

## Summary of Issues – Wasamac Project

This document provides a general summary of the comments received by the Impact Assessment Agency of Canada (the Agency) on the Wasamac project (the Project) during the comment period of the Initial Project Description submitted by the proponent, Monarques Gold Corporation. The original comments are posted on the Canadian Impact Assessment Registry.

<b>Accidents and Malfunctions</b>
Effects related to the increase in traffic on local roads, including heavy equipment traffic on the <i>rang des Cavalier</i> , and the risk of incidents. Possibility to plan for transportation on Highway 117 and to put in place a contingency plan.
Effects of increased road traffic on official off-road vehicle (ORV) trails and the potential for incidents.
Clarification of the risks associated with the transportation of hazardous materials, including the use of Rail Veyor and the railway, and implementation of a contingency plan.
Need to implement a contingency plan in case of accidental spills of toxic products or wastewater, including those from electrical equipment whose mechanics are maintained with petroleum products.
Effects of seismic events and development of a contingency plan.
Clarification on the manufacture and storage of explosives and hazardous materials, on the risks of cracks in house foundations due to vibrations during blasting and on the contingency plan.
Possibilities of infrastructure breakdowns related to project activities.
Effects of oil spills from mining equipment on groundwater quality and contingency plan.
<b>Climate Change and Greenhouse Gas Emissions</b>
The project's effects on the climate for its entire supply, processing and consumption chain, not limited to activities on the mine site.
Details on greenhouse gas (GHG) emissions for each phase of the project and the measures under consideration to reduce GHG and SO <sub>2</sub> emissions on an ongoing basis.
Description of the activities that would impact carbon sinks and the areas of land that are expected to be affected by the project, depending on the type of ecosystem.
Details on obtaining environmental certification.
<b>Cumulative Effects</b>
Cumulative and regional effects due to the location of the project in an area of high natural resource exploitation.

<b>Fish and Fish Habitat</b>
Description of all watercourses and water bodies affected or likely to be affected by the project and the resulting effects on fish and fish habitat.
Effects on fish habitat resulting from changes to the hydrological and hydrogeological regime, encroachment of infrastructure on watercourses and water bodies, and erosion and sedimentation resulting from the dewatering of drifts.
Effects on the free passage of fish resulting from the installation of watercourse crossings, changes to watercourse flows and changes to the hydrogeological regime and groundwater supply to watercourses.
<b>General</b>
Accuracy on the maximum daily production capacity, in case the maximum production is reached before what was planned.
<b>Geology, Geochemistry and Geological hazards</b>
Effects of acid mine drainage and metal leaching from mine waste on the Project.
Effects of pit dewatering and groundwater pumping on soil compaction at certain locations around the mine (private property).
<b>Health Conditions, Human Health and Well-Being</b>
Visual effects of project infrastructures and tie-in with Landscape Agreement AU 82-51 applied by the Ministry of Forests, Wildlife and Parks for forest management works, mainly for the proposed Kekeko Hills Regional Park.
Effects of changes in the visual environment on human receptors.
Effects of increased noise and vibration on the health of nearby residents and mitigation measures.
Details on the number of blasting operations planned per day and the daily velocity (minimum, maximum, average) of blast vibrations in mm/s.
Effects of the project on air quality and method of mitigation for human health and ecosystems during all phases of the project.
Details on the current air quality situation at the mine site and beyond.
Adverse health effects on nearby residents due to stress, anxiety and concern about the effects of the project on properties and the environment.
Effects of accidents or malfunctions on human health and level of preparedness to notify and protect the population.
Risks to the health and safety of workers and citizens related to the use of a new technology (Rail Veyor) to operate the mine.
Clarification of risks considered unacceptable for the health and safety of people.
Analysis of the stress caused by the fear of property value depreciation and adequacy of compensation.

<b>Indigenous Peoples</b>
Effects of the project on the health of Indigenous peoples, particularly in relation to their use of the territory.
Description of the use of the territory around the Wasamac property by Indigenous peoples.
Effects of the construction of the temporary worker camps and description of the socio-economic impacts that could affect the health, including the safety of Indigenous girls and women.
Description of the areas that are used by Indigenous communities for traditional activities around the Wasamac property that could be contaminated and where contaminants could be found in food that is trapped, fished, hunted, harvested or cultivated for subsistence or medicinal purposes.
Clarification on the economic and financial benefits for Indigenous peoples and their future generations.
Clarifications on how the proponent will involve Indigenous peoples in the preparation of its impact study.
Clarification of how the proponent plans to build a relationship of trust with Indigenous peoples.
Clarifications reflecting the concerns raised by Indigenous peoples in their discussions with the proponent on the Initial Project Description, including the existence of Indigenous rights in the region and the potential for the project to affect the exercise of those rights.
Clarification of the proponent's willingness to redevelop the site in a state acceptable to Indigenous peoples, in collaboration with them, so that they and future generations can use it to exercise their rights.
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Description of a plan for the mobilization of Indigenous people and measures to proactively and continuously involve them.
Clarification of the communities in the vicinity of the project and verification of the distance (approximate) between the project's implementation area and the Long Point First Nation community.
Clarification on the inclusion of Wahgoshig First Nation in the communities consulted.
Clarification on the names of the communities used alternately (for example, the community of Pikogan is also the Abitibiwinni First Nation).
Clarification regarding the proximity of the project to: lands used for traditional purposes by the Indigenous peoples of Canada; lands forming part of a reserve within the meaning of subsection 2(1) of the Indian Act; First Nation lands within the meaning of subsection 2(1) of the First Nations Land Management Act; lands covered by a comprehensive land claim agreement or self-government agreement; any other lands set aside for the use and benefit of the Indigenous peoples of Canada.

Specification of any structure, site or thing of historical, archaeological, paleontological or architectural significance. If the proponent considers that this point is not applicable in the context of Wasamac, it must be mentioned.

**Land and Resource Use and Land Tenure**

Effects on the value of the real estate properties of residents in the vicinity of the project.

Clarification on the establishment of a buffer zone around the mill and mine where the properties will be purchased.

Clarification on the possibility of expropriation and the need for citizens to relocate, as well as on the buy-back of properties, price, the possibility of relocation and the dispute resolution process.

Clarifications on the protocol for dealing with breakdowns caused by the operation of the mine and the compensation of citizens, including the budget for compensation.

Clarification on protecting the integrity of homes and drinking water facilities (individual wells).

**Migratory Birds**

Effects of the project on migratory birds during construction, operation and decommissioning caused by clearing activities, road infrastructure, road traffic, contact with toxic substances and sensory disturbances

**Ore Processing and Transportation Alternatives**

Description of the interface between the "Rail-Veyor" and the Ontario National Railway.

Description of the persons or entities legally responsible for the processing of ore at an existing plant in Ontario, the anticipated changes in responsibility and control over time and the geographic extent of responsibility and control for the proposed activity.

In the event that the processing of ore at an existing mill in Ontario is not the responsibility of Monarch Gold Corporation, a description of any non-arm's length relationship between the proponent and the third party; the current or anticipated contractual relationship between the proponents; the legal responsibilities of each person or entity involved; any partnerships or agreements; and any shared relationships with shareholders, parent or affiliate; any legal entities in both businesses; the manner in which the nature of the relationship between the proponent or the designated activity and the entity proposing the activity may influence or direct the carrying out of the proposed activity and any limitations on such influence or direction; anticipated changes in the ability of the proponent of the designated activity to influence and direct the carrying out of the proposed activity over time.

Clarification of the regulatory requirements for processing ore at an existing mill in Ontario, including a description: whether the proposed activity is in an area of federal jurisdiction; the potential effects of the proposed activity in areas of federal jurisdiction; the applicable federal regulatory processes that will assess the potential effects of the activity; the provincial legislative and regulatory requirements in respect of the proposed activity and the provincial legislative and regulatory requirements in respect

of the potential effects in areas of federal jurisdiction; and the regulatory requirements of other jurisdictions in respect of the proposed activity and its potential effects in areas of federal jurisdiction.
Description of the persons or entities legally responsible for the transportation of ore by rail from the Wasamac Property to the mill in Timmins, Ontario, the anticipated changes in responsibility and control over time, and the geographic extent of the responsibility and control in relation to the proposed activity.
Clarification of the regulatory requirements for the transportation of ore by rail from the Wasamac Property to the mill in Timmins, Ontario including a description: whether the proposed activity is within federal jurisdiction; the potential effects of the proposed activity on areas of federal jurisdiction; the applicable federal regulatory processes that will assess the potential effects of the activity; the legislative and regulatory requirements of the Province with respect to the proposed activity, as well as the legislative and regulatory requirements of the Province with respect to potential effects on areas of federal jurisdiction; the regulatory requirements of other jurisdictions with respect to the proposed activity, and its potential effects on areas of federal jurisdiction.
<b>Project Purpose</b>
Precisions on the project's purpose in relation to sustainable development and the preponderance of mining and forestry activity in the Abitibi-Témiscamingue region, which creates economic fragility due to the volatility of these fields of activity.
Project's purpose in relation to the importance of developing projects that bring more than just jobs to society.
Clarification of the project's purpose in relation to the usefulness of the exploited resource.
Clarification of the project's purpose in relation to the life of the project based on the quantity of exploitable ore.
<b>Site Restoration and Monitoring Committee</b>
Details on the final remediation plan, the timing of its development, the assessment of the costs of remediation, the dismantling of infrastructure, planting, the effects on the environment and citizens, the potential future uses of the site and the developer's liability following closure.
Details on the establishment of a monitoring committee and its mandate, including the power to challenge the budget allocated for the studies, its accountability, the rehabilitation at project closure, technical and financial support to use experts.
Possibility of applying an impermeable membrane to the tailings pond to reduce leaching to zero at the end of operations.
Clarification of the criteria to be used to rehabilitate the site to an acceptable state.
<b>Social Acceptability</b>
Clarification of the proponent's commitment to work towards the social acceptability for citizens, notably through compensation, upholding of agreements, information to citizens, job creation and the right of citizens to influence the project.

Analysis of the social divide that could result from the polarization of opinions on the project and its effects on the harmonious cohabitation of residents in the vicinity of the project.

Clarification of the repercussions that the implementation of a water system could have for people living near the project.

**Socio-Economic Conditions**

Effects of the project on the economic environment and impacts on social interactions, structure and maintenance of a good quality of life.

Effects of the project on the local and global supply chain.

Positive and negative impacts on the local economy and population, taking into account new economic opportunities, the context of labour shortages and housing accessibility.

Effects of the project on recreational and family activities in the vicinity of the mine site, including the Kékéko Hills and lakes Hélène, Adelaine, Wasa and Wildca.

Effects of the project on traffic and road users.

Description of the community's profile, including the expected number of jobs created, the type of skills and knowledge that may be required to support project completion, the main economic activities in the study area, and the barriers to employment and participation of under-represented local groups.

Description of the local and external recruitment strategy.

Possibility of prioritizing local hiring by considering the context of the region, labour shortages, minority groups, women, and youth education.

Details on employee retention over the life of the mine.

Details on the placement of employees following the eventual closure of the mine.

**Species at Risk**

Effects on species at risk, including caribou (fragmentation and loss of habitat area and quality, population disturbance and changes in predator movements), and description of mitigation measures.

**Surface Water, Drinking Water and Groundwater**

Effects on water quality due to disruption of water regime or accumulation areas for waste rock, tailings and overburden management.

Clarification on the management and treatment of wastewater prior to discharge to the environment, as well as the discharge of pumped groundwater.

Effects on surface water in the area of the mine sometimes used for drinking water supply.

Effects on the hydrology of surrounding watersheds and forest environments and mitigation measures.

Descriptions of water intakes or outfalls to be constructed in a navigable watercourse(s).

Clarification of the potential for deposition or dewatering of any navigable watercourse.

Effects of the project on existing or potential sources of drinking water and on the quality and quantity of available drinking water in relation to changes in groundwater and surface water flow.
Effects on the potability of well water and the water supply of nearby citizens.
Effects on groundwater and description of mitigation measures.
Description of the nature of the surface formations and the depth within the project boundaries.
<b>Terrestrial Fauna and Habitat</b>
Effects on flora and fauna (fragmentation, habitat loss, population disturbance).
<b>Timelines, Consultation Method and Evaluation Process</b>
Clarification on the establishment of a transparent, inclusive consultation process with reasonable timelines and tools to facilitate public participation in the context of the pandemic.
Clarification on the treatment of comments received and the establishment of a follow-up committee and the budget allocated to this committee.
Clarification on the consultation planned in the case of a mine life extension and the conduct of another impact assessment.
Details on the means available to citizens to participate in the process, including legal issues, and ways of maximizing their participation, particularly through specialist support.
Effects of a possible change of operator on the process and citizens.
Clarification of the conditions for having or not having an impact assessment, according to the Impact Assessment Act.
Clarification of the anticipated timing of construction, operation, decommissioning and closure of the project, including any planned expansion of the project.
Clarification of the expected date for decision making by the regulatory authorities (2023), whereas the proponent's schedule provides for three months for decision-making following the review of the conformity of the impact study and the IAA provides for 300 days (impact assessment) + 30 days (decision-making).
<b>Vulnerable Population Groups (GBA+)</b>
Basic information on the communities potentially affected by the project and details on the health context, including the demographic profile, the health status of the population, access to health and social care centers, health-related behaviors, types of stress experienced and the existence of sensitive receptors such as schools, daycare centers, retirement homes, nearby health care centers.
Details on the information used to understand the differential impact of the project on the health of women, children, other vulnerable groups and First Nations.
Need to integrate the elements required to conduct the informed analysis of GBA+, including an examination of the broader social, legal and economic environment and the power systems that present barriers for certain individuals or groups.

Need to assess intersectional factors in order to understand the reality of those who are most marginalized due to overlapping identity factors and to identify potential impacts on various individuals or groups, including the uneven distribution of project impacts and how the project might reinforce or challenge existing inequalities. Importance of mobilizing groups and individuals in the GBA+ process.

**Wetlands and Forests**

Effects of the project on wetlands and their ecological functions, including in relation to the possible filling of certain wetlands.

Effects of potential soil changes, including soil loss, compaction, and erosion on soil productivity for forest vegetation and biodiversity.

Description of methods used and effects of tree clearing on species with cultural values and biodiversity.

Effects of land-use change and recovery of forest land, mitigation measures and description of their rehabilitation.