



Indigenous Services Canada Services aux
Autochtones Canada

March 20th, 2026

Sent by email

Amy Sen
A/ Director, Ontario Region
Impact Assessment Agency of Canada / Government of Canada
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cc: springpolegoldmine-minedorspringpole@iaac-aeic.gc.ca

Dear Amy Sen:

Re: Springpole Gold Project – Request for comment on draft Environmental Assessment Report and draft potential conditions by March 13, 2026

Indigenous Services Canada (ISC) has reviewed the draft Environmental Assessment Report (the draft EA Report) and Draft Conditions for the Springpole Gold Mine Project. Thank you for the opportunity to provide comments and for considering ISC's input to the assessment to date. In keeping with our mandate, ISC's review of the draft EA Report has focused on the characterization of the proposed project's potential environmental effects considered under the *Canadian Environmental Assessment Act, 2012* (CEAA 2012), section 5(1)(c) pertaining to changes to the environment and Indigenous Peoples' health and socio-economic conditions; physical and cultural heritage and sites of significance; and the current use of lands and resources for traditional purposes. As requested, we also commented on the recommended mitigation measures, monitoring and follow-up programs; and whether the report accurately and adequately summarized contents and views from ISC.

ISC notes that the Draft Report describes the consultation and engagement undertaken with Indigenous communities. We commend the efforts undertaken by the Impact Assessment Agency of Canada (IAAC) and the Proponent to seek input from Indigenous communities and to understand the effects of the project on Indigenous peoples. Further, we note that the Indigenous communities closest to the project have provided substantial input which has been summarized throughout the report.

However, the Indigenous-led assessment currently underway by Cat Lake and Lac Seul First Nations remains outstanding and its findings have not been accounted for in this draft EA Report. Given the timing of the draft EA Report and the proposed timing of the Minister's decision, their potentially highly relevant information to support the assessment of effects, mitigation measures and conditions is not represented in the current draft. As a result, some of the conclusions may be premature or not adequately founded.

With the information currently available, the draft EA Report refrains from drawing conclusions on the significance of effects to physical and cultural heritage and to sites of significance of Indigenous Peoples, indicating that additional mitigation measures may still be proposed. The draft EA Report draws a conclusion of non-significance for effects to health and socio-economic conditions, however the information presented does not fully support this conclusion in light of information presented to date by Indigenous groups.

For these reasons, ISC does not find that the draft EA Report accurately and adequately characterizes environmental effects within federal jurisdiction related to ISC's mandate. Further information on these comments, along with contextual considerations are provided below as well as in Appendix A, in the hopes that these issues can be addressed in the final report.

Information Considered in draft EA Report

The Proponent has provided support to Lac Seul First Nation and Cat Lake First Nation, to conduct an Indigenous-led environmental assessment of the project, Kita-ki-nan. ISC understands that the involved First Nations intend to make the Draft Kita-ki-nan Extended Summary Report public available shortly. This information will offer critical insights into the significance of residual effects, key mitigation, and proposed conditions. ISC encourages the Agency to make every effort to allow for the consideration of the Indigenous-led assessment in the Ministers decision and conditions. ISC notes that, if necessary, the Minister may extend the time limit for an environmental assessment under section 27(3) of CEAA 2012 to allow the Agency to take into account circumstances that are specific to the project, which could help to preserve the honour of the Crown.

ISC strongly encourages the Proponent to work closely with impacted Indigenous groups to understand their findings, conclusions and recommendations and to address remaining concerns throughout the planning and execution of the Springpole project. To date, specifically with regard to health, Indigenous groups have expressed concerns regarding the Proponent's limited consideration of Indigenous determinants of health in the assessment of potential effects on Indigenous health and well-being, such as social relations, family, community cohesion, cultural continuity, stress levels, mental health and food security. Indigenous groups have also expressed a lack of confidence in both the scope and the conservativeness of the Proponent's assessment. ISC notes that the potential conditions require that the Proponent work with Indigenous groups to meaningfully implement the required mitigation, monitoring and follow-up measures; these efforts should also be informed by the Indigenous-led assessment.

Characterization of Effects

The draft EA Report abstains from drawing a conclusion regarding physical and cultural heritage and sites of importance (Section 8), as IAAC continues to work with Indigenous communities to identify measures that could mitigate or accommodate this loss.

However, the draft EA Report identifies that Indigenous groups have clearly expressed that the damage done to the cultural and spiritual value of the Waabizheshi Agaasademon Onigam existing portage cannot be reversed. Site preparation and construction will require the removal of the portage as it is within the open pit area. As noted in the Draft Report, the portage has been used by Indigenous travelers since time immemorial to the present, a fact that is supported by archeological finds dating back to 8000 B.C. Based on ISC's review of project information from IAAC, the proponent, and Indigenous groups, we find it is unlikely that the proponent proposal of a documentation and commemoration plan, and a design plan following mine abandonment will be adequate. ISC encourages consideration that the final EA Report characterize the residual adverse environmental effects on physical and cultural heritage and on sites of importance as significant.

The draft EA Report considers a limited selection of pathways of effects and associated mitigation measures regarding health and socio-economic conditions in Section 7. With regards to health, the draft EA Report focuses primarily on potential health effects associated with biophysical changes and contaminant exposure pathways (e.g., contaminants in water, air, and country foods). However, this approach does not take into consideration the broader determinants of health that are central to Indigenous health and well-being. With regards to socio-economic conditions, the draft EA Report limits its analysis to traplines which is not indicative of broader socio-economic effects that may result from the presence of the project, related disturbance to the surrounding environment, and real and perceived biophysical effects. Related socio-economic effects, which are interconnected with culture and land use, could include effects to sense of place, social cohesion and relations, intergenerational relations and knowledge transfer, shifts in subsistence land use, and associated effects to wellbeing that can influence community members' ability to access project-related benefits. Given the exclusion of broader determinants of health and of a robust range of socio-economic effects from the characterization of effects in the draft EA Report, ISC does not find these effects are adequately characterized and as a result the final characterization of socio-economic effects as non-significant may be inaccurate. Information from the Indigenous-led assessment and resulting conditions could further substantiate the characterization of effects and better inform a conclusion on significance and propose mitigations for consideration.

Contextual considerations

ISC notes that some concerns Indigenous groups have identified during the environmental assessment process may not be directly related to the Project and cannot be directly addressed under CEAA 2012. The proposed project would be occurring in a social and economic context that is already experiencing challenging realities related to colonial legacies, geographic and economic inequities and ongoing crises. ISC further notes that the relatively short-term duration of the project may leave communities in the area susceptible to the negative social and economic legacies of boom-bust dynamics once the project is closed. While direct health and socio-economic effects are outside the scope of CEAA 2012, social and ecological context remains part

of significance analyses, alongside measures of duration, magnitude, reversibility, etc. We note that the draft EA Report references communities' concerns with regards to their baseline health and socio-economic conditions. ISC encourages IAAC to describe the analysis undertaken with regards to the social context in which effects are occurring and how this affected significance determinations.

ISC also notes that the draft EA Report is silent on the issue of community safety, particularly that of Indigenous women and girls. We acknowledge that related effects are beyond the scope of CEAA 2012; however, the Calls for Justice resulting from the National Inquiry into Missing and Murdered Indigenous Women and Girls highlight the need for particular attention to, and dedicated mitigation of, potential increases in violence towards Indigenous women, girls, and 2SLGBTQQIA individuals resulting from resource development projects. Meaningful consideration should be given to the increased risk to neighbouring communities resulting from the project and to the means of mitigating these effects. If the decision of whether significant adverse effects are justified under the circumstances is required and referred to Governor in Council, ISC recommends that these issues be taken into account. While these efforts cannot be conditioned under CEAA 2012, the Proponent should be taking meaningful steps in collaboration with Indigenous communities to address any related harms associated with its project.

Detailed comments

Additional comments to support the drafting of IAAC's final EA Report and Conditions are included with this correspondence (Appendix A). In large part, these recommended additions or edits aim to strengthen the report's treatment of important health concerns raised through the assessment.

Thank you for the opportunity to review the Draft EA Report and Draft Conditions. If you have any questions or concerns, please contact Julia Gregory, Policy Analyst, Impact Assessment, by e-mail at julia.gregory@sac-isc.gc.ca.

Sincerely,

Laura Mitchell

Director General,
Lands and Environmental Management Branch,
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Attachments :

APPENDIX A : Indigenous Services Canada's comments on Springpole Gold Draft EA Report and Draft Conditions

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Table 1: Indigenous Services Canada's comments on Springpole Gold Draft EA Report

ID	Draft Report Section	Original text / discussion	Recommendation
ISC- 01	3.1.1 Assessment of Effects 3.1.1 Loss or alteration of fish habitat Section B: Alternative means of carrying out the project. Page 113	<i>"ECCC identified uncertainties in the water quantity modelling for small inland waterbodies east of the stockpiles, which could translate to uncertainties in effects to fish habitat. The Proponent will clarify assumptions in its modelling and refine predictions to inform the conditions of the Fisheries Act authorization."</i> <i>"The Proponent will clarify assumptions in its modelling and refine predictions to inform the conditions of the Fisheries Act authorization."</i> <i>Annex B: "ECCC expressed concern with the selected location due to the potential for seepage to enter Birch Lake and Springpole Lake. Cat Lake First Nation and Lac Seul First Nation also expressed concerns about the proximity to both lakes and water quality."</i>	ISC would like to highlight that changes to water quantity modelling may also influence predicted changes to water quality, which could impact human health. However, Fisheries Act authorizations do not consider potential impacts to human health. Therefore, under the health and socio-economic conditions of Indigenous peoples ISC recommends requiring the Proponent to update the water quality modelling to reflect any revised water quantity modelling and to explicitly consider potential impacts to human health. Otherwise, potential health impacts associated with changes in surface water quality would only be identified <u>after the fact</u> through the comprehensive water monitoring program.
ISC- 02	7. Effects to the health and socio-economic conditions of Indigenous Peoples	<i>"To verify that water quality remains protective of Indigenous health conditions, the Proponent committed to establishing a comprehensive water monitoring program"</i>	In its January 10, 2025, submission, ISC highlighted that real or perceived risks related to drinking water quality represent a key concern for potentially impacted Indigenous communities.

	7.1.1 Health conditions – drinking water. Page 57	<i>in the region with the participation of Indigenous communities.”</i>	ISC acknowledges IAAC’s recommendation to the Proponent to implement a comprehensive water monitoring program and recommends that: - the Proponent seek consensus with potentially impacted Indigenous groups on the design and implementation of the follow-up program including the selection of monitoring parameters. - the follow-up program include observational and perceptual parameters, including whether Indigenous community members are likely to: - o observe changes in drinking water quality or related environmental conditions; and - o become less willing to drink water from these sources due to real or perceived contamination.
ISC- 03	7 Effects to the health and socio-economic conditions of Indigenous Peoples 7.1.1 Health conditions – drinking water. Page 57	<i>“To verify that water quality remains protective of Indigenous health conditions, the Proponent committed to establishing a comprehensive water monitoring program in the region with the participation of Indigenous communities. This program would include opportunities for community-based monitoring for Cat Lake First Nation, Lac Seul First Nation, and Slate Falls Nation at sites in addition to those required by provincial permitting.”</i>	ISC has noted that several key elements of the proposed <u>community-based monitoring program</u> remain undefined, such as, the scope of monitoring activities, the selection of parameters to be monitored, the mechanisms to respond to monitoring results, and the thresholds that would trigger management actions if contamination is detected. The Draft EA Report does not ensure financial resources and long-term support for the <u>community-based monitoring program</u>. ISC recommends that the final EA report and conditions specify the scope, governance and implementation of

			the proposed community-based monitoring program to ensure that it is meaningful, feasible to implement, and responsive to Indigenous concerns.(text for proposed condition in ISC-12)
ISC- 04	7. Effects to the health and socio-economic conditions of Indigenous Peoples 7.1.1 Health conditions – drinking water. Page 57	<i>“IAAC also recommends that the Proponent provide direct notification to Indigenous communities if any potential health risks are forecasted or identified.”</i>	In addition to direct notifications, ISC recommends that IAAC include a condition requiring the Proponent to commit to sharing, in a timely and culturally-relevant manner, the results of its regulatory water quality monitoring reports with potentially impacted Indigenous communities, and that the Final EA Report be updated accordingly to reflect this commitment.
ISC- 05	7. Effects to the health and socio-economic conditions of Indigenous Peoples 7.1.1 Health conditions – drinking water. Page 57	<i>“IAAC understands that the assumptions in the human health risk assessment are conservative and protective of human health, and that effluents would remain within the Proponent’s proposed receiver-based effluent criteria. IAAC is of the view that, with the implementation of mitigation measures, the project is not likely to result in residual adverse effects to Indigenous health conditions due to impacts on drinking water.”</i>	ISC notes that several communities have expressed concerns on the Registry, regarding existing challenges and potential project impacts on their access to and use of water from Birch Lake and Springpole Lake for drinking purposes. Cat Lake First Nation, for example, is currently under a boil water advisory (in place since February 2024), and, due to the high cost of store-bought food and water, many community members rely on harvested foods and water collected from preferred locations such as Birch Lake and Springpole Lake. Moreover, Indigenous groups indicated that any perceived or real degradation of these water sources could further affect community reliance on trusted local drinking water sources.

			Considering the uncertainties associated with the water quantity and water quality modelling, as well as concerns raised by Indigenous groups, ISC recommends that IAAC provide a more comprehensive rationale in the Final EA Report for its conclusion that the Project is not likely to result in residual adverse effects to Indigenous health conditions related to drinking water, including clarification on how existing conditions and potential actual and/or perceived changes to drinking water quality due to the project are considered.
ISC- 06	7. Effects to the health and socio-economic conditions of Indigenous Peoples 7.1.1 Health conditions – Country Foods. Page 57 -58	<i>“Project-related activities could increase the concentrations of contaminants of potential concern (COPC), including arsenic, cobalt, mercury, and methylmercury, in air, soil, water, and sediments through fugitive emissions, dust deposition, and effluent discharge. This could lead to an increase in contaminant concentrations in traditional vegetation, wild meat, and fish tissue that may be consumed by Indigenous Peoples. A consumption advisory currently exists for Birch Lake due to elevated concentrations of arsenic and methylmercury in fish“(...)” The Proponent’s risk assessment predicted that the project would cause a negligible increase in COPC in terrestrial country foods, and a marginal increase in aquatic country foods.”</i>	ISC suggests that the follow-up monitoring program for country foods include arsenic and methylmercury in fish tissue from species consumed by Indigenous communities. This monitoring should start as soon as construction commences and continue through to the post-closure phase. If monitoring shows that arsenic or methylmercury are increasing over time relative to pre-construction concentrations, the Proponent should update the human health risk assessment using the results of monitoring and implement modified or additional measures.

ISC-07	7. Effects to the health and socio-economic conditions of Indigenous Peoples 7.1.2 Socio-economic conditions	Section 7.1.2 Socio-economic effects only discusses traplines. The draft EA Report limits economic impacts to 8 existing trapline holders, of which 2 are Indigenous. Only one Indigenous trapline holder expressed support for the project and the proponent accommodated their interests and addressed their concerns. The conclusions drawn may be applicable to the effects to traplines and trapline users, and we note that IAAC is careful to draw conclusions regarding residual adverse effects to the socio-economic conditions of Indigenous Peoples related to trapline use specifically. The draft EA Report makes no mention of other socio-economic conditions that may be affected by a change in the environment resulting from the project.	The conclusions of non-significance drawn in the draft EA Report with regards to socio-economic conditions, as well as those related to current use, seem to be due in part to a siloed approach to understanding effects that are, for Indigenous peoples in particular, closely interrelated. Issues such as social cohesion, sense of place, subsistence land use and intergenerational transfer of knowledge that link social, economic, health, and culture do not fit neatly within a single heading in the draft EA Report, but are nonetheless effects to Indigenous peoples from changes in the environment as a result of the project. The EA Report could further substantiate or refine its conclusions by exploring a more robust set of changes to the environment and subsequent effects to socio-economic conditions and by acknowledging and assessing the interconnected nature of effects to Indigenous peoples.
ISC-08	7.1.2 Socio-economic conditions	The draft EA Report did not comment on the issue of Indigenous employment. First Mining Gold Corp.'s Environmental Impact Statement states "<i>...the Indigenous working age population is expected to grow and may require raising Indigenous educational attainment level to facilitate participation in the workforce; and other barriers to employment include a lack of a high school equivalent or other educational requirements, a lack of a driver's licence or access to transportation, low motivation, lack of interest, and reduced capacity to</i>	As the forthcoming results of the First Nation community-based assessment on socio-economic impacts are not reflected in the draft EA Report, the draft EA Report considers only a very narrow set of effects (ie. one trapper and Proponent accommodation) (as noted in ISC-07). On the issue of Indigenous employment, the Proponent identified a number of mitigative measures to address Indigenous employment participation which rely heavily on public programs which may not actually be available. Heightened inequities in economic and workforce participation due to existing community

		<i>work due to social or mental health issues. In addition, members who use substances and are in recovery may not be able to obtain employment if they have been charged with a criminal offence or are actively receiving treatment.”</i>	socio-economic challenges could further exacerbate Indigenous mental health outcomes as project benefits are disproportionately realized in the region. These potential effects are interconnected with those resulting from environmental changes due to the project; however, no discussion of this or related mitigation within the care and control of the Proponent, or commitments from the Proponent, is presented. The issue of effects to socio-economic conditions to Indigenous People resulting from a change in the environment from the project warrants further consideration in the draft EA Report and in any referral to Governor in Council in the event that conclusions of significant adverse effects found.
ISC-09	7. Effects to the health and socio-economic conditions of Indigenous Peoples 7.1.3 Effects from malfunctions and accidents. Page 60	<i>“While residual adverse effects to Indigenous Peoples’ health and socio-economic conditions due to malfunctions and accidents could be possible, IAAC is of the view that such effects have a low probability of occurrence and would be managed by proposed mitigation measures.”</i>	ISC notes in the draft EA Report that Indigenous groups have expressed concerns pertaining to accidents and malfunctions. The Draft Report states that <i>“residual adverse effects to Indigenous Peoples’ health and socio-economic conditions due to malfunctions and accidents could be possible”</i> but then concludes that <i>“effects have a low probability of occurrence and would be managed by proposed mitigation measures.”</i> It is not clear how IAAC reached this conclusion, as the Proponent hasn’t yet provided an accident response plan outlining proposed mitigation. It is also not clear that the Proponent’s “malfunctions and accidents plan” will be subject to expert review to ensure that

			proposed mitigation in the accident response plan will be adequate to address the risks posed by accidents and malfunctions. ISC suggests that this conclusion is premature given the uncertainty that exists around health impacts from accidents and malfunctions.
ISC-10	8. Effects to the physical and cultural heritage and sites of significance of Indigenous Peoples 8.1.2 Archaeological and heritage resources	<i>"The timing of project activities is not expected to affect sensitive cultural activities. The residual effects would be limited to the PDA but would be long-term" (p.70)</i>	The project exists year-round and affects cultural activities throughout the year. The statement that effects would be limited to the PDA suggests the assessment is considering only tangible, physical heritage and sites of importance; this disregards the very real, yet intangible effects on cultural heritage articulated by affected Indigenous groups. Further consideration of intangible effects should be articulated in the draft EA Report to substantiate or refine conclusions of significance.
ISC-11	9. Current Use of Lands and Resources for Traditional Purposes of Indigenous Peoples	The draft EA Report states the project will likely cause residual adverse environmental effects in several areas, but with proposed mitigation measures the project will NOT likely cause significant adverse environmental effects to Indigenous peoples' use of Land and Resources for Traditional Purposes. This conclusion ignores the interrelatedness of natural elements to each other and to the cultural context and use of these elements by Indigenous Peoples. The draft EA Report	At a certain point, multiple non-significant effects do reach a threshold at which point they could be considered significant. The threshold is very much subjective, and should be based on the perspective of those most directly impacted. The draft EA Report identifies potential impacts to multiple elements that relate to the use of lands and resources for Traditional Purposes of Indigenous Peoples. For example, the decline in caribou herd population poses a residual adverse effect to Indigenous peoples. The other residual risks of

		presents the following residual adverse effects: Caribou populations : The risk to caribou calving area by sensory and vegetative disturbances could be reversible after 18 years. There is no guarantee that this population will recover, and it is noted that other herds are also in decline or facing extirpation, posing an adverse effect to Indigenous people's use of this resource. Availability of plant and medicine species: There will be reduced plant availability and with the implementation of mitigative measures the project is likely to result in residual effects to Indigenous Peoples. Fishing: the destruction of fish habitat by isolation and dewatering and the development of a co-disposal facility within 120 metres from both lakes will create a distrust in fishing activities, and that implementation of mitigative measures will result in residual adverse effects to Indigenous peoples' fishing. Portages and navigable waters: The project will remove a longstanding portage route, and with mitigative measures developed by the Proponent, the project will likely result in residual adverse effects to Indigenous peoples' use of portages and navigable waters.	available plant and medicine species, fishing, portage and navigable waters, water seepage from co-disposal facility, and sensory visual disturbances will all result in residual adverse effects to current use of lands and resources for traditional purposes of Indigenous peoples. While Table 9-1 lists a summary of mitigative measures, they do not guarantee any relief from the impacts of the project activities (construction, operation, closure, abandonment). ISC understands that affected First Nations have noted that land user behaviours will change as a result of the project and that mitigation measures targeted at specific effects will not be able to mitigate overall effects to land use. The forthcoming Indigenous-led assessment would offer important insights in this regard that warrant consideration by decision-makers. Further discussion of these effects should be presented in the EA Report to substantiate or refine the conclusions on significance.
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		Water: Seepage from the co-disposal facility will likely to cause effects to water quality to Springpole and Birch Lakes, however, the report indicates that it would remain within water quality criteria. The report also stated that the project will likely result in residual adverse effects to Indigenous peoples' use of water for traditional practices. Sensory and visual disturbances: Noise and the development of a 77 metre tall co-disposal facility that covers 380 hectares will have an impact on the landscape. Although mitigative measure can be put in place to buffer the visual disturbance, the current use may not be fully reversible and the project will likely cause adverse effects to Indigenous peoples.	
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Table 2 : Indigenous Services Canada's comments on Springpole Gold Draft Conditions

ID	Section	Recommendation
ISC-12	Section 5 Health and socio-economic conditions of Indigenous peoples	- ISC recommends refining the following conditions (new text underlined): <i>"5.4.2 monitor, during all phases of the Designated Project, changes in concentrations of contaminants of potential concern in species and at the locations identified pursuant to condition 5.4.1, using sampling methods that are non-lethal unless non-lethal methods are not technically feasible. <u>Arsenic and methylmercury must be included as contaminants of potential concern to be monitored in fish.</u>"</i> - ISC recommends adding the following new conditions: <u>5.3.3 update the water quality modelling to reflect the revised water quantity modelling and to explicitly consider potential impacts on human health.</u> <u>5.3.4 establish, prior to construction and in consultation with Indigenous groups, and maintain during all phases of the Designated Project, community-based monitoring programs for Cat Lake First Nation, Lac Seul First Nation, and Slate Falls Nation. The Terms of Reference for these programs shall be developed in consultation with the respective First Nations.</u> <u>5.4.3 If follow-up monitoring shows that arsenic or methylmercury are increasing over time relative to pre-construction concentrations, update the human health risk assessment using the results of monitoring and implementing modified or additional measures.</u> <u>5.5 The Proponent shall make regulatory monitoring reports related to air, water, and country food (e.g. fish) available to Indigenous communities and will provide timely notification in a culturally relevant manner to Indigenous communities if any potential health risks are identified or forecasted.</u>

ISC- 13	Section 8 Indigenous Environmental Committee	- ISC recommends consistency in the language used in the draft conditions as in the Draft EA Report. ISC suggests the following changes to the existing content on page 15 (new text underlined): <i>“8.1 The Proponent shall establish, prior to construction and in consultation with Indigenous groups, and maintain during all phases of the Designated Project, an Indigenous Environmental Committee and any sub-committees, <u>to review project approvals and environmental management and monitoring plans, to identify mitigation measures (including those related to accidents and malfunctions), as well as facilitate communication and engagement related to potential environmental effects of the Designated Project on Indigenous health, land use, and physical and cultural heritage . The Terms of Reference for the Indigenous Environmental Committee and any sub-committees shall be developed in consultation with Indigenous groups and shall include:</u>”</i> - ISC recommends adding the following new condition: <u>8.1.3 The Proponent shall ensure that monitoring programs and parameters are informed by community concerns and developed in full collaboration with Indigenous groups.</u>
ISC-14	Section 10 Independent environmental monitor	ISC recommends refining the following conditions (new text underlined): <i>“10.1 The Proponent shall retain, prior to construction, the services of a third-party independent environmental monitor, who is a qualified individual as it pertains to environmental monitoring in Ontario, <u>with priority given to Indigenous candidates,</u> to independently observe and record on the implementation of the conditions set out in this document during construction, and to report findings to <u>Indigenous groups, the Indigenous Environmental Committee,</u> the Proponent and the Agency <u>at the same time.</u></i>

		<i>10.2 The Proponent shall require the independent environmental monitor to report to <u>Indigenous groups, the Indigenous Environmental Committee and the Agency</u>, in writing, prior to or concurrent with reporting to the Proponent, if, in their view, any Designated Project activity does not comply with any condition set out in this document. The Proponent shall require the independent environmental monitor to report the information to the Agency at a frequency and in a format determined in consultation with the Agency."</i>
ISC-15	Section 11 Accidents and Malfunctions	ISC recommends refining the following conditions (deleted text crossed out and new text underlined): <i>"11.4.2 notify, as soon as feasible <u>immediately</u> and pursuant to the communication plan referred to in condition 11.5, Indigenous groups of the accident or malfunction, and notify the Agency in writing no later than 24 hours following the accident or malfunction. When notifying Indigenous groups and the Agency, the Proponent shall specify:"</i>