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Re: 15-Mile Processing Hub Project, Response to Summary of Issues

Thank you for providing the Summary of Issues raised in relation to the 15-Mile Processing Hub Project (the Project). We sincerely appreciate the time taken by Mi'kmaq communities and organizations, the public, federal authorities, provincial departments, and other interested parties to review and comment on our Project. We have carefully reviewed the Summary of Issues, as well as all of the submissions and comments posted on the Canadian Impact Assessment Registry (the registry) for the Project, to better understand the views and concerns of those whose interests may be affected by the Project.

This submission, which has been prepared in part to fulfil the requirements of section 15(1) of the Impact Assessment Act, articulates how the issues identified by the Impact Assessment Agency of Canada (IAAC) in the Summary of Issues have been and/or will continue to be addressed by 15-Mile Minerals and Renewables Ltd. (15-MMR). To support transparency and promote understanding among all interested parties, this submission goes beyond responding only to the "key issues" identified by IAAC (as required by the Act), by also addressing the "other issues" summarized by IAAC and additional issues noted by us in our review of the submissions and comments on the registry.

To facilitate IAAC's review of this submission, our response to the additional issues noted by us is provided in Attachment A, while our response to the "Key Issues" identified by IAAC is provided in Attachment B, and our response to the "Other Comments, Advice, and Recommendations" is provided in Attachment C. In Attachments B and C, to minimize redundancy, later responses refer back to content provided in earlier responses. This cover letter, together with all attachments, forms our Response to the Summary of Issues, and we urge IAAC to fully consider all of this information in subsequent decision-making.

Our Successful Track Record of Responsible Operations

St Barbara and its subsidiaries in Nova Scotia have a strong track record of responsible mineral exploration, development, operations, and reclamation. We remain committed to the highest standards of environmental stewardship and to the responsible development of our mineral assets within the Province.

The environmental charges referenced in comments relate to road run off events that occurred when the Touquoy Mine was owned and operated by Atlantic Gold Corporation, prior to its acquisition by St Barbara. Following the acquisition, St Barbara undertook measures to review and improve road infrastructure, including improved designs and the implementation of improved controls to manage sediment and silt runoff. St Barbara undertook monitoring activities of the success of the remediation ever since. Since these improvements were completed, no charges have occurred under St Barbara's ownership and operation of the site.

Historic Mining Contamination and Mine Closure

We, as Nova Scotians, understand and share the concerns about the environmental impacts and financial burden to taxpayers that have resulted from historic mining activity in the Province from late 1800's and early 1900's. St Barbara's commitment includes developing a sound closure and progressive reclamation plan for all three mine sites, providing financial security, and remediating historical contamination currently existing within the Project footprint. This will ensure that mining activities are conducted responsibly, the land is rehabilitated once operations end, and taxpayers are not responsible for funding restoration



Project redesign demonstrates 15-MMR's commitment to responsible development

We take all feedback received from the Mi'kmaq, federal authorities, and other interested parties extremely seriously. 15-MMR has taken the time to continue engagement, collect additional data, and carry out further study and analyses. The outcomes of this work have informed the extensive redesign of how 15-MMR proposes to responsibly develop the Project. This was and remains an intentional effort to constructively address the issues that had been raised and demonstrates 15-MMR's commitment to bring forward the best most responsible project design. The redesign prioritized environmental and social constraints over economic benefits, leaving viable gold resources in the ground where necessary in order to minimize the potential environmental and social effects of the Project to minimize potential environmental and social effects while balancing responsible resource development objectives. As a result of the redesign, the projected disturbed footprint has been reduced by 55% for Old Mitchell, 43% for Old Austen, and 23% for 15-Mile relative to the previously assessed designs.

We urge IAAC to take into full account the significant efforts 15-MMR has made, over years, through a substantial Project redesign, to respond to and address feedback from the Mi'kmaq, federal authorities, and interested parties in respect of the previous projects rather than allow concerns about previous designs to influence the appropriate permitting pathway. These project designs are materially different in scope.

The next steps in the process, including the decision to be made pursuant to section 16 of the Impact Assessment Act, must, in fairness, consider the Project as it is now proposed, with its substantially reduced potential for adverse effects within federal jurisdiction, and the comments to be considered in that decision-making should be limited to those that pertain to and have been provided in relation to the newly designed Project.

Full assessment

The Project will be subject to a full, thorough, in-depth, and robust assessment. As IAAC is aware, the Project is subject to a provincial EA pursuant to the Nova Scotia Environment Act and the Environmental Assessment Regulations. The recently signed Co-operation Agreement between Nova Scotia and Canada on Environmental and Impact Assessment explicitly recognizes that Nova Scotia has an "established robust process for the high-quality assessment of the effects of certain types of projects, informed by rigorous science, and Indigenous and community knowledge". As detailed elsewhere in our submission, the provincial EA process considers a wide range of potential effects (including but not limited to federal effects) on biophysical, social, economic, health, cultural, and heritage interests, including those of the Mi'kmaq of Nova Scotia. We note that the Province of Nova Scotia, in its submission on the registry (document #397), has also confirmed that its provincial EA and regulatory processes will address potential adverse effects in federal jurisdiction, including direct or incidental adverse effects, that may be caused by the Project. In addition, other federal, provincial, and municipal permitting processes required for the Project will address federal effects.

Taken together, these assessments and permitting processes will ensure a comprehensive, robust, and transparent evaluation of the Project, with meaningful opportunities for participation by the Mi'kmaq of Nova Scotia and the public without wasteful and time-consuming duplication of processes. Nova Scotia has demonstrated they can successfully assess, permit and regulate gold mining projects of similar scale and mining rates and is well positioned to lead the assessment process. The Province's established regulatory framework and technical expertise provide a strong foundation for the thorough assessment and management of all potential project effects, including those within federal jurisdiction.

15-MMR commitments to ongoing engagement

In particular, 15-MMR recognizes the significant interest of the Mi'kmaq of Nova Scotia in the Project, including their interests in the lands, waters, and resources of Nova Scotia. We remain committed to respectful, open, and ongoing engagement that recognizes Mi'kmaq Treaty Rights and supports meaningful two-way dialogue.

15-MMR will continue working with the Mi'kmaq to share information and seek understanding of the Project's potential effects on rights protected under section 35 of the Constitution Act, 1982. Throughout Project planning, 15-MMR has shared information, discussed community interests and concerns, sought to understand traditional land and resource use, and identified measures to avoid, reduce, or otherwise mitigate potential effects. Mi'kmaq knowledge and feedback have informed the updated Project design and 15-MMR remains committed to incorporating Mi'kmaq perspectives through Two-Eyed Seeing (Etuaptmuk).

Concerns regarding the Project's potential environmental and socio-economic effects on the Mi'kmaq of Nova Scotia will of course be addressed through the EA and permitting processes. 15-MMR is currently in discussions with the Assembly of Nova Scotia Mi'kmaq Chiefs regarding a royalty agreement for resource revenue sharing and is seeking to negotiate a Mutual Benefits Agreement (MBA) well before commencement of the Project. The MBA would establish a framework for Mi'kmaq economic participation and shared benefits, including procurement opportunities, employment and training commitments, and other priorities identified through ongoing discussions.



15-MMR recognizes that meaningful engagement is a shared process requiring the active participation of all parties. We remain committed to ongoing dialogue, transparent information and data sharing, collaboration, and informed Project decision-making regardless of the permitting pathway.

Closing Remarks

15-MMR's Response to the Summary of Issues is intended to support IAAC in making its decision with respect to the need for a federal impact assessment for the Project.

We agree with the Province of Nova Scotia that the potential effects of the Project, including direct and indirect adverse effects within federal jurisdiction, can and will be effectively addressed through the robust provincial EA process, in combination with the provincial Industrial Approval process and other federal and provincial permitting processes. We agree with the DFO statement, in their Federal Authority Advice Record, that key issues related to fish and fish habitat "can be addressed by the proponent meeting DFO's regulatory requirements under the Fisheries Act and Species at Risk Act".

We also agree with the Co-operation Agreement statement that, when a proposed project is primarily provincially regulated and subject to a provincial EA process, Canada will rely on Nova Scotia's EA and regulatory processes to address the adverse effects within federal jurisdiction. The 15-Mile Processing Hub Project is a mining project, regulated primarily by Nova Scotia and subject to its robust oversight. We note the Province of Nova Scotia has requested IAAC rely on Nova Scotia's EA and regulatory processes, together with other federal approvals, permits, and processes, to avoid unnecessary duplication while ensuring that adverse effects within federal jurisdiction are appropriately addressed. In our view, this is the appropriate path forward.

Further, we encourage IAAC to consider the comprehensive suite of mitigation measures, management plans, and monitoring programs that 15-MMR has committed to develop and implement. Of note, we have highlighted, both in the IPD and throughout our Response, our commitment to implement standard mitigation measures identified by IAAC, consistent with your efforts to make the impact assessment process more efficient. To support your consideration of 15-MMR's commitments, we attach a comprehensive List of Commitments and Mitigation Measures for the Project as Attachment D.

In closing, 15-MMR is committed to advancing the 15-Mile Processing Hub Project in a safe and responsible manner, in accordance with applicable federal and provincial regulatory requirements and guidelines, guided by ongoing consultation with the Mi'kmaq of Nova Scotia, relevant authorities, and local communities.

Please do not hesitate to contact the undersigned if you have any questions or require additional information.

Sincerely,

<Original signed by>

Andrew Strelein
Managing Director & CEO

Attachment A

Response to Additional Issues Identified by 15-MMR



Attachment A: Response to Additional Issues Identified by 15-MMR

As noted in the cover letter included with this submission, this attachment provides 15-MMR's response to additional issues noted by us in our review of the submissions and comments on the registry. The information provided in this attachment is an integral part of 15-MMR's Response to the Summary of Issues, and we urge IAAC to fully consider all of this information in subsequent decision-making. While some of these issues are touched upon in the cover letter, this part of our Response provides additional relevant detail.

Our Successful Track Record of Responsible Operations

St Barbara and its subsidiaries in Nova Scotia have a strong track record of responsible mineral exploration, mine development, operation, and reclamation. 15-MMR is committed to continue this strong track record as it develops the 15-Mile Processing Hub Project.

Several submissions on the registry refer to instances of regulatory non-compliance in relation to the Touquoy Mine and suggest that the proponent of the 15-Mile Processing Hub Project has a poor environmental track record. These assertions are inaccurate and misleading.

All of the referenced incidents occurred when the Touquoy Mine was owned and operated by Atlantic Gold Corporation, prior to St Barbara's acquisition of the operation in July 2019. Since the acquisition, St Barbara, through its subsidiary Atlantic Mining NS Inc. (AMNS), has actively advanced reclamation activities at the Touquoy Mine and taken corrective action to address the pre-existing compliance issues.

The silt release and monitoring incidents, which occurred between February 2018 and June 2019, primarily related to significant rainfall events that caused runoff containing sediment from secondary access roads, overwhelming portions of the stormwater management system. These incidents were not associated with active mining operations, tailings management, or the processing facility. St Barbara upgraded the section of road and corrected the issue.

St Barbara and 15-MMR are committed to continued excellence in the responsible development of their mineral assets in the Province and have incorporated the lessons learned from the previous operator into Project planning and design.

Historic Mining Contamination and Mine Closure

A number of submissions and comments on the public registry argue the Project should not be allowed to proceed because historic mining in Nova Scotia resulted in environmental impacts, some of which remain unremediated today.

We, as Nova Scotians, understand and share the concerns about the environmental impacts and financial burden to taxpayers that have resulted from historic mining activity in the Province. Today, mining activity in Nova Scotia is highly regulated and robust mechanisms are in place to ensure mining proceeds in a safe and environmentally responsible manner that protects the public from mining-related liability.

St Barbara and its subsidiaries in Nova Scotia are committed to restoring the land after mining is complete. To do this, we develop a closure and reclamation plan, which must be approved by the Province, and set aside financial security, known as a reclamation bond (held by the provincial government), to fund the process of remediation. This ensures that mining activities are conducted responsibly, the land is rehabilitated once operations end, and taxpayers are not responsible for funding restoration.

St Barbara, through its subsidiary AMNS, is proud to be the first company to move a gold mine into full reclamation in Nova Scotia. At the Touquoy Mine, reclamation activities are already underway and will continue throughout the project; in 2024 and 2025, we spent \$18 million on reclamation activities and we remain committed to fully reclaiming the site. Our reclamation bond for the Touquoy Mine is \$79.9 million, the largest reclamation bond in place in Nova Scotia, and the amount is re-evaluated at a minimum every three years.

Moreover, we are not just reclaiming the Touquoy Mine: we are also cleaning up soils at the site that were impacted by historical mining by other parties prior to our acquisition of the property. In total, 263,540 tonnes of arsenic-contaminated soils and historic mine tailings have been remediated.

We will bring the same commitment to the 15-Mile Processing Hub Project, developing a sound closure and progressive reclamation plan for all three mine sites, providing financial security, and remediating historical contamination currently existing within the Project footprint. The risks associated with site remediation will be fully assessed in a Human Health and Ecological Risk Assessment (HHERA) to be completed for each site (and included in the provincial environmental assessment (EA)) and risks will be effectively mitigated through site-specific management plans developed by qualified professionals in consultation with the Mi'kmaq and relevant authorities.



Project redesign demonstrates 15-MMR's commitment to responsible development

Several submissions on the public registry refer to the projects previously proposed by Atlantic Mining NS Inc. (AMNS) (another subsidiary of St. Barbara) and variously state that those projects were “abandoned,” “rejected” or “unable to achieve approval.” These statements are incorrect. None of the projects previously advanced by AMNS have been abandoned by St Barbara or 15-MMR or rejected by any regulator.

15-MMR took the feedback received during the previous assessment processes extremely seriously and proactively chose to withdraw the projects and go back to the drawing board to redesign how it proposes to develop the three properties. This was and remains an intentional effort to constructively address the issues that had been raised. Rather than showing a lack of understanding, ability, or compliance (as suggested in some submissions), 15-MMR's actions demonstrate its commitment to bring forward the best project. The redesign prioritized environmental and social outcomes, refining the Project scope to minimize potential environmental and social effects while balancing responsible resource development objectives.

15-MMR has taken the time to continue to engage the Mi'kmaq, government departments and agencies with relevant technical expertise, and other interested parties, and to collect additional data and carry out further study and analyses. The outcomes of this work have informed the extensive redesign of how 15-MMR proposes to responsibly develop the Project.

Rather than advancing each site in isolation, each with its own stand-alone ore processing and tailings management facilities, the consolidation of the three properties into one project, which reflects previous regulator feedback, allows 15-MMR to take a holistic and integrated approach to mine design, limiting duplicative infrastructure, minimizing disturbance, accelerating reclamation, and efficiently sequencing site development to extend operational life and associated benefits, including employment and government revenues.

This extensive work has resulted in an innovative and efficient model of mine development that significantly reduces the potential for adverse effects. These are not the same projects as before. The new project and site names are intended to differentiate this new, responsive approach from the old project designs, and to encourage assessment participants to consider the Project as it is now proposed.

Of note, the Project redesign incorporates previous feedback from the Mi'kmaq, federal authorities (in particular DFO), and key interested parties and substantially reduces the mine infrastructure at both the Old Austen and Old Mitchell mine sites, as detailed in our responses to the Key Issues (Attachment B) and other comments (Attachment C).

Project scale

Another important aspect of the Project redesign pertains to its scale relative to other mining activities. Some submissions on the public registry refer to the Project as a large “mega” project. That is not an accurate characterization of the Project.

When considering the size of the Project and its potential to cause adverse environmental effects, it is important to consider not only the ore production / mill throughput (the capacity aspects that are referenced in the Physical Activities Regulations (PAR)), but also other aspects of mining, especially mining rate (i.e., the total volume of material, including waste rock and ore, extracted from the mine in a given time period).

Projects with similar overall mining rates generally require comparable open pit volumes, stockpiles, and tailings requirements resulting in a similar scale of physical disturbance and associated environmental effects. The redesign of the 15-Mile Processing Hub Project incorporates a relaxed mining rate and a low strip ratio. When combined with our proposed mill throughput of approximately 8,219 tonnes per day (tpd), this results in a mining rate, including both waste rock and ore, of approximately 36,164tpd.

While mill throughput is often used as an indicator of project size, it does not, on its own, reflect the overall scale of mining activity. A project with lower mill throughput but higher strip ratio can have a similar mining rate and therefore similar requirements for open pit volumes, stockpiles, and tailings requirements and similar potential for environmental effects.

As a result, despite its high capacity, the redesigned 15-Mile Processing Hub Project is expected to have a scale of mining activity and associated potential environmental effects that are comparable to projects with lower mill throughput but higher strip ratios and similar mining rates.

The Province of Nova Scotia has previously assessed and permitted a gold mining project with a comparable overall mining rate through the provincial EA process established under the Environmental Act and Environmental Assessment Regulations. Although the ore processing rate of that project is lower, its higher strip ratio resulted in a total mining rate of approximately 36,000 tpd, which is comparable to the combined mining rate proposed for the 15-Mile Processing Hub Project across all three sites.

We recognize that the PAR establish a threshold of 5,000 tpd for ore production / mill throughput; however, we emphasize that these are not, on their own, reliable indicators of overall project scale or, importantly, the potential for adverse environmental effects. This is particularly true where key parameters such as mining rate are comparable to projects that fall below these thresholds. It is worth considering mining rates and strip ratio in addition to ore production / mill throughput when assessing the size of the Project and its potential for effects.



It is worth noting also that the average daily ore production rate over the life of mine is below the PAR threshold at all three sites, specifically 4,495 tpd, 1,627 tpd, and 3,148 tpd at the 15-Mile, Old Austen, and Old Mitchell mines, respectively. And notably, Old Austen and Old Mitchell are designed as quarry-style deposits with no ore processing or tailings on-site, further minimizing the scale of the mining activity there.

As a result of the redesign, the projected disturbed footprint has been reduced by 55% for Old Mitchell, 43% for Old Austen, and 23% for 15-Mile relative to the previously assessed designs.

Full assessment

Several submissions on the public registry call for a “full,” “thorough,” “in-depth,” and/or “robust” assessment of the Project. There is no question that the Project will be subject to a full, thorough, in-depth, and robust assessment.

The Project is subject to a provincial EA by the Province of Nova Scotia, pursuant to the Nova Scotia *Environment Act* and the *Environmental Assessment Regulations*. The provincial EA process will include consideration of potential effects of the Project on a wide range of matters, including air quality and climate change, noise, geology, soils, groundwater and surface water quality and quantity, fish and fish habitat, flora and fauna, including aquatic and terrestrial species at risk, birds (including migratory birds), wetlands, protected areas and conservation lands, physical and cultural heritage (including archaeological resources), health, and other socio-economic conditions, including those of the Mi'kmaq of Nova Scotia. Decision-making following a provincial EA thus considers a broader range of matters than decision-making in federal impact assessments, which must be focused narrowly on federal interests.

The provincial EA process also requires the proponent to engage the Mi'kmaq and to consult the public, to document issues raised, and to explain how Mi'kmaq and public input has been incorporated into project planning, mitigation measures, or addressed in other ways. The provincial EA must document engagement and consultation that has occurred and that is planned. 15-MMR has outlined its engagement and consultation plans in the IPD and remains committed to respectful, transparent, and ongoing engagement. See also the response to Comment A-11 in Attachment C. In addition, the provincial EA process includes mandatory Indigenous and public consultation by the Province.

In addition, other federal, provincial, and municipal authorizations, permits, licenses, leases, and other approval mechanisms will be required for Project construction and operation, as outlined in Section 4.3 of the IPD. In particular, potential adverse Project effects within federal jurisdiction will be addressed through robust federal regulatory review and permitting processes, including pursuant to the *Fisheries Act*, the *Migratory Birds Convention Act, 1994*, the *Species at Risk Act*, and others, as listed in Section 4.3.1 of the IPD. These processes also include mandatory Crown consultation with Indigenous groups.

Taken together, these assessment and permitting processes will ensure a comprehensive, robust, and transparent evaluation of the Project, including its potential adverse effects and its positive benefits, with meaningful opportunities for involvement by the Mi'kmaq of Nova Scotia and the public.

Early in the process

Several submissions on the registry state that there is not enough information in the IPD to adequately understand or assess the potential effects of the Project. That is not the purpose of the IPD and the submission met, indeed exceeded, the IPD requirements. We are at an early stage in the assessment and permitting processes. 15-MMR is committed to early engagement. The 15-Mile Processing Hub Project was presented to the public in June 2025, and multiple public information sessions were held in November 2025. 15-MMR will continue to share information and gather feedback to inform ongoing Project planning and design.

While 15-MMR has, for several years, been engaging the Mi'kmaq, consulting the public, collecting data and Indigenous Knowledge, undertaking studies, modeling, and analyses, and redesigning the Project to incorporate that information, much work is still underway. 15-MMR is actively working on the development of comprehensive EA documentation and permitting applications and supporting materials, which are expected to be ready for submission next year. 15-MMR is committed to sharing a copy of the draft materials with the Mi'kmaq for review, discussion, and feedback.

15-MMR will continue to engage the Mi'kmaq and consult the public, as well as federal and provincial authorities with relevant expertise and knowledge, throughout this period to further improve our understanding of existing conditions and potential effects and inform the development of appropriate management, and monitoring approaches to effectively mitigate potential adverse effects and enhance benefits.

Attachment B

Key Issues Responses



Attachment B: Key Issues

Key Issue		15-MMR Response
Fish and Fish Habitat		
1	Concerns about adverse effects on fish and fish habitat in the St. Mary's and East West River Sheet Harbour watersheds due to changes in water quality from sedimentation, seepage, runoff, storm events, sediment transport from trucks on haul roads, the use of untreated contact water for dust suppression, as well as contaminant releases such as heavy metals, mercury, arsenic, cyanide, and other deleterious substances.	The consolidation of the three properties into one project allows 15-Mile Minerals & Renewables Ltd. (15-MMR) to take an integrated approach to mine design, limiting duplicative infrastructure and minimizing disturbance. By eliminating ore processing, tailings management, and surface water withdrawals at both the Old Austen and Old Mitchell mine sites, the potential for adverse effects on fish and fish habitat in the St. Mary's and West River Sheet Harbour watersheds has been substantially reduced. Other important changes in the Project redesign (described in Section 2.6.2 of the Initial Project Description (IPD)) include reducing the size of the open pits, eliminating or reducing stockpiles, increasing separation distances between mine infrastructure and watercourses, and reducing the number and extent of watersheds, watercourses, and wetlands affected by the Project, all of which serve to further reduce the potential for adverse effects on fish and fish habitat in all watersheds. <i>Sedimentation</i> As described in Section 5.1.1 of the IPD, 15-MMR has committed to develop an Erosion and Sediment Control Plan (ESCP) for each site to prevent adverse effects on water quality due to sedimentation. The ESCP will be implemented prior to construction to prevent the release of sediment-laden runoff to watercourses and wetlands. Sediment control fences will be installed in areas (e.g., slopes and embankments) where organic materials and till are exposed to potential erosion and siltation. Sediment control fences will be inspected and maintained until the disturbed areas have stabilized and revegetation has occurred. 15-MMR has also committed to adhere to standard mitigation measures identified by IAAC (noted in Table 5.1-2 of the IPD) and to relevant codes of practice and guidance provided by DFO. These commonly used mitigation measures and best practices are expected to be effective in addressing well-understood adverse effects related to sedimentation. <i>Seepage and Runoff</i> Potentially acid-generating (PAG) waste rock will be managed in accordance with industry best practices and current guidance from the Mine Environment Neutral Drainage (MEND) program. At the 15-Mile Mine site, PAG waste rock will be placed directly into the tailings management facility (TMF). At the Old Austen and Old Mitchell mine sites, PAG waste rock will be temporarily stored in stockpiles with a clay or geomembrane liner (as noted in Table 1.5-1 of the IPD) and placed back into the exhausted pit. The Project design incorporates lessons learned from the operation of the Touquoy Mine and includes multiple water management controls intended to prevent uncontrolled releases from occurring and to avoid and minimize adverse effects if one were to occur. Runoff collection ditches and settling ponds will be used to collect contact water and site runoff, preventing the accidental release of sediments or contaminants to the receiving environment. The TMF will utilize seepage collection ditches and ponds around the perimeter. TMF seepage collection ditches, contact ponds, and settling ponds are proposed to be lined with clay to reduce infiltration. Emergency overflow pathways will be directed to internal containment areas, including open pits where appropriate. All contact water within the Project Development Areas (PDAs) will be collected and treated to meet applicable regulatory criteria before discharge. <i>Runoff and Storm Events</i> Non-contact runoff from undisturbed areas will be diverted around mine infrastructure to minimize contact water volumes requiring treatment. The water management facilities are designed to accommodate a 1-in-100-year storm event, based on historical climate data and projected future changes in extreme rainfall over the lifespan of the facilities. <i>Sediment Transport by Vehicles</i> Trucks transporting ore will not enter the pit. They will be loaded outside the pit, similar to other quarries that operate in the area. Appropriate dust and sediment control measures will be implemented, as required, to minimize the potential for off-site transport of dirt and debris associated with trucks transporting ore. These measures will be periodically reviewed and adjusted based on site conditions and operational requirements to ensure their continued effectiveness. <i>Dust Suppression</i> Where contact water is used for dust suppression, it will be applied only within the PDAs where runoff will be collected and treated as part of the site's water management system. 15-MMR will also consider alternative dust suppression approaches to further reduce the use of contact water. However, using fresh water for dust suppression would increase water withdrawal requirements, which 15-MMR has minimized to avoid adverse effects on water flows and fish habitat. <i>Contaminant Releases</i> Mercury and arsenic will not be used in ore processing and are present, along with heavy metals and other contaminants, in the historic tailings that already exist on site. 15-MMR's approach to managing historic mining materials within the PDAs is described for all three sites in Section 2.3 of the IPD, including work that has been completed and/or is planned to characterize and delineate impacts of historic mining activity and, where historic mining materials require disturbance, the steps that will be taken to safely handle contaminated organic materials and minimize the potential mobilization of contaminants. All process tailings will undergo cyanide destruction and arsenic abatement prior to discharge to the TMF. This technology has been successfully applied at St Barbara's Touquoy site. 15-MMR has committed to develop and implement a Metal Leaching and Acid Rock Drainage (ML/ARD) Management Plan, an Historical Tailings Management Plan, a Groundwater Management and Monitoring Plan, Surface Water Management and Monitoring Plan, and a Spill Contingency Plan, all of which will be designed to prevent any off-site mobilization of contaminants from existing historic mine materials disturbed by the Project and PAG waste rock excavated from the open pits. 15-MMR has also committed to develop Emergency Response Plans for each site, which will include measures to minimize contaminant mobilization and exposures should an incident occur. All of these plans will be developed by qualified professionals in consultation with relevant authorities with technical expertise. <i>Mitigation, including Offsetting, and Monitoring</i> In addition, 15-MMR is committed to implementing standard mitigation measures identified by IAAC for the protection of fish and fish habitat (as summarized in Table 5.1-2 of the IPD), adhering to relevant codes of practice and guidance provided by DFO (as noted in Section 5.1.1 of the IPD), and developing and implementing a suite of other site-specific mitigation measures during construction, operation, and closure and reclamation. These measures will be documented in the management plans referenced above. Any adverse changes to fish and fish habitat that cannot be avoided, reduced, or otherwise mitigated through the measures above would be addressed through the development and implementation of an Offsetting Plan to achieve no net loss of fish habitat. 15-MMR is also committed to develop and implement an Aquatic Effects Monitoring Plan (AEMP) to verify effect predictions and the effectiveness of mitigation measures and to guide adaptive management if unforeseen effects on fish and fish habitat are identified. <i>Assessment</i> Potential effects of the Project on fish and fish habitat and the need for and scope of mitigation measures, including offsetting, will be fully evaluated by the federal government (specifically Fisheries and Oceans Canada (DFO)) through the <i>Fisheries Act</i> authorization process, as well as by the provincial government through the provincial environmental assessment (EA) process. See other responses below for additional details relevant to fish and fish habitat in the St. Mary's and East and West River Sheet Harbour watersheds.



Key Issue		15-MMR Response
2	Concerns about direct and indirect loss or harmful alteration, disruption, and destruction of fish and fish habitat from project infrastructure construction and operations at the 15-Mile, Old Austen, and Old Mitchell mine sites due to due to project activities such as open pit development, dewatering, waste rock, tailings, water extraction, effluent discharge, watercourse realignment/crossings, and wetland alteration.	In response to prior feedback from DFO, the Mi'kmaq, and the public, substantial changes were made to the mine plan for all three sites to avoid, reduce, and otherwise mitigate potential direct and indirect loss or harmful alteration, disruption, or destruction of fish and fish habitat due to project construction and operation. These changes are summarized in Section 2.6.2 of the IPD. The response to Key Issue 1 also applies to Key Issue 2, as both issues relate to potential adverse effects on fish and fish habitat. The following additional responses are provided to address specific points made in Key Issue 2 that were not explicitly noted in Key Issue 1. <i>Open Pit Development and Dewatering</i> As part of the Project redesign, the size of the open pits has been reduced and setbacks between open pits and watercourses have been increased. Contact water from pit dewatering will be managed in accordance with the Surface Water Management and Monitoring Plan to mitigate potential adverse effects on water quality and flows. <i>Waste Rock</i> As part of the Project redesign, the volume of waste rock, including PAG waste rock, has been reduced. All PAG will be managed in accordance with the ML/ARD Management Plan, which will include standard mitigation measures identified by IAAC specifically related to activities that disturb materials that may be acid generating/metal leaching (as noted in Table 5.1-2 of the IPD). See also discussion of PAG in the response to Key Issue 1 (under the heading <i>Seepage and Runoff</i>). <i>Tailings</i> As part of the Project redesign, the need for tailings management at both the Old Austen and Old Mitchell mine sites has been eliminated. The TMF will be designed to adhere to Canadian Dam Association (CDA) and Mining Association of Canada (MAC) guidelines. All process tailings will undergo cyanide destruction and arsenic abatement prior to discharge to the TMF. <i>Water Extraction</i> As part of the Project redesign, the need for surface water withdrawal has been eliminated for both the Old Austen and Old Mitchell mine sites. For the 15-Mile Mine site, 15-MMR is committed to implementing standard mitigation measures identified by IAAC specifically related to use of water intake pipes in fish habitat (as noted in Table 5.1-2 of the IPD). <i>Effluent Discharge</i> See responses to Key Issue 1 with respect to sedimentation, seepage, runoff, storm events, and contaminant releases. <i>Watercourse Realignments/Crossings</i> See response to Key Issue 7 regarding the Seloam Brook realignment. Watercourse crossings, realignments, and associated infrastructure will be designed to maintain fish passage and protect fish and fish habitat, in accordance with applicable regulatory requirements and best management practices, including relevant codes of practice and guidance provided by DFO related to in-water work and watercourse crossings (as noted in Section 5.1.1 of the IPD). 15-MMR is also committed to implementing standard mitigation measures identified by IAAC for work in fish habitat (as summarized in Table 5.1-2 of the IPD). <i>Wetland Alteration</i> As outlined in Section 2.6.3 of the IPD, the number of wetlands directly affected by the 15-Mile, Old Austen, and Old Mitchell mine sites has been reduced by 19%, 61%, and 55% respectively. A Wetland Compensation Plan will be developed and implemented to achieve no net loss of wetland area and function, in accordance with the Nova Scotia Wetland Conservation Policy (Nova Scotia Environment 2011).
3	Concerns about changes to hydrology at the 15-Mile, Old Austen, and Old Mitchell mine sites, including altered groundwater–surface water connectivity, flow diversion into open pits, groundwater quantity, lowered water tables, reduced groundwater discharge, and changes to ecological flows that may adversely affect fish habitat and how these changes may be worsened by climate change, drought, or flood conditions.	Potential alterations to groundwater and surface water for all three mine sites will be assessed through groundwater, water balance, and continuous hydrologic modelling. The assessment will evaluate potential changes to groundwater levels, discharge, and flow patterns (e.g., diversions associated with mine infrastructure), groundwater–surface water interactions, and resulting changes to ecological flows. Climate change has been incorporated into the development of Project-specific groundwater and surface water model inputs, including climate change-adjusted precipitation, temperature, and potential evapotranspiration datasets for all three mine sites. Climate change adjustment factors were developed using regionally representative climate projections and will be applied to evaluate how projected changes in seasonal precipitation and temperature patterns, including wetter winter conditions and drier late-summer conditions, may influence groundwater recharge, groundwater discharge, and ecological flows. These datasets will be used to evaluate potential Project effects under future climate conditions and to determine whether climate change could exacerbate predicted hydrologic effects. Potential impacts of hydrological changes on fish habitat will be assessed in accordance with DFO's Framework for Assessing the Ecological Flow Requirements to Support Fisheries in Canada. Watercourses and fish habitat areas predicted to experience greater than ±10% change in daily flow will be subject to more detailed assessment of impacts to the flow regime to better understand potential effects on fish and fish habitat and to identify appropriate mitigation, monitoring, and contingency measures. As noted in the response to Key Issue 1, 15-MMR has committed to develop and implement a Groundwater Management and Monitoring Plan, a Surface Water Management and Monitoring Plan, and an Aquatic Effects Monitoring Plan, all of which will guide adaptive management if unforeseen effects on fish and fish habitat are identified. Water management measures will be designed and implemented with the objective of minimizing environmental impacts while supporting safe operations and progressive reclamation. During operation, site runoff will be diverted around active open pits to maintain safe operating conditions. During active reclamation, some site water may be directed to open pits that are planned to be closed as pit lakes to facilitate pit-filling and reduce pit-filling times. Decisions regarding the diversion of site water will consider both water quantity and water quality effects, including potential reductions in flow to surrounding watercourses and associated ecological implications. The potential effects on fish and fish habitat due to hydrological changes caused by the Project will be fully evaluated by the federal government (specifically DFO) through the <i>Fisheries Act</i> authorization process, as well as by the provincial government through the provincial EA process.



Key Issue		15-MMR Response
4	Concerns about the adequacy of proposed containment and management of potential acid-generating waste rock, stormwater, and contact water at the Old Mitchell and Old Austen mine sites, including uncertainty regarding liner and containment performance of pits used for tailings, stockpile duration, contact water collection, discharge routing, extreme-weather resilience, seepage/contaminant release, and monitoring and contingency measures for adverse effects to the St. Mary's watershed and associated fish habitat under normal, worst-case, and long-term conditions.	To be clear, there will be no tailings deposited in the pits at any of the three mine sites. All tailings will be generated at the central ore processing facility and safely managed in the TMF, both located at the 15-Mile Mine site. The Project redesign has eliminated the need for tailings management facilities at both the Old Austen and Old Mitchell mine sites. The responses to Key Issues 1 and 2 address the management of PAG waste rock (including liner material and stockpile duration), water management (including non-contact water diversion, and contact water and seepage collection and treatment prior to discharge), storm events, contaminant releases, relevant management, monitoring, and contingency plans, and the assessment of potential effects on the St. Mary's watershed (and all potentially affected watersheds) and fish and fish habitat. The response to Key Issue 3 addresses how future climate change considerations have been incorporated into the water modelling that will support the assessment of potential effects on hydrology and fish and fish habitat. As described in the responses to Key Issues 1 and 2, PAG waste rock at the Old Austen and Old Mitchell mine sites will be temporarily stored in stockpiles with a clay or geomembrane liner (as noted in Table 1.5-1 of the IPD) and placed back into the exhausted pit. Predictive water quality modelling completed for the EA has included the assumption that PAG waste rock stockpiles will not be lined in order to provide a conservative estimate of potential contaminant migration to the receiving environment. The following additional response is provided to address a specific point made in Key Issue 4 that was not explicitly noted in either Key Issue 1 or 2. <i>Discharge Routing</i> As noted in Table 1.7-1 of the IPD, 15-MMR is using an impacts-based approach to determine optimal discharge locations, using modeling to determine potential flow losses from mine infrastructure and siting discharge points to offset those losses while minimizing potential adverse effects on water quality and fish habitat. The proposed discharge locations for each of the 15-Mile, Old Austen, and Old Mitchell mine sites are described (and shown) in Sections 2.3.1 (Figure 2.3-2), 2.3.2 (Figure 2.3-3), and 2.3.3 (Figure 2.3-5), respectively, of the IPD. As noted in response to Key Issue 1, all contact water within the PDAs will be treated to meet applicable regulatory criteria before discharge. As noted in the response to Key Issue 2 (with respect to tailings), mine facilities, including facilities for safe temporary and long-term storage of mine materials, will be designed in accordance with applicable regulatory requirements and guidelines, and will be subject to scrutiny through the provincial EA, Industrial Approval, and other mine-related permitting and through the federal <i>Fisheries Act</i> and <i>Metal and Diamond Mining Effluent Regulations</i> (MDMER) permitting.
5	Concerns about adverse effects on fish habitat due to the malfunctions or accidents that lead to the release of contaminants into nearby waterbodies as well as the mobilization of contaminants due to the disturbance of existing acidic soil and vegetation that may contain arsenic or other contaminants from historic mining materials within the project area.	See responses to Key Issue 1 with respect to seepage, runoff, storm events, and contaminant releases. In addition to the measures noted there, secondary containment will be installed for all fuel and reagent storage within the PDAs. Fuel storage and refueling stations for vehicles and equipment will be located a minimum of 30 metres away from surface water bodies as required by Nova Scotia Environment and Climate Change. See the response to Key Issue 1 with respect to relevant management and monitoring plans, including Spill Contingency Plans and Emergency Response Plans that will be developed by qualified professionals for each mine site. The predictive models that will be developed for each site to support the provincial EA and Industrial Approval application, as well as the <i>Fisheries Act</i> authorization and MDMER permitting applications, will assess the potential effects of the Project, including from remediation of historic tailings, on groundwater and surface water flows and quality. The flow and water quality predictions will then inform the assessment of potential effects on fish and fish habitat. In addition, the risks associated with site remediation will be fully assessed in a Human Health and Ecological Risk Assessment (HHERA) to be completed for each site (and included in the provincial EA) and risks will be effectively mitigated through site-specific management plans developed by qualified professionals. Potential effects of the Project (including the proposed remediation of historic tailings within the PDAs) on fish and fish habitat, including the effects of accidents and malfunctions, and the need for and scope of mitigation measures, including offsetting, will be fully evaluated by the federal government (specifically DFO) through the <i>Fisheries Act</i> authorization process, as well as by the provincial government through the provincial EA, Industrial Approval, and other permitting processes.
6	Concerns about reconnecting the open pit during decommissioning of the Old Mitchell mine site to an unknown nearby stream and any changes to seasonal and hydrological flow patterns and changes to temperature, sediment, and nutrient regimes that could adversely affect fish habitat in the St. Mary's watershed.	Potential changes to hydrological flow patterns and water quality (including temperature and nutrient regimes) associated with decommissioning of the Old Mitchell Mine, including reconnection of the open pit to the surrounding watershed, will be assessed through predictive modeling carried out to support the provincial EA and Industrial Approval application, as well as the <i>Fisheries Act</i> authorization application. As noted in the response to Key Issue 5, the flow and water quality predictions will then inform the assessment of potential effects on fish and fish habitat, which will also take into account proposed mitigation and management measures, including (but not limited to) the ESCP and offsetting to achieve no net loss of fish habitat. To be clear, as noted in Section 2.3.6 of the IPD, reconnection of the post-closure pit lake at the Old Mitchell Mine site to the surrounding watershed and discharge to receiving watercourses would occur only once regulatory criteria for water quality are achieved. Water quality monitoring during closure and post-closure will confirm protection of downstream environments (see the response to Key Issue 1 for information regarding the Surface Water Management and Monitoring Plan and the AEMP). Potential effects of the Project on fish and fish habitat in the St. Mary's watershed (and, indeed, all watersheds affected by the Project), and the need for and scope of mitigation measures, including offsetting, will be fully evaluated by the federal government (specifically DFO) through the <i>Fisheries Act</i> authorization process, as well as by the provincial government through the provincial EA, Industrial Approval, and other permitting processes.
7	Concerns about adverse effects on fish and fish habitat from the Seloam Brook realignment and uncertainties associated with the length and extent of realignment that would be required.	The existing alignment and condition of Seloam Brook reflects past disturbance, including diversion, due to historic mining activity at the site. For example, as noted in Section 3.6.5 of the IPD, multiple deposits of historic tailings are clustered along Seloam Brook. The Seloam Brook realignment will not only facilitate the location of Project infrastructure but, importantly, presents an opportunity to remediate ongoing contamination (including arsenic) from historical tailings and improve conditions for fish. In response to prior feedback from the Mi'kmaq and DFO, and guided by qualified professionals, 15-MMR has redesigned the proposed Seloam Brook realignment, shifting the channel outside the area impacted by historical mine tailings, incorporating natural channel design features, and focusing on improving fish passage, habitat quality, and productivity. These features include pools, riffles, runs, and wetlands, woody debris for cover, and suitable spawning, rearing, and overwintering habitat. The realigned channel design also considers thermal mitigation through maintenance of existing groundwater seeps and riparian planting. The realignment footprint has also been minimized. The potential effects of the Seloam Brook realignment on fish and fish habitat, and the need for and scope of mitigation measures, including offsetting, will be fully evaluated by the federal government (specifically DFO) through the <i>Fisheries Act</i> authorization process, as well as by the provincial government through the provincial EA, Industrial Approval, and other permitting processes.



Key Issue		15-MMR Response
8	Concerns about the death of fish from the use of explosives near fish habitat.	In response to prior feedback from DFO, 15-MMR has redesigned the Project to increase setback distances between the open pits and nearby watercourses, reducing the potential for any blasting-related effects on fish and fish habitat. The new pit setbacks have been assessed by qualified mining/blasting professionals to confirm DFO's requirements for vibration and blasting limits will be met. Further, as noted in Section 5.1.1 of the IPD, 15-MMR has committed to developing and implementing a Blast Management Plan, developed by qualified professionals, implementing standard mitigation measures identified by IAAC for the use of explosives in and around fish habitat (Table 5.1-2 of the IPD), and adhering to DFO's guidance, including <i>Measures to Avoid Causing Harm to Fish and Fish Habitat Including Aquatic Species at Risk Pertaining to Blasting</i> (DFO 2018) and <i>Guidelines for the Use of Explosives In or Near Canadian Fisheries Waters</i> (Wright and Hopky 1998). The potential effects of blasting on fish and fish habitat, and the need for and scope of mitigation measures, will be fully evaluated by the federal government (specifically DFO) through the <i>Fisheries Act</i> authorization process, as well as by the provincial government through the provincial EA.
9	Concerns about direct and cumulative effects on spawning, rearing, overwintering, and migration of Atlantic salmon and other cold-water species within the St. Mary's watershed including the availability and effectiveness of cold-water refugia due to changes to the hydrology of multiple watersheds, acid rock drainage, sedimentation, contaminant mobilization, effluent discharge, barriers to fish passage, and how this will hinder ongoing restoration efforts in these watersheds.	As noted previously, in response to prior feedback from DFO, the Mi'kmaq , and the public, 15-MMR has substantially redesigned the Old Mitchell Mine site development plan to avoid, reduce, and otherwise mitigate the potential effects of the Project on fish and fish habitat in the St. Mary's watershed. As described in Section 2.6.2 of the IPD, key changes that are beneficial to fish and fish habitat include elimination of ore processing and tailings management at the Old Mitchell Mine site. This means the Old Mitchell Mine will operate similar to conventional quarries (which exist in the watershed) with substantially reduced anticipated environmental impacts. The revised layout of the Old Mitchell Mine site has reduced the number of watersheds directly affected by 11%, with no infrastructure proposed to be located in any watershed that flows directly to the St. Mary's River. The number of watercourses disturbed was reduced by about 23% and the number of wetlands directly affected was reduced by about 55%. The size of the open pit and infrastructure at Old Mitchell Mine has been substantially reduced, resulting in smaller stockpiles and increased distance from the St. Mary's River and from Nova Scotia Nature Trust lands. The proposed Old Mitchell Mine open pit is now approximately 2 km from the St. Mary's River (as a straight line) at its nearest point. (In comparison, the existing Touquoy Mine is 75 m away from the Moose River and has had no measurable impact on water quality in that watercourse.) The Project redesign has also eliminated surface water withdrawal from the St. Mary's River. Prior responses to Key Issues 1 through 6 and 8 apply to this Key Issue as well, as they describe how 15-MMR has addressed and/or will address potential effects on fish and fish habitat, which include Atlantic salmon and other cold-water species within the St. Mary's watershed. In particular, those responses address changes in water quality (including temperature), hydrology, ARD management, sedimentation, contaminant mobilization, and effluent discharge. The following additional responses are provided to address specific points made in Key Issue 9 that were not previously noted. <i>Direct and Cumulative Effects</i> The assessment of potential Project effects on fish and fish habitat will consider both direct effects of the Project and cumulative effects of the Project in combination with other past, present, and reasonably foreseeable projects and activities affecting fish and fish habitat in the watersheds potentially affected by the Project. See the response to Key Issue 10 below for further detail regarding the consideration of cumulative effects. <i>Spawning, Rearing, Overwintering, and Migratory Habitat</i> The assessment of potential Project effects on fish and fish habitat will consider all fish habitat types potentially affected by the Project in all watersheds potentially affected by the Project. Mitigation measures, including offsetting as required, will be developed and implemented to avoid residual harmful effects to fish habitat outside of the PDA, specifically downstream of the PDA in McKeen Brook where Atlantic salmon and other cold-water fish populations and spawning, rearing, and overwintering habitat are known to occur. <i>Barriers to Fish Passage</i> The Project has been designed to avoid and minimize barriers to fish movement where feasible¹ and to maintain connectivity within affected watersheds. The Project is not anticipated to create barriers to fish passage within the St. Mary's River watershed. See the response to Key Issue 2 regarding 15-MMR's commitments with respect to the design of watercourse crossings, realignments, and associated infrastructure. The assessment of potential effects on fish and fish habitat will specifically evaluate potential effects on aquatic connectivity and movement of Atlantic salmon and other cold-water fish species between spawning, rearing, and overwintering habitats. <i>Restoration</i> As noted above, the Project redesign substantially reduces mine-related infrastructure and potential adverse effects of the Project in the St. Mary's watershed. Achieving no net loss of fish habitat, maintaining fish passage, and supporting ongoing watershed restoration and Atlantic salmon recovery efforts will continue to be key considerations in Project design, assessment, and permitting.
10	Concerns about adverse cumulative effects on fish and fish habitat within the St. Mary's watershed from the proposed mine sites in combination with past, existing, and reasonably foreseeable activities (e.g., ongoing and historic mining, clearcutting, onshore wind, hydrogen production), including habitat loss, altered groundwater–surface water connectivity, reduced ecological flows, degraded water quality and habitat function due to project activities such as open pit development, dewatering, waste rock, tailings, effluent discharge, watercourse realignment/crossings, and wetland alteration including related offsetting needs to address such effects.	Section 34.1(1)(d) of the <i>Fisheries Act</i> requires that DFO consider the cumulative effects of carrying out a project before exercising a decision under the <i>Fisheries Act</i>. The Nova Scotia EA process also requires consideration of cumulative effects on groundwater and surface water quality and quantity, fish and fish habitat, and wetlands (among other environmental components) (as specified in the Nova Scotia Class I Environmental Assessment Checklist). Therefore, both the provincial EA documentation and the <i>Fisheries Act</i> authorization application will include an assessment of cumulative effects on fish and fish habitat of the Project in combination with past, existing, and reasonably foreseeable activities. This assessment will consider guidance provided by DFO in its Position Statement on the Consideration of Cumulative Effects in Support of Decision Making on Fisheries Act Authorizations Concerning Fish and Fish Habitat Protection (DFO 2025). This assessment will also take into account the measures, including offsetting, that 15-MMR has committed to implement to mitigate the potential effects of the Project on fish and fish habitat (as outlined in Section 5.1.1 of the IPD). See also the responses to Key Issues 1 through 9 as they describe how 15-MMR has addressed and/or will address the specific Project activities and potential effects listed here.

¹ The location of the orebodies is fixed and proven extraction methodologies further constrain the degree of flexibility of site configuration.



Key Issue		15-MMR Response
11	Concerns about the unique river biodiversity in the St. Mary's River that is an Ecologically Significant Area Candidate site, particularly for Atlantic salmon, American eel, and Brook floater.	15-MMR recognizes the ecological importance of the St. Mary's River and has completely redesigned the Project to substantially reduce mine-related infrastructure in the St. Mary's watershed, as described previously. In its new configuration, the Old Mitchell Mine would be similar in nature to other quarries that exist in the watershed. The responses to Key Issues 1 through 10 describe how 15-MMR has addressed and/or will address potential effects of the Project on fish and fish habitat, including in the St. Mary's watershed. DFO has shared with 15-MMR the draft conservation and protection objectives for the candidate Ecologically Significant Area (ESA) and has advised that the candidate ESA is currently in the planning phase and may result in additional regulatory requirements, if approved. 15-MMR anticipates that DFO will take into account, as appropriate, the ESA conservation and protection objectives during its review of the <i>Fisheries Act</i> authorization application for the Old Mitchell Mine site. 15-MMR will comply with all regulatory requirements that apply to the Project, including conditions attached to the <i>Fisheries Act</i> authorization. 15-MMR has been engaging DFO with respect to the Project, including the Old Mitchell Mine site, as summarized in Section 1.5.2 and Appendices A and D of the IPD. 15-MMR will continue to engage DFO throughout Project planning, assessment, and permitting to ensure that potential effects to fish, fish habitat, and other aquatic species are appropriately assessed and mitigated. See also the response to Key Issue 24 regarding Brook Floater.
Migratory Birds		
12	Concerns about adverse effects on migratory birds from wetland and habitat loss, alteration and fragmentation during construction, and sensory disturbance from noise, vibration and lighting, and accidental release during operations (e.g., tailings, fuel spills, hazardous releases).	In response to prior feedback from Environment and Climate Change Canada (ECCC), the Mi'kmaq, and the public, 15-MMR has substantially redesigned the Project to avoid, reduce, and otherwise mitigate the potential effects of the Project. Key changes relevant to migratory birds and their habitat, including wetlands and mature forests, include reducing the extent of ground disturbance by reducing the size of open pits and the volume of waste rock. As outlined in Section 2.6.3 of the IPD, the total footprint of infrastructure considered in the current Project design has been reduced by approximately 38%, and the number of wetlands directly affected by the 15-Mile, Old Austen, and Old Mitchell mine sites has been reduced by 19%, 61%, and 55% respectively, significantly reducing potential effects to migratory birds. In addition to these design changes, 15-MMR is committed to implementing standard mitigation measures identified by IAAC for the protection of migratory birds (as summarized in Table 5.1-4 of the IPD), adhering to relevant guidance provided by ECCC, including the Guidelines to Avoid Harm to Migratory Birds (ECCC 2023) (as noted in Section 5.1.3 of the IPD), and developing and implementing a suite of other mitigation measures during construction, operation, and closure and reclamation, as outlined in Section 5.1.3 of the IPD. These measures will be documented in the Wildlife Management Plan, which will be developed in consultation with ECCC and Nova Scotia Department of Natural Resources and Renewables (DNRR), prior to the start of construction. Migratory bird considerations will also be incorporated into Project Spill Contingency Plans and Emergency Response Plans. A Wetland Compensation Plan will be developed in consultation with ECCC and DNRR and implemented to achieve no net loss of wetland area and function, in accordance with the Nova Scotia Wetland Conservation Policy (Nova Scotia Environment 2011). Potential effects of the Project on migratory birds and their habitat, including cumulative effects, and the need for and scope of mitigation measures, including compensation, will be fully evaluated by the provincial government through the provincial EA and permitting processes. 15-MMR has been engaging ECCC with respect to the Project, as summarized in Section 1.5.2 and Appendices A and D of the IPD. Ongoing consultation with ECCC is expected to ensure the requirements of the <i>Migratory Birds Convention Act, 1994</i>, and the <i>Migratory Birds Regulations, 2022</i>, are appropriately addressed in Project planning and implementation.
Indigenous Peoples' Current Use of Lands and Resources for Traditional Purposes		
13	Concern about impacts on current use, especially due to the proximity of the Old Austen mine site to the Killag River and the West River Sheet Harbour watershed. The proponent should assess water quality, fish habitat, Atlantic salmon, aquatic species at risk, and Mi'kmaq harvesting activities that may be affected by changes within the watershed.	In response to prior feedback from the Mi'kmaq regarding land and resource use, 15-MMR has substantially redesigned the Project to increase setbacks from key waterbodies such as the Killag River and reduce the extent of disturbance. For the Old Austen Mine site in particular, as described in Section 2.6.2 of the IPD, the redesign has resulted in an estimated 43% reduction in overall disturbance area, avoidance of several watersheds (including the Cope Brook watershed which flows to Beaver Lake Indian Reserve 17 (IR-17)), an approximately 22% reduction in the number of watercourses disturbed, and an approximately 61% reduction in the number of wetlands directly affected. Direct disturbance to moose patch areas was entirely eliminated. These and other changes, including the elimination of the previously proposed Beaver Dam haul road, reduce the potential for adverse effects on current use and Mi'kmaq harvesting activities and the biophysical environment on which they depend. 15-MMR continues to collect baseline data for environmental conditions in the Project area. 15-MMR will also continue to engage with the Mi'kmaq to supplement information previously obtained through Mi'kmaq Ecological Knowledge Studies (MEKS) (described in Section 5.2.2 of the IPD – see also the response to Key Issue 28) to enhance understanding of current use of land and resources for traditional purposes and how those uses might be affected by the Project. As explained in the response to Key Issue 5, predictive models will be used to assess the potential effects of the Project on groundwater and surface water flows and quality, which will inform the assessment of potential effects on fish and fish habitat (including Atlantic salmon and aquatic species at risk), among other environmental components. This will then inform the assessment of potential effects on Mi'kmaq harvesting activities, including consideration of the availability and quality of resources, the quality of experience, and other factors relevant to current use. The findings of the HHERAs mentioned in the response to Key Issue 5 would also inform this assessment. As noted in the cover letter to this Response, 15-MMR remains committed to ongoing dialogue, transparent information and data sharing, and collaboration with the Mi'kmaq to understand and address potential effects of the Project on current use of lands and resources for traditional purposes, among other Mi'kmaq interests. See also responses to Key Issues 1 through 11 as they describe how 15-MMR has addressed and/or will address potential Project effects on water quality, fish habitat, Atlantic salmon, and aquatic species. The potential effects of the Project on current use of lands and resources by the Mi'kmaq for traditional purposes, and the need for and scope of mitigation measures, will be assessed in the provincial EA.



Key Issue		15-MMR Response
14	Concern about the effects of the project on current use within the project area of each mine site by the Mi'kmaq of Nova Scotia for hunting, fishing, gathering and overnight camps. Narrow focus on maintaining physical access to use areas, rather than a holistic assessment informed by Etuaptmumk (Two-Eyed Seeing) that gives consideration to the broader ecological conditions, food security, wildlife health, and intergenerational knowledge transfer necessary for the meaningful exercise of Mi'kmaq harvesting rights.	The response to Key Issue 13 also applies to Key Issue 14, as both issues relate to potential adverse effects on current use. Additional responses to the points raised in Key Issue 14 are provided below. Mi'kmaq knowledge and feedback have informed the updated Project design presented in the IPD. 15-MMR remains committed to incorporating Mi'kmaq perspectives through Two-Eyed Seeing (Etuaptmumk). As described in Section 5.2.2 of the IPD (see also the response to Key Issue 28), 15-MMR has contracted Indigenous-owned companies to conduct various MEKS. These studies provide valuable information regarding ecological knowledge and traditional use that has been and will continue to be incorporated into Project planning. 15-MMR will continue to engage with Mi'kmaq communities and representative organizations to supplement information obtained through previous MEKS reports to enhance understanding of current use of land and resources for traditional purposes and how those uses might be affected by the Project. As noted in response to Key Issue 5, 15-MMR has committed to undertaking a HHERA for each of the three mine sites. The HHERAs will support understanding of the linkages between physical components of the environment (such as air, water, and soil), biological components (such as vegetation, fish, and wildlife, including food and medicinal resources), and people, and the potential effect of the Project on ecological and human health. As noted in response to Key Issue 13, the assessment of potential effects on fish, wildlife, vegetation, and other environmental components will support and inform the assessment of potential effects on use of those resources, including consideration of the availability and quality of resources, the quality of experience, and other factors relevant to current use. 15-MMR remains committed to working collaboratively with Mi'kmaq communities to identify opportunities that support the protection of traditional food resources and facilitate the transfer of Indigenous Knowledge between Elders, harvesters, and youth. Where appropriate, 15-MMR will provide capacity funding and support participation in environmental monitoring, site visits, and other community-identified initiatives that contribute to these objectives.
Indigenous Peoples' Health, Social, and Economic Conditions		
15	Concerns about significant gaps in Indigenous-specific health, social, and economic baseline information, including the absence of a Mi'kmaq health baseline, inadequate socio-economic data for many reserve communities, limited information on housing, employment, health and social services, community safety, cultural continuity, mental well-being, food security, drinking water, and existing community concerns, as well as the lack of commitments to undertake comprehensive Indigenous-specific baseline studies and incorporate Mi'kmaq-led traditional food quality research, which create uncertainty in identifying pathways of effects and may hinder the assessment of the likelihood, severity and significance of potential adverse effects on Indigenous health and well-being.	The IPD (including, but not limited to, Sections 3.5 and 3.7) contained preliminary baseline information for Mi'kmaq communities, including information drawn from the Community Wellness Study completed by Millbrook First Nation in 2021 for the previous Beaver Dam Mine Project. 15-MMR continues to compile baseline information regarding health, social, and economic conditions in Mi'kmaq communities based on publicly available information. 15-MMR will include and consider available baseline information, including information shared by Mi'kmaq communities and organizations, in the provincial EA (see note below regarding data governance principles). Through previous and ongoing engagement, 15-MMR acknowledges the concerns expressed by the Mi'kmaq regarding the Project and remains committed to continued collaboration to identify and implement appropriate measures to avoid, reduce, and otherwise mitigate potential adverse effects. 15-MMR remains committed to engaging with the Mi'kmaq with a goal of building transparent, respectful, and meaningful working relationships. In particular, 15-MMR seeks opportunities to continue engaging with Mi'kmaq communities, such as Millbrook First Nation, to better understand and address information gaps related to existing Indigenous health, social, and economic conditions, and other socio-economic information specific to Mi'kmaq communities. As part of this commitment 15-MMR seeks to work with participating Mi'kmaq communities to establish appropriate data-sharing practices, including how community information is collected, used, stored, shared, and reported, in accordance with community preferences and applicable data governance principles.
16	Concerns about potential impacts on Mi'kmaq health and traditional land use resulting from exposure to contaminants of potential concern associated with historical mine materials, acid rock drainage, metal leaching, and the release of arsenic and other contaminants, particularly given the overlap of the project area with Mi'kmaq traditional use lands, the proximity of Mi'kmaq communities, and the potential for exposure through air, water, country foods and land-based activities.	The Project redesign substantially reduces the extent of disturbance and volume of waste rock, eliminates ore processing and tailings facilities at both the Old Austen and Old Mitchell mine sites, and avoids several watersheds (including the Cope Brook watershed which flows to IR-17). These and other Project changes, as well as various management and monitoring plans described previously (see response to Key Issues 1 and 2), significantly reduce the potential for contaminant mobilization and exposure. See the responses to Key Issues 1 and 2, as they describe how 15-MMR has addressed and/or will address historic mine materials, ML/ARD, and contaminants. See also the responses to Key Issues 13 and 14, as they describe how 15-MMR has addressed and/or will address the potential effects on current/traditional use of land and resources. 15-MMR has also committed to carry out HHERAs for each site, which will examine potential pathways of exposure through air, water, soil, country foods, and medicinal resources (such as plants). The results of the HHERAs will inform the assessment of potential effects of the Project on human health, including Mi'kmaq health, traditional land and resource use, and the exercise of Indigenous rights. This information will be provided in the provincial EA documentation. 15-MMR is committed to providing the Mi'kmaq with opportunities to access and review relevant Project information and will continue to share updates, findings, and other information to support meaningful collaboration and engagement throughout the Project.



Key Issue		15-MMR Response
17	Concerns about adverse effects on the environmental and socio-economic conditions, and impacts on rights of the Mi'kmaq associated with trucking routes and associated infrastructure, including their location, characteristics, and anticipated traffic volume.	In response to prior Mi'kmaq feedback regarding traditional land and resource use, the Project redesign eliminates the previously proposed Beaver Dam Haul Road due to concerns raised around interference with traditional land use. Changes to the Old Austen and Old Mitchell mine site plans have also reduced the trucking volumes associated with the development of those sites to less than 30% of the volume expected with previous project designs. Further, no concentrates will be transported by truck. 15-MMR has completed supporting studies, including traffic assessments and physical condition evaluations of potential transportation routes and operating schedules. 15-MMR continues to evaluate ore transportation options, with a clear objective of avoiding IR-17 in the preferred route selection. A Traffic Impact Study will be completed as part of the provincial EA to assess Project-associated trucking between the mine sites, including proposed routing. To mitigate the potential adverse effects associated with Project-related trucking, 15-MMR is committed to: • using existing public roadways designed to safely accommodate truck traffic; • avoiding night-time trucking operations; • outfitting each haul truck used for the Project with vehicle tracking devices to moderate driving behaviour and track truck location; • explore opportunities for worker bussing; and • encourage carpooling among workers who live in similar locations. These measures are expected to minimize potential adverse effects of Project-associated traffic on surrounding communities, residents, and land users. 15-MMR will continue to engage with local communities regarding proposed trucking routes and operating hours and remains open to considering alternative routes and schedules where appropriate. In September 2025, a new <i>Traffic Safety Act</i> was introduced in the Nova Scotia Legislature. The Act is intended to modernize regulations for Nova Scotia's public highway network, including a framework to improve road safety and implement vehicle condition standards. Haul traffic generated by the Project will be regulated under this robust framework.
18	Concerns about the recognition and addressing of Millbrook First Nation's longstanding opposition to the project, which was informed by extensive consultation and the Beaver Dam Community Wellness Study. Millbrook's concerns were in relation to water quality, atmospheric dust, impacts on critical hunting grounds and mainland moose habitat, and the proximity of Beaver Lake Indian Reserve No. 17, all of which support the need for a federal review.	15-MMR recognizes the significant interest of Millbrook and other Mi'kmaq communities in the Project, including their interests in the lands, waters, and resources. Mi'kmaq knowledge and feedback, including information obtained from the Beaver Dam Community Wellness Study and through extensive prior engagement (documented in Section 1.6 and Appendices B and D of the IPD), have informed the updated Project design presented in the IPD. 15-MMR remains committed to incorporating Mi'kmaq knowledge and perspectives in Project planning and implementation. 15-MMR thoroughly reviewed and considered the concerns raised through prior engagement, including with Millbrook First Nation, and proactively chose to withdraw the projects and go back to the drawing board to redesign how it proposes to develop the three properties. This was and remains an intentional effort to constructively address the Project-related issues that had been raised. Substantial changes in the Project were specifically designed to avoid, reduce, or otherwise mitigate potential adverse effects of the Project on air and water quality, fish and wildlife habitat, traditional use areas, and neighbouring communities, including IR-17. Throughout Project planning, 15-MMR has shared information, discussed community interests and concerns, and sought to understand traditional land and resource use. 15-MMR provided detailed information about the Project changes and the timing of the planned submission of an IPD to Millbrook First Nation for review and comment. Additionally, 15-MMR provided the draft IPD, including an offer for capacity funding, for review, discussion, and comment. To date Millbrook First Nation has not provided feedback on the changes to the new Project design. 15-MMR will continue engaging with Millbrook and other identified First Nations to share information, facilitate opportunities to meet, and seek understanding of the new Project design's potential effects, recognizing that meaningful engagement is a shared process requiring the active participation of all parties. To support progress in addressing concerns and developing collaborative approaches, 15-MMR supports establishing a forum for technical discussions similar to the Technical Advisory Group to facilitate coordinated, collaborative discussion. 15-MMR remains committed to ongoing dialogue, transparent information and data sharing, collaboration, and informed Project decision-making. See also responses to Key Issues 1 through 7, 9, and 10 related to water quality, Key Issue 1 related to dust (suppression), Key Issue 13 related to moose habitat, and Key Issues 13 through 16 related to current/traditional use. As noted previously, these potential effects will be fully evaluated by the federal government through the <i>Fisheries Act</i> and MDMER permitting processes and/or by the provincial government through the provincial EA process. The need for a federal IA will be determined by IAAC pursuant to section 16 of the <i>Impact Assessment Act</i>, based on its consideration of this Response to the Summary of Issues, as well as other factors specified in s.16(2) of the Act.
19	Concerns about the potential impacts of the project's large and geographically dispersed workforce on Indigenous communities, particularly the heightened risk of gender-based violence affecting Indigenous women and girls, the lack of targeted mitigation measures to address community vulnerabilities and workforce-related risks, and the need to ensure safe and inclusive working and living environments for Indigenous women seeking employment or residing near the project area.	Project workers during all Project phases are expected to commute daily from nearby communities (e.g., Sheet Harbour, Sherbrooke, Antigonish). No worker camps or fly-in fly-out workers will be part of the Project and no large influx of workers from outside of the local community is expected. 15-MMR is committed to implementing standard mitigation measures identified by IAAC for the protection of health, social, and economic conditions of Indigenous peoples (as summarized in Table 5.3-2 of the IPD), including measures specifically related to workforce management and community integration. 15-MMR will also explore opportunities for bussing and carpooling of daily workers to reduce traffic and facilitate safe and efficient movement to and from Project sites. To address concerns around safety of Indigenous people, women, and others with social identity or intersectionality factors that may result in vulnerabilities related to working at a mine site or living in nearby communities, 15-MMR seeks to co-develop with the Mi'kmaq mandatory Mi'kmaq cultural awareness training for employees and contractors associated with the Project. The effectiveness and relevance of the training will be reviewed periodically, with opportunities for feedback and improvement identified through ongoing engagement with Mi'kmaq communities to support continued learning and respectful relationship building. The potential effects of the Project on health, social, and economic conditions of the Mi'kmaq will be assessed in the provincial EA, taking into account the measures noted above.
20	Concerns about adequate assessment of economic participation and benefits for the Mi'kmaq in Nova Scotia, including procurement opportunities, Mi'kmaq employment opportunities and training commitments, resource revenue sharing, and other economic partnership discussions with Kwikw'kw Maw-klusuaqn's Benefits Department.	As described in Section 5.3 of the IPD, 15-MMR will maintain ongoing engagement with Mi'kmaq communities throughout all phases of the Project to develop and implement mitigation measures, which may include targeted employment, training programs, apprenticeships, and environmentally focused roles to support Mi'kmaq participation in the workforce, as well as capacity building, and to explore development of a Mi'kmaq procurement strategy to create opportunities for Mi'kmaq-owned businesses. In addition to the mitigation measures identified above, 15-MMR is committed to implementing standard mitigation measures identified by IAAC for the protection of health, social, and economic conditions of Indigenous Peoples (as summarized in Table 5.3-2 of the IPD), including measures specifically related to employment, procurement, and contracting processes. 15-MMR is currently in discussions with the Assembly of Nova Scotia Mi'kmaq Chiefs regarding a royalty agreement for resource revenue sharing and is seeking to negotiate a Mutual Benefits Agreement (MBA). The MBA would establish a framework for Mi'kmaq economic participation and shared benefits, including procurement opportunities, employment and training commitments, and other priorities identified through ongoing discussions.



Key Issue		15-MMR Response
Indigenous Peoples' Spiritual, Physical and Cultural Heritage		
21	Concerns about the health and restoration of Atlantic salmon populations in the St. Mary's River (Napu'saqnuk), which extend beyond ecology and include the protection of Mi'kmaq culture and heritage and are located within the ancestral and unceded territory of the Mi'kmaq, in a watershed that has supported Indigenous communities for thousands of years as a vital travel corridor, source of sustenance, and cultural landscape.	15-MMR acknowledges that the rivers around the Old Mitchell Mine PDA have been important transportation routes and a resource base for the Mi'kmaq and their ancestors for millennia. Napu'saqnuk, the St. Mary's River, has also provided Atlantic salmon, an important resource for food and ceremonial purposes for the Mi'kmaq. See the response to Key Issue 9 for a description of substantial changes made to the Old Mitchell Mine site development plan to avoid, reduce, and otherwise mitigate the potential effects of the Project on the St. Mary's watershed. As noted in the responses to Key Issues 1 through 6, 9 through 11, and 13 through 16, the assessment (in support of the <i>Fisheries Act</i> and MDMER permitting and provincial EA) will evaluate the potential effects of the Project on groundwater and surface water flows and quality, fish and fish habitat (including Atlantic salmon), and other biophysical components, and the consequential effects of those changes on Mi'kmaq uses of the lands and resources, including fishing, harvesting, and associated intergenerational knowledge transfer, and on ecological and human health. As described in Sections 5.2.1 and 5.2.2 of the IPD, the assessment will also consider potential effects on Indigenous culture and heritage, including cultural landscapes, sites, and features that support traditional use and cultural activities. 15-MMR looks forward to continued engagement and collaboration with the Mi'kmaq throughout the EA process to better understand, consider, and address potential Project-related impacts.
22	Concerns about the proposed mining development at the Old Mitchell Mine Site, which is situated between two Mi'kmaq-supported conservation initiatives and within a known traditional use area supported by previous Mi'kmaq Ecological Knowledge Studies (MEKS): the Whale Sanctuary Project and the proposed Napu'saqnuk Ecologically Significant Area.	As described in the responses to Key Issues 14 and 28, the MEKS provide valuable information regarding ecological knowledge and traditional use that has been and will continue to be incorporated into Project planning. The measures outlined in the response to Key Issues 1 and 2 (and described in greater detail in the IPD) are expected to avoid, reduce, and otherwise mitigate the potential effects of the Project (including their extent downstream) on water quality and fish and fish habitat. The Project is therefore not expected to have any impact on the marine environment or the whale sanctuary. See the response to Key Issue 17, which addresses issues related to trucking. See the response to Key Issue 9 for a description of substantial changes made to the Old Mitchell Mine site development plan to avoid, reduce, and otherwise mitigate the potential effects of the Project on the St. Mary's watershed. See also the responses to Key Issues 1 through 6 and 9 through 11, as these address the potential effects of the Project on the St. Mary's watershed, and Key Issues 13 through 16, which address potential effects on current/traditional use. The response to Key Issue 11 also specifically addresses the candidate ESA.
23	Concerns about environmental degradation from project activities including dust, increased traffic and construction, runoff, and industrial activity that can affect culturally significant lands and species of importance to the Mi'kmaq in Nova Scotia such as Atlantic salmon, American eel, and Brook floater, as well as undermine existing environmental commitments, conservation objectives, and areas of significance to the Mi'kmaq in Nova Scotia.	The response to Key Issue 1 addresses dust (suppression) and runoff. The response to Key Issue 17 addresses issues related to trucking. The responses to Key Issues 1 through 11 address potential effects on water quality and flows, fish and fish habitat, and aquatic species, while the response to Key Issue 12 addresses migratory birds. The response to Key Issue 11 also specifically addresses conservation objectives associated with the candidate ESA. The responses to Key Issues 13 through 16 address potential effects on current/traditional use of lands and resources. The response to Key Issue 21 addresses potential effects on Mi'kmaq culture and heritage, including cultural landscapes, sites, and features. 15-MMR looks forward to continued engagement and collaboration with the Mi'kmaq throughout the EA and permitting processes to better understand, consider, and address potential Project-related impacts.
24	Concern for the Brook floater population within the St. Mary's watershed, one of the species' most important remaining strongholds, where mining-related effects on water quality, sedimentation, aquatic connectivity, habitat integrity and host fish populations could threaten the long-term viability of the species listed as Special Concern under the Species at Risk Act.	The responses to Key Issues 1 through 6 and 8 through 11 address potential effects on water quality and flows, fish and fish habitat, and aquatic species, which includes Brook Floater in the St. Mary's watershed. Sedimentation is addressed specifically in the response to Key Issue 1, while aquatic connectivity is addressed in the response to Key Issue 9. Potential adverse effects on Brook Floater (and other fish and aquatic species in the St. Mary's watershed) will be mitigated through: the avoidance of riparian areas where practicable¹ (for example, by increasing separation distances between mine infrastructure and watercourses as part of the Project redesign); treatment of water prior to discharge to meet applicable regulatory criteria; implementation of standard mitigation measures identified by IAAC for the protection of fish and fish habitat (as summarized in Table 5.1-2 of the IPD); adherence to relevant codes of practice and guidance provided by DFO (as noted in Section 5.1.1 of the IPD); and development and implementation of a suite of other site-specific mitigation measures during construction, operation, and closure and reclamation, which will be documented in various management and monitoring plans (as described in the response to Key Issue 1). Project planning, assessment, and permitting will consider and incorporate, where relevant, management measures for Brook Floater outlined in the Management Plan for the Brook Floater (<i>Alasmidonta varicosa</i>) in Canada (DFO 2018) and the Recovery Plan for the Brook Floater (<i>Alasmidonta varicosa</i>) in Nova Scotia (DNRR 2022). Potential effects on aquatic species at risk and species of conservation interest (including Brook Floater) will be assessed by the federal government (specifically DFO) in the <i>Fisheries Act</i> permitting process and by the provincial government through the provincial EA and permitting processes.
25	Concern about the characterization of impacts to traditional land use as temporary, despite the project's decades-long duration and potential for lasting effects on landscapes, cultural continuity, and intergenerational knowledge transfer, without methodology for assessing these long-term cultural impacts in collaboration with the Mi'kmaq of Nova Scotia.	15-MMR acknowledges the importance of considering the potential long-term effects of the Project on traditional land use, cultural continuity, and the transfer of Indigenous Knowledge between generations. 15-MMR is committed to continued engagement with the Mi'kmaq regarding the assessment of potential impacts to traditional land use, including potential effects on cultural continuity and intergenerational knowledge transfer. 15-MMR will seek opportunities to incorporate Mi'kmaq perspectives, Indigenous Knowledge, and community-identified approaches into the evaluation of long-term cultural effects and the development of appropriate mitigation measures. See also the responses to Key Issues 13 through 16, which also address current/traditional use, and the response to Key Issue 21, which addresses potential effects on Mi'kmaq culture and heritage, including cultural landscapes, sites, and features.



Key Issue		15-MMR Response
26	Concern about the risk of impacts to Mi'kmaq archaeological and cultural heritage resources, including potential burial sites, given that proponent investigations are incomplete and further archaeological work should be conducted with Mi'kmaq participation.	Archaeological assessments for the Project were undertaken consistent with the Mi'kmaw Archaeological Protocols published by Maw-lukutijik Saqmaq Assembly of Nova Scotia Mi'kmaw Chiefs and the Nova Scotia <i>Special Places Protection Act</i>. Archaeological assessments have been completed for the 15-Mile Mine (2008, 2018, 2019, 2020, 2021, 2022), Old Austen Mine (2008, 2014, 2015, 2018, 2019, 2020), and Old Mitchell Mine (2014, 2018, 2022) sites. While archaeological sites were identified as being potentially affected by the Project at 15-Mile Mine and at Old Mitchell Mine, none was of Mi'kmaq provenance. Shovel testing in Fall 2020 at the Old Austen Mine site disclosed one site with moderate to high potential for historic Euro-Canadian resources; the Project has been redesigned to avoid this site. Additionally, two areas near the PDA were identified as having elevated potential for historic Mi'kmaq resources but no pre-contact Mi'kmaq artifacts were found. The archaeological assessments are currently being updated to reflect Project redesign and an additional study has been undertaken for Old Mitchell Mine. 15-MMR is committed to avoiding areas of elevated potential for Mi'kmaq archaeological resources within the PDAs. If avoidance is not feasible, site-specific mitigation measures will be developed in discussion with the Mi'kmaq and Nova Scotia Museum. A Protection of Heritage and Archaeological Resources procedure will be developed (with input from the Mi'kmaq if possible) outlining the process to be implemented during construction and operations. If Mi'kmaq archaeological resources are encountered during construction or operation, all Project work will be halted in keeping with the Nova Scotia <i>Special Places Protection Act</i>, and immediate contact will be made with the Kwilmu'kw Maw-klusuaqn (KMK) and the Nova Scotia Museum. In addition to these mitigation measures, 15-MMR is committed to implementing standard mitigation measures identified by IAAC for protection of physical and cultural heritage (as summarized in Table 5.2-2 of the IPD). In keeping with its commitment to building open and transparent working relationships with the Mi'kmaq, 15-MMR will share archaeological assessment reports with the Mi'kmaq and welcomes Mi'kmaq participation in archaeological field teams.
Indigenous Peoples' Rights		
27	Concerns about adverse impacts to the Mi'kmaq of Nova Scotia and their ability to exercise Section 35 Rights under the <i>Constitution Act, 1982</i> . Concerns about impacts to fishing, including but not limited to Atlantic salmon and American eel, hunting and harvesting, the loss of cultural and spiritual use of lands and waters, and health and socioeconomic conditions including food security.	The responses to Key Issues 1 through 11 address potential effects on water quality and flows, fish and fish habitat, and aquatic species. The responses to Key Issues 13 through 16 address current/traditional use (including fishing, hunting, harvesting, and food and medicinal resources), and the response to Key Issue 21 addresses potential effects on Mi'kmaq culture and heritage, including cultural landscapes, sites, and features. The responses to Key Issues 15 through 17, 19, and 20 address potential effects on the health and socio-economic conditions of the Mi'kmaq. 15-MMR will continue engaging with the Mi'kmaq to share Project information and gain a greater understanding and perspective of the potential effects of the Project on Section 35 Rights under the <i>Constitution Act, 1982</i>. For example, as part of our ongoing commitment to engagement and collaboration with the Mi'kmaq, 15-MMR remains open to exploring support for Indigenous-led health and socio-economic baseline studies, including a country foods study, or to conducting co-designed baseline studies on Indigenous health, social, cultural, and economic conditions with potentially affected Mi'kmaq, and looks forward to the opportunity to work together. The assessment of the potential effects of the Project on the exercise of Indigenous rights will be documented in the provincial EA.
28	Concerns about the limited documentation currently available for review and the need for MEKS and Archaeological Resource Impact Assessments (ARIA) at each of the three proposed mine sites to properly assess impacts on Mi'kmaw Section 35 Rights, using Assembly of Nova Scotia Mi'kmaw Chiefs-approved providers.	15-MMR has contracted Membertou Geomatics Solutions and previously the Confederacy of Mainland Mi'kmaq to conduct MEKS to obtain valuable information about ecological knowledge and traditional land and resource use. Information from the MEKS has been and will continue to be incorporated into Project design. The following studies are completed or underway: • updated MEKS for the 15-Mile Mine site completed in 2024; • updated MEKS for the Old Mitchell Mine site expected to be complete in August 2026; • updated MEKS for the Old Austen Mine site commencing in Summer 2026; • MEKS for the previous Fifteen Mile Stream Gold Project completed in 2018; • MEKS for the previous Cochrane Hill Gold Project completed in 2019; • MEKS for the previous Beaver Dam Mine Project completed in 2016; and • MEKS for the previous Beaver Dam Mine Project completed in 2009. See the response to Key Issue 26 for a description of the fifteen archaeological assessments that have been undertaken and key findings at each site. Based on feedback received through engagement, 15-MMR will provide Mi'kmaq communities and organizations with plain language summaries of the MEKS and archaeological assessment work completed for the PDAs.

ⁱ The location of the orebodies is fixed and proven extraction methodologies further constrain the degree of flexibility of site configuration.

Attachment C

Other Comments, Advice, and Recommendations



Attachment C: Other Comments, Advice, and Recommendations

Comment		15-MMR Response
Accidents and Malfunctions		
A-1	Concerns about health and environmental risks associated with gold mining including tailing storage facility failure, waste rock management, acid rock drainage and metal leaching, cyanide and processing management, long-term water treatment obligations, and closure and post-closure monitoring requirements.	The health and environmental risks associated with the Project will be fully assessed through the provincial EA, Industrial Approval, and other permitting processes, as well as federal permitting processes. The proposed redesigned tailings management approach aligns with global best practices and will improve long-term stability, eliminate surface tailings stockpiles at closure, reduce dust and erosion potential, and support progressive reclamation. This approach includes immediate placement of PAG material into the TMF, and backfilling of PAG material into exhausted pits to be stored subaqueously, which is consistent with MEND and recent guidance from Nova Scotia Environment and Climate Change. The Project redesign also incorporates extensive experience from the Touquoy Mine related to tailings management, water management, reclamation planning, and environmental monitoring. Prior to construction, 15-MMR will develop plans to prevent accidents and malfunctions occurring and response measures to be implemented should an accident or malfunction occur. These will include a Fire Prevention Plan, site-specific Spill Contingency Plans, site-specific Emergency Response Plans, an Accidents and Malfunctions Response Plan, and an Accidents and Malfunctions Communication Plan, developed by qualified professionals in consultation with relevant authorities with technical expertise. These plans will reduce the potential for adverse effects on human and environmental health and safety. See the responses to Key Issues 5, 13, 14, and 16 for a discussion of 15-MMR's commitment to carry out HHERAs for all three sites. The HHERAs are also discussed in Section 5.3 of the IPD. A Reclamation and Closure Plan will be developed in accordance with Nova Scotia regulatory requirements and will outline closure objectives, reclamation measures, long-term monitoring requirements, and contingency measures. Financial assurance in the form of a reclamation bond will be provided to the Province of Nova Scotia to help ensure funds are available to implement closure and reclamation activities, including long-term monitoring and maintenance obligations. See also the responses to Key Issues 1 and 2 for a discussion of how 15-MMR has addressed or will address issues related to tailings management, including TMF design to standards, contact water and seepage management, and relevant management and monitoring plans (including Emergency Response Plans). Of note, there will be no tailings deposited in the pits at any of the three mine sites. All tailings will be generated at the central ore processing facility and safely managed in the TMF, both located at the 15-Mile Mine site. The Project redesign has eliminated the need for tailings management facilities at both the Old Austen and Old Mitchell mine sites. See the responses to Key Issues 1 and 2 for a discussion of how 15-MMR has addressed or will address issues related to waste rock management, including ML/ARD management. As noted in the response to Key Issue 1, all process tailings will undergo cyanide destruction and arsenic abatement prior to discharge to the TMF. See the responses to Key Issues 1 and 2 for a discussion of how 15-MMR has addressed or will address issues related to water management, including treatment. The Groundwater Management and Monitoring Plan, the Surface Water Management and Monitoring Plan, and the AEMP are discussed in the response to Key Issue 1. Additional closure and post-closure monitoring is described in Sections 2.3.2, 2.3.4, and 2.3.6 of the IPD for the 15-Mile, Old Austen, and Old Mitchell mine sites, respectively. Monitoring requirements will be established through the provincial EA and federal and provincial permitting processes, including (but not limited to) <i>Fisheries Act</i> and MDMER permitting. 15-MMR is committed to complying with all monitoring requirements specified in approval documents issued for the Project.
Alternative Means of Carrying Out the Project/ Alternatives to the Project		
A-2	Concerns about whether various technically and economically feasible options, such as the use of best available technologies (e.g., alternatives to cyanide and dry stack tailings) and alternatives to the project, were adequately considered.	A range of technically and economically feasible alternatives have been considered as part of Project development, including processing technologies and tailings management approaches. For gold extraction, cyanide remains the industry standard for the type of non-refractory gold mineralization present at the Project. Alternative lixiviants (a liquid medium used in hydrometallurgy to selectively dissolve and extract target metals from solid ores or minerals) are generally less effective for this ore type, may require more complex processing conditions (such as elevated temperatures), and/or can introduce other environmental (e.g., mercury) and operational challenges. Metallurgical testing completed for the Project has identified opportunities to reduce cyanide consumption within the leaching circuit while maintaining gold recovery. Treated process water will undergo cyanide detoxification prior to discharge to the TMF, with testing to confirm residual cyanide concentrations are below applicable regulatory criteria. Alternative tailings management approaches, including dry stack tailings, were also evaluated. Based on Project-specific geochemical and hydrogeological considerations, dry stack tailings were not advanced because increased oxygen exposure could promote acid generation and metal leaching. The selected tailings management approach, with subaqueous storage, is intended to limit oxygen ingress, support long-term geochemical stability, and facilitate progressive reclamation and closure in a manner consistent with current industry best practices. The evaluation of alternative means will continue to be documented and refined through the provincial EA and permitting processes, including consideration of environmental, technical, economic, and social factors.



Comment		15-MMR Response
Atmospheric Emissions		
A-3	Concerns about the adverse effects on the environment and health of public users of the areas surrounding the project from changes in noise, dust, arsenic, mercury, and air quality due to project activities, including trucking.	As noted in the response to Comment A-1, adverse Project effects on the environment and health will be fully assessed through the provincial EA, Industrial Approval, and other permitting processes, as well as federal permitting processes. The provincial EA process requires consideration of existing air quality conditions, expected air emissions, and potential changes to air quality that may be caused by the Project. 15-MMR has retained a third-party consultant to provide air emission estimates for all identified potential air pollutants following the updated Schedule A: Ambient Air Quality Standards issued by Nova Scotia, effective June 1, 2026. Air quality modelling will be used to evaluate Project-related changes in air quality at sensitive receptors within the study area, such as public use locations, as identified by qualified professionals in consultation with relevant authorities with technical expertise and engagement with the Mi'kmaq and the public. A Dust Management Plan and an Air Quality Management Plan, including monitoring and adaptive management measures, will be developed and implemented for the Project. See the response to Key Issue 1 for further information about dust suppression. Potential effects on the acoustic environment will be assessed in accordance with the provincial <i>Guidelines for Environmental Noise Measurement and Assessment</i> (NSECC 2023), as part of the provincial EA. See the response to Key Issue 1 for a discussion regarding 15-MMR's approach to management of arsenic, mercury, and other contaminants. See the response to Key Issue 17 for a discussion regarding issues related to trucking. As noted in the response to Key Issues 5, 13, 14, and 16, 15-MMR has committed to carry out HHERAs for all three sites.
Aquatic Species		
A-4	Concerns about downstream effects on eel grass beds.	Eelgrass beds are not present within the PDA for any of the three sites, and no effects on eelgrass habitat are anticipated. See the responses to Key Issues 1 through 11, which describe how 15-MMR has addressed and/or will address issues related to groundwater and surface water quality and flows, fish and fish habitat, and aquatic species. The measures outlined in those responses (and described in greater detail in the IPD) are expected to avoid, reduce, and otherwise mitigate the potential effects of the Project (including their extent downstream) on water quality and fish and fish habitat. The Project is therefore not expected to have any impact on the marine environment or the whale sanctuary.
Climate Change and Greenhouse Gas Emissions		
A-5	Concerns about energy needs and greenhouse gas emissions associated with project activities, including the lack of consideration of post-2050 greenhouse gas emissions estimates despite the project's anticipated operational activities beyond 2050, that could potentially hinder federal and provincial climate commitments and net-zero objectives.	The implications of the Project for climate change will be fully considered through the provincial EA. The provincial EA process requires quantification of greenhouse gas (GHG) emissions from the Project, including all phases and activities. The initial GHG emissions estimate for the Project (provided in Section 5.6.1 of the IPD) was completed in accordance with ECCC's Strategic Assessment of Climate Change (SACC) (2020). Project-related emissions, fuel use, and electricity demand will be quantified as part of the assessment, including emissions from construction, operation, and closure and reclamation. GHG emission avoidance and reduction measures will also be considered. The provincial EA process also requires consideration of how climate change might affect the Project now and in the future. The assessment will describe climate hazards, consider climate adaptation measures, and evaluate how climate change may affect Project infrastructure over its life cycle, including long-term closure performance. See the response to Key Issue 3 for a discussion of how climate change has been incorporated into the development of Project-specific hydrological models. Of note, closure and reclamation of the Project is expected to be complete at all three sites prior to 2050. While post-closure activity, such as inspection and monitoring, may continue beyond 2050, emissions associated with those activities would be infrequent and low, and are not expected to hinder the achievement of federal or provincial climate commitments or objectives. Nevertheless, GHG emissions from all Project phases and activities will be quantified, as noted above.
Cumulative Effects		
A-6	Concerns about the concurrent development of multiple open pit mine sites in the region that could cumulatively affect wetlands, biodiversity, species at risk, and Mi'kmaq cultural continuity and rights, from project activities including heavy truck traffic, which could be worsened by climate change and cumulatively interact with historic gold mining operations, other active and proposed mining projects, and forestry, road building, quarrying, and other land disturbances.	The consolidation of the three properties into one project allows 15-MMR to take a holistic and integrated approach to mine design, limiting duplicative infrastructure and reducing overall disturbance (and consequent effects) compared to if the three properties were each developed independently. For the provincial EA, the proponent is obliged to consider and describe any predicted cumulative effects of the Project in relation to all of the biophysical, socio-economic, health, and cultural and heritage resources listed in the <i>Nova Scotia Environmental Assessment Checklist</i>. These cumulative effects will be considered by the Government of Nova Scotia in their assessment and decision-making processes. Cumulative effects will also be considered by the Government of Canada. As explained in the response to Key Issue 10, Section 34.1(1)(d) of the <i>Fisheries Act</i> requires that DFO consider the cumulative effects of carrying out a project before exercising a decision under the <i>Fisheries Act</i>. Therefore, both the provincial EA documentation and the <i>Fisheries Act</i> authorization application will include an assessment of cumulative effects of the Project in combination with past, existing, and reasonably foreseeable projects and activities. Other projects and activities to be included in the assessment, potentially including mining, forestry, transportation, quarrying, and other land disturbances, will be identified in consultation with regulators, and through engagement with Mi'kmaq communities, and interested parties. (The IPD considered 23 existing, approved, planned, and reasonably foreseeable developments for the preliminary assessment of cumulative effects.) Climate change will also be considered (for example, see the response to Key Issue 3 for a discussion of how Project-specific hydrological models will be used to evaluate potential Project effects under future climate conditions and to determine whether climate change could exacerbate predicted hydrologic effects).
A-7	Concerns about the cumulative impact of the project on marine mammals and recovering fish populations, especially in relation to the Old Mitchell mine site.	As noted in the response to Key Issue 22 and Comment A-4, the Project is not expected to have any impact on the marine environment or the whale sanctuary and will therefore not contribute to cumulative effects on marine mammals. See also the responses to Key Issues 1 through 11, which describe how 15-MMR has addressed and/or will address issues related to groundwater and surface water quality and flows, fish and fish habitat, and aquatic species, which are relevant to potential effects on fish populations. The responses to Key Issue 10 in particular and Comment A-6 above explain how the assessment will consider cumulative effects on fish and fish habitat.



Comment		15-MMR Response
Ecologically Sensitive Areas		
A-8	Concerns about adverse effects to protected and conserved areas in the region that contribute to biodiversity conservation, climate resilience, ecological connectivity, and watershed protection.	For the provincial EA, the proponent is obliged to assess potential effects on protected areas and conservation lands. The assessment will therefore describe protected areas and conservation lands potentially affected by the Project, identify and evaluate potential effect pathways, and develop appropriate measures to avoid, reduce, or otherwise mitigate any potential adverse effects. See also the responses to Key Issues 9 and 11 as they pertain to restoration efforts and the candidate ESA in the St. Mary's watershed. Of note, the Project redesign has increased the separation distance between mine infrastructure at the Old Mitchell Mine site and Nova Scotia Nature Trust protected land and the St. Mary's River to proactively minimize any potential adverse effects.
Assessment /Process Engagement		
A-9	Concerns about short notices, compressed timelines, and general confusion caused by project name changes that have hindered Indigenous and public engagement.	Notification and public comment period timelines in the federal impact assessment (IA) process have been and will be established by IAAC. For its part, 15-MMR shared a draft of the IPD with potentially affected Mi'kmaq groups and organizations in April 2026 (<i>i.e.</i>, prior to its formal submission to IAAC) and has been sharing information about the proposed Project changes with the Mi'kmaq since early 2025 and with the public, including via meetings with Community Liaison Committee members. These and other Mi'kmaq and public engagement activities undertaken by 15-MMR are documented in Sections 1.6 and 1.7 and Appendices B, C, and D of the IPD. 15-MMR remains committed to mutual respect, transparent communication, and meaningful, long-term engagement with the Mi'kmaq and the public. As noted in the cover letter to this submission, in response to prior feedback from Mi'kmaq communities and organizations, federal authorities, and the public, 15-MMR has undertaken a major redesign of its approach to develop the three properties, resulting in an innovative, integrated model of mine development that significantly reduces the potential for adverse effects. These are not the same projects as before. The new project and site names are intended to differentiate this new, responsive approach from the old project designs, and to encourage IA participants to consider the Project as it is now proposed. Judging from the volume and scope of comments on the registry, it does not appear that participation in the process has been hindered in any way.
A-10	Concerns about the regulatory environment and the need for a robust assessment process with opportunity to analyse, pose questions, assess and understand adverse environmental, health, social, and economic effects, and impacts to Indigenous peoples.	The Project will be subject to a full and robust assessment. As noted in Section 4.3 of the IPD, the Project is subject to a provincial EA by the Province of Nova Scotia, pursuant to the Nova Scotia <i>Environment Act</i> and the <i>Environmental Assessment Regulations</i>. The provincial EA process will include consideration of potential effects of the Project on a wide range of matters, including air quality and climate change, noise, geology, soils, groundwater and surface water quality and quantity, fish and fish habitat, flora and fauna, including aquatic and terrestrial species at risk, birds (including migratory birds), wetlands, protected areas and conservation lands, physical and cultural heritage (including archaeological resources), health, and other socio-economic conditions, including those of the Mi'kmaq of Nova Scotia. Decision-making following a provincial EA thus considers a broader range of matters than decision-making in federal IAs, which must be focused narrowly on federal interests. The provincial EA process also requires the proponent to engage with the Mi'kmaq and the public, to document issues raised, and to explain how Mi'kmaq and public input has been incorporated into project planning, mitigation measures, or addressed in other ways. The provincial EA must document engagement that has occurred, and that is planned. 15-MMR has outlined its engagement plans in the IPD and remains committed to meaningful, respectful, transparent, and ongoing engagement. 15-MMR recognizes that meaningful engagement is a shared process requiring the active participation of all parties. See also the response to Comment A-11 below. In addition, the provincial EA process includes mandatory Indigenous and public consultation by the Province. In addition, other federal, provincial, and municipal authorizations, permits, licences, leases, and other approval mechanisms will be required for Project construction and operation, as outlined in Section 4.3 of the IPD. In particular, potential adverse Project effects within federal jurisdiction will be addressed through robust federal regulatory review and permitting processes, including pursuant to the <i>Fisheries Act</i>, the <i>Migratory Birds Convention Act, 1994</i>, the <i>Species at Risk Act</i>, and others, as listed in Section 4.3.1 of the IPD. For example, DFO notes, in their Federal Authority Advice Record, that key issues related to fish and fish habitat "can be addressed by the proponent meeting DFO's regulatory requirements under the <i>Fisheries Act</i> and <i>Species at Risk Act</i>." These processes also include mandatory Crown consultation with Indigenous groups.
A-11	Given Project complexity, there is a need for capacity funding for participation of Indigenous groups and the public in the project assessment and permitting.	As noted in Section 1.6.4 of the IPD, 15-MMR has committed to provide funding and opportunities to participate in regulatory review processes. For example, as documented in Appendix D of the IPD, 15-MMR offered capacity funding to KMK, Mi'kmaq communities and organizations to support their review of the draft IPD.
A-12	Should an IA be required, the establishment of a Technical Advisory Group (TAG) is recommended, recognizing its previous success in facilitating meaningful Mi'kmaq consultation, technical review, collaborative learning, and the application of Etuaptmumk (Two-Eyed Seeing) through participation by KMK, CMM, individual First Nations, and regulatory agencies.	To support progress in addressing concerns and developing collaborative approaches, 15-MMR supports establishing a forum for technical discussions similar to the Technical Advisory Group to facilitate coordinated, collaborative discussion. 15-MMR remains committed to ongoing dialogue, transparent information and data sharing, collaboration, and informed Project decision-making.



Comment		15-MMR Response
Follow-up and monitoring		
A-13	Concerns about the uncertainties of long-term monitoring efforts need to ensure regulatory compliance during and after the life of the project.	15-MMR has committed to develop, and implement monitoring programs for air quality (including dust), noise, groundwater quality and quantity, surface water quality and quantity, aquatic effects (<i>i.e.</i>, on fish, fish habitat, and aquatic species), and wetlands. In addition, an adaptive post-closure monitoring plan will be developed within the final Reclamation and Closure Plan, which will include surface water, groundwater, pit lake water quality, revegetation success, and infrastructure stability. The monitoring plans will verify the effectiveness of mitigation measures and apply an adaptive management approach to modify or add mitigation as required. All monitoring plans will be developed by qualified professionals in consultation with relevant authorities with technical expertise and will incorporate monitoring requirements established through assessment and permitting processes. 15-MMR will also monitor compliance with applicable regulatory requirements and approval conditions, including commitments made by 15-MMR through the EA and permitting processes. It is anticipated that regulatory authorities who issue an approval, permit, licence, or any other kind of authorization in respect of the Project and those who have compliance and enforcement responsibilities pursuant to federal or provincial legislation would independently carry out inspections and monitoring throughout the Project lifespan.
Indigenous Consultation		
A-14	Concerns about the need for meaningful participation by Indigenous groups in the assessment of the project; respect for Mi'kmaw treaty rights; free prior and informed consent; meaningful consultation; reconciliation objectives; and the inclusion of Indigenous Knowledge and worldviews in decision-making, while also addressing concerns about trust stemming from past environmental compliance issues involving the proponent's parent company, St. Barbara Ltd.	15-MMR recognizes the significant interest of the Mi'kmaq of Nova Scotia in the Project, including their interests in the lands, waters, and resources of Nova Scotia. We remain committed to respectful, open, and ongoing engagement that recognizes Mi'kmaq Treaty Rights and supports meaningful two-way dialogue. 15-MMR will continue engaging with the Mi'kmaq to share Project information and gain a greater understanding and perspective of the potential effects of the Project on Section 35 Rights under the <i>Constitution Act, 1982</i>. Throughout Project planning, 15-MMR has shared information, discussed community interests and concerns, sought to understand traditional land and resource use, and identified measures to avoid, minimize, or otherwise mitigate potential effects. Mi'kmaq knowledge and feedback have informed the updated Project design presented in the IPD (see for example the responses to Key Issues 14 and 28). For example, as part of our ongoing commitment to engagement and collaboration with the Mi'kmaq, 15-MMR remains open to exploring support for Mi'kmaq -led health and socio-economic baseline studies, including a country foods study, or to conducting co-designed baseline studies on Mi'kmaq health, social, cultural, and economic conditions with potentially affected Mi'kmaq, and looks forward to the opportunity to work together. 15-MMR remains committed to incorporating Mi'kmaq perspectives through Two-Eyed Seeing (Etuaptmunk). The assessment of the potential effects of the Project on the exercise of Indigenous rights will be documented in the provincial EA. The cover letter to this submission addresses the matter of St Barbara's environmental track record.
Non-Indigenous Health, Social and Economic Effects		
A-15	Concern about adverse effects to human health conditions related to contamination of drinking water and food supply and increased health risks for vulnerable populations.	The response to Key Issue 1 addresses the management of contaminants from historic mining materials and from Project mining activity, including the development and implementation of management and monitoring plans to prevent any off-site mobilization of contaminants and to minimize contaminant mobilization and exposures should a release occur. As noted in the responses to Key Issues 5, 13, 14, and 16, 15-MMR has committed to complete HHERAs for all three sites, which will examine potential pathways of exposure through air, water, soil, country foods, and medicinal resources (such as plants). The results of the HHERAs will inform the assessment of potential effects on human health, including vulnerable populations, which must be included in the provincial EA.
A-16	Concerns about adverse social, economic, and community effects on local traffic, tourism, recreation, aquaculture, fisheries, the nearby whale sanctuary, and local ways of life, as well as uncertainty regarding the economic benefits to Nova Scotians relative to the environmental costs of gold mining.	The provincial EA process requires the proponent to consult the public, document issues raised and explain how public input has been incorporated into project planning, mitigation measures, or addressed in other ways. 15-MMR's public engagement to date is summarized in Section 1.7 and Appendix C of the IPD. The substantial redesign of the Project was directly informed by issues and concerns raised by local communities and the public, including the concerns listed here. The assessment will continue to be informed by 15-MMR's ongoing engagement. 15-MMR has outlined its engagement plans in the IPD and remains committed to respectful, transparent, and ongoing engagement. The provincial EA process requires the consideration of potential Project effects on socio-economic conditions, including potential effects on local homes and businesses. This assessment will be supported by the assessment of potential effects on air quality, noise, light, groundwater, surface water, fish and fish habitat, vegetation, and wildlife, among other biophysical components. Preliminary information on socio-economic conditions and communities is provided in the IPD (Section 3). In addition, the response to Key Issue 17 addresses issues related to trucking and the assessment of traffic-related impacts. The responses to Key Issues 1 through 6, 9 through 11, 13 through 16, and 21 address issues related to potential effects of the Project on groundwater and surface water flows and quality, fish and fish habitat, and other biophysical components, and the consequential effects of those changes on uses of the lands and resources, including fishing. As noted in the responses to Comments A-4 and A-7, the Project is not expected to have any impact on the marine environment, including the whale sanctuary or marine commercial fisheries. The IPD included a preliminary estimate of economic benefits to be realized if the Project proceeds. This estimate will be updated for the provincial EA. The assessment of economic effects relies on Statistics Canada's Input-Output (I-O) model to estimate the direct, indirect, and induced economic impacts associated with Project-related expenditures. As stated in the introduction to A guide to using the input-output model of Statistics Canada (Poole 1993), "The Input-Output (I-O) model uses the Canadian Input-Output (I-O) tables to track and quantify the economic activity generated by changes in consumption or production. The Canadian I-O tables present one of the most complete and detailed accounting frameworks of the Canadian economy available. As such the model has the greatest potential of all major economic models for capturing the flows of goods and services between industries and consumers at relatively detailed levels." Use of the Statistics Canada I-O model is standard practice when assessing economic benefits in the context of project-specific EA in Canada. As noted in the IPD, the Project is expected to generate significant economic contributions, including an estimated 1,380 jobs in Nova Scotia during construction, with 740 jobs during operations. Local spending is estimated at \$116 million during construction and a further \$776 million during operations and closure, supporting regional development. 15-MMR notes that more than a third of public submissions to the registry acclaimed the potential economic benefits the Project would deliver, including employment, business opportunities, community investment, economic growth and diversification, training, and tax and royalty revenues, as well as consequential benefits for services and infrastructure (including health and education), youth and family retention, and rural community sustainability. 15-MMR is confident that its redesigned Project can and will deliver these benefits while effectively managing potential environmental effects through a robust framework of management and monitoring plans and regulatory oversight.



Comment		15-MMR Response
A-17	Concerns about adverse social, economic effects related to light, dust, noise, contaminant releases into waterways, population growth pressures on a small, aging community, and potential declines in property values.	The response to Comment A-16 applies here, as both comments pertain to potential socio-economic effects of the Project. As noted there, potential effects of the Project on light, air quality (including dust), noise, water quality, and local homes and businesses, among other effects, must be considered in the provincial EA. See also the responses to Key Issues 1 (dust suppression and contaminant releases), Key Issues 1 through 11 (groundwater and surface water quality and fish and fish habitat), and Comment A-3 (noise). As noted in the response to Key Issue 19, Project workers during all Project phases are expected to commute daily from nearby communities (e.g., Sheet Harbour, Sherbrooke, Antigonish). No worker camps or fly-in fly-out workers will be part of the Project and no large influx of workers from outside of the local community is expected. Thus, the Project is not expected to result in significant changes to local populations, especially during construction, which provides temporary employment. 15-MMR notes that a number of submissions to the public registry refer to potential benefits to community sustainability arising from improvements to services and infrastructure (including health and education) and youth and family retention that may result from the economic benefits delivered by the Project.
Permitting and Authorizations		
A-18	Consult with Transport Canada to ensure compliance with the <i>Canadian Navigable Waters Act</i> (CNWA). Contact Transport Canada regarding the submission of an application for an Exemption by Order of the Governor in Council pursuant to Section 24 of the CNWA.	Table 4.3-1 of the IPD acknowledges that approval, notification, or exemption pursuant to the CNWA may be required if Project works were to interfere with navigation. 15-MMR met with Transport Canada on June 25, 2026, to discuss the CNWA requirements for the Project. 15-MMR will continue to consult with Transport Canada to ensure applicable regulatory requirements pursuant to the CNWA are met.
A-19	Consult with NRCan to ensure compliance with the <i>Explosives Act</i> .	Table 4.3-1 of the IPD acknowledges that a licence and/or certificate under the <i>Explosives Act</i> may be required for the Project. 15-MMR is committed to early and ongoing consultation with NRCan to ensure applicable regulatory requirements pursuant to the <i>Explosives Act</i> are met.
Project scope		
A-20	Concerns about the future scope of the project and potential to project expansions in the future that may cause or worsen the effects of the project.	The Project redesign contemplates efficient and integrated development of the mineral resources located at the three properties. Any future expansion or modification of the Project would be undertaken in accordance with applicable federal and provincial regulatory requirements. Where required, additional engagement and consultation and regulatory review processes would be completed to identify, assess, and effectively manage potential effects.
A-21	Concerns about the lack of information on the project's trucking routes and associated infrastructure, including their location and characteristics, number of trips, and the resulting inability to adequately assess the project's full footprint and potential effects on areas of federal jurisdiction, Indigenous Peoples, local communities, wildlife, fish and fish habitat, water quality, watersheds, ecosystems, cumulative effects, and risks associated with transportation incidents, accidents, and deteriorating road conditions.	The response to Key Issue 17 addresses this comment.
Remediation of Historic Mining Sites		
A-22	Concerns about adverse effects on the environment, health, social, and economic conditions due to the mobilization of contaminants due to the disturbance of existing acidic soil and vegetation that may contain arsenic or other contaminants from historic tailings of abandoned mine sites within the project area.	The responses to Key Issues 1 and 5 address this comment.



Comment		15-MMR Response
Species at Risk, Terrestrial Wildlife and their Habitat		
A-23	Concerns about adverse effects on terrestrial plants, wildlife, and federal and provincial species at risk (e.g., mainland moose, boreal felt lichen, blue felt lichen, frosted glass whiskers, vole ears lichen, amphibians, birds, bats, wood turtle, snapping turtle), including injury, mortality, noise, light, water contamination, and habitat loss and fragmentation from project activities.	As noted previously, the Project redesign reduced the areal extent of overall disturbance for all three properties by an estimated 23% at the 15-Mile Mine site, 43% at the Old Austen Mine site, and 55% at the Old Mitchell Mine site. The specific changes made are described in Section 2.6.2 of the IPD. These changes substantially reduce the potential for adverse effects on terrestrial plants, wildlife, and species at risk. The following changes are of particular note with respect to the concerns listed here: • At 15-Mile Mine, the number of watersheds directly affected was reduced by 8%, the number of watercourses disturbed was reduced by approximately 35%, the number of wetlands directly affected was reduced by approximately 19%, direct impacts to three additional occurrences of blue felt lichen were avoided, and direct impacts to boreal felt lichen were entirely eliminated. • At the Old Austen Mine, the number of watersheds with mine infrastructure was reduced from seven (including the Cope Brook watershed which flows to Beaver Lake IR 17) to four, the number of watercourses disturbed was reduced by approximately 22%, the number of wetlands directly affected was reduced by approximately 61%, direct disturbance to moose patch areas was entirely eliminated, and direct impacts to blue felt lichen and boreal felt lichen were completely avoided. • At the Old Mitchell Mine, the number of watersheds directly affected was reduced by 11%, with no infrastructure proposed to be located in any watershed that flows directly to the St. Mary's River, the number of watercourses disturbed was reduced by approximately 23%, the number of wetlands directly affected was reduced by approximately 55%, and direct effects to blue felt lichen and boreal felt lichen were completely avoided. Micro-siting of mine infrastructure will continue throughout the design process to further avoid or minimize effects on vegetation and wildlife, including species at risk. Ongoing targeted studies will confirm the presence or potential presence of sensitive species within PDAs, and final construction and operational footprints will incorporate these findings to avoid, reduce, or otherwise mitigate potential impacts. Avoidance of species at risk will be prioritized wherever feasible.¹ Known locations will be clearly identified, mapped, and communicated to personnel, and buffer zones will be established following provincial special management practices and applicable federal/provincial recovery plans. For all taxa, 15-MMR will consult with DNR and ECCC to develop appropriate measures to mitigate potential adverse effects on species at risk and their habitat. Mitigation, monitoring, and contingency measures will be documented in various management plans, including the Wildlife Management Plan and Wetland Monitoring Plan, which will be in consultation with ECCC and DNR, prior to the start of construction. Mitigation measures may include (depending on the species), but are not limited to, fencing, speed limits, signage, maintaining buffers and wildlife corridors, dust suppression mechanisms, and noise and light reduction. Immobile species that will be directly impacted by Project infrastructure may be transplanted or relocated to other suitable habitat, where feasible and appropriate, in consultation with relevant authorities, lichen and plant specialists, and the Mi'kmaq. The assessment of the potential effects of the Project on flora and fauna, including species at risk, will be included in the provincial EA. 15-MMR will comply with applicable permitting requirements pursuant to the provincial <i>Endangered Species Act</i> and the federal <i>Species at Risk Act</i>. The responses to Key Issues 12 and 24 also provide information to address this comment.

¹ The location of the orebodies is fixed and proven extraction methodologies further constrain the degree of flexibility of site configuration.

Attachment D

Initial Project Description Commitments



Attachment D: Initial Project Description Commitments

This table documents Project-related commitments made by 15-MMR throughout the Initial Project Description (IPD) and Summary of Issues (SOI) Response development process. The commitments captured herein reflect the Project as currently understood and are current as of August 5, 2026. As Project planning and design continue to advance, technical studies are completed, stakeholder, Indigenous and regulatory engagement progresses, and additional information becomes available, commitments may be refined, revised, supplemented, or expanded. Accordingly, this table should be considered a living record that will be updated throughout the impact assessment, permitting, detailed design, construction planning, and regulatory review processes to reflect the most current Project commitments.

Theme/VC	Commitment Type	Commitment	Details	IPD or SOI Response Section	Pre-Construction	Construction	Operations	Closure	Post-Closure
Accidents and Malfunctions	Best Practices & Compliance	Tailings Management Facility (TMF) Designed to Canadian Dam Association (CDA) and Mining Association of Canada (MAC) Guidelines	The TMF will be designed to adhere to CDA and MAC guidelines.	IPD Section 2.3.1, p.37	X	X	X	X	
Accidents and Malfunctions	Additional Study	Dam Breach Study	A Dam Breach Study will be completed before permits are obtained.	IPD Section 1.6.3, IPD Table 1.6-1, p.22	X				
Accidents and Malfunctions	Best Practices & Compliance	Emergency Response Plan (ERP)	An ERP will be developed for each site and submitted for regulatory approval.	IPD Section 1.6.3, IPD Table 1.6-1, p.23, SOI Key Issues Response Table	X	X	X	X	
Accidents and Malfunctions	Best Practices & Compliance	Fire Prevention Plan	Establish fire prevention and spill contingency plans; Restrict vehicle and equipment refueling and servicing to designated locations; Use secondary containment systems for the storage of hazardous materials; Provide training to Project employees on accident and malfunction prevention and response.	IPD Section 5.8, IPD Table 5.8-1, p.141	X	X	X	X	
Accidents and Malfunctions	Best Practices & Compliance	Spill Contingency Plan	Establish fire prevention and spill contingency plans; Restrict vehicle and equipment refueling and servicing to designated locations; Use secondary containment systems for the storage of hazardous materials; Provide training to Project employees on accident and malfunction prevention and response.	IPD Section 5.8, IPD Table 5.8-1, p.142	X	X	X	X	
Accidents and Malfunctions	Best Practices & Compliance	Accidents and Malfunctions Response Plan	Develop and maintain an accidents and malfunctions response plan including: A description of potential accidents and malfunctions that may cause adverse federal effects during any phase of the Project, including both worst-case and more likely alternate scenarios.	IPD Section 5.8, IPD Table 5.8-1, p.141	X	X	X	X	
Accidents and Malfunctions	Best Practices & Compliance	Incident Notification to Indigenous Groups and Applicable Regulatory Agency	Inform Indigenous groups as soon as feasible, and the applicable regulatory agency within 24 hours, while providing: the date, time, and location of the accident or malfunction; a summary of the accident or malfunction; the substance and quantities released; the relevant authorities notified and involved in the response.	IPD Section 5.8, IPD Table 5.8-1, p.141		X	X	X	
Accidents and Malfunctions	Best Practices & Compliance	Incident Reporting to Applicable Regulatory Agency	Submit a report to the applicable regulatory agency within 60 days, describing: the incident and its adverse federal effects; measures taken to mitigate the adverse federal effects; feedback from Indigenous groups and relevant authorities; residual effects and any additional mitigation or monitoring measures; steps taken to prevent recurrence.	IPD Section 5.8, IPD Table 5.8-1, p.141		X	X	X	
Accidents and Malfunctions	Engagement	Communication Plan for Accidents/Malfunctions with Indigenous Groups	Develop a communication plan in consultation with Indigenous groups for accidents and malfunctions.	IPD Section 5.8, IPD Table 5.8-1, p.142	X	X	X	X	
Accidents and Malfunctions	Mitigation	Water Management Structures Designed for 1-in-100-Year Flood	Water management structures will be designed to accommodate, at a minimum, a 1-in-100-year flood event, based on historical climate data and projected future changes in extreme rainfall over the lifespan of the structures.	IPD Section 5.8, IPD Table 5.8-1, p.141	X	X	X	X	
Atmospheric Environment	Mitigation	Blast Management Plan	A Blast Management Plan will be developed, with blasting occurring during daytime hours. Nearby communities will be provided notification in advance of blasting.	IPD Section 1.6.3, IPD Table 1.6-1, p.23	X	X	X		
Atmospheric Environment	Mitigation	Berms Constructed Around Open Pit Perimeters	Berms will be constructed around the perimeters of the open pits to provide additional mitigation of noise emissions.	IPD Section 5.4.1, p.123		X	X		
Atmospheric Environment	Monitoring	Ongoing Noise Monitoring	Ongoing noise monitoring will be conducted based on the final Project layout and mill design, and in accordance with regulatory requirements.	IPD Section 5.4.1, p.123		X	X	X	
Atmospheric Environment	Mitigation	Equipment Maintenance and Mufflers	Equipment, vehicles, and haul trucks will be maintained in good working order and equipped with appropriate mufflers to reduce noise.	IPD Section 5.4.1, p.123		X	X	X	
Atmospheric Environment	Mitigation	Blasts Scheduled 9am-5pm, Avoiding Statutory Holidays and Culturally Important Days	Schedule blasting activities between 9:00 a.m. and 5:00 p.m., and avoid blasting on statutory holidays and on days of cultural importance as identified in consultation with Indigenous groups.	IPD Section 5.3, IPD Table 5.3-2, p.121		X	X		
Atmospheric Environment	Engagement	Advance Notice to Indigenous Groups of Noise/Vibration Activities	Provide advanced notice to Indigenous groups of the location and timing of Project activities that may impact health via noise or vibration through methods determined in consultation with Indigenous groups.	IPD Section 5.3, IPD Table 5.3-2, p.121		X	X		
Atmospheric Environment	Best Practices & Compliance	Complaint Response Process	Establish a process for receiving and addressing complaints within 48 hours of the complaint being received and implement corrective actions to reduce exposure in a timely manner.	IPD Section 5.3, IPD Table 5.3-2, p.121		X	X	X	
Atmospheric Environment	Mitigation	Dust Management Plan	A Dust Management Plan will be developed for the Project. The plan will outline measures for monitoring, controlling, and mitigating dust emissions during all phases of the Project, including construction, operation, and closure.	IPD Section 1.6.3, IPD Table 1.6-1, p.21	X	X	X	X	
Atmospheric Environment	Mitigation	Air Quality Management Plan	Emission reduction mitigation measures will be described in an Air Quality Management Plan to be prepared for the Project.	IPD Section 5.4.2, p.125	X	X	X	X	
Atmospheric Environment	Monitoring	Ongoing Air Quality Monitoring	Ongoing air quality monitoring will occur over the life of the Project with comparison made to baseline air quality conditions and applicable regulatory limits, including the Maximum Permissible ground level concentrations listed in Schedule A of the NS Air Quality Regulations.	IPD Section 5.4.2, p.125		X	X	X	
Atmospheric Environment	Mitigation	Dust Suppression on Access/Haul Roads	During dry periods, water and/or dust suppressants will be applied to access roads and haul roads as needed to mitigate dust emissions.	IPD Section 5.4.2, p.125		X	X	X	
Atmospheric Environment	Mitigation	Speed Limits to Limit Fugitive Dust	Project vehicles will be required to comply with established speed limits to limit fugitive dust generation from vehicle travel on unpaved roads.	IPD Section 5.4.2, p.125		X	X		
Atmospheric Environment	Mitigation	Cover or Enclose Dust-Generating Material	Cover or enclose material that may become a source of fugitive dust in stockpiles, moved on conveyors or transported within and outside the Project Development Areas.	IPD Section 5.3, IPD Table 5.3-2, p.121		X	X		
Atmospheric Environment	Mitigation	Anti-Idling Policy	Establish and enforce a policy to prohibit unnecessary idling, except when required for health, safety, or operational reasons.	IPD Section 5.3, IPD Table 5.3-2, p.121		X	X	X	
Atmospheric Environment	Best Practices & Compliance	No Night-Time Trucking	To mitigate the potential adverse effects associated with Project-related trucking, avoid night-time trucking operations	SOI Key Issues Response Table		X	X		
Climate Change	Additional Study	Strategic Assessment of Climate Change (SACC) Implementation for Greenhouse Gas (GHG) Emissions	Should a federal impact statement be required for the Project, the SACC will be implemented to quantify potential greenhouse gas (GHG) emissions, develop mitigation measures, and assess climate change resilience.	IPD Section 1.9, p.31	X	X	X	X	
Climate Change	Additional Study	Solar Energy Trade-Off Study	15-MMR is completing trade-off studies to evaluate the potential for incorporating solar energy during operations.	IPD Section 5.6.3, p.137	X				
Community Engagement	Engagement	Community Engagement Plan	A Community Engagement Plan has been developed and is being implemented to guide Project engagement.	IPD Section 1.7.4, p.31	X	X	X	X	X
Community Engagement	Engagement	Extended Office Hours at Community Offices	Extend office hours at each of the three operating satellite community office locations, including Sheet Harbour, Stellarton, and Guysborough.	IPD Section 1.7.4, p.31	X	X	X		
Community Engagement	Engagement	Open Houses to Share Baseline Data and Modelling	Hold Open Houses to share Project updates, including baseline data and modelling results. Technical experts will be available to respond to questions and listen to concerns.	IPD Section 1.7.4, p.31	X	X	X		
Community Engagement	Engagement	Circulate Draft Initial Project Description (IPD) to Active Community Liaison Committees (CLCs)	Circulate a draft IPD to active CLCs for review and comment prior to submission. Input will be considered and incorporated, where feasible.	IPD Section 1.7.4, p.31	X				
Cultural Heritage	Best Practices & Compliance	Archaeological Screening/Reconnaissance Procedures	During construction or operations, if archaeological deposits are encountered, procedures and protocols developed by the Mi'kmaq of Nova Scotia and the Nova Scotia Museum will be implemented.	IPD Section 1.6.3, IPD Table 1.6-1, p.21		X	X		
Cultural Heritage	Best Practices & Compliance	Chance Find Protocol and Training	Immediately halt work at the location of a discovery; Delineate an area around a discovery as a no-work zone; Notify Indigenous groups and the applicable regulatory agency within 24 hours of a discovery and allow Indigenous groups to monitor archaeological works; Develop mandatory training on chance finds, which includes the identification of sensitive locations within the Project area and the implementation of the above measures.	IPD Section 5.2.1, IPD Table 5.2-2, p.116		X	X		
Fish and Fish Habitat	Mitigation	Fish and Fish Habitat Offsetting Plan	A detailed Fish & Fish Habitat Offsetting Plan is to be submitted with future regulatory submissions.	IPD Section 1.5.3, IPD Table 1.5-1, p.16; IPD Section 5.1.1, p.111	X	X	X		
Fish and Fish Habitat	Mitigation	Fish Rescue Plan	Individual fish will be protected throughout the construction phase by implementation of a fish rescue from all in-water work areas. A site-specific fish rescue plan will be developed by a professional biologist for the Project.	IPD Section 5.1.1, p.110	X	X			
Fish and Fish Habitat	Mitigation	In-Water Works Timing Windows	Fish will further be protected by restricting all in-water work to site-specific timing windows based on the fish species.	IPD Section 5.1.1, p.110		X			
Fish and Fish Habitat	Monitoring	Aquatic Effects Monitoring Plan (AEMP)	A series of environmental management and monitoring plans will be developed and implemented prior to Project development, including an AEMP to be implemented during Project construction, operation, and closure phases.	IPD Section 5.1.1, p.111	X	X	X	X	
Fish and Fish Habitat	Best Practices & Compliance	Adherence to Fisheries and Oceans Canada (DFO) Codes of Practice	15-MMR is committed to adhering to DFO codes of practice relevant to Project activities, including those for culvert maintenance, in-water structure maintenance and repair, and temporary fords.	IPD Section 5.1.1, p.111		X	X	X	
Fish and Fish Habitat	Additional Study	Ecological Risk Assessment for Dust Effects on Fish	15-MMR has retained a third-party consultant to complete an Ecological Risk Assessment to investigate potential effects of dust on fish and fish habitat.	IPD Section 1.6.3, IPD Table 1.6-1, p.21	X				
Fish and Fish Habitat	Best Practices & Compliance	Adherence to Fisheries and Oceans Canada (DFO) Blasting Guidance	15-MMR will adhere to setback recommendations and other mitigation strategies to minimize impact to fish and fish habitat from blasting activities outlined by DFO in the Measures to Avoid Causing Harm to Fish and Fish Habitat Including Aquatic Species at Risk Pertaining to Blasting (DFO, 2018).	IPD Section 5.1.1, p.111		X	X		
Fish and Fish Habitat	Mitigation	Buffer Zones Around Turtle Aquatic Habitats	Implement buffer zones around aquatic habitats deemed suitable to support turtles, where feasible.	IPD Section 5.4.11, p.136		X	X		



Theme/VC	Commitment Type	Commitment	Details	IPD or SOI Response Section	Pre-Construction	Construction	Operations	Closure	Post-Closure
Fish and Fish Habitat	Mitigation	Stabilize Erodible Areas and Maintain Stability	Stabilize all erodible areas (including excavated materials) and regularly inspect and maintain the stability of these areas until they are permanently stable.	Table 5.1-2, Section 5.1.1, p.110	X	X	X	X	
Fish and Fish Habitat	Mitigation	Install Settling Basin and Filtration Systems for Runoff	Install settling basin and/or filtration systems for water flowing onto the site and water being pumped or diverted from the Project site such that water run-off meets applicable Total Suspended Solids criteria before discharge into the receiving environment.	Table 5.1-2, Section 5.1.1, p.110		X	X	X	
Fish and Fish Habitat	Mitigation	Gradual Dewatering to Prevent Sediment Resuspension	For any dewatering, do so gradually to prevent sediment resuspension and bank destabilization.	Table 5.1-2, Section 5.1.1, p.110		X	X	X	
Fish and Fish Habitat	Mitigation	Install Temporary Clear Span Bridges for High-Water Flows	Install temporary clear span bridges to accommodate expected high-water flows.	Table 5.1-2, Section 5.1.1, p.110		X	X		
Fish and Fish Habitat	Mitigation	Maintain Undisturbed Vegetated Buffer Zone	Maintain an undisturbed vegetated buffer zone between areas of on-land activity and the high-water mark of any waterbody.	Table 5.1-2, Section 5.1.1, p.110	X	X	X	X	
Fish and Fish Habitat	Mitigation	Isolate In-Water Project Activities from Fish-Bearing Waters	Isolate in-water Project activities from the receiving fish-bearing waters to mitigate intensity, spatial scale, and duration of sedimentation in fish habitat taking into account DFO's Standard: In-Water Site Isolation.	Table 5.1-2, Section 5.1.1, p.110		X	X		
Fish and Fish Habitat	Mitigation	Install Structures to Reduce Scouring and Sedimentation	Install structures to reduce scouring and sedimentation in aquatic areas intended to receive concentrated drainage, including water ditch checks, blocks, riprap, and silt fencing as appropriate.	Table 5.1-2, Section 5.1.1, p.110		X	X	X	
Fish and Fish Habitat	Additional Study	Characterize Acid Rock Drainage and Metal-Leaching Potential per MEND	Describe the methods used to characterize and confirm through geochemical testing acid rock drainage and metal-leaching potential of rock materials that follow the methodologies provided in the MEND program's Prediction Manual for Drainage Chemistry from Sulphidic Geologic Materials, including static and kinetic methods and the frequency and timing of characterization.	Table 5.1-2, Section 5.1.1, p.110	X	X	X		
Fish and Fish Habitat	Additional Study	Pre-Construction Characterization of Acid Rock Drainage and Metal-Leaching Potential	Characterize the acid rock drainage and metal-leaching potential of materials with potential geochemical risk for acid generation and metal leaching prior to construction.	Table 5.1-2, Section 5.1.1, p.110	X				
Fish and Fish Habitat	Additional Study	Confirmatory Geochemical Testing	Confirm through geochemical testing, as appropriate, to validate initial characterization and predictions.	Table 5.1-2, Section 5.1.1, p.110	X	X	X		
Fish and Fish Habitat	Best Practices & Compliance	Use Only Non-Acid-Generating and Non-Metal-Leaching Rock for Project Works	Use only rock materials characterized as not acid-generating, non-potentially acid-generating and non-metal-leaching for Project works.	Table 5.1-2, Section 5.1.1, p.110		X	X	X	
Fish and Fish Habitat	Mitigation	Limit Oxidation Reactions in Potentially Acid-Generating and Metal-Leaching Materials	Limit oxidation reactions in materials characterized as acid-generating and metal-leaching or potentially acid-generating and metal-leaching, which may include the use of covers.	Table 5.1-2, Section 5.1.1, p.110		X	X	X	X
Fish and Fish Habitat	Mitigation	Maintain Fish Passage in Watercourses	Maintain fish passage in watercourses frequented by fish by avoiding activities that reduce minimum flows or remove existing passage structures—except in cases where watercourses are permanently removed for the construction of Project components.	Table 5.1-2, Section 5.1.1, p.110		X	X	X	
Fish and Fish Habitat	Mitigation	Capture and Relocate Trapped Fish	Safely capture and relocate fish that may become trapped in isolated or enclosed areas, ensuring they are returned to the same watercourse or waterbody.	Table 5.1-2, Section 5.1.1, p.110		X	X		
Fish and Fish Habitat	Best Practices & Compliance	Prevent Concrete and Cement Materials from Entering Fish-Bearing Waters	Implement measures to prevent sediments, debris, concrete, and concrete fines and any water contacting uncured or partly cured concrete or Portland cement or lime-containing construction materials, including water that may be used for exposed aggregate wash-off, wet curing, equipment and truck washing, from entering the receiving environment directly or indirectly.	Table 5.1-2, Section 5.1.1, p.111		X	X		
Fish and Fish Habitat	Best Practices & Compliance	Use Pre-Cast Concrete Instead of Cast-in-Place	Use pre-cast concrete, instead of cast-in-place, unless not feasible.	Table 5.1-2, Section 5.1.1, p.111		X	X		
Fish and Fish Habitat	Best Practices & Compliance	Maintain CO2 Tank On Site for Concrete Spill Neutralization	Have a CO2 tank with regulator, hose, and gas diffuser, or other equivalent technology easily accessible during these Project activities, so that they can be deployed quickly to mitigate any spills that may occur and neutralize pH.	Table 5.1-2, Section 5.1.1, p.111		X	X		
Fish and Fish Habitat	Best Practices & Compliance	Use Non-Treated or Water-Based Treated Wood for In-Water Structures	Use only non-treated wood materials (e.g., pre-cast concrete, steel, plastic) for construction in fish-bearing waters, where feasible. If the use of non-treated materials is not feasible, only use wood treated with water-based preservatives.	Table 5.1-2, Section 5.1.1, p.111		X	X		
Fish and Fish Habitat	Best Practices & Compliance	Install Screens on Water Intake Structures per DFO Code of Practice	Install screens on the water intake structures taking into account DFO Interim Code of Practice for End-of-Pipe Fish Protection Screens for Small Water Intakes in Freshwater.	Table 5.1-2, Section 5.1.1, p.111		X	X		
Fish and Fish Habitat	Best Practices & Compliance	Brook Floater Management and Recovery Best Practices	Project planning, assessment, and permitting will consider and incorporate, as appropriate, management measures for Brook Floater outlined in the Management Plan for the Brook Floater (Alasmidonta varicosa) in Canada (DFO 2018) and the Recovery Plan for the Brook Floater (Alasmidonta varicosa) in Nova Scotia (DNR 2022).	SOI Key Issues Response Table	X	X	X	X	
Geology, Soils and Sediment	Mitigation	Historic Tailings Management Plan	Disturbed tailings and contaminated soils will be managed per a historic tailings management plan similar to that completed by St Barbara at the Touquoy Mine site.	IPD Section 1.1, p.12; IPD Section 2.3.1, p.36	X	X	X	X	
Geology, Soils and Sediment	Mitigation	Remediation of Mercury-Impacted Soils in Clay Cell Within 15-Mile Tailings Management Facility (TMF)	Remediation of mercury-impacted soils will include excavation, transport, and storage within a clay cell constructed within the 15-Mile TMF. Any soils disturbed by infrastructure exceeding site-specific soil quality guidelines will be remediated.	IPD Section 1.5.3, IPD Table 1.5-1, p.17; IPD Section 2.3.1, p.37	X	X	X	X	
Geology, Soils and Sediment	Mitigation	Clay/Geomembrane Liner for Temporary Potentially Acid-Generating (PAG) Stockpile	Based on geochemical analyses indicating the potential for acid rock drainage, it is assumed that a clay or geomembrane liner will be required to collect and manage contact water from the PAG stockpile until the material can be backfilled into the empty pit.	IPD Section 1.5.3, IPD Table 1.5-1, p.17; IPD Section 2.3.3, p.43	X	X			
Geology, Soils and Sediment	Additional Study	Comprehensive Geochemical Characterization Program	A comprehensive geochemical characterization program will be completed during operations to inform waste rock delineation and management strategies.	IPD Section 2.3.2, p.40			X		
Geology, Soils and Sediment	Mitigation	Erosion and Sediment Control Plan (ESCP)	A Project-specific ESCP will be developed and implemented prior to construction to prevent the release of sediment-laden runoff to watercourses and wetlands.	IPD Section 5.1.1, p.111; IPD Section 5.4.4, p.128	X	X	X	X	
Groundwater and Surface Water	Additional Study	Detailed Groundwater and Surface Water Modelling for Tailings Management Facility (TMF)	Detailed groundwater and surface water modelling is ongoing to confirm the design meets all regulatory standards and guidelines that protect water quality.	IPD Section 1.5.3, IPD Table 1.5-1, p.17	X				
Groundwater and Surface Water	Best Practices & Compliance	Compliance With International Cyanide Management Code	The cyanide supplier for the Project will comply with the International Cyanide Management Code .	IPD Section 2.3.1, p.38		X	X		
Groundwater and Surface Water	Monitoring	Robust Water Quality Monitoring Program	Maintain a robust water quality monitoring program to confirm water quality. Monitoring will be ongoing throughout all phases of the Project.	IPD Section 1.6.3, IPD Table 1.6-1, p.21	X	X	X	X	X
Groundwater and Surface Water	Monitoring	Surface Water Management and Monitoring Plan	A Project-specific Surface Water Management and Monitoring Plan will be developed detailing the design and maintenance of water management infrastructure and monitoring of surface water quality and quantity within the receiving environment.	IPD Section 5.4.6, p.130	X	X	X	X	X
Groundwater and Surface Water	Mitigation	Contact Water Collection and Treatment Prior to Discharge	All contact water within the Project Development Areas will be collected and treated to applicable regulatory standards prior to discharge.	IPD Section 5.4.6, p.130		X	X	X	
Groundwater and Surface Water	Monitoring	Groundwater Management and Monitoring Plan	A Project-specific Groundwater Management and Monitoring Plan will be developed and implemented through all Project phases.	IPD Section 5.4.5, p.129	X	X	X	X	X
Groundwater and Surface Water	Mitigation	Secondary Containment for Fuel and Reagent Storage	Secondary containment will be installed for all fuel and reagent storage within the Project Development Areas.	IPD Section 5.4.5, p.129; IPD Section 5.4.6, p.130		X	X		
Groundwater and Surface Water	Best Practices & Compliance	Minimum Distance Between Fuel Storage and Surface Water Bodies	Fuel storage and refueling stations for vehicles and equipment will be located a minimum of 30 metres away from surface water bodies.	SOI Key Issues Response Table	X	X	X	X	
Groundwater and Surface Water	Monitoring	Consult Relevant Authorities for Monitoring and Management Plans	The Metal-Leaching and Acid Rock Drainage Management Plan, Historical Tailings Management Plan, Groundwater Management and Monitoring Plan, Surface Water Management and Monitoring Plan, and Spill Contingency Plan will be developed by qualified professionals in consultation with relevant authorities with technical expertise.	SOI Key Issues Response Table	X	X	X		
Migratory Birds	Best Practices & Compliance	Pre-Clearing Nest Surveys / Timing Windows	Avoid the destruction of active nests and will implement mitigation measures by adhering to timing windows to avoid clearing or conducting pre-clearing nest surveys to ensure the absence of nesting activity prior to any disturbance.	IPD Section 5.1.3, p.113	X	X			
Migratory Birds	Best Practices & Compliance	Setback Distances from Nests	During active construction, setback distances from known or identified nests will be adhered to as feasible and as determined through consultation with Nova Scotia Department of Natural Resources and Renewables or Environment and Climate Change-Canadian Wildlife Service.	IPD Section 5.1.3, p.113		X			
Migratory Birds	Mitigation	Bird Deterrents on Tailings Management Facility (TMF)	Measures will be implemented to deter birds from accessing the TMF, including use of audio and visual deterrents to dissuade birds from landing in the TMF.	IPD Section 5.1.3, p.113			X	X	
Migratory Birds	Additional Study	Continue Avifauna Surveys Through 2026	Dedicated avifauna surveys will continue through 2026 to confirm the presence or potential presence of avifauna and to assess potential impacts to these species from Project activities.	IPD Section 5.4.10, p.135	X				
Migratory Birds	Best Practices & Compliance	Optimize Lighting Design to Reduce Total Lighting	Optimize lighting design to reduce the total amount of lighting needed.	Table 5.1-4, Section 5.1.3, p.114		X	X	X	
Mi'kmaq Engagement	Best Practices & Compliance	Adherence to Data Sharing and Consent Principles	Adhere to established principles of data sharing and data use consent, as guided by the Mi'kmaq of Nova Scotia.	IPD Section 1.6.4, p.24	X	X	X	X	X
Mi'kmaq Engagement	Engagement	Meetings with Chiefs and Council	Continue to hold meetings with community Chiefs and Council members to share and discuss Project information	IPD Section 1.6.4, p.24	X	X	X	X	X
Mi'kmaq Engagement	Engagement	Community Open Houses	Community Open Houses will be held to share and discuss Project information.	IPD Section 1.6.4, p.24	X	X	X	X	
Mi'kmaq Engagement	Engagement	Invite Participation in Environmental Baseline Studies	Invite Mi'kmaq communities to participate in environmental baseline studies, including site visits and review of data and reports where appropriate	IPD Section 1.6.4, p.24	X	X	X		
Mi'kmaq Engagement	Engagement	Opportunity to Review Draft Regulatory Documents	Provide draft regulatory documents for review and feedback, including the Initial Project Description and baseline study results. Provide funding and opportunities to participate in regulatory review processes.	IPD Section 1.6.4, p.24	X				
Mi'kmaq Engagement	Financial	Funding for Regulatory Review Participation	Provide funding and opportunities for the Mi'kmaq to participate in regulatory review processes	IPD Section 1.6.4, p.24	X				
Mi'kmaq Engagement	Financial	Share Job Opportunities on Mi'kmaq Job Boards	Share job opportunities on Mi'kmaq job boards, which can include future training opportunities	IPD Section 1.6.4, p.24	X	X	X	X	
Mi'kmaq Engagement	Additional Study	Updated Mi'kmaq Ecological Knowledge Study (MEKS) for Old Austen and Old Mitchell Mines	Updated MEKS to be completed for the Old Austen Mine and the Old Mitchell Mine.	IPD Section 1.6.4, p.24	X				



Theme/VC	Commitment Type	Commitment	Details	IPD or SOI Response Section	Pre-Construction	Construction	Operations	Closure	Post-Closure
Mi'kmaq Engagement	Engagement	Support Indigenous-Led Health and Socio-Economic Baseline Studies	15-MMR remains open to exploring support for Indigenous-led health and socio-economic baseline studies, including a country foods study, or to conducting co-designed baseline studies on Indigenous health, social, cultural, and economic conditions with potentially affected Mi'kmaq.	IPD Section 1.6.4, p.24	X	X	X		
Mi'kmaq Engagement	Monitoring	Protection of Heritage and Archaeological Resources Procedure with Input from the Mi'kmaq	A Protection of Heritage and Archaeological Resources procedure will be developed, outlining the process to be implemented during construction and operation, with input from the Mi'kmaq.	IPD Section 5.2.1, p.115	X	X	X		
Mi'kmaq Engagement	Engagement	Share Monitoring and Management Plans for Mi'kmaq Review	Provide the Mi'kmaq communities with opportunities to access and review monitoring and management plans and continue to share updates, findings, and other information to support meaningful collaboration throughout the Project.	SOI Key Issues Response Table	X	X	X		
Reclamation / Closure	Financial	Financial Security Estimate for Reclamation	A financial security estimate based on costs associated with reclamation activities will be provided in accordance with provincial requirements.	IPD Section 2.3.2, p.39	X			X	
Reclamation / Closure	Mitigation	Progressive Reclamation During Operations	15-MMR is planning to complete progressive reclamation during operations where practical, including backfilling potentially acid-generating material during operations at 15-Mile.	IPD Section 1.6.3, IPD Table 1.6-1, p.22			X		
Reclamation / Closure	Monitoring	Water Quality Monitoring for Pit Lake Discharge	Discharge from pit lakes will only occur once water quality meets applicable regulatory criteria.	IPD Section 2.3.2, p.40				X	X
Reclamation / Closure	Monitoring	Post-Closure Monitoring Plan	An adaptive post-closure monitoring plan will be developed within the final Reclamation and Closure Plan.	IPD Section 2.5, p.58				X	X
Reclamation / Closure	Best Practices & Compliance	Revegetation with Native Species	The non-acid-generating stockpile at closure will be regraded with slopes that promote local vegetation growth, soiled, seeded, and planted with native species.	IPD Section 2.3.2, p.40				X	
Reclamation / Closure	Engagement	Invite Indigenous Groups to Participate in Reclamation	Identify plant species of interest in consultation with Indigenous groups for use in establishing self-sustaining vegetation communities; Invite Indigenous groups to participate in the reclamation activities.	IPD Section 5.2.2, IPD Table 5.2-4, p.118			X	X	
Socioeconomic	Additional Study	Human Health and Ecological Risk Assessment (HHERA)	Undertake a HHERA for each of the three mine sites associated with the Project.	IPD Section 5.3, p.120	X				
Socioeconomic	Additional Study	Consider Millbrook First Nation Community Wellness Study	Consider information provided in the Millbrook First Nation Community Wellness Study in Project design.	IPD Section 5.3, IPD Table 5.3-1, p.118	X				
Socioeconomic	Financial	Mi'kmaq Employment and Training Strategy	Engage with the Mi'kmaq to develop and implement mitigation measures, which may include targeted employment, training programs, apprenticeships, and environmentally focused roles to support Mi'kmaq participation in the workforce and capacity building.	IPD Section 5.3, p.121	X	X	X	X	
Socioeconomic	Financial	Mi'kmaq Procurement Strategy	Explore development of a Mi'kmaq procurement strategy to create opportunities for Mi'kmaq-owned businesses.	IPD Section 5.3, p.121	X	X	X	X	
Socioeconomic	Financial	Partnerships and Mutual Benefit Agreements	Partnerships and Mutual Benefit Agreements will be pursued where there is interest from the Mi'kmaq in entering into such arrangements to support sustainable, long-term socio-economic benefits.	IPD Section 5.3, p.121	X	X	X	X	
Socioeconomic	Best Practices & Compliance	Workplace Anti-Harassment, Anti-Discrimination, Anti-Violence Policy	Implement a workplace anti-harassment, anti-bullying, anti-discrimination, and anti-violence policy that incorporates gender-appropriate, gender-specific, and culturally appropriate policies and processes, including sexual harassment and assault counselling as well as confidential and culturally sensitive care.	IPD Section 5.3, IPD Table 5.3-2, p.122		X	X	X	
Socioeconomic	Best Practices & Compliance	Workplace Drug and Alcohol Policy	Implement a workplace policy on the use and possession of drugs and alcohol, which prohibits the use of, or being under the influence of, illicit drugs or alcohol during work hours.	IPD Section 5.3, IPD Table 5.3-2, p.122		X	X	X	
Socioeconomic	Best Practices & Compliance	Mandatory Cross-Cultural Awareness Training	Develop mandatory cross-cultural awareness training and provide the training to all employees and contractors associated with the Project.	IPD Section 5.3, IPD Table 5.3-2, p.122		X	X	X	
Socioeconomic	Best Practices & Compliance	Worker Code of Conduct	Establish a worker code of conduct that outlines expectations and requirements in relation to the measures developed to promote safe, respectful, and inclusive conduct in the workplace and the community.	IPD Section 5.3, IPD Table 5.3-2, p.122		X	X	X	
Socioeconomic	Best Practices & Compliance	Prohibit Employee Recreational Use for Hunting/Fishing/Gathering	Prohibit employees and contractors associated with the Project from fishing, hunting, trapping, gathering plants, and using off-road vehicles for recreational purposes within the Project area, or from using the Project area to access surrounding areas for these purposes, unless such access is granted specifically to enable the exercise of Indigenous rights.	IPD Section 5.2.2, IPD Table 5.2-4, p.118		X	X	X	
Socioeconomic	Additional Study	Light Impact Assessment	To understand potential Project-related impacts on the visual environment, prepare a light impact assessment to quantify the illuminance at identified sensitive receptors.	IPD Section 5.4.3, p.126	X				
Socioeconomic	Mitigation	Directional/Shielded Lighting to Reduce Trespass	Use directional lighting that targets only the areas where illumination is essential and use shielded fixtures to minimize glare and prevent light leakage into directions where light is not essential.	IPD Section 5.1.3, IPD Table 5.1-4, p.114		X	X	X	
Socioeconomic	Mitigation	Motion Sensors/Strobe Lighting	Use automatic sensors or strobe lighting in areas where continuous lighting is not essential.	IPD Section 5.1.3, IPD Table 5.1-4, p.114		X	X	X	
Terrestrial Environment	Monitoring	Wildlife Management Plan (WMP)	A WMP will be developed in consultation with Environment and Climate Change Canada and Nova Scotia Department of Natural Resources and Renewables before construction begins.	IPD Section 1.5.3, IPD Table 1.5-1, p.17; IPD Section 5.1.3, p.113, SOI Key Issues Table	X	X	X	X	
Terrestrial Environment	Best Practices & Compliance	Wildlife Awareness Training for Personnel	Provide wildlife awareness training to personnel to reduce interactions between site personnel and wildlife.	IPD Section 1.5.3, IPD Table 1.5-1, p.17		X	X	X	
Terrestrial Environment	Mitigation	Speed Limits and Roadside Buffers	Fencing, speed limits, signage, and maintaining an un-vegetated buffer along roadsides will be implemented, where practicable, to improve visibility and reduce the potential for collisions with wildlife.	IPD Section 5.4.9, p.135		X	X		
Terrestrial Environment	Mitigation	Secure Human Food and Waste Containment	Human food and waste will be securely contained to minimize the potential for attracting birds.	IPD Section 5.1.3, p.114; IPD Section 5.4.9, p.135		X	X		
Terrestrial Environment	Monitoring	Wetland Monitoring Plan	A wetland monitoring plan will be prepared through the life cycle of the permitting process in consultation with Nova Scotia Environment and Climate Change. The plan will commit to monitoring baseline conditions in all relevant wetlands to establish pre-construction condition and throughout all relevant Project phases.	IPD Section 5.4.7, p.132	X	X	X	X	X
Terrestrial Environment	Mitigation	Wetland Compensation Plan	A Wetland Compensation Plan will be developed and implemented to achieve no net loss of wetland area and function	SOI Key Issues Response Table	X	X			
Terrestrial Environment	Mitigation	Wetland Compensation for Losses	All wetland losses will be compensated in accordance with the wetland alteration process outlined in the Nova Scotia Wetland Conservation Policy.	IPD Section 5.1.3, p.114	X	X			
Terrestrial Environment	Mitigation	Micro-Siting to Avoid Wetlands	Alternative locations for Project infrastructure are being considered, when practicable, focusing specifically on avoiding impacts to wetland habitat.	IPD Section 5.4.7, p.132	X				
Terrestrial Environment	Mitigation	Transplant Priority Flora Species	Transplant priority flora species, where deemed reasonable and appropriate in consultation with regulators and the Mi'kmaq of Nova Scotia, that are located within the direct footprint of the Project infrastructure to nearby areas where suitable habitat is present.	IPD Section 5.4.8, p.133	X	X			
Terrestrial Environment	Mitigation	Invasive Species Control	Develop measures to control invasive species during construction, including cleaning vehicles and equipment before entering the Project Development Area (PDA) and prior to leaving any known site with invasives species within the PDA.	IPD Section 5.4.8, p.133		X	X		
Terrestrial Environment	Best Practices & Compliance	Adherence to at-Risk Lichens Special Management Practices	For certain rare and sensitive lichen species, special management practices have been established to limit disturbance to individuals and their supporting habitat on Crown land, as outlined in the At-Risk Lichens – Special Management Practices (NSNR, 2018).	IPD Section 5.4.8, p.133	X	X	X		
Terrestrial Environment	Mitigation	Buffer Zones Around Species at Risk (SAR) and Species of Conservation Interest (SOCI)	Known locations of SAR and SOCI will be clearly identified and, when feasible, buffer zones will be established based on relevant standards and best management practices.	IPD Section 5.4.11, p.136	X	X	X		
Terrestrial Environment	Best Practices & Compliance	Species at Risk (SAR) Identification Training for Personnel	All site personnel will be trained on the identification of SAR and SOCI, with observations to be recorded throughout all phases of the Project.	IPD Section 5.4.11, p.136		X	X	X	
Terrestrial Environment	Best Practices & Compliance	Construction Scheduling to Avoid Sensitive Life History Periods	Scheduling construction activities outside of sensitive life history periods, such as nesting and hibernation, where feasible.	IPD Section 5.4.11, p.136	X	X			
Terrestrial Environment	Engagement	Species at Risk (SAR) Permit Engagement With Nova Scotia Department of Natural Resources and Renewables (NSDNR) and Environment and Climate Change Canada (ECCC)	For all taxa, 15-MMR will engage with NSDNR biodiversity team and ECCC to identify SAR permit requirements under the relevant provincial and federal legislation to mitigate potential impacts to SAR and their habitats.	IPD Section 5.4.11, p.136	X				
Terrestrial Environment	Additional Study	Old Growth Forest Field Program	15-MMR is planning to conduct an Old Growth Forest field program early Spring of 2026. Where practical, the Old Mitchell Mine layout will be adjusted to avoid Old Growth Forest.	IPD Section 1.6.3, IPD Table 1.6-1, p.23	X				
Traffic	Mitigation	Haul Route Avoiding IR-17 and Night-Time Operations	The preferred route utilizes existing public roadways and excludes night-time operations to manage truck frequency and minimize potential effects on surrounding communities.	IPD Section 2.3.3, p.46			X		
Traffic	Mitigation	Using Existing Public Roadways	Use existing public roadways designed to safely accommodate truck traffic	SOI Key Issues Response Table		X	X		
Traffic	Monitoring	Vehicle Tracking Devices on Haul Trucks	Outfit each haul truck used for the Project with vehicle tracking devices to moderate driving behaviour and track truck location.	IPD Section 2.3.3, p.46; IPD Section 2.3.5, p.53, SOI Key Issues Response Table		X	X		
Traffic	Mitigation	Explore Worker Bussing	Explore opportunities for worker bussing.	SOI Key Issues Response Table		X	X		
Traffic	Best Practices & Compliance	Encourage Worker Carpooling	Encourage carpooling among workers who live in similar locations.	SOI Key Issues Response Table		X	X		