



Canadian Malartic Corporation (CMC) Responses to the Canadian Environmental Assessment Agency's (Agency) Table of Questions, Comments and Concerns Raised during the Teleconference Sessions Held between October 2016 and January 2017 for the Hammond Reef Gold Project Environmental Assessment

Question, Comment or Concern	Agency Response	CMC Response
Water Resources		
<i>Water Quantity</i>		
Will there be any measurable change in water quantity of the system?	The proponent has indicated there would be slight changes in water levels from the Project. However, the proponent would work with the signatories to the Seine River Water Management Plan to ensure that water level changes in the system would remain within the limits established by the plan.	CMC agrees with the Agency response. CMC has committed to implementing contingency measures to offset project related effects on Marmion Reservoir during low water level periods.
Concerned about the amount of water needed to refill Mitta Lake during closure.	The Agency acknowledged the comment. The pits would be passively filled over a period of approximately 218 years. Also, the proponent has indicated 16 megatonnes of waste rock from the east pit would backfill the west pit, which would reduce the volume of water needed to fill the pits.	CMC agrees with the Agency response. Filling of the open pits is not expected to have a measureable impact on water levels or outflows from Marmion Reservoir.
Is the proponent studying upstream water given it is controlled by a dam system?	The proponent has looked at upstream and downstream water levels. The proponent indicated there would be a plan for water-taking from the Upper Marmion Reservoir that would maintain water levels within baseline variation. Water levels would be monitored and water would be recycled to reduce the freshwater demands of the Project.	CMC agrees with the Agency response.
Is there seepage from the waste rock?	There would be seepage from the waste rock. The proponent has committed to mitigation measures, such as ditches and collection ponds, to capture seepage for treatment, as necessary to meet federal and provincial regulatory requirements to protect aquatic life, prior to discharge into the environment.	CMC agrees with the Agency response.



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<i>Water Quality</i>		
How will the proponent mitigate the effects that draining Mitta Lake into Marmion Reservoir may have? Concerned that Mitta Lake has no aquatic life below a certain depth.	The proponent would drain Mitta Lake in stages, treating the water as necessary during each stage to ensure the water meets provincial and federal requirements for the protection of aquatic life, prior to discharge.	The detailed plan for draining Mitta Lake has not been developed, but will include fish salvage, archeological monitoring and water quality monitoring. CMC has committed to work with the Indigenous groups during the development of the plan (see Commitment 30 in Chapter 9 of the EIS/EA). All water discharged will meet provincial and federal requirements for the protection of aquatic life.
Will the water quality going into the Project be the same as the water quality going out?	Intake water quality likely would not be the same as effluent water quality. However, the effluent water discharged from the Project would need to comply with the <i>Metal Mining Effluent Regulations</i> and subsection 36(3) of the <i>Fisheries Act</i> regarding the deposit of effluent to waters frequented by fish, taking into account the <i>Canadian Council of Ministers of the Environment's Water Quality Guidelines for Protection of Aquatic Life</i> . Also, the Project would need to comply with conditions on effluent quality set by the Ontario Ministry of the Environment and Climate Change in the Environmental Compliance Approval.	CMC agrees with the Agency response.
Concerned about the spring melt carrying toxins from mine dust and depositing it in the surrounding area.	Any mine dust that would settle near the mine operations area is not predicted to be at levels that would adversely affect plants, wildlife or humans outside the property boundary of the Project. In addition, mine effluent includes spring melt that makes contact with substances from the mine operations area. The <i>Metal Mining Effluent Regulations</i> require capture and subsequent discharge of the mine effluent through a controlled discharge point. According to these regulations, discharge is permitted only if the effluent quality complies with regulatory limits.	CMC agrees with the Agency response.



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<p>If higher quality water is introduced into the system, would it release toxins that may not have been there otherwise?</p>	<p>The proponent is expected to release water that complies with federal and provincial government requirements for water quality that protects aquatic life. Water quality modeling and an ecological risk assessment have been completed for the receiving waterbodies. The results show no adverse effects on the environment. Federal and provincial government agencies are working with the proponent to address the methylmercury issue.</p>	<p>CMC confirms that all water discharged will meet provincial and federal requirements for the protection of aquatic life. The mine effluent will contain elevated concentrations of sulphate, compared to the water in Marmion Reservoir, but significantly lower than discharge from the former Steep Rock Mine. Sulphate concentrations will diminish rapidly in Marmion Reservoir to near background concentrations within 100 m of the discharge location.</p> <p>CMC recognizes and appreciates concerns with respect to sulphate release and its potential influence on methylmercury generation. However, for a basin such as the Marmion Reservoir, which has many natural inputs of mercury (e.g. upstream wetlands), a large surface area which influences photo-demethylation, and fluctuating water elevations due to operation of the Raft Lake Dam, it is not possible to isolate the overall influence of one process over another to accurately predict potential changes over time that may result from minor changes in sulphate concentrations.</p> <p>Should the project proceed, CMC is committed to work with the regulating authorities and Indigenous groups on this important issue. Should fish tissue mercury levels rise relative to the already impacted fish tissue concentrations CMC is committed to working with the regulators to provide data with which to update safe consumption guidelines for fish such that the public and Indigenous communities can safely enjoy this resource.</p>
<i>Methylmercury</i>		
<p>Concerned there may already be methylmercury in the watershed and therefore the Project would increase methylmercury in the system.</p>	<p>Studies have shown there is methylmercury in the watershed. The proponent has been asked to describe whether the Project would contribute to increases in methylmercury levels in the system. The Agency will provide further updates through the remainder of the environmental assessment process.</p>	<p>See response above.</p>



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<i>Treating and monitoring water quality</i>		
Will the proponent only be treating the water by aerating it?	Effluent water discharged from the Project would need to comply with the <i>Metal Mining Effluent Regulations</i> and subsection 36(3) of the <i>Fisheries Act</i> regarding the deposit of effluent to waters frequented by fish, taking into account the <i>Canadian Council of Ministers of the Environment's Water Quality Guidelines for Protection of Aquatic Life</i> . Also, the Project would need to comply with conditions on effluent quality set by the Ontario Ministry of the Environment and Climate Change in the Environmental Compliance Approval. The proponent has committed to treat effluent, if necessary to comply. Aeration could be a possible step in the water treatment process. Details on the type of treatment procedures would be determined with final project design during the regulatory phase, should the Project receive environmental assessment approval to proceed.	CMC agrees with the Agency response. Water will be treated if required to meet federal and provincial effluent criteria for the protection of aquatic life. The method of treatment would depend on the specific parameter(s) that need to be reduced to meet effluent criteria.
Will effluent quality be inspected by a third party?	Effluent quality must meet the requirements of the <i>Metal Mining Effluent Regulations</i> . Ontario regulatory requirements would also apply. Federal and provincial authorities have powers to conduct inspections as deemed necessary.	CMC agrees with the Agency response.
Is there a list of contaminants being tested for, before the water is discharged from the Project and did any of these contaminants exist previously in the waters surrounding the project site?	The proponent would need to comply with the <i>Metal Mining Effluent Regulations</i> and subsection 36(3) of the <i>Fisheries Act</i> regarding the deposit of effluent to waters frequented by fish, taking into account the <i>Canadian Council of Ministers of the Environment's Water Quality Guidelines for Protection of Aquatic Life</i> . Parameters that were tested in baseline studies would be included in the effluent testing prior to discharge from the Project. These tested parameters exist in the waters surrounding the project site and include: physical parameters such as pH, acidity and temperature; major ions; nutrients; organics; microorganisms; and metals.	CMC agrees with the Agency response.



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<p>Are the parameters that were monitored for the baseline conditions of the water the same as those monitored under Metal Mining Effluent Regulations such as arsenic, cadmium, and total suspended solids?</p> <p>What exactly are the provincial and federal requirements and are there minimum/ maximum levels for contaminants in the water?</p> <p>What are the acceptable levels of arsenic, cadmium, and sulphate in the water?</p>	<p>The <i>Metal Mining Effluent Regulations</i> covers a subset of the parameters included in the baseline studies. The Regulations focus on: arsenic, copper, cyanide, lead, nickel, zinc, total suspended solids, Radium-226, pH and volume of effluent. The Regulations include maximum concentrations that can be present in the effluent prior to discharge. Ontario's Provincial Water Quality Objectives cover the parameters included in the baseline studies, except sulphates. The proponent would be expected to meet both federal and provincial requirements, as stipulated by the Regulations and provincial permits.</p> <p>There are contaminants in the water that exceed guidelines for the protection of aquatic life: aluminum, arsenic, iron, copper, cadmium, cobalt, lead, mercury and phosphorus. During the permitting phase, it is expected that the Ontario Ministry of the Environment and Climate Change would identify compliance limits to protect aquatic life within the receiving water body.</p>	<p>CMC agrees with the Agency response.</p>
<p>Would it be possible to have a committee formed with Indigenous groups that would test water to ensure it is of good quality?</p>	<p>The Agency acknowledged the comment and will forward this request to the proponent.</p>	<p>CMC has committed to a comprehensive Environmental Effects Monitoring program, which will include regular water quality testing of effluent and at selected locations within the reservoir. In addition, at the request of the Ontario Ministry of Natural Resources and Forestry (MNR), CMC will test water within the reclaim water pond within the Tailings Management Facility. All results will be shared with the applicable regulatory agencies and will be available to Indigenous groups and the public.</p> <p>Furthermore, the Resource Sharing Agreement with the First Nations provide for an environmental committee which meets on a quarterly basis. Also, regular information sessions are held with the Métis Nation of Ontario. Any request regarding sampling and water quality will be discussed with the appropriate Indigenous communities (First Nations and Métis) during future meetings.</p>
<p>Will the overflow from the open pit, continue to be treated once it is released?</p>	<p>Overflow would be monitored before it is released. It would take approximately 218 years for the pit to fill to the point of overflowing. Water quality is expected to be better at the upper layer of the water column due to stratification. The proponent has committed to monitor water quality during the first 5-10 years after the decommissioning phase. Once that period is over, the monitoring plan would be re-evaluated as required to ensure water quality standards would continue to be met over the longer term.</p>	<p>CMC has committed to monitor pit water quality annually (as able based on safety considerations) beginning the first year of closure until a stable chemical condition is reached (pending approval from MOECC and MNDM) or until discharge occurs. Towards the end of the filling period, prior to discharge, surface water quality within the flooded pits will be tested to confirm suitability for discharge. Discharge water quality is expected to meet discharge criteria over the long term without treatment. After overflow, monitoring will occur for a period of five years unless a reduced monitoring frequency is approved by the MOECC and MNDM pending monitoring results (Commitment 98 in Chapter 9 of the Version 3 EIS/EA)</p>



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Is there water quality monitoring both locally and downstream and will it happen regularly once the mine is operational?	The proponent would have a monitoring program in which they would do end-of-pipe, local, and possibly some downstream testing if deemed necessary to establish reference datasets. However, the monitoring plan still has to be developed in detail and would include specific contaminants, monitoring locations, and frequency of sampling and reporting.	CMC agrees with the Agency response.
Would the proponent be using a closed-loop system to recycle their water? Will there be water discharged from the Project?	The proponent has indicated the Project would recycle as much water as possible. Specific details on the recycling system will follow during detailed design, if the Project proceeds to the regulatory phase. There would still be periodic releases of water from the Project, but it would be tested and treated as necessary to meet federal and provincial regulatory requirements before it is released.	CMC agrees with the Agency response.
Atmospheric Environment		
<i>Air</i>		
Will the proponent add water to the tailings if they dry?	Thickened tailings would have a surface with a mix of particle sizes that are less susceptible to wind erosion and would not be a major source of dust from the Project. The proponent would be expected to manage the moisture content of the tailings to comply with federal and provincial air quality criteria, specifically the <i>National Ambient Air Quality Objectives, Canadian Ambient Air Quality Standards</i> and the <i>Ontario Ambient Air Quality Criteria</i> .	CMC agrees with the Agency response.
How will the proponent control methylmercury formed from dust deposition?	The proponent has indicated the Project would not generate or use mercury and that a best management practices plan to control dust generation would be implemented. The Agency and the Ontario Ministry of the Environment and Climate Change have asked the proponent to describe whether the Project would contribute to increases in methylmercury levels. The Agency will provide further updates through the remainder of the environmental assessment process.	CMC agrees with the Agency response. The Project will not use mercury and the generation of mercury from due to extraction and ore processing is not predicted. Therefore, the Project is not expected to add mercury to the watershed.
How will dust be controlled in the winter, specifically when snow is removed from the roads and pit?	The proponent has indicated the Project would have a best management practices plan to control dust emissions. Dust control measures within the plan include road maintenance to manage silt content in surface soils and wet drilling to control dust generation within the pit. The winter season is also expected to provide natural mitigation, given that the frozen ground reduces the breakup of surface material.	CMC agrees with the Agency response.



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<i>Noise</i>		
What is considered the 'normal' range of noise, and what are current baseline noise levels in the project area?	According to Ontario's Environmental Noise Guideline (NPC-300), nighttime and daytime levels should be around 40 and 45 decibels (A-weighting), respectively.	CMC agrees with the Agency response.
Fish and Fish Habitat		
A few years back, there was a high level of methylmercury in fish in Sawbill Bay. Concerned that the mine will have a high impact on fish. Has baseline fish tissue been collected, specifically for mercury levels?	The proponent collected fish tissue samples in 2010, 2011 and 2014 of fish from Lizard Lake, Sawbill Bay, Turtle Bay and Sapawe Lake. Analysis of the fish tissue confirmed that baseline mercury levels are elevated in large-bodied fish (i.e., smallmouth bass, northern pike, walleye), with walleye sampled from Sawbill Bay having the highest concentration. Sapawe Lake fish had the lowest concentration of mercury. The existing levels do not appear to have affected the fish populations. However, mercury levels in fish from Sawbill Bay (and Upper Marmion Reservoir) exceed Ontario's recommended limits for consumption by women of child-bearing age and children under 15 years of age.	CMC agrees with the Agency response. The fish tissue sampling program completed by CMC in 2014 was completed at the request of local stakeholders, including Indigenous communities, and with the assistance of Indigenous community members. The results of this sampling program were provided to the government for distribution to the local stakeholder and Indigenous communities.
Will the proponent be relocating the fish in Mitta Lake and creating new habitat, or just moving them to another lake?	The proponent would relocate fish from Mitta Lake. A detailed fish salvage and relocation plan would be developed with input from Indigenous groups. In addition, Fisheries and Oceans Canada would require the proponent to have an Offsetting Plan to offset the loss of fish habitat in Mitta Lake.	CMC agrees with the Agency response. The Offsetting Plan will include creation of new habitat to offset loss of fish habitat in Mitta Lake.



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<p>Fish testing in Sawbill Bay was done a few years back and high levels of methylmercury in fish were found. Concerned that the mine will have a high impact on fish.</p>	<p>The proponent has been asked to describe whether the Project would contribute to increases in methylmercury levels in the system. The Agency will provide further updates through the remainder of the environmental assessment process.</p>	<p>The Project will not use mercury and the generation of mercury from due to extraction and ore processing is not predicted. Therefore, the Project is not expected to add mercury to the watershed.</p> <p>The mine effluent is expected to have elevated concentrations of sulphate, compared to the water in Marmion Reservoir. Sulphate concentrations will diminish rapidly in Marmion Reservoir to near background concentrations within 100 m of the discharge location. Marmion Reservoir has many natural inputs of mercury (e.g. upstream wetlands), a large surface area which influences photo-demethylation, and fluctuating water elevations due to operation of the Raft Lake Dam, it is not possible to isolate the overall influence of one process over another to accurately predict potential changes over time that may result from minor changes in sulphate concentrations.</p> <p>Should the Project proceed, CMC is committed to working with the regulating authorities and Indigenous groups on this important issue. Should fish tissue mercury levels rise relative to the already impacted fish tissue concentrations, CMC is committed to working with regulators to provide data with which to update safe consumption guidelines for fish (Commitment 165 in Chapter 9 of the Version 3 EIS/EA).</p>
<p>Will fish migration be studied?</p>	<p>Fish studies were completed in waterbodies within the local study area but did not include fish migration. Fisheries and Oceans Canada may consider fish migration during the regulatory process under the Fisheries Act to finalize the Offsetting Plan.</p>	<p>Fish migration is not expected to be impacted by the Project and at present there is no plan to study fish migration.</p>
<p>Which fish species are present in Mitta Lake? Concerned effects on baitfish may be downplayed.</p>	<p>Fish species found in Mitta Lake include white sucker, brook stickleback, ninespine stickleback, fathead minnow, Iowa darter, mottled sculpin, finescale dace and slimy sculpin. Fisheries and Oceans Canada considers potential effects to all fish that support a commercial, recreational or Aboriginal fishery, including baitfish. Measures to address effects on baitfish would be included in the fish habitat Offsetting Plan.</p>	<p>CMC agrees with the Agency response.</p>
<p>How will small fish species be captured as a part of the relocation plan?</p>	<p>Details of the relocation plan will be developed prior to finalization of the plan, during the regulatory phase.</p>	<p>CMC agrees with the Agency response.</p>



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Terrestrial Wildlife and Habitat		
<i>Terrestrial Wildlife and Habitat</i>		
Has the proponent identified any moose migratory corridors?	No migratory corridors were identified. The proponent indicated there are aquatic feeding areas near the project site, with a moose calving/herding area on the east side of Lizard Lake. Major movement corridors would be maintained around project components.	CMC agrees with the Agency response.
Does the proponent have plans to deal with wildlife that enter the project area?	The proponent stated staff would be required to report wildlife sightings and mortalities, especially on or near roads. Additionally, blasting would be temporarily suspended if large mammals were spotted within the danger zone as identified by the blasting supervisor.	CMC agrees with the Agency response.
Has the proponent done any work assessing impacts to species at risk? Will there be habitat compensation for them?	The proponent completed assessments on species at risk that were observed in the local study area, including Canada warbler, snapping turtle, bald eagle, common nighthawk, and bats (little brown myotis and northern myotis). The Ministry of Natural Resources and Forestry expects, and the proponent committed to provide, habitat compensation for bat species as required by the Endangered Species Act, 2007. In addition, the proponent indicated that by creating and enhancing wetland areas, these wetlands could support other wildlife, including snapping turtles.	CMC agrees with the Agency response. The wetland areas referenced by the Agency will be created as part of the fish habitat offsetting plan (i.e, no net loss plan)
Has a bat assessment been done?	Bats were assessed in 2013. Seven bat species were found in or near the proposed project site.	CMC agrees with the Agency response.
Why is construction not considered to affect wildlife during denning and nesting season if the reason the habitat is not there is because of construction?	The proponent would avoid land clearing during denning and nesting periods to be protective of wildlife. It is understood that once the land is cleared, the habitat would be lost. The proponent expects wildlife would be displaced to similar habitat in the local and regional study areas. After the decommissioning phase of the Project, the rehabilitated mine site would mature into wildlife habitat.	CMC agrees with the Agency response.
Are snapping turtles in the area? How will they know to move to more suitable habitat?	Snapping turtles were found in the project area. Suitable habitat can be found within the local study area and mitigation measures, such as culvert crossing, would be put in place to encourage snapping turtles to move to the suitable habitat.	CMC agrees with the Agency response.



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<i>Wildlife Health</i>		
Is there any mitigation to prevent contamination of wildlife and plants from seepage?	To mitigate potential contamination of plants and wildlife, seepage from the stockpiles would be intercepted and captured through ditches and collection ponds. This water would be directed to the processing plant collection pond or the reclaim pond of the tailings management facility for eventual reuse or treatment prior to discharge. The Agency is awaiting further information from the proponent about seepage from the tailings management facility.	<p>CMC agrees with the Agency response. Additional information regarding seepage from the Tailings Management Facility has been provided in the response to Federal comment T(3)-08 (see Addendum Part A; Table A-1). Groundwater modelling and water quality modelling analyses were completed no adverse effects to aquatic life were predicted in the downstream environment were predicted. Should seepage bypass be greater than predicted and/or water quality be worse than predicted such that adverse impacts to aquatic life in the downstream receiving environment are possible as a result of the Project, appropriate contingency measures will be implemented (Commitment 129 in Chapter 9 of the Version 3 EIS/EA).</p> <p>An ecological risk assessment was completed (see Section 5.2.1.1.2 of the Human Health and Ecological Risk Assessment TSD) considering potential interaction between wildlife and the TMF Reclaim Water Pond. Predicted concentrations were determined to be below guidelines or toxicological benchmarks considered to be protective of wildlife health.</p>
Current Use of Lands and Resources		
<i>Country Foods</i>		
Did the proponent study vegetation along the shoreline, specifically a medicinal plant called Weecay?	The proponent considered vegetation along the shoreline of waterbodies in the local study area. Weecay has not been identified in the information provided to the Agency. Traditional land use studies have been kept confidential due to the nature of the information. The Agency will confirm with the proponent whether its commitment to avoid traditional use areas takes Weecay, and access to it, into account. The Agency will provide further updates through the remainder of the environmental assessment process.	Shoreline vegetation was surveyed extensively during field surveys for the environmental assessment in 2010-2013 and in 2017. Additional wetland habitats that weecay (<i>Acorus calamus</i>) is known to grow in were also intensely surveyed during wetland evaluations conducted for the Project in 2012. There were no recorded observations of weecay in the vegetation communities on or within proximity to the Project. Project effects to weecay are not anticipated.
Which plants were a part of the ecological and human health risk assessments? Concerned about wild rice.	The plant species included in the human health and ecological risk assessment are: cattail, velvetleaf blueberries, cranberries and Labrador tea. The proponent has been asked to describe whether the Project will contribute to increases in methylmercury levels in the system. As part of this analysis, the proponent will also be required to provide analysis on whether there would be any impacts to wild rice. The Agency will provide further updates through the remainder of the environmental assessment process.	The potential for impact to wild rice due to sulphate discharge was assessed based on standards recently developed by the Minnesota Pollution Control Agency (MPCA). Sulphate concentrations in areas where wild rice is known to be harvested are predicted to be well below the estimated sulphate standard for the protection of wild rice.



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<i>Rights of Indigenous Peoples</i>		
Concerned that the proponent's harvesting policy may infringe on Indigenous people's rights.	The harvesting policy would apply to both Indigenous and non-Indigenous workers while working onsite or staying at the worker accommodation camp, as a condition of employment. The policy is intended to address effects to fish and wildlife populations and onsite safety concerns.	CMC agrees with the Agency response.
<i>Size of Local Study Area</i>		
Concerned that the local study area is not big enough and does not capture all of the traditional activities that may be affected by the Project.	The Aboriginal Interests Local Study Area figure (shown on slide 40 of the presentation) includes lands and waters likely to be affected by the Project and focuses on land and natural resource uses that could experience direct change of use due to project construction and operations, or indirect change of use due to environmental changes triggered by the Project. Land and resource use also may be affected by temporary restrictions of access for safety and security reasons.	CMC agrees with the Agency response.
<i>Trapping</i>		
Were all potential Indigenous trappers identified? Grand Council Treaty 3 may know whether Indigenous trappers are in the area. Has the Agency contacted Grand Council Treaty 3?	The proponent stated potential Indigenous trappers were identified through the traditional land use studies and effects on these trappers were taken into account in the effects assessment. The Agency consults with individual First Nations directly, rather than through Grand Council Treaty 3, unless directed otherwise by the First Nations. However, the Agency does notify Grand Council Treaty 3 when formal comment periods occur during the environmental assessment process.	All trapline owners that may be impacted by the Project, either Indigenous and non-Indigenous, have been identified. Where trapline owners would be impacted, compensation agreements have been signed.
Physical and Cultural Heritage		
Concerned that there is not a formal protocol in place with the proponent if they uncover new heritage sites.	The proponent advised that new archaeological discoveries would be subject to the <i>Ontario Heritage Act</i> . All project work would cease and the Indigenous group(s) would be contacted.	CMC agrees with the Agency response. CMC has also committed to archeological monitoring during the draining of Mitta Lake.



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Cumulative Environmental Effects		
<p>Concerned about the cumulative effect on water quality/quantity due to Steep Rock overflowing during the life of the Project.</p>	<p>Overflow of the pits at Steep Rock Mine will occur around 2070. It is predicted that the overflow water would be neutral in pH with metal concentrations near Provincial Water Quality Objectives.</p> <p>The Project is expected to discharge effluent at a quality that complies with the <i>Metal Mining Effluent Regulations</i> and subsection 36(3) of the <i>Fisheries Act</i>, taking into account the <i>Canadian Council of Ministers of the Environment's Water Quality Guidelines for Protection of Aquatic Life</i>. Also, the Project would need to comply with conditions on effluent quality set by the Ontario Ministry of the Environment and Climate Change in the Environmental Compliance Approval.</p> <p><i>The proponent has indicated there would be slight changes in water levels from the Project. However, the proponent would work with the signatories to the Seine River Water Management Plan to ensure that water level changes in the system would remain within the limits established by the plan.</i></p> <p>Note: Italicized text indicates an update since the material was sent to the Indigenous Groups on April 28, 2017</p>	<p>CMC has committed to implementing contingency measures to offset project related effects on Marmion Reservoir during low water level periods.</p>
Accidents and Malfunctions		
<p>Concerned about the construction of the tailings management facility how it will be ensured that the proponent follows the guidelines.</p>	<p>The proponent would need to follow the Canadian Dam Association guidelines and Ontario Ministry of Natural Resources and Forestry's requirements. Detailed design would require approval from the ministry before construction. The Agency understands that ministry officials may conduct compliance monitoring to ensure the intent of the <i>Lakes and Rivers Improvement Act</i> is being met.</p>	<p>CMC agrees with the Agency response.</p>
<p>Will there be financial assurances in the event of an accident or malfunction, specifically if the proponent goes bankrupt?</p>	<p>The Agency understands that financial assurance is required under the Mining Act for closure, but not for accidents and malfunctions. If the company went bankrupt, they would still be liable, as would any future owner of the mine.</p>	<p>CMC agrees with the Agency response.</p>



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Effects of the Environment on the Project		
Concerned about catastrophic flooding due to climate change.	The proponent would manage mine site water by taking advantage of the tailings management facility which is designed for a 1 in 100-year storm capacity. The proponent also looked into how climate change could affect the Project. The Agency understand that, as part of the application process for dams and containment structures, the proponent would have to demonstrate how climate change considerations are incorporated in the project design.	CMC agrees with the Agency response and adds that the Tailings Management Facility will be designed to safety route a 1 in 10,000-year return period storm without overtopping.
Concerned about how changes to the environment due to climate change such as a lot of snow or rainfall may affect the Project.	The tailings management facility would be designed to accommodate specific storm events and its capacity would exceed what is needed by the Project, thereby reducing the risk of a dam breach. In the event of extended dry periods, the proponent proposes to take advantage of the capacity within the tailings management facility and water management ponds to store water and minimize water-taking from the Upper Marmion Reservoir.	CMC agrees with the Agency response. The Tailings Management Facility will be designed to safety route a 1 in 10,000-year return period storm without overtopping.
Project Description		
What is the design of the collection pond, ditches, and pumps? Will they incorporate pre-existing natural structures in their design?	Detailed design work has not started; however, it is not unusual to take advantage of the natural topography. The proponent indicated that topographic lows for ditches and ponds would be used, as deemed suitable. For regulatory approval to build, the proponent would have to submit detailed plans for the collection ponds, ditches, pumps, and other project components.	CMC agrees with the Agency response.
How will the tailings be thickened? Are there chemicals added and what are they composed of?	The proponent indicated thickening agents would be used to dewater the tailings. Final design would be required to provide a list of chemicals contained in the thickening agents. However, further clarification on the types of chemicals contained in thickeners will be sought from the proponent. The Agency will provide further updates through the remainder of the environmental assessment process.	The thickening and rheological behaviour of the Hammond Reef tailings were characterized by bench scale testing. The test results indicated that the tailings can be sufficiently thickened using high compression thickeners with the addition of hydro soluble, non-toxic anionic polyacrylamide flocculant, an agent similar in nature to what is used in municipal waste water treatment plants, at a dosage rate of 30 grams per tonne. Further testing will be required during detailed design to confirm the dewatering equipment specifications and flocculant requirements. For reference purposes, the products FLOMIN 905 (see MSDS provided) and AN905 VHM is an example of a flocculant that may be used. Furthermore, CMC has significant operational experience with thickened tailings at its Malartic Mine operation.



Canadian Malartic Corporation (CMC) Responses to the Canadian Environmental Assessment Agency's (Agency) Table of Questions, Comments and Concerns Raised during the Teleconference Sessions Held between October 2016 and January 2017 for the Hammond Reef Gold Project Environmental Assessment

Question, Comment or Concern	Agency Response	CMC Response
Indigenous Consultation		
<p>Concerned that not enough is being done to include Indigenous communities in the Project</p>	<p>The Agency acknowledged the comment and will forward it to the proponent for consideration. The environmental assessment process provides participation opportunities to learn about the Project and consider potential effects of the Project.</p> <p>The proponent has indicated meetings with community representatives to address matters of interest were held. The Agency understands from the proponent that the approach followed to involve Indigenous communities in the Project follows the communication strategies agreed by community leadership and the proponent, early in the environmental assessment process. The proponent also indicated it has promoted training and use of enterprises owned by Indigenous peoples, as well as provided support for the traditional land use studies.</p> <p>The Agency has been including Indigenous groups throughout the federal environmental assessment process (e.g., correspondence, face-to-face meetings, and teleconference sessions). Future opportunities include the comment periods on the draft and final Comprehensive Study Report.</p>	<p>CMC is committed to working with and including Indigenous communities in the project through ongoing employment opportunities, meetings, and working with first nations communities, should the project proceed.</p> <p>CMC has been very proactive and holds regular meetings, site visits and project updates with the different First Nations and Métis Nation of Ontario. Spring and Fall ceremonies are also being held on the project site or Quetico Provincial Park where all FN and MNO members can attend. CMC has a full time Indigenous relations manager in Atikokan.</p> <p>Furthermore, a Resource Sharing Agreement has been signed since 2010 with 8 of the 9 First Nations. The RSA provides for three committees:</p> <ul style="list-style-type: none"> - The Environmental Committee; - The Training, Employment and Economic Development Committee; and - The Social and Cultural Committee. <p>The purposes of the Committees are to facilitate information sharing and maintaining open and transparent lines of communication.</p> <p>The RSA mentions that CMC Hammond Reef will provide employment opportunities respecting the Hammond Reef Project where possible and commercially reasonable. Members of the Surrounding Local Communities will take priority respecting employment opportunities so long as they meet the requisite</p>



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Question, Comment or Concern	Agency Response	CMC Response
<p>Concerned that their information on current use was not included in the proponent's traditional land use studies</p>	<p>The proponent has indicated that a series of workshops were undertaken to better understand traditional land use in the project area. The workshops determined that Indigenous communities participate in a variety of land use activities including, hunting, trapping, fishing, plant harvesting, and collecting natural items. While the detailed findings of the workshops remain confidential, the proponent has stated that the information was used to facilitate project planning, identify mitigation measures, and to draw conclusions in relation to the effects assessment. The Agency encourages Indigenous communities to share any comments about the effects assessment and potential impacts to s.35 rights due to the Project.</p>	<p>The Traditional Use Study was designed based on (1) Agency principles from the guide <i>Considering Aboriginal traditional knowledge in environmental assessments conducted under the Canadian Environmental Assessment Act – Interim Principals</i>, (2) input from First Nations Chiefs and Elders, and (3) academic review.</p> <p>Input was sought from the Chief of the Lac des Mille Lacs First Nation and the Fort Frances Chiefs Secretariat. Three group meetings with Elders were recommended. The group meetings were held and the formal call for participants was issued through the Fort Frances Chiefs Secretariat, the Lac des Mille Lacs band administrator and the Wabigoon Lake Ojibway Nation administration.</p> <p>Input to the Traditional Use Study was also sought through community open houses and individual interviews with trapline holders and a local wild rice harvester.</p> <p>CMC feels that the Traditional Use Study completed in support of the environmental assessment adequately included input from the Indigenous groups likely to be impacted by the Project.</p>
<p>Concerned that they cannot trust the proponent.</p>	<p>The Agency understands from the proponent that communication protocols are in place with the committees established through resource sharing agreements. It is understood that committee representatives would ensure all Indigenous groups are notified regarding matters of interest, and that there have been committee meetings to discuss issues and plan events, such as seasonal ceremonies at Mitta Lake.</p> <p>If the Project is approved, the environmental assessment decision would likely include provisions for a follow-up program. The subsequent regulatory phase would likely make provisions for federal and provincial environmental oversight. In addition, government monitoring activities also would require the proponent to demonstrate Indigenous groups were included and notified of events, as agreed either during the federal or provincial environmental assessment processes or as required by other federal or provincial regulatory processes.</p>	<p>CMC agrees with the Agency response.</p>



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Question, Comment or Concern	Agency Response	CMC Response
Environmental Assessment Methodology		
Concerned that inadequate funding has been provided.	The Agency acknowledged the comment. The Agency's Participant Funding Program made funds available to Indigenous groups to support participation in the federal environmental assessment. In addition, the proponent indicated financial support was provided for conducting traditional land use studies and reviewing environmental assessment documents.	CMC agrees with the Agency response.
How could there not be adverse effects from the Project on fish, plants, wildlife and nearby lakes?	A human health and ecological risk assessment was completed which looked at potential contaminants and their pathways. It assessed effects on humans and wildlife, and determined contaminant levels would not have adverse effects. The proponent also indicated that traditional knowledge and traditional land use studies were used in the assessment to identify and characterize receptors and receptor locations.	CMC agrees with the Agency response.
Miscellaneous		
Concerned that Impact Benefit Agreements are not effective and do not adequately support First Nations in their capacity to negotiate and secure adequate accommodation.	The Agency acknowledged the comment and will forward it to the proponent for consideration. During the environmental assessment process, the Agency will continue to seek the views of Indigenous groups on the predicted environmental effects, the likelihood and nature of potential impacts to their s.35 rights, and views on any accommodation measures proposed.	The RSA agreement signed in 2010 is valid and will be in place until the project's production phase. CMC has always been proactive and discussions will take place in due time towards signing Impact Benefit Agreements with the First Nations and the Métis.
Concerned about lack of resource sharing agreements with the proponent.	The Agency acknowledged the comment and will forward it to the proponent for consideration.	CMC is committed to working with and including Indigenous communities in the project through ongoing employment opportunities, meetings, and working with first nations communities. As a result, a Resource Sharing Agreement has been signed since 2010 with 8 of the 9 First Nations. CMC has always been available to discuss with all communities.