and addressed 449 comments on the baseline studies from provincial and federal government agencies, STPN and MOFN to date. MNO provided Valued Component information that is also helpful in informing field plans and assessment work. FMG has considered the comments and feedback received to date, provided responses and incorporated the feedback into the draft EIS and field workplans accordingly. FMG will continue to share information and discuss ongoing studies through the draft EIS.

FMG provided the preliminary alternatives assessment for the Project to the Agency, MECP, and local Indigenous communities through the EA Portal as well as presentations during community meetings. FMG has considered the comments and feedback received to date, provided responses and incorporated the feedback into the draft EIS accordingly. Feedback on the alternatives assessment for the Project will continue to be considered through the draft EA process and incorporated into the EIS, as appropriate

Engaging early on the environmental baseline studies prior to submission of an EA helps all parties with a thorough understanding of the existing environment. FMG has taken additional time to conduct this engagement, including presenting information at community meetings in 2021, and providing funding for technical review by consultants selected by the communities. Although these efforts have resulted in a longer EA timeline, FMG is confident that the information gathered through this process will help facilitate the overall understanding of the Project. Similarly, early engagement on the alternatives assessment for the Project occurred in 2021, including presentation of identified alternatives and preliminary results of the assessment. However, engagement activities have been challenged by the COVID-19 pandemic, as in-person meetings, and public and community open houses were deferred for several months. FMG has adapted and implemented additional methods of communication such as virtual meetings, providing videos and plain language fact sheets. FMG is planning to present the draft EIS information during in-person community meetings and is also preparing a webinar format (anticipating the draft EIS presentation webinar to occur in July/August 2022). FMG also expects to carry out engagement activities on the final EIS once it is submitted.

Further detail regarding past and ongoing engagement including expected timelines is presented in Table 1.

3. Advancement of Studies in Support of the EIS

During the preparation of the federal EIS guidelines, which were issued in June 2018, FMG identified the need to also complete a provincial EA and entered into a voluntary agreement in April 2018 with Ontario to also carry out an Individual Provincial EA. FMG initiated the development of the Terms of Reference for the provincial EA process with the goal of carrying out a coordinated federal and provincial EA producing one set of documents to meet the requirements of both processes. FMG also advanced a Pre-Feasibility Study (PFS) for the Project, which was finalized and published in February 2021. This study provides greater certainty and definition of the Project concept and economic feasibility, which in turn allows for greater confidence in the prediction of effects and mitigation measures in the EA while maintaining flexibility to further explore alternatives and Project optimizations through the EA process. FMG has been working closely with the Agency as this has progressed, including sharing a Project Description update in May 2021. Throughout 2021 FMG has also undertaken substantial work including technical modelling assessment across all areas of the environment towards completing the draft EIS, which was issued for review in May 2022.

FMG has completed extensive baseline studies, including additional programs incorporating feedback in 2021 which are presented in the draft EIS. The 2022 baseline studies are proposed in order to address feedback received from Indigenous communities and government agencies, completion of portions of work that were delayed due to a forest fire, and to support future permitting requirements. Further detail regarding the ongoing programs, including expected timelines is presented in Table 1.

FMG has offered and continues to communicate the opportunity for local Indigenous communities to undertake TK / TLU studies to inform the EA process. To support this, FMG offered financial support for the TK

/ TLU work and provided shapefiles associated with the Project to facilitate community mapping. The draft EIS has considered the available information contained in community Land Use Plans and TK / TLU information provided to date. FMG is confident that the conservative study areas used in the baseline studies will cover the locations of any specific land use areas and will continue to offer opportunities to collect additional TK / TLU information throughout the draft EIS process to inform the Project going forward.

4. Coordination with Provincial Environmental Assessment Processes

In addition to a federal EA, the Project is also subject to an individual EA under the Ontario *Environmental Assessment Act*, with overlapping requirements between the provincial and federal EA. This includes, but is not limited to, requirements for consultation and engagement, environmental baseline studies, effects assessment, mitigation, and monitoring.

FMG has been working, and intends to continue working, with the Agency and the Province to integrate the provincial and federal EA processes to meet the needs of the respective legislation, while minimizing duplication of effort. This coordinated approach helps improve efficiency for all parties by sharing information, coordinating consultation and engagement efforts, using common documents that meet the requirements of both authorities, and coordinating technical meetings to facilitate the review process.

With the EIS Guidelines being issued in 2018, FMG focused on advancing the Terms of Reference for the provincial EA, so that the two processes could then proceed on similar timelines with the same EA documents. The Terms of Reference describes the framework for the planning and decision-making process to be followed during the preparation of the provincial EA. FMG received approval of the provincial Terms of Reference for the provincial EA in November 2021, after significant consultation on several iterations with government agencies and Indigenous communities, including the allowance for multiple extensions to standard review periods. During this time, FMG continued to advance the baseline studies and engagement on the Project; however it did not start conducting the alternatives assessment or effects assessment in order to align the federal process with the provincial timelines, resulting in requiring a longer EA timeline overall. Following the approval of the Terms of Reference, FMG was able to proceed with the federal EIS and provincial EA in a coordinated manner. As discussed with and requested by both the Agency and the Province, FMG agreed to prepare a draft EIS for review and comment as part of the process. The timelines presented in Table 2 take into account FMG's expectations for the provincial process. FMG will work to coordinate federal and provincial EAs in order to minimize the risk of the delays due to any lack of coordination between federal and provincial processes (e.g., different information request and engagement timing and/or requirements) but it is acknowledged that there is potential risk with the submissions becoming uncoordinated.

5. Summary and Conclusions

In summary, FMG has advanced environmental data collection, consultation and engagements efforts and technical assessments since the issuance of the EIS guidelines, with significant advancement occurring since the EIS guidelines were issued including having completed a comprehensive draft EIS of over 10,000 pages documenting the baseline environment, alternatives, detailed Project description, consultation to date, proposed mitigation measures, advanced technical modelling of potential effects, effects assessment of 23 valued components, and closure planning concepts. The additional time requested to complete the EIS under



CEAA 2012, until December 31, 2025, is required to allow for the Project to continue on a clear path to the submission of a final EIS.

Should the Agency decline to grant the requested extension and FMG is required to re-start a new process, FMG submits that this would derail the significant progress made to date would create procedural uncertainty, and cause confusion for stakeholders. It would also impact the investment FMG has made in advancing the Project and assessment work to date.

If you have any questions or require additional information, please do not hesitate to contact me.

Sincerely,

<Original signed by>

Meghan Bertenshaw, Project Manager - Environmental Assessment and Permitting
First Mining Gold

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Cc: Christine Greenaway, Team Leader, Ontario Region, Impact Assessment Agency of Canada
Steve Lines, VP - Environment and Community Relations, First Mining Gold

Workplan
Table 1: Springpole Project EIS Workplan (refer to next table for timelines)

Activity	Additional Detail	Timeline	Potential Risks	Contingency Timeline
EIS Guidelines	<ul style="list-style-type: none"> • EIS Guidelines issued on June 19, 2018 	Completed in 2018	Not applicable; task completed.	Not applicable; task completed.
Baseline studies completed to date	<ul style="list-style-type: none"> • Air Quality • Aquatics • Hydrogeology • Hydrology • Surface Water Quality • Geochemistry • Sound and Vibration • Terrestrial Studies • Stage 1 and 2 Archaeological Assessment for Mine Site Area • Stage 1 Archaeological Assessment for access road and transmission line • Cultural Heritage 	Completed in 2021	Not applicable; task completed.	Not applicable; task completed.
PFS completed to support project planning	<ul style="list-style-type: none"> • PFS published in February 2021. This study provides greater certainty on the Project concept and economic feasibility, which in turn allows for greater confidence in the prediction of effects and mitigation measures in the EA. 	Completed in 2021	Not applicable; task completed.	Not applicable; task completed.
Working with communities to	<ul style="list-style-type: none"> • Negotiate process and consultation protocols with MOFN and MNO. 	FMG will continue to provide capacity	<i>Risks:</i>	Not applicable; FMG will continue to

Activity	Additional Detail	Timeline	Potential Risks	Contingency Timeline
establish capacity support for EA process and TK studies	<ul style="list-style-type: none"> Established the Springpole Environment Committee with members from Cat Lake First Nation, Slate Falls Nation and Lac Seul First Nation which was formed to facilitate discussions around TK / TLU, environment, education and training and other community goals and vision. FMG has offered and continues to communicate the opportunity for local Indigenous communities to undertake TK / TLU studies to inform the EA process. MOFN and MNO have advanced TK studies and are prepared for EA review. 	support throughout the life of the Project	<ul style="list-style-type: none"> <i>Indigenous communities delayed in providing comments or do not wish to participate in process.</i> 	provide capacity support throughout the life of the Project
Provincial Terms of Reference	<ul style="list-style-type: none"> With the EIS Guidelines being issued in 2018, FMG focused on advancing the Terms of Reference for the provincial EA, so that the two processes could then proceed on similar timelines. Provincial Terms of Reference approved in November 2021, after significant consultation on several iterations with government agencies and Indigenous communities, including the allowance for extensions to standard review periods. 	Completed in 2021	Not applicable; task completed.	Not applicable; task completed.
Draft EIS planning and development	<ul style="list-style-type: none"> Completed draft alternatives assessment, technical modelling and effects assessments 	Completed in 2021	Not applicable; task completed.	Not applicable; task completed.
Consultation and engagement on Baseline Studies completed to date	<ul style="list-style-type: none"> Completed reports provided to Indigenous communities and government agencies for review. Plain language summaries on each discipline posted online and provided to Indigenous communities. 	Completed in 2021	Not applicable; task completed.	Not applicable; task completed.

Activity	Additional Detail	Timeline	Potential Risks	Contingency Timeline
	<ul style="list-style-type: none"> Information presented in meetings with Indigenous communities and government agencies for review. Comments received and responded to from provincial and federal agencies, STPN and MOFN and discussed in meetings when needed. Open house meetings held in Cat Lake First Nation, Lac Seul First Nation, Slate Falls Nation, MOFN, Municipality of Sioux Lookout and Township of Ear Falls to present baseline data. 2021 and 2022 workplans provided to Indigenous communities and government agencies for review. 			
Consultation and Engagement on Alternatives Assessment completed to date	<ul style="list-style-type: none"> Materials (preliminary tables and figures) provided to Indigenous communities and government agencies for review. Comments received from MOFN, MECP and the Agency and responded to. Open house meetings held in Cat Lake First Nation, Lac Seul First Nation, Slate Falls Nation, MOFN, Municipality of Sioux Lookout and Township of Ear Falls to present preliminary alternatives assessment. 	Completed in 2021	Not applicable; task completed.	Not applicable; task completed.
Ongoing Environmental Data Collection	<p>Hydrogeology</p> <ul style="list-style-type: none"> Complete work scheduled for 2021 that was delayed due to a forest fire near the site (four sets of nested monitoring wells remain to be installed). 	Expected completion in Q4 2022	<p><i>Risks:</i></p> <ul style="list-style-type: none"> <i>Additional requests received from Indigenous</i> 	If required, additional data can be collected in 2023 to continue to

Activity	Additional Detail	Timeline	Potential Risks	Contingency Timeline
	<ul style="list-style-type: none"> • Complete installation of groundwater monitoring locations for long term mine operations. 		<i>communities, government agencies or other stakeholders</i>	supplement the dataset and support permitting.
	Hydrology <ul style="list-style-type: none"> • No gaps in baseline data identified, monitoring will be ongoing. • Manual flow measurements will continue to be collected to develop rating curves for the Springpole Lake inlet, outlet, and other ongoing monitoring sites. • Winter flow measurement will be attempted if conditions are safe to do so to verify/validate pro-rating of flows. 	Ongoing monitoring to support future permitting		
	Surface Water Quality <ul style="list-style-type: none"> • No gaps in baseline identified; continue the current monitoring program 	Ongoing monitoring to support future permitting		
	Terrestrial <ul style="list-style-type: none"> • Additional avian surveys as per Environment and Climate Change Canada’s Guidance Memo Springpole Gold Project Environmental Assessment on Birds and Their Habitat • Further Eastern Whip-poor-will surveys • Additional survey work for Boreal Caribou • Further SAR bat survey work to delineate habitat use and better confirm species presence/absence 	Expected completion in Q3 2022 Additional ongoing monitoring to support species at risk permitting expected		

Activity	Additional Detail	Timeline	Potential Risks	Contingency Timeline
	<ul style="list-style-type: none"> • Updated assessment of small mammal communities use of the landscape relative to the Project footprint • Additional wetland evaluation work to identify and confirm the provincial status of wetlands that may be directly impacted by the Project including updating amphibian and turtle survey results within these wetlands 			
	<p>Air Quality</p> <ul style="list-style-type: none"> • Continue the current monitoring program to establish a robust dataset with at least 2 years of data to support permitting 	<p>Expected completion in Q3 2022</p>		
	<p>Aquatics</p> <ul style="list-style-type: none"> • Targeted Lake Sturgeon survey using eDNA methods • Full lake BsM program on Springpole Lake during the summer • Fish community and habitat studies within Birch Lake, adjacent to the Co-disposal Facility • Include Lake Trout and Whitefish as species sampled for contaminants • 2021 program lower trophic level (LTL) studies (phytoplankton, zooplankton, temperature and dissolved oxygen sampling) will be continued in 2022 in six (6) deep basins in Springpole Lake and two (2) deep basins in Birch Lake 	<p>Expected completion in Q4 2022</p> <p>Additional ongoing monitoring to support permitting expected</p>		

Activity	Additional Detail	Timeline	Potential Risks	Contingency Timeline
	<p>Geochemistry</p> <ul style="list-style-type: none"> • Mine rock humidity cell program, including the continuation of some existing humidity cells initiated as part of a previous program, and several new mine rock humidity cell tests initiated as part of the ongoing program • Mine rock column testing and mineralogical testing to assess metal leaching • Tailings testing program including static and kinetic testing of project tailings generated to represent the current mine plan • Revised field leach barrel program for mine rock • Supplemental borrow material testing 	Expected completion in Q4 2022		
	Cultural Heritage Evaluation Report	Expected completion in Q4 2022		
	Stage 2 Archaeological Assessment for access road and transmission line	Not required for the EIS and will occur prior to construction		
Draft EIS submission	<ul style="list-style-type: none"> • Comprehensive draft EIS provided to Indigenous communities, government agencies and the public for review including plain language summary in June 2022 	Completed in June 2022	Not applicable; task completed.	Not applicable; task completed.

Activity	Additional Detail	Timeline	Potential Risks	Contingency Timeline
Consultation on draft EIS	<ul style="list-style-type: none"> Information posted on publicly available website. 	Q3 - Q4 2022	<i>Risks:</i> <ul style="list-style-type: none"> <i>Indigenous communities delayed in providing comments or do not wish to participate in process.</i> <i>Government agencies delayed in providing comments or technical issues require further work to resolve.</i> 	Q3 2022 – Q2 2023 to provide additional time for addressing delayed comments or completion of unexpected technical work
	<ul style="list-style-type: none"> Information presented/discussed in smaller virtual and in-person meetings with Indigenous communities and government agencies. Communication method will be dependent upon preference of community/agency. 			
	<ul style="list-style-type: none"> Written comments to be received from government agencies and Indigenous communities and responded to. 			
	<ul style="list-style-type: none"> Technical review meetings to discuss comments received and how they will be addressed in the final EIS. 			
	<ul style="list-style-type: none"> Open house meetings to be held in Indigenous communities and public locations to present information and respond to questions on draft EIS. 			
Receipt of supplemental TKLU information from Indigenous communities	<ul style="list-style-type: none"> Receipt of supplemental traditional knowledge and land use information from Indigenous communities for incorporation into final EIS 	Q4 2022	<i>Risk: Indigenous communities delayed in providing traditional knowledge and land use information</i>	Q3 2023 to allow for additional time for receipt of traditional knowledge and land use information

Activity	Additional Detail	Timeline	Potential Risks	Contingency Timeline
Development of final EIS	<ul style="list-style-type: none"> Update alternatives assessment, technical modelling and effects assessments based on input received and any additional data available 	Q4 2022 – Q2 2023	<i>Risk: Updates are more substantial than expected</i>	Q3 2023 – Q3 2024 to allow for additional technical work
Final EIS Submission	<ul style="list-style-type: none"> Final EIS provided to Indigenous communities, government agencies and the public for review. 	Q3 2023	<i>Risk: Updates are more substantial than expected</i>	Q4 2024
Conformity Review by the Agency	<ul style="list-style-type: none"> Agency reviews the final EIS for conformity to EIS guidelines FMG addresses any comments resulting from Agency's conformity review Agency confirms the final EIS conforms with the EIS guidelines 	Q3 2023	<i>Risk: Final EIS requires revisions to meet conformity</i>	Q4 2024 to address outstanding conformity items
Comment period and technical review	<ul style="list-style-type: none"> Information posted on publicly available website. 	Q3 2023 – Q4 2023	Not applicable (risk is incorporated into next step)	Q4 2024 – Q2 2025
	<ul style="list-style-type: none"> Information presented/discussed in smaller virtual and in-person meetings with Indigenous communities and government agencies. Communication method will be dependent upon preference of community/agency. 			
	<ul style="list-style-type: none"> Technical review meetings to discuss comments received and how they will be addressed in the final EIS. 			

Activity	Additional Detail	Timeline	Potential Risks	Contingency Timeline
Address Information Requirements and additional engagement with Indigenous communities if required	<ul style="list-style-type: none"> • FMG responds to requests for additional information or clarification on the final EIS • It is expected that two rounds of information requests may be required • Further engagement with Indigenous communities if required 	Q4 2023 – Q1 2024	<i>Risk: New questions raised during review of final EIS</i>	Q2 2025 – Q4 2025 to address new comments and potential third round of information requests
Agency confirms all required information and studies have been received	<ul style="list-style-type: none"> • Agency confirms that all information required for preparation of the environmental assessment report has been received 	Q1 2024	Not applicable (risk is incorporated into previous steps)	Q4 2025

