


IAMGOLD Corporation – Côté Gold Project				
Document Title	Compliance Monitoring Program Report			
Document No.	IMG-ENV-CMPR-100	Revision	3.0	

IAMGOLD Corporation

Côté Gold Project

Compliance Monitoring Program Report



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DEFINITIONS, ACRONYMS AND ABBREVIATIONS

CEAA	Canadian Environmental Assessment Agency, now the Impact Assessment Agency of Canada (“IAAC”)
CEAA 2012	<i>Canadian Environmental Assessment Act, 2012</i>
CMPR	Compliance Monitoring Program Report
Director	Director of the MECP Environmental Approvals Branch
EA	Environmental Assessment
EAA	<i>Environmental Assessment Act</i>
EER	Environmental Effects Review
EPCM	Engineering, Procurement and Construction Management
MECP	Ministry of the Environment, Conservation and Parks, previously the Ministry of Environment and Climate Change
IAAC	Impact Assessment Agency of Canada, previously the Canadian Environmental Assessment Agency
IAMGOLD	IAMGOLD Corporation
km	Kilometers
Project	The Côté Gold Project
Registry	IAMGOLD Electronic Commitments Registry System
the EA	Amended Environmental Impact Statement / Final Environmental Assessment Report (AMEC, January 2015)

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1. Introduction

IAMGOLD Corporation (“IAMGOLD”) is a mid-tier mining company with four operating gold mines (including one joint venture) in Canada and abroad. These assets in North and South America and West Africa are complemented by development and exploration projects, and continued assessment of acquisition opportunities.

IAMGOLD proposes to construct, operate and eventually rehabilitate a new open pit gold mine, the Côté Gold Project (“Project”) in the Chester and Yeo Townships, within the District of Sudbury, in northeastern Ontario. The Project area is located approximately 20 kilometres (“km”) southwest of Gogama, 130 km southwest of Timmins, and 200 km northwest of Sudbury.

An Environmental Assessment (“EA”) was completed for the Project under the *Canadian Environmental Assessment Act, 2012* (CEAA 2012) and the Ontario *Environmental Assessment Act* (EAA). The Amended Environmental Impact Statement / Final Environmental Assessment Report is hereafter referred to as the EA (AMEC, January 2015). A Decision Statement was issued by the Federal Minister of Environment on April 13, 2016 and a Notice of Approval issued by the Ontario Minister of the Environment and Climate Change on December 22, 2016.

Following receipt of the EA approvals, IAMGOLD optimized the Project based on feedback from First Nations, Métis, local communities and regulators. Project optimizations were evaluated through an Environmental Effects Review (“EER”) which concluded that predicted environmental effects of the Project are similar or reduced compared to the EA, and the conclusions of the EA remain valid. EER findings were accepted by the Canadian Environmental Assessment Agency ([“CEAA”], now the Impact Assessment Agency of Canada [“IAAC”]) and Ontario Ministry of Environment, Conservation and Parks (“MECP”). IAMGOLD received a revised Decision Statement from the Federal Minister of Environment and Climate Change Canada on February 25, 2019. The MECP confirmed via letter on April 29, 2019 that the 2016 Notice of Approval remains in effect for the Project, provided comments on the applicability of each EA condition, and included guidance and clarifications related to MECP expectations.

2. Purpose and Scope

The purpose of this Compliance Monitoring Program Report (“CMPR”) is to outline how IAMGOLD will track and monitor fulfillment of Provincial EA conditions and commitments. The CMPR is intended to fulfil the requirements of specific Conditions and direction from the MECP in the April 29, 2019 letter, as outlined in the sections below. This version of the document also addresses MECP comments on the July 22, 2020 version of the CMPR.

It is understood that amendments to the CMPR may be required by the MECP’s District Manager or Director of the Environmental Approvals Branch (“Director”). Should revision(s) be required, a copy of the updated CMPR will be submitted to the MECP within the prescribed timeline.

2.1 Provincial EA Condition 5 Requirements

Provincial EA Notice of Approval Condition 5 requirements, along with IAMGOLD’s Concordance is presented in Table 2.1.



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Table 2-1: Provincial EA Notice of Approval Condition 5

Condition	IAMGOLD Concordance
<i>5.1 The Proponent shall prepare and submit to the District Manager and Director and make available to the public on the Proponent website, an Environmental Assessment Compliance Monitoring Program.</i>	IAMGOLD has developed this CMPR, which will be submitted to the District Manager and Director and will be posted on the website: www.iamgold.com/cotegold
<i>5.2 The Compliance Monitoring Program Report shall be submitted 60 days before the start of Construction or by such other date as may be agreed to in writing by the District Manager and Director.</i>	IAMGOLD submitted the CMPR on July 23, 2020 in fulfillment of the condition. On August 7, 2020, a letter from the Director of the EAB confirmed approval to accept the change in timing of the submission from 60 days to 30 days prior to the start of Construction.
<i>5.3 The Compliance Monitoring Program Report shall describe how the Proponent will monitor its fulfilment of: The provisions of the Environmental Assessment pertaining to mitigation measures, public consultation, and additional studies and work to be carried out;</i>	CMPR – Section 3, Appendix A (EA Mitigation Commitments Registry), and Appendix B (EA Monitoring Commitments Registry).
<i>All other commitments made by the Proponent during the Environmental Assessment process including the Commitments Registry as contained in the Environmental Assessment Commitment Tables dated February 8, 2016; and</i>	CMPR – Section 3, Appendix A (EA Mitigation Commitments Registry), and Appendix B (EA Monitoring Commitments Registry).
<i>The conditions included in this Notice of Approval.</i>	CMPR – Section 3 and Appendix C (Provincial EA Conditions Registry).
<i>5.4 The Compliance Monitoring Program Report must contain an implementation schedule for Construction, operations, and closure, as well as for monitoring during Construction, operations and closure.</i>	CMPR – Section 4. The timing for implementation of EA commitments and conditions, including monitoring, is provided in Appendices A, B, and C.
<i>5.5 When the Proponent submits the Compliance Monitoring Program Report to the District Manager and Director, the Proponent shall append a statement indicating that the Compliance Monitoring Program Report is intended to fulfil Condition 5 of this Notice of Approval.</i>	CMPR – Section 2
<i>5.6 The District Manager or Director may require the Proponent to amend the Compliance Monitoring Program Report at any time. Should an amendment be required, the District Manager/Director will notify the Proponent, in writing, of the required amendment and the date by which the Proponent must complete the amendment and submit it to the District Manager/Director.</i>	Condition acknowledged in CMPR – Section 2
<i>5.7 The Proponent shall carry out the Compliance Monitoring Program, as detailed in the Compliance Monitoring Program Report, and as it may be amended by the District Manager/Director.</i>	Condition acknowledged in CMPR – Sections 3 and 4

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Condition	IAMGOLD Concordance
<i>5.8 The Proponent shall make the documentation resulting from the fulfillment of the Compliance Monitoring Program available to the District Manager or Director upon request, in a timely manner, when so requested by Ministry staff in relation to an on-Site inspection, an audit, a pollution incident report, or compliance.</i>	Condition acknowledged in CMPR – Section 5

2.2 Additional Requirements

In addition to Condition 5, the MECP has also identified specific information that is required to be included in the CMPR. These additional requirements are outlined in Provincial EA Conditions and sections of the MECP April 29, 2019 letter. These additional CMPR requirements are summarized below, with detailed condition wording and compliance status provided in Appendix D.

Conditions Related to Project Optimization


As a result of Project optimization, as documented in the EER, some Provincial EA conditions have either been addressed or are no longer applicable. In the MECP's April 29, 2019 letter, specific direction was provided to document the status of the following conditions in the CMPR:

- Conditions 13.1 and 13.2 (Polishing Pond Discharge Pipeline Alignment)
- Condition 14.1 and 14.2 (Transmission Line Crossing at Mesomikenda Lake)
- Condition 23.1 (Best Management Practices and Best Available Technology)

Documentation of Changes to Specific Activities

MECP's April 29, 2019 letter and conditions review table outlined requirements for documentation of changes to activities associated with specific conditions in the CMPR. The following conditions and required documentation include:

- Condition 11.3 (Surface Water Quality) – any changes to the lakes that will require depth stratified sampling needs to be documented in CMPR. Rationale and justification for these changes should be provided in the CMPR.
- Condition 11.4 (Surface Water Quality) – any changes to the lakes that will be monitored needs to be documented in CMPR. Rationale and justification for these changes should be provided in the CMPR.
- Condition 15 (General) – any changes to types of reports/applications that will be provided to Indigenous communities should be documented in the CMPR. Rationale and justification for these changes should be provided in the CMPR.
- Condition 17.2 (Terrestrial Systems and Habitat Monitoring Plan) – any changes to monitoring periodicity should be documented in the CMPR. Rationale and justification for these changes should be provided in the CMPR.

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Methyl Mercury Monitoring Plan

Provincial EA Condition 18.1 outlines the requirements for a methyl mercury monitoring program, and requires that the CMPR include a study plan outlining the frequency of proposed sampling during the pre-dam construction and post-dam construction periods. The study plan required by the condition to be included in the CMPR is provided in Appendix E.

3. Compliance Monitoring Tools

The EER report included a review and update of the EA mitigation and monitoring commitments, including those related to public and Indigenous consultation and additional studies and work to be carried out (summarized in Appendix C of the EER). IAMGOLD intends to monitor the fulfillment of these EA commitments, as well as the EA conditions, through use of the following compliance monitoring tools.

3.1 Commitments Registry

IAMGOLD maintains an electronic registry system (“registry”) and has kept accurate records of all commitments made throughout the Pre-Construction phase via its registry. The registry groups commitments by specific disciplines for implementation (e.g. air quality, groundwater, etc.), as summarized in Appendices A to C.


As required, IAMGOLD will backup the contents of the current registry, including all mitigation and monitoring commitments, and conditions of approval. Reference will be made to the source documents for these conditions, commitments, and agreements by uploading applicable documents or alternatively referencing them.

As approvals are received, IAMGOLD will review mitigation and monitoring commitment and import them into the registry. Management of each individual condition will be assigned to specific team members. Team members will be responsible for single, recurring and perpetual commitments, and will engage relevant departments well in advance of any due dates to ensure compliance.

3.2 Management and Monitoring Plans

IAMGOLD, in conjunction with a third-party Engineering, Procurement, and Construction Management (EPCM) team have developed a series of management and monitoring plans to be implemented at appropriate phases of the Project with the aim of ensuring that EA conditions and mitigation and monitoring commitments in the EER report are implemented effectively. The list, titles and structure of environmental management and monitoring plans that will be compiled for Project are subject to change as the Project progresses, but are currently planned as follows:

- Project Environmental Management Plan (Overarching)
- Air Quality Management and Monitoring Plan (Overarching plan – detailed plans incorporated or appended include, but are not limited to: Ambient Air Monitoring, Fugitive Dust Management and Green House Gas Management)
- Archaeology and Heritage Management Plan
- Aquatic Environmental Management and Monitoring Plan (Overarching plan – detailed plans incorporated or appended include, but are not limited to: Mercury Environmental Monitoring and Fish Salvage)
- Blasting / Explosives Management Plan
- Community Communication Plan
- Dam Management Plan


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- Emergency Response Plan
- Erosion and Sediment Control Plan
- Human Resources Management Plan
- Indigenous Consultation Plan
- Indigenous Environmental Health Follow-Up Program
- Land Use and Access Management Plan
- Management of Community Grievances
- Mine Rock and ARD / ML Management Plan (Overarching plan – detailed plans incorporated or appended include, but are not limited to: Supplemental Open Pit PAG, Continuity Assessment, Interim Waste Rock Management Plan (updated), and Field Cell Leachate Testing Program)
- Noise and Vibration Management and Monitoring Plan
- Socio-Economic / Community Management Plans
- Soil Management Plan
- Spills Prevention and Response Plan
- Terrestrial Systems & Habitat Biodiversity Management and Monitoring Plan (Overarching plan – detailed plans incorporated or appended include, but are not limited to: Biodiversity Monitoring)
- Traditional Land and Resource Use Follow-Up Program
- Transportation and Traffic Management Plan
- Waste Management Plan
- Water Management and Monitoring Plan (Overarching plan – detailed plans incorporated or appended include, but are not limited to: Surface Water Monitoring and Groundwater Monitoring)

Where relevant, management and monitoring plans prepared by the EPCM team focused on the Construction phase, are being utilized to support compliance.

3.3 Ongoing Updates and Maintenance

Additional Project commitments, including permit conditions and other non-regulatory agreements (e.g. ongoing consultation commitments), will be incorporated into the registry and will result in the review and update of management and monitoring plans as appropriate. The registry and management and monitoring plans will be updated on an ongoing and as-needed basis, no less frequently than annually during the Construction, Operations and Closure (active) phases of the Project.

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4. Implementation Schedule

The implementation schedule for each condition and commitment (as presented in Appendices A to C) assume the following Project milestones (Table 4.1). Monitoring will be ongoing throughout Construction, Operations and Closure phases, as documented in the management and monitoring plans and summarized in Appendices A to C.

Table 4-1: Implementation Schedule

Project Phase	Start Date	Completion Date ¹	Duration ¹
Design and Pre-Construction Planning	Dec 2016	Sep 2020	3.5 years
Construction	Sep 2020	Dec 2022	2 years
Operations	2023	2039	16 years
Closure ¹	2040	-	-
Decommissioning ²	2040	2042	2 years
Active Closure ³	2040	2070	30 years
Passive Closure and Site Close Out ⁴	2070	-	-
¹ Completion dates and durations are approximate and are subject to change and will be based on monitoring results and direction from regulatory authorities. ² Decommissioning: Demolition and major site rehabilitation activities. Pumping and monitoring activities implemented. ³ Active Closure: Dams are removed, and the open pit is allowed to flood. Pumping and monitoring activities implemented. ⁴ Passive Closure: Commences once the open pit is flooded and passively discharges to Three Duck Lake (Upper).			


5. Documentation and Annual Reporting

The compliance monitoring program will be carried out in accordance with the Project's commitments and EA conditions, with copies of relevant documentation maintained on file. The registry will track and record compliance progress, with a summary of compliance status provided for each commitment and EA condition in Annual Compliance Reports. IAMGOLD will also continue to maintain the Project's Record of Consultation, with applicable supporting records, throughout the life of the Project.

IAMGOLD is committed to providing documentation in a timely manner in support of the Compliance Monitoring Program to MECP upon request.

The Annual Compliance Reports will summarize the results of the Compliance Monitoring Program, and will be developed for the Project based on Condition 6 of the Notice of Approval:

- 6.1 *The Proponent shall prepare an annual Compliance Report which describes its compliance with the conditions of approval set out in this Notice of Approval, and which describes the results of the Proponent's Environmental Assessment Compliance Monitoring Program required by Condition 5 of this Notice of Approval*

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- 6.2 *The first annual Compliance Report shall be submitted to the District Manager and Director and made available to the public on the Proponent website within one year from the start of Construction and shall cover all activities of the previous 12 month period*
- 6.3 *Subsequent Compliance Reports shall be submitted to the District Manager and Director, and made available to the public, on or before the anniversary of the start of Construction each year thereafter, until it has submitted its final Compliance Report. Each Compliance Report shall cover all activities of the previous 12 month period*
- 6.4 *Once all conditions in this Notice of Approval have been satisfied, the Proponent shall indicate in its annual Compliance Report that the Compliance Report is its final Compliance Report, and that all conditions in this Notice of Approval have been satisfied. The District Manager and Director may vary the time at which the Proponent is to provide its final Compliance Report, and will state this in writing to the Proponent*
- 6.5 *The Proponent shall retain, either on Site or in another location approved by the District Manager or Director, a copy of each of the annual Compliance Reports and any associated documentation of compliance monitoring activities*
- 6.6 *The Proponent shall make the Compliance Reports and associated documentation available to the District Manager and Director in a timely manner when requested to do so by Ministry staff*

The first Compliance Report will be submitted within one year of the start of Construction, with annual reports submitted each year to the District Manager and Director for the public record and Ministry review. Once all conditions have been met to the satisfaction of the MECP (during the Closure phase), IAMGOLD will submit a final Compliance Report which states the Project has satisfied all conditions and has met all obligations for close-out.

Compliance Reports will include the following topics and may include others as deemed appropriate during report preparation:



- Introduction
- Project Overview and Update
- Regulatory Overview and Update
- Consultation Update
- Compliance Monitoring Results (tables) including:
 - EA Mitigation Commitments
 - EA Monitoring Commitments
 - EA Conditions
- Summary of changes to the compliance program

Appendices A to C contain draft reporting tables to be presented in the Annual Compliance Reports to summarize compliance during the reporting period and the overall program. Appendix D provides an example of completed reporting tables. The structure of the tables is subject to revision during annual report preparation as needed to better present the information available.

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Appendix A

EA Mitigation Commitments Registry



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Appendix A – EA Mitigation Commitments Registry



Commitment List and Information			Implementation Schedule				Documentary Compliance Proof / Evidence to be Maintained on File (subject to change)	Compliance Status (this column will be populated in annual compliance reports)
Tracking No.	Category	Commitment	Design/Planning	Construction	Operation	Closure		
EA-MT1	Air Quality	<p>EER Mitigation Commitment 1 - Fugitive dust emissions.</p> <ul style="list-style-type: none"> - Mitigation: Dust Best Management Plan (DBMP) - Commitment: The DBMP will ensure effective fugitive dust management to mitigate potential off-site effects of the particulate matter and trace metals present on the particulate. The DBMP will detail the following measures: watering frequency, visual monitoring, inspection, record keeping, responsibility, training, complaint response, and corrective actions. The site will have water trucks with water sprays and cannons; should weather conditions not permit watering, other Ministry of the Environment and Climate Change (MOECC) approved suppressants (such as calcium chloride) will be used. If further mitigation is required at specific locations (e.g., active stockpiles), dedicated water sprays will be employed. Travel surfaces will be maintained to minimize silt (fine material). - Standard: Maintain air quality to be compliant with Ontario Regulation 419/05 standards for total suspended particulate (TSP) and metals at off-site receptors. 	N	Y	Y	Y	Air Quality Management and Monitoring Plan	
EA-MT2	Air Quality	<p>EER Mitigation Commitment 2 - Exhaust from generators, trucks and mobile equipment.</p> <ul style="list-style-type: none"> - Mitigation: Engine Maintenance program - Commitment: A preventive maintenance program will be employed that encompasses all pollution control equipment and diesel-fired engines. 	N	Y	Y	Y	<p>EPCM program</p> <p>Air Quality Management and Monitoring Plan</p>	

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Tracking No.	Category	Commitment	Design/Planning	Construction	Operation	Closure		
		- Standard: Maintain air quality to be compliant with Ontario AAQC for NO2, SO2, CO, and particulate matter at off-site receptors.						
EA-MT3	Air Quality	EER Mitigation Commitment 3 - Exhaust from trucks and off-road mobile equipment. - Mitigation: Equipment compliant with Transport Canada vehicle emission requirements. - Commitment: Emission reductions achieved through the use of current equipment that complies with Transport Canada's off-road engine emission criteria. - Standard: Transport Canada Off Road Compression- Ignition Engine Emission Regulations (SOR/2005-32).	N	Y	Y	Y	Equipment procurement records Air Quality Management and Monitoring Plan	
EA-MT4	Air Quality	EER Mitigation Commitment 4 - Sulphur dioxide (SO2) emissions from diesel fuel use. - Mitigation: Use of low sulphur fuel. - Commitment: Low sulphur fuels will be used in off-road diesel engines; this will reduce the sulphur dioxide emissions from all sources and the resultant off-site air concentrations. - Standard: Environment Canada Sulphur in Diesel Fuel Regulation limiting fuel sulphur content for off road engines. (SOR/2002-254).	N	Y	Y	Y	Equipment procurement records Air Quality Management and Monitoring Plan	

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Tracking No.	Category	Commitment	Design/Planning	Construction	Operation	Closure		
EA-MT5	Air Quality	EER Mitigation Commitment 5 - Dust from TMF. - Mitigation: Dust Best Management Plan (DBMP). - Commitment: Controlling dust from the TMF is required to prevent off-site dust. As a large exposed area, control method must prevent potential for dusting to occur. - Standard: Maintain air quality to be compliant with Ontario Regulation 419/05 standards for TSP and metals at off-site receptors.	N	N	Y	N	Air Quality Management and Monitoring Plan	
EA-MT6	Air Quality	EER Mitigation Commitment 6 - Particulate emissions from drilling operations. - Mitigation: Control measures provided by equipment supplier. - Commitment: Mitigation measures are required to prevent off-site effects of TSP and metals, through the use of equipment with dust control. - Standard: Compliance with Ontario Regulation 419/05 standards for TSP and metals at off-site receptors.	N	N	Y	N	EPCM program Air Quality Management and Monitoring Plan	
EA-MT7	Air Quality	EER Mitigation Commitment 7 - Particulate emissions and NOx from open pit blasting. - Mitigation: Blasting to occur mid-day based on favourable climatic conditions. Follow manufacturer's recommended guidelines regarding water infiltration and time of explosives usage. - Commitment: Blasting will occur when meteorological conditions are such that off-site TSP, metals and NOx levels are compliant with regulations. NOx emissions may increase if emulsion is left in boreholes for extended period of time due to infiltration of water. - Standard: Compliance with Ontario Regulation 419/05 air quality standards for NOx, TSP, and metals at off-site receptors.	N	N	Y	N	Air Quality Management and Monitoring Plan Blasting/Explosives Management Plan	

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Tracking No.	Category	Commitment	Design/Planning	Construction	Operation	Closure		
EA-MT8	Air Quality	EER Mitigation Commitment 8 - Hydrogen cyanide (HCN) emissions from tailings. - Mitigation: Cyanide destruction at the ore processing plant. - Commitment: HCN emissions from TMF are expected to be minimal, as sulphur dioxide will be used to destroy cyanide at the Ore Processing Plant before tailings are released to the TMF. - Standard: Compliance with Ontario Regulation 419/05 air quality standard for HCN at off-site receptors.	N	N	Y	N	Design/Engineering records Air Quality Management and Monitoring Plan	
EA-MT9	Air Quality	EER Mitigation Commitment 9 - Material handling at the ore processing plant. - Mitigation: Dust collection systems. - Commitment: Mitigation measures to control dust emissions from crushing (primary and secondary) and reclaim from feed stockpiles are required to prevent off-site effects of TSP and metals. Crushing and reclaim from stockpiles for crushed materials will be controlled with applicable dust control systems. A maintenance plan will ensure that dust control systems are functioning properly. - Standard: Compliance with Ontario Regulation 419/05 air quality standards for TSP at off-site receptors.	N	N	Y	N	Design/Engineering records Air Quality Management and Monitoring Plan	
EA-MT10	Air Quality	EER Mitigation Commitment 10 - Particulate emissions from lime silo. - Mitigation: Dust collection systems. - Commitment: Mitigation measures are required to control dust during lime delivery to the silos to prevent off-site effects of TSP. Lime silo vents are to be controlled by dust control systems. A maintenance plan will ensure dust control systems are functioning properly. - Standard: Compliance with Ontario Regulation 419/05 air quality standards for TSP at off-site receptors.	N	N	Y	N	Design/Engineering records Air Quality Management and Monitoring Plan	

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Tracking No.	Category	Commitment	Design/Planning	Construction	Operation	Closure		
EA-MT11	Air Quality	EER Mitigation Commitment 11 - Emissions from lime slaker. - Mitigation: Dust collection systems. - Commitment: Mitigation measures are required to control emissions from the lime slaker to prevent off-site effects of TSP. Emissions from the lime slaker are to be controlled. A maintenance plan will ensure dust control systems are functioning properly. - Standard: Compliance with Ontario Regulation 419/05 air quality standard for TSP at off-site receptors.	N	N	Y	N	Design/Engineering records Air Quality Management and Monitoring Plan	
EA-MT12	Air Quality	EER Mitigation Commitment 12 - Particulate from dry material handling in ore processing plant (flocculants, copper sulphate). - Mitigation: Dust collection systems. - Commitment: Mitigation measures are required to control emissions from handling and mixing of dry chemicals. Mixing and handling areas are to be controlled. A maintenance plan will ensure dust control systems are functioning properly. - Standard: Compliance with Ontario Regulation 419/05 air quality standard for TSP at off-site receptors.	N	N	Y	N	Design/Engineering records Air Quality Management and Monitoring Plan	
EA-MT13	Air Quality	EER Mitigation Commitment 13 - Emissions from induction furnace. - Mitigation: Dust collection systems. - Commitment: Emissions from the furnace are to be controlled. A maintenance plan will ensure dust control systems are functioning properly. - Standard: Compliance with Ontario Regulation 419/05 air quality standard for TSP at off-site receptors.	N	N	Y	N	Design/Engineering records Air Quality Management and Monitoring Plan	

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Tracking No.	Category	Commitment	Design/Planning	Construction	Operation	Closure		
EA-MT14	Air Quality	EER Mitigation Commitment 14 - SO2 emissions from cyanide destruction. - Mitigation: Closed loop delivery. - Commitment: To control emissions during delivery, SO2 is to be delivered to the site as a pressurized liquid. Delivery system to include a gas capture system. - Standard: Compliance with Ontario Regulation 419/05 air quality standard for SO2 at off-site receptors.	N	N	Y	N	Design/Engineering records Air Quality Management and Monitoring Plan	
EA-MT15	Air Quality	EER Mitigation Commitment 15 - Emissions from on-site emergency generators. - Mitigation: Develop a testing schedule to minimize air quality effects. - Commitment: Mitigation measures are required to control NOx and TSP emissions from the generators. Testing will be conducted as per established industry protocols. - Standard: Maintain air quality to be compliant with Ontario Regulation 419/05 air quality standards for TSP and NOx at off-site receptors. Testing schedule will be part of MOECC ECA.	N	N	Y	N	Air Quality Management and Monitoring Plan	
EA-MT16	Noise and Vibration	EER Mitigation Commitment 16 - Construction blasting noise at the receptors. - Mitigation: Charge size of construction blasting outside of the open pit boundary will be such that the objectives of NPC-119 will be achieved. - Commitment: Minimum separation distance of 1.25 km between blast location and nearest receptor to be maintained. If blast size exceeds 250 kg per delay and/or if the minimum separation is less than 1.25 km, IAMGOLD will prepare a blast noise study to achieve objectives of NPC 119. - Standard: NPC-119 noise limit of 120 dBL.	N	Y	N	N	Noise and Vibration Management and Monitoring Plan Blasting/Explosives Management Plan	

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EA-MT17	Noise and Vibration	EER Mitigation Commitment 17 - Construction blasting vibration at the receptors. - Mitigation: Charge size of construction blasting outside of the open pit boundary will be such that the objectives of NPC-119 will be achieved. - Commitment: Minimum separation distance of 1.25 km between blast location and nearest receptor to be maintained. If blast size exceeds 250 kg per delay and/or if the minimum separation is less than 1.25 km, IAMGOLD will prepare a blast noise study to achieve objectives of NPC 119. - Standard: NPC-119 vibration (PPV) limit of 10 mm/s.	N	Y	N	N	Noise and Vibration Management and Monitoring Plan Blasting/Explosives Management Plan	
EA-MT18	Noise and Vibration	EER Mitigation Commitment 18 - Construction noise at the receptors. - Mitigation: 1 km setback distances to be kept at the Project site between the construction location and the receptors. - Commitment: 1 km setback distances to be maintained between the construction location and the receptors. If construction occurs closer to the receptors (e.g., waterways, road realignments), IAMGOLD to prepare a construction noise study for the particular activity. - Standard: N/A	N	Y	N	N	Noise and Vibration Management and Monitoring Plan	
EA-MT19	Noise and Vibration	EER Mitigation Commitment 19 - Construction Equipment Noise Limits. - Mitigation: Construction equipment not to exceed noise levels specified in NPC-115 and NPC-118 - Commitment: Ensure equipment used for construction meet the guideline limits. - Standard: Achieve objectives of NPC 115 and NPC 118 construction equipment noise limits.	N	Y	N	N	Equipment procurement records Noise and Vibration Management and Monitoring Plan	

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EA-MT20	Noise and Vibration	EER Mitigation Commitment 20 - Operational blasting noise at the receptors. - Mitigation: Blasting charge size in the open pit is planned to be in compliance with NPC-119. - Commitment: Blasting charge sizes used in the open pit will be 536 kg per delay or smaller. If it exceeds 536 kg per delay, IAMGOLD will prepare a blast noise study to show compliance with NPC 119. - Standard: Compliance with NPC-119 noise limit of 120 dBL.	N	N	Y	N	Noise and Vibration Management and Monitoring Plan Blasting/Explosives Management Plan	
EA-MT21	Noise and Vibration	EER Mitigation Commitment 21 - Operational blasting vibration at the receptors. - Mitigation: Blasting charge size in the open pit is planned to be in compliance with NPC-119. - Commitment: Blasting charge sizes used in the open pit will be 536 kg per delay or smaller. If it exceeds 536 kg per delay, IAMGOLD will prepare a blast vibration study to show compliance with NPC 119. - Standard: Compliance with NPC-119 vibration (PPV) limit of 10 mm/s.	N	N	Y	N	Noise and Vibration Management and Monitoring Plan Blasting/Explosives Management Plan;	
EA-MT22	Groundwater	EER Mitigation Commitment 22 - Inflows to open pit. - Mitigation: Perimeter dam construction. - Commitment: Construction of perimeter dams in low lying areas along Clam Lake and the outflow of Chester Lake to minimize inflows to the open pit. - Standard: Lakes and Rivers Improvement Act.	Y	Y	N	N	Design/Engineering records Water Management and Monitoring Plan	

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EA-MT23	Groundwater	EER Mitigation Commitment 23 - Inflows to open pit. - Mitigation: Surface water realignments. - Commitment: Surface water realignments to minimize risks associated with surface water features in close proximity to an open pit. - Standard: Lakes and Rivers Improvement Act.	Y	N	N	N	Design/Engineering records	
EA-MT24	Groundwater	EER Mitigation Commitment 24 - Mine rock management. - Mitigation: Engineered facilities to manage mine rock. - Commitment: Construction of engineered facilities to store mine rock (MRA), low-grade ore (low-grade stockpile) and tailings (TMF). Standard: n/a	Y	Y	Y	N	Design/Engineering records Mine Rock and ARD/ML Management Plan (specific section: Interim Waste Rock Management Plan (updated))	
EA-MT25	Groundwater	EER Mitigation Commitment 25 - Mine rock seepage. - Mitigation: Engineered facilities to manage seepage. - Commitment: Construction of engineered water management systems to collect runoff and seepage from the MRA, low-grade stockpile, TMF, and polishing pond. - Standard: Ontario Water Resources Act Environmental Compliance Approval, Metal Mining Effluent Regulations.	Y	Y	Y	Y	Design/Engineering records	
EA-MT26	Surface Water	EER Mitigation Commitment 26 - Mine rock runoff. - Mitigation: Engineered facilities to manage runoff. - Commitment: Engineered water management systems will be constructed to collect runoff and seepage from the MRA, ore stockpiles, TMF, and Overburden Stockpile during the Operations Phase and the Post-closure Stage I Phase. - Standard: Ontario Water Resources Act Environmental Compliance Approval, Metal Mining Effluent Regulations.	Y	N	N	N	Design/Engineering records	

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EA-MT27	Surface Water	EER Mitigation Commitment 27 - Watercourse realignment. - Mitigation: Engineered facilities to manage surface water flows. - Commitment: Engineered realignment channels will be constructed to convey the range of flows that can be reasonably expected over the projected life of mine or life of realignment feature as applicable. - Standard: Ontario Water Resources Act Environmental Compliance Approval, Metal Mining Effluent Regulations.	Y	N	N	N	Design/Engineering records	
EA-MT28	Surface Water	EER Mitigation Commitment 28 - Erosion and sediment control. - Mitigation: Erosion and sediment control measures. - Commitment: Erosion and sediment control measures will be constructed to promote settling of sediments and mitigate the migration of suspended solids into nearby surface water features. - Standard: Ontario Water Resources Act Environmental Compliance Approval, Metal Mining Effluent Regulations.	N	Y	N	N	Erosion and Sediment Control Plan Construction Phase Environmental Compliance Approval (Approval # 6493-BXGLVZ)	
EA-MT29	Surface Water	EER Mitigation Commitment 29 - Realignment of surface water flows. - Mitigation: Realignment channels and dams. - Commitment: Realignment channels and dams will be designed to convey the range of flows and water levels reasonably expected over the Project life. Realignment dams will be constructed to allow excavation of the open pit and construction of the TMF. - Standard: Lakes and Rivers Improvement Act, (LRIA), Fisheries Act, Navigation Protection Act.	Y	Y	N	N	Design/Engineering records	

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EA-MT30	Surface Water	EER Mitigation Commitment 30 - Realignment of surface water flows. - Mitigation: Realignment channels and dams. - Commitment: Realignment channels and dams will be designed to convey the range of flows and water levels reasonably expected over the Project life. Realignment dams will be constructed to allow excavation of the open pit and construction of the TMF. - Standard: Lakes and Rivers Improvement Act, (LRIA), Fisheries Act, Navigation Protection Act.	Y	Y	N	N	Design/Engineering records Water Management and Monitoring Plan	
EA-MT31	Water Quality	EER Mitigation Commitment 31 - Acid rock drainage from onsite roads. - Mitigation: Use of non-acid generating materials for road construction purposes. - Commitment: IAMGOLD will sample mine rock to ensure only non-acid generating materials are used for construction purposes. - Standard: n/a	N	Y	Y	Y	Design/Engineering records Mine Rock and ARD/ML Management Plan (specific sections: Supplemental Open Pit PAG Continuity Assessment, Interim Waste Rock Management Plan (updated), and Field Cell Leachate Testing Program)	

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Tracking No.	Category	Commitment	Design/Planning	Construction	Operation	Closure		
EA-MT32	Water Quality	<p>EER Mitigation Commitment 32 - Discharge of total suspended solids due to soil erosion and transport of sediments from disturbed areas, and potential increases in total suspended solids concentrations within surface water receivers.</p> <p>- Mitigation: Best Management Practices (BMPs) and engineering designs to limit soil erosion and mobilization / transport of sediments from disturbed areas.</p> <p>- Commitment: During Construction, Operations and Closure phases, BMPs for erosion and sediment control include: design of physically stable mine rock and tailings storage facilities, the use of earthwork methods to minimize slope length and grade, ditching, sediment ponds / traps, channel and slope armouring, use of natural vegetation buffers, vegetation of disturbed soil, and runoff controls (i.e., sediment fencing and small check dams). During Post-closure, erosion and sediment control would be focused on monitoring the success of closure activities.</p> <p>- Standard: Total suspended solids discharge limits: Metal Mining Effluent Regulations (MMER), and Ontario Regulation 560/94, Effluent Monitoring and Effluent Limits – Metal Mining Sector. Total suspended solids (and turbidity) water quality guidelines: Canadian Water Quality Guidelines for the Protection of Aquatic Life and Provincial Water Quality Objectives.</p>	N	Y	Y	Y	<p>Erosion and Sediment Control Plan</p> <p>Water Management and Monitoring Plan</p> <p>Construction Phase Environmental Compliance Approval (Approval # 6493-BXGLVZ)</p>	

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Tracking No.	Category	Commitment	Design/Planning	Construction	Operation	Closure		
EA-MT33	Water Quality	<p>EER Mitigation Commitment 33 - Potential influence of process water and seepage / runoff from TMF on receiving environment water quality.</p> <ul style="list-style-type: none"> - Mitigation: Treatment of process water; construction and operation of engineered water management systems to collect runoff and seepage from the TMF; reclaim water returned (or recycled) to the process plant; use of liners on starter tailings dams to limit seepage losses during the early years of operations. - Commitment: Process water will be treated at the ore processing plant for cyanide, cyanide destruction constituents, as required, prior to discharge into the TMF. Seepage and runoff will be collected at collection ponds around the perimeter of the TMF and pumped to the TMF reclaim pond. Water in the reclaim pond will be recycled back to the ore processing plant, with no water from the reclaim pond being discharged to the environment through the polishing pond under normal flow conditions. - Standard: Effluent discharge requirements under: Metal Mining Effluent Regulations (MMER), and Ontario Regulation 560/94, Effluent Monitoring and Effluent Limits – Metal Mining Sector. Water quality guidelines: Canadian Water Quality Guidelines for the Protection of Aquatic Life and Provincial Water Quality Objectives. 	N	Y	Y	Y	<p>Water Management and Monitoring Plan (specific sections: Surface Water and Groundwater Monitoring Plans)</p> <p>Construction Phase Environmental Compliance Approval (Approval # 6493-BXGLVZ)</p>	

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EA-MT34	Water Quality	EER Mitigation Commitment 34 - Potential influence of explosives residuals in mine rock, low-grade ore and open pit on receiving environment water quality (i.e., ammonia and nitrate). - Mitigation: BMPs for explosives use. - Commitment: Implementation of BMPs during blasting to reduce the blast waste rate and mass of residual explosives present in the open pit, mine rock, low-grade ore and dam construction material. - Standard: Water quality guidelines: Canadian Water Quality Guidelines for the Protection of Aquatic Life and Provincial Water Quality Objectives.	N	Y	Y	N	Blasting/Explosives Management Plan Construction Phase Environmental Compliance Approval (Approval # 6493-BXGLVZ)	
EA-MT35	Water Quality	EER Mitigation Commitment 35 - Potential influence of sewage on receiving environment water quality. - Mitigation: Treatment of sewage. - Commitment: Sewage will be treated to a quality that meets federal and provincial legislative requirements before discharge to the environment. - Standard: Effluent discharge requirements under: Wastewater Systems Effluent Regulations, and Ontario Water Resources Act (Section 53).	N	N	Y	N	Design/Engineering records Water Management and Monitoring Plan Construction Phase Environmental Compliance Approval (Approval # 6493-BXGLVZ)	

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EA-MT36	Water Quality	<p>EER Mitigation Commitment 36 - Potential influence of seepage / runoff from MRA, low-grade stockpile and open pit on receiving environment water quality.</p> <ul style="list-style-type: none"> - Mitigation: Construction and operation of engineered water management systems to collect runoff and seepage; monitoring and treatment of effluent, as required. - Commitment: Open pit inflow and runoff will be collected in the open pit sump. Seepage and runoff from the MRA and from the low-grade stockpile will be collected in ponds. During the Operations phase, water collected by these facilities will be pumped to the polishing pond. The excess water in the polishing pond, which will be monitored for water quality, is discharged to the environment. - Standard: Effluent discharge requirements under: Metal Mining Effluent Regulations (MMER), and Ontario Regulation 560/94, Effluent Monitoring and Effluent Limits – Metal Mining Sector. Water quality guidelines: Canadian Water Quality Guidelines for the Protection of Aquatic Life and Provincial Water Quality Objectives. 	N	N	Y	Y	<p>Design/Engineering records</p> <p>Water Management and Monitoring Plan (specific sections: Surface Water and Groundwater Monitoring Plans)</p> <p>Construction Phase Environmental Compliance Approval (Approval # 6493-BXGLVZ)</p>	
EA-MT37	Water Quality	<p>EER Mitigation Commitment 37 - Potential impact of landfill leachate from solid domestic and industrial waste on groundwater quality.</p> <ul style="list-style-type: none"> - Mitigation: Management of solid domestic and industrial waste in a permitted landfill, including the use of BMPs; monitoring of groundwater quality; remedial action, as required. - Commitment: Solid domestic and industrial waste will be placed into a landfill that will be operated in accordance with federal and 	N	Y	Y	Y	Waste Management Plan	

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Tracking No.	Category	Commitment	Design/Planning	Construction	Operation	Closure		
		provincial legislative requirements, and BMPs, including mitigation, monitoring, remedial action, and closure plans, will be integrated into the operation and closure of the landfill. - Standard: Ontario Regulation 232/98.						
EA-MT38	Water Quality	EER Mitigation Commitment 38 - Acid rock drainage from the MRA potentially affecting effluent quality. - Mitigation: Inclusion of PAG rock within the bulk of the MRA. - Commitment: The inclusion of any PAG materials with the bulk of the waste will likely be an appropriate management method and segregation of any PAG materials does not appear to be necessary. - Standard: n/a	Y	N	Y	Y	Design/Engineering records Mine Rock and ARD/ML Management Plan (specific sections: Supplemental Open Pit PAG Continuity Assessment, Interim Waste Rock Management Plan (updated), and Field Cell Leachate Testing Program)	
EA-MT39	Water Quality	EER Mitigation Commitment 39 - Potential influence of seepage / runoff from MRA and Côté Pit Lake on receiving environment water quality. - Mitigation: Monitoring and, if determined to be required, water collection and treatment. - Commitment: Seepage and runoff from the MRA and water in the open pit will be monitored prior to Post-closure phase (Stage II). If the monitoring determines that the water quality is not suitable for discharge to the environment, then collection and treatment measures will be implemented accordingly. - Standard: Water quality guidelines: Canadian Water Quality Guidelines for the Protection of Aquatic Life and Provincial Water Quality Objectives.	N	N	N	Y	Water Management and Monitoring Plan (specific section: Groundwater Monitoring Plan)	

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EA-MT40	Terrestrial Biology	EER Mitigation Commitment 40 - Adverse effects to wetlands. - Mitigation: Where practical, avoid placement structures in waterbodies along the transmission line ROW, and to the extent practicable, in low-lying areas (difficult for some portions of the existing Shining Tree ROW). - Commitment: Where practical, avoid placement structures in waterbodies along the transmission line ROW, and to the extent practicable, in low-lying areas. - Standard: n/a	Y	Y	N	N	Design/Engineering records Terrestrial Systems & Habitat Biodiversity Management and Monitoring Plan	
EA-MT41	Terrestrial Biology	EER Mitigation Commitment 41 - Adverse effects to ungulates (Moose) and furbearers (Wolves, Bears, Marten) due to the loss of habitat or noise disturbance. - Mitigation: Develop a compact Project site to reduce overall habitat loss and to limit the potential adverse effects related to interference with wildlife movement. Utilize existing infrastructure for access and minimize construction of new roads and other corridors wherever alternatives exist. Construction crews will be advised to not interfere or harass wildlife. No hunting by Project personnel permitted while working or residing on site. Enforce speed limits along Project roads to reduce the potential for collisions with wildlife. Signs warning drivers of the possibility of wildlife encounters will be posted in areas of high wildlife activity. Include wildlife awareness information in regular safety and	N	Y	N	N	Design/Engineering records Human Resources Management Plan Terrestrial Systems & Habitat Biodiversity Management and Monitoring Plan Transportation and Traffic Management Plan	

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Tracking No.	Category	Commitment	Design/Planning	Construction	Operation	Closure		
		<p>environmental inductions. Project personnel will be made aware of seasonal changes in local large mammal behaviour or presence.</p> <p>- Commitment: Minimize the width of the transmission line ROW to the proposed 50 m. Utilize existing infrastructure for access and minimize construction of new roads where practical. No hunting by Project personnel will be permitted while working or residing on-site. Enforce speed limits along Project roads. Include wildlife awareness information in regular safety and environmental inductions.</p> <p>- Standard: n/a</p>						
EA-MT42	Terrestrial Biology	<p>EER Mitigation Commitment 42 - Adverse effects to bats due to loss of habitat or noise disturbance.</p> <p>- Mitigation: Develop a compact site to reduce overall habitat loss and to limit potential adverse effects related to sound emissions, to the extent practicable. Enforce speed limits along Project roads and reduce vehicular traffic associated with construction.</p> <p>- Commitment: Minimize the width of the transmission line ROW to the proposed 50 m. Enforce speed limits along Project roads and reduce vehicular traffic associated with construction.</p> <p>- Standard: n/a</p>	N	Y	N	N	<p>Design/Engineering records</p> <p>Terrestrial Systems & Habitat Biodiversity Management and Monitoring Plan</p>	
EA-MT43	Terrestrial Biology	<p>EER Mitigation Commitment 43 - Adverse effects to migratory birds and avian SAR due to loss of habitat or noise disturbance.</p> <p>- Mitigation: Minimize the Project footprint to the extent practicable. Construction and clearing within the transmission line ROW outside migratory bird breeding season (April 15 to August 31). Maintain existing vegetation ground cover along the transmission line ROW to the extent practicable. Install conductor wires at a sufficient distance apart to prevent the accidental electrocution (contact of wingtips with wire) of large avian species. Utilize existing infrastructure for access and minimize construction of new roads and other corridors where possible.</p>	N	Y	N	N	<p>Design/Engineering records</p> <p>Human Resources Management Plan</p> <p>Terrestrial Systems & Habitat Biodiversity Management and Monitoring Plan</p> <p>Transportation and Traffic Management Plan</p>	

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		<p>Advise Project personnel not to interfere or harass wildlife. Include Common Nighthawk and Bank Swallow identification as part of site induction to improve success of wildlife reporting programs. Contact the MNRF and Environment Canada within 24 hours if Common Nighthawk or Bank Swallow are recorded nesting on site. No hunting by Project personnel permitted while working or residing on-site. Educate Project personnel on how to handle food and food wastes in a responsible manner and create and enforce policies to ensure no feeding of wildlife.</p> <p>- Commitment: Minimize the width of the transmission line ROW to the proposed 50 m. Construct in winter, where frozen surfaces are required to minimize surface erosion. Retain existing low-lying vegetation ground cover along the transmission line ROW thereby minimizing vegetation clearing. Utilize existing infrastructure for access and minimize construction of new roads. No hunting by Project personnel will be permitted while working or residing on-site. Enforce speed limits along Project roads. Include wildlife awareness information in regular safety and environmental inductions.</p> <p>- Standard: Canadian Migratory Birds Convention Act, Canadian Species at Risk Act, Ontario Endangered Species Act</p>						
EA-MT44	Terrestrial Biology	<p>EER Mitigation Commitment 44 - Adverse effects to raptors due to loss of habitat or noise disturbance.</p> <p>- Mitigation: Develop a compact site to prevent encroachment of Project activities on raptor nesting sites and adjacent habitat. Minimize the level of potentially disturbing activities near any known or subsequently discovered active raptor nest sites during the raptor breeding season (April 15 – August 31) until nests are vacated. Dispose of food wastes generated on site in an appropriate manner that limits the attraction of wildlife, including Common Ravens, Turkey Vultures and Bald Eagles. Remove</p>	N	Y	N	N	Terrestrial Systems & Habitat Biodiversity Management and Monitoring Plan	

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		<p>carcasses of road-killed animals or any other carcasses found onsite in a timely manner to limit the attraction of wildlife, such as Common Ravens and Turkey Vultures.</p> <p>- Commitment: Minimize the width of the transmission line ROW to the proposed 50 m. Dispose of food wastes generated on site in an appropriate manner. Remove carcasses of road-killed animals or any other carcasses found onsite in a timely manner. Minimize the width of the transmission line ROW to the proposed 50 m. Dispose of food wastes generated on site in an appropriate manner.</p> <p>- Standard: n/a</p>						
EA-MT45	Terrestrial Biology	<p>EER Mitigation Commitment 45 - Direct vegetation (and wildlife habitat) loss, alteration, and fragmentation from the physical footprint of the Project.</p> <p>- Mitigation: Limit the area of Project footprint and limit disturbance from employees and mining activities. No vegetation removal is to occur during sensitive wildlife breeding seasons such as the migratory bird nesting season (April 15 to August 31). Construct the transmission line to minimize the potential for ground disturbance and soil erosion during construction and to reduce the necessity for creation of additional permanent access roads. Retain existing low-lying vegetation along the transmission line ROW thereby minimizing vegetation clearing and allowing for the maintenance of root masses and ground vegetation that will reduce the potential for erosion and encourage continued vegetation growth through operations and beyond closure. Where practical, use existing roads and trails. Where practical, rehabilitate habitat for plants and wildlife.</p> <p>- Commitment: Existing access roads and infrastructure used to the extent practical in transmission line construction. Vegetation clearing to take place outside of the migratory bird nesting season</p>	Y	Y	Y	Y	Terrestrial Systems & Habitat Biodiversity Management and Monitoring Plan	

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		(April 15 to August 31). If under unforeseen circumstances minor vegetation removal is necessary between April 15 and August 31, non-intrusive surveys such as point counts for singing male birds will be completed by qualified individuals. If singing males are recorded then it will be assumed that a nesting female is nearby and proper provincial and federal species-specific nest buffers will be established around the singing male; no vegetation removal will occur within these buffers between April 15 and August 31. A mitigation / management plan will be developed in consultation with Environment Canada and the Ministry of Natural Resources to address potential impacts to breeding birds. Retain existing low ground cover along transmission line ROW thereby minimizing vegetation clearing. Maintain vegetated buffers adjacent to creek and river transmission line crossings. - Standard: Canadian Migratory Birds Convention Act.						
EA-MT46	Terrestrial Biology	EER Mitigation Commitment 46 - Direct vegetation (and wildlife habitat) loss, alteration, and fragmentation from the physical footprint of the Project. - Mitigation: Limit the area of Project footprint and limit disturbance from employees and mining activities. No vegetation removal is to occur during sensitive wildlife breeding seasons such as the migratory bird nesting season (April 15 to August 31). Construct the transmission line to minimize the potential for ground disturbance and soil erosion during construction and to reduce the necessity for creation of additional permanent access roads. Retain existing low-lying vegetation along the transmission line ROW thereby minimizing vegetation clearing and allowing for the maintenance of root masses and ground vegetation that will reduce the potential for erosion and encourage continued vegetation growth through operations and beyond closure. Where practical, use existing roads and trails. Where practical,	N	Y	Y	Y	Terrestrial Systems & Habitat Biodiversity Management and Monitoring Plan	

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		rehabilitate habitat for plants and wildlife. - Commitment: Apply and enforce speed limits along all Project access roads and always give the right-of-way to wildlife. Vehicle use will be restricted to designated areas and use of off-road vehicles for recreational purposes will be prohibited for workers. Progressive revegetation will be implemented where practical to reduce the amount of disturbed habitat during the Project lifecycle and will include active seeding to promote vegetation growth, stabilize the substrate, reduce potential erosion and enhance natural recovery of vegetation communities. - Standard: Canadian Migratory Birds Convention Act						
EA-MT47	Terrestrial Biology	EER Mitigation Commitment 47 - Introduction of invasive plant species can change vegetation ecosystem composition. - Mitigation: Limit / prevent the transfer of invasive plant species from equipment and imported soil used for rehabilitation. - Commitment: Create topsoil and overburden stockpiles for use in future rehabilitation activities. Clean construction equipment and vehicles on a regular basis. Use locally-sourced native species to revegetate disturbed and exposed areas and encourage natural revegetation. - Standard: n/a	N	Y	Y	Y	Terrestrial Systems & Habitat Biodiversity Management and Monitoring Plan	
EA-MT48	Terrestrial Biology	EER Mitigation Commitment 48 - Project preparation, construction, operation and closure activities can increase the risk of nest destruction and mortality of migratory birds (incidental take). - Mitigation: Limit risk of nest destruction and mortality of migratory birds. - Commitment: Typically, clearing of vegetation will take place outside of the migratory bird nesting season (April 15 to August 31). If under unforeseen circumstances minor vegetation removal is necessary between April 15 and August 31, non-intrusive	Y	Y	Y	Y	Terrestrial Systems & Habitat Biodiversity Management and Monitoring Plan	

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		<p>surveys such as point counts for singing male birds will be completed by qualified individuals. If singing males are recorded, then it will be assumed that a nesting female is nearby and proper provincial and federal species-specific nest buffers will be established around the singing male; no vegetation removal will occur within these buffers between April 15 and August 31. A mitigation/ management plan will be developed in consultation with Environment Canada and the MNRF to address potential impacts to breeding birds. Minimize disturbance to active nest sites.</p> <p>- Standard: Canadian Migratory Birds Convention Act</p>						
EA-MT49	Terrestrial Biology	<p>EER Mitigation Commitment 49 - Wildlife-vehicle collisions and physical hazards on the Project site may cause injury / mortality to individual animals.</p> <p>- Mitigation: Reduce risk of mortality to wildlife</p> <p>- Commitment: Enforce speed limits on Project roads. The presence of wildlife will be monitored and communicated to Project site personnel. All Project personnel will be provided with environmental awareness training. Vehicles will yield right-of-way to wildlife. Vehicle use will be restricted to designated areas and use of off-road vehicles for recreational purposes will be prohibited for workers. The Mine Rock Areas, TMF polishing pond and low-grade ore stock pile will be regularly monitored for wildlife activity and hazards. If a SAR is identified within the Project area during construction, and construction activities will harm or harass the observed individual(s), work within the vicinity of the observed occurrence will be modified to minimize disturbance until the individual(s) leave the area. Information regarding the observation of SAR (species, number of individuals, location) should be reported to the MNRF within 48 hours.</p> <p>Temporary suspension of surface blasting if Moose, Black Bear,</p>	N	Y	Y	Y	Terrestrial Systems & Habitat Biodiversity Management and Monitoring Plan	

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		wolf and other wildlife are observed within the danger zone identified by the blast supervisor. - Standard: Canadian Species at Risk Act, Ontario Endangered Species Act.						
EA-MT50	Terrestrial Biology	EER Mitigation Commitment 50 - Attractants (e.g., food waste, oil products) may increase carnivore-human encounters and result in the loss (destruction or relocation) of individual animals. Attractants may also increase predator numbers and thereby increase predation risk on prey species. - Mitigation: Reduce the risk of mortality to wildlife - Commitment: Education and reinforcement of proper waste management practices will be provided to all Project personnel. Prohibit littering. Prohibit feeding of wildlife. Dispose of waste in accordance to a Waste Management Plan which will limit the presence of food attractants. All Project personnel will be provided with environmental awareness training. Presence of wildlife will be monitored and communicated to Project site personnel. - Standard: n/a	N	Y	Y	Y	Terrestrial Systems & Habitat Biodiversity Management and Monitoring Plan Waste Management Plan	
EA-MT51	Terrestrial Biology	EER Mitigation Commitment 51 - Construction and operation of the transmission line can result in bird and bat strikes and increase mortality of migratory and non-migratory bird and bat species. - Mitigation: Reduce the risk of mortality to birds and bats. - Commitment: Use bird/bat deterrents / deflectors on transmission lines in high use areas (e.g., waterfowl movement corridors). - Standard: Ontario Endangered Species Act.	N	Y	Y	Y	Design/Engineering records Terrestrial Systems & Habitat Biodiversity Management and Monitoring Plan	

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EA-MT52	Terrestrial Biology	EER Mitigation Commitment 52 - Adverse effects to vegetation communities due to activities associated with the maintenance of the transmission line wires and poles (dust production by service vehicles) and the need for periodic clearing of tall woody vegetation to ensure adequate clearance below the conductors. - Mitigation: The generation of dust by transmission line service vehicles is expected to be limited and can be minimized by having these vehicles drive slowly along the transmission line ROW. Ensure that ongoing clearing is constrained to the necessary area of clearance (the ROW). Use mechanical brushing. - Commitment: Minimize the speed of service vehicles along the transmission line ROW. - Standard: n/a	N	N	Y	N	Terrestrial Systems & Habitat Biodiversity Management and Monitoring Plan	
EA-MT53	Terrestrial Biology	EER Mitigation Commitment 53 - Adverse effects to ungulates (Moose) and furbearers (Wolves, Bears, Marten) due to activities associated with maintenance of the transmission line wires and poles. - Mitigation: Include wildlife awareness information in regular safety and environmental inductions. Project personnel will be advised not to interfere or harass or feed wildlife. Project personnel will be made aware of seasonal changes in local large mammal behaviour or presence. Project personnel will be required to handle food and food wastes in a responsible manner. No hunting by Project personnel will be permitted while working or residing on-site. Enforce speed limits along Project roads to reduce the potential for collisions with wildlife. Signs warning drivers of the possibility of wildlife encounters will be posted in areas of high wildlife activity. - Commitment: Include wildlife awareness information in regular safety and environmental inductions. - Standard: n/a	N	N	Y	N	Terrestrial Systems & Habitat Biodiversity Management and Monitoring Plan	

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EA-MT54	Terrestrial Biology	<p>EER Mitigation Commitment 54 - Adverse effects to migratory birds, raptors and avian SAR due to activities associated with maintenance of the transmission line wires and poles.</p> <p>- Mitigation: Minimize the speed of service vehicles along the transmission line ROW to minimize dust production and thereby limit the zone of influence. Use marker balls and bird diverters on the transmission line wires to reduce the likelihood of bird collisions with power lines in high-risk location such as near wetlands.</p> <p>- Commitment: Minimize the speed of service vehicles along Project roads and along the transmission line ROW. Use marker balls and bird diverters on wires in high-risk areas.</p> <p>- Standard: Canadian Migratory Birds Convention Act, Canadian Species at Risk Act, Ontario Endangered Species Act</p>	N	N	Y	N	<p>Design/Engineering records</p> <p>Terrestrial Systems & Habitat Biodiversity Management and Monitoring Plan</p>	
EA-MT55	Terrestrial Biology	<p>EER Mitigation Commitment 55 - Adverse effects to vegetation communities due to activities associated with the removal of the transmission line wires and poles.</p> <p>- Mitigation: Time removal of transmission line infrastructure to minimize the potential for ground disturbance and soil erosion by equipment and vehicles and to reduce the necessity for creation of additional permanent access roads. Retain existing low-lying vegetation ground cover thereby minimizing vegetation clearing and allowing for the maintenance of root masses and ground vegetation that will reduce the potential for erosion and encourage continued vegetation growth beyond closure. Minimize the speed of service vehicles along Project roads and along the transmission line ROW to lessen dust production and thereby limit the zone of influence. Encourage natural revegetation and recolonization of the ROW as part of the reclamation process.</p> <p>- Commitment: Remove transmission line infrastructure in the winter and minimize disturbance to vegetation during closure</p>	N	N	N	Y	<p>Terrestrial Systems & Habitat Biodiversity Management and Monitoring Plan</p>	

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		activities. Minimize the speed of service vehicles along Project roads and along the transmission line ROW to lessen dust production. - Standard: n/a						
EA-MT56	Terrestrial Biology	EER Mitigation Commitment 56 - Adverse effects to ungulates (Moose) and furbearers (Wolves, Bears, Marten) due to activities associated with the removal of the transmission line wires and poles. - Mitigation: Utilize existing infrastructure for access and minimize construction of new roads and other corridors where other alternatives exist. Include wildlife awareness information in regular safety and environmental inductions. Project personnel will be advised not to interfere or harass or feed wildlife. Project personnel will be made aware of seasonal changes in local large mammal behaviour or presence. Project personnel will be required to handle food and food wastes in a responsible manner. No hunting by Project personnel will be permitted while working or residing on-site. Enforce speed limits along proposed access roads to reduce the potential for collisions with wildlife. Signs warning drivers of the possibility of wildlife encounters will be posted in areas of high wildlife activity. - Commitment: Utilize existing infrastructure for access and minimize construction of new roads. Include wildlife awareness information in regular safety and environmental inductions. - Standard: n/a	N	N	N	Y	Design/Engineering records Terrestrial Systems & Habitat Biodiversity Management and Monitoring Plan	
EA-MT57	Terrestrial Biology	EER Mitigation Commitment 57 - Adverse effects to bats due to activities associated with the removal of the transmission line wires and poles. - Mitigation: Utilize existing infrastructure for access and minimize construction of new roads and other corridors where alternatives exist. Project personnel will be advised not to interfere or harass	N	N	N	Y	Terrestrial Systems & Habitat Biodiversity Management and Monitoring Plan	

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		wildlife. - Commitment: n/a - Standard: Ontario Endangered Species Act.						
EA-MT58	Terrestrial Biology	EER Mitigation Commitment 58 - Adverse effects to migratory birds, raptors and avian SAR due to activities associated with the removal of the transmission line wires and poles. - Mitigation: Utilize existing infrastructure for access and minimize construction of new roads and other corridors where alternatives exist. Include wildlife awareness information in regular safety and environmental inductions. Project personnel will be advised not to interfere or harass or feed wildlife. Project personnel will be made aware of seasonal changes in local large mammal behaviour or presence. Project personnel will be required to handle food and food wastes in a responsible manner. No hunting by Project personnel will be permitted while working or residing on-site. Enforce speed limits along Project roads to reduce the potential for collisions with wildlife. Signs warning drivers of the possibility of wildlife encounters will be posted in areas of high wildlife activity. - Commitment: Utilize existing infrastructure for access. Include wildlife awareness information in regular safety and environmental inductions. - Standard: Canadian Migratory Birds Convention Act, Canadian Species at Risk Act, Ontario Endangered Species Act.	N	N	N	Y	Terrestrial Systems & Habitat Biodiversity Management and Monitoring Plan	
EA-MT59	Fish and Fish Habitat	EER Mitigation Commitment 59 - During construction water quality may be impaired due to elevated TSS in runoff which can affect aquatic species. Some concentrations above background may occur temporarily. - Mitigation: The use of erosion control measures and timing of construction to avoid spawning and egg incubation periods will	N	Y	N	N	Erosion and Sediment Control Plan	

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		<p>reduce the potential for effect to fish and aquatic life.</p> <ul style="list-style-type: none"> - Commitment: Construction in water bodies will be undertaken within the in-water construction windows to minimize effects to fish spawning. Erosion control fencing and sedimentation catchments will be installed downstream of active construction areas. - Standard: As required under a consolidated works permit under the Lakes and Rivers Improvement Act issued by the Ministry of Natural Resources and Forestry and under the Fisheries Act Section 35. TSS must not exceed 5 mg/L (long-term) or 25 mg/L TSS (short-term; CCME 2013) 					Construction Phase Environmental Compliance Approval (Approval # 6493-BXGLVZ)	
EA-MT60	Fish and Fish Habitat	<p>EER Mitigation Commitment 60 - Construction of the watercourse realignments will result in flooding of some terrestrial vegetation which could cause methyl mercury production and potentially affect recreational use of sport fish through consumption limits.</p> <ul style="list-style-type: none"> - Mitigation: Removal of terrestrial vegetation and organic soils prior to flooding will reduce the potential for methyl mercury production through decaying of terrestrial vegetation. - Commitment: Terrestrial vegetation and organic soils will be removed prior to flooding. - Standard: Health Canada consumptions restriction guideline (0.61 mg/kg Hg)- Health Canada 2004. 	N	Y	N	N	<p>Design/Engineering records</p> <p>Aquatic Management and Monitoring Plan</p> <p>Construction Phase Environmental Compliance Approval (Approval # 6493-BXGLVZ)</p>	

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EA-MT61	Fish and Fish Habitat	<p>EER Mitigation Commitment 61 - Fish will be relocated from habitats that will be lost during the construction phase (i.e., open pit, MRA and TMF) but not all fish will be able to be collected, therefore individual fish will be lost during construction.</p> <p>- Mitigation: Relocate fish (representative numbers of the community) to established habitats. Time relocation relative to life cycle requirements and environmental conditions to minimize stress.</p> <p>- Commitment: Non-destructive fishing will be conducted in fish habitats that will be lost. Timing of removals will be planned around life cycle requirements to minimize losses of individuals. Fish captured as part of the relocation program will be released within the watershed they are captured. Small and large-bodied fish will be targeted. A biologist will be present to monitor the capture and proper care of any aquatic life found.</p> <p>- Standard: Section 35 of the Fisheries Act does not allow for the destruction of fish. A permit is required to provide for loss of some individuals.</p>	N	Y	N	N	Aquatic Management and Monitoring Plan	
EA-MT62	Fish and Fish Habitat	<p>EER Mitigation Commitment 62 - Loss of existing lentic and lotic habitat will occur through the construction of the Project.</p> <p>- Mitigation: Design of the realignment channels will incorporate the life cycle requirements of the resident fish species and promote, where possible, an increase in habitat that is currently limited within the local study area.</p> <p>- Commitment: Construct realignments to provide for life cycle requirements of resident fish</p> <p>- Standard: Fisheries Act Section 35. No loss of productive habitat related to commercial, aboriginal or recreational fisheries.</p>	Y	Y	N	N	Fisheries Act Authorization	

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EA-MT63	Fish and Fish Habitat	EER Mitigation Commitment 63 - Water intake structures will trap, impinge fish. - Mitigation: Design water intake structures to meet DFO requirements to prevent/limit fish impingement. - Commitment: Ensure intake pipe are fitted with screens to prevent fish impingement and consistent with DFO guidelines. - Standard: DFO Freshwater Intake End-of-Pipe Fish Screen Guideline.	Y	Y	Y	N	Design/Engineering records Aquatic Management and Monitoring Plan	
EA-MT64	Fish and Fish Habitat	EER Mitigation Commitment 64 - Blasting in the open pit during construction may affect spawning success and limit habitat utilization by some fish in water bodies adjacent to the open pit. However, the area affected is primarily profundal habitat and is of limited value for fish spawning thus any effects are expected to be minimal. - Mitigation: The spawning habitat within the water bodies affected will be included in the Fisheries Act Authorization for the site as a loss of habitat and will be addressed through the compensation plan. - Commitment: Spawning habitat in Clam Lake within 238.5 m from open pit will be included in the Fisheries Act Authorization and ensuing compensation plan. - Standard: DFO guideline - Wright D-G., and Hopky G-E., 1998. Guidelines for the Use of Explosives in or Near Canadian Fisheries Waters. Fisheries Act Section 35. No loss of productive habitat related to commercial, aboriginal or recreational fisheries.	Y	N	N	N	Fisheries Act Authorization	

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EA-MT65	Fish and Fish Habitat	<p>EER Mitigation Commitment 65 - During the first years of operation the watercourse realignments may not be fully established and resident fish may experience some interruption in access to habitat or the quality of habitats.</p> <p>- Mitigation: Time construction of watercourse realignments to allow for vegetation growth for one season prior to commissioning of watercourse realignments, if possible or conduct planting of aquatic vegetation immediately following commissioning of channel realignments to promote the establishment of vegetation within the newly constructed habitats.</p> <p>- Commitment: Construct habitat/realignments during the winter so that growth can occur over the spring and summer period and water can inundate new habitat areas to allow for vegetation growth or conduct planting of aquatic vegetation in newly constructed habitats immediately following commissioning. Planting of aquatic vegetation during this time will promote more rapid establishment of habitat.</p> <p>- Standard: Section 35 Fisheries Act authorization.</p>	N	Y	N	N	<p>Design/Engineering records</p> <p>Aquatic Management and Monitoring Plan</p>	
EA-MT66	Fish and Fish Habitat	<p>EER Mitigation Commitment 66 - Dams will be removed and the open pit reconnected to Upper Three Duck Lakes through an outlet channel. Until these habitats are established some reduction in fish access to habitat or the quality of habitats may occur. Once established a net increase in fish habitat will be provided.</p> <p>- Mitigation: Time construction of water realignments to allow for vegetation growth for one or more growing seasons prior to commissioning of watercourse realignments or conduct planting of aquatic vegetation immediately following commissioning of channel realignments to promote the establishment of vegetation within the newly constructed habitats.</p> <p>- Commitment: Construct habitat/realignments during the winter</p>	N	N	N	Y	<p>Design/Engineering records</p> <p>Aquatic Management and Monitoring Plan</p>	

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		so that growth can occur over the spring and summer period and water can inundate new habitat areas to allow for vegetation growth or conduct planting of aquatic vegetation in newly constructed habitats immediately following commissioning. Planting of aquatic vegetation during this time will promote more rapid establishment of habitat. - Standard: Section 35 Fisheries Act authorization.						
EA-MT67	Land and Resource Use	EER Mitigation Commitment 67 - Other Recreational Use – access limitations along transmission line alignment. - Mitigation: Consult with local snowmobile clubs and organizations, particularly when construction timing and transmission line engineering / pole placement is better known, to minimize potential conflicts. - Commitment: Consult with local snowmobile clubs and organizations, as applicable, to minimize potential conflicts with snowmobilers during construction of the transmission line. - Standard: n/a	Y	Y	N	N	Record of Consultation	
EA-MT68	Land and Resource Use	EER Mitigation Commitment 68 - Trapping – relocation of trapper cabins or buildings along transmission line alignment. - Mitigation: Appropriate mitigation measures to be determined through consultation between the MNRF and affected trappers. - Commitment: Discuss with the MNRF and the affected trappers about appropriate effects management strategies for the removal of trapper cabins or associated buildings that may be overlap with the selected transmission line alignment. - Standard: n/a	Y	Y	N	N	Record of Consultation	

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EA-MT69	Land and Resource Use	EER Mitigation Commitment 69 - Navigable Waters – restricted access to the 4M Circle Canoe Route. - Mitigation: To be determined through consultation with any potential canoe route users to facilitate safe navigation during Construction and Operations. - Commitment: Through consultation with users, establish a suitable portage / connection such that the portage route will still be usable or an alternative route is developed. This could also include placing markers to ensure canoes do not approach active construction sites. The area will be posted with signage indicating which camp sites are closed and access is limited to a period of 24-hours. If the need arises the area can be monitored. - Standard: Navigation Protection Act.	Y	Y	Y	N	Land Use and Access Management Plan	
EA-MT70	Land and Resource Use	EER Mitigation Commitment 70 - Incompatibility with Ontario Ministry of the Environment and Climate Change's Land-Use Policy (D-Series Guidelines). - Mitigation: Incorporate the MOECC D-series guidelines (MOE, 1995). - Commitment: Develop minimum 300 metre setbacks from provincially or municipally designated sensitive recreation uses, any building or associated amenity area not associated with industrial use where humans or the natural environment may be adversely affected by air emissions from the Class III Industrial facilities (excludes transmission line) such as campgrounds, residences, as per the MOECC D-Series Guidelines (MOE, 1995). - Standard: MOECC D-Series Guidelines.	Y	Y	Y	Y	Design/Engineering records	

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EA-MT71	Land and Resource Use	EER Mitigation Commitment 71 - Maintain access to forestry resources. - Mitigation: Re-route the Chester Access Road south of the Project site. - Commitment: Discuss alignment with the Forestry Management Area holders and EACOM for re-routing the Chester Access Road south of the Project site. - Standard: n/a	Y	Y	N	N	Record of Consultation	
EA-MT72	Land and Resource Use	EER Mitigation Commitment 72 - Maintain access to cottage on Schist Lake. - Mitigation: Provide road alternate access to cottages north of Schist Lake. - Commitment: IAMGOLD will provide alternative road access to the cottages north of Schist Lake. - Standard: n/a	N	Y	Y	Y	Design/Engineering records Record of Consultation	
EA-MT73	Land and Resource Use	EER Mitigation Commitment 73 - Hunting – loss of Bear Management Area (BMA). - Mitigation: The Ministry of Natural Resources and Forestry (MNRF) has advised that the affected BMA holder can apply to obtain licenses to additional BMAs in the Timmins District to augment the loss of access to the northern portion of the affected BMA. - Commitment: Discuss potential Project effects with MNRF and the affected BMA holders. - Standard: n/a	N	Y	Y	Y	Record of Consultation	

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EA-MT74	Land and Resource Use	EER Mitigation Commitment 74 - Hunting – potential adverse effects due to increased vehicular traffic. - Mitigation: Enforce speed limits and warn IAMGOLD personnel of areas of high wildlife activity and crossings. - Commitment: Enforce speed limits along proposed Project access roads to reduce the potential adverse effects of increased vehicular traffic associated with the Project. - Standard: n/a	N	Y	Y	Y	Terrestrial Systems & Habitat Biodiversity Management and Monitoring Plan Transportation and Traffic Management Plan	
EA-MT75	Land and Resource Use; Traditional Land and Resource Use	EER Mitigation Commitment 75 - Hunting – safety of Project site workers. - Mitigation: Prohibit hunting on IAMGOLD property to provide safety for both hunters and workers. - Commitment: Inform workers of the no hunting policy and post signs warning hunters. Control access to the site for general public including hunters. - Standard: n/a	N	Y	Y	Y	Land Use and Access Management Plan	
EA-MT76	Land and Resource Use	EER Mitigation Commitment 76 - Hunting - potential adverse effects due to poor waste management practices. - Mitigation: Food wastes generated on-site will be appropriately disposed of to reduce the attraction of wildlife. - Commitment: Ensure frequent pick-up and removal of waste generated on-site. - Standard: n/a	N	Y	Y	Y	Waste Management Plan	
EA-MT77	Land and Resource Use	EER Mitigation Commitment 77 - Trapping – loss of access to trapline area (GO031). - Mitigation: Based on discussion with the MNRF no compensation is required for trap line losses. Appropriate mitigation measures to be determined through consultation between the MNRF and affected trappers. - Commitment: Continue discussions with the MNRF and affected trappers about potential effects and/or effects management	Y	Y	Y	Y	Record of Consultation	

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		strategies, where appropriate. - Standard: n/a						
EA-MT78	Land and Resource Use	EER Mitigation Commitment 78 - Cottagers and Outfitter Camps – increased boating on Mesomikenda Lake. - Mitigation: Limit recreational boating for workers while they are staying at the work camp on-site. Potential purchase of cottages. - Commitment: Inform workers of the recreational boating policy. - Standard: n/a	N	Y	Y	Y	Human Resources Management Plan	
EA-MT79	Traditional Land and Resource Use	EER Mitigation Commitment 79 - Canoeing (traditional) – loss of portage route. - Mitigation: To be determined through consultation with any potential canoe route users to facilitate safe navigation during construction and operations. - Commitment: Through consultation with users, establish a suitable portage/ connection such that the portage route will still be usable or an alternative route is developed. The area will be posted with signage indicating which camp sites are closed and access is limited to a period of 24-hours. If the need arises the area can be monitored. Notification processes related to land access controls and/or activity restrictions on current use will be developed in consultation with affected Indigenous groups, in consideration of individual consultation preferences of each community and consistent with any potential commercial agreements. - Standard: Navigation Protection Act	N	Y	Y	N	Land Use and Access Management Plan Record of Consultation	

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EA-MT80	Traditional Land and Resource Use	EER Mitigation Commitment 80 - Fishing (traditional) – in-water works along transmission line alignment. - Mitigation: Design or time construction activities so there are limited or no in-water works required. - Commitment: In-water works are limited during construction of the transmission line alignment. - Standard: n/a	N	Y	N	N	Aquatic Management and Monitoring Plan	
EA-MT81	Traditional Land and Resource Use	EER Mitigation Commitment 81 - Cultural, Spiritual and Ceremonial Sites, Eagle's Nest – impacts to raptors. - Mitigation: Inform workers of locally nesting raptors. Consult with Mattagami First Nation and Flying Post First Nation on how the removal of an eagle's nest can be conducted in a culturally sensitive manner and be open to hosting a traditional ceremony (ies) on site should one be requested. - Commitment: Inform workers of locally nesting raptors to avoid unnecessary disturbance. - Standard: n/a	N	Y	Y	N	Terrestrial Systems & Habitat Biodiversity Management and Monitoring Plan Record of Consultation	
EA-MT82	Traditional Land and Resource Use	EER Mitigation Commitment 82 - Hunting and Fishing (traditional) – depletion of fish / wildlife. - Mitigation: No hunting or fishing by Project personnel will be permitted while working or residing on-site. - Commitment: No hunting or fishing by Project personnel will be permitted while working or residing on-site. - Standard: n/a	N	Y	Y	Y	Human Resources Management Plan	
EA-MT83	Traditional Land and Resource Use; Socio-economic	EER Mitigation Commitment 83 - Impacts on the exercise of Indigenous rights by the Métis rights-bearing community in the Project Area. - Mitigation: Through a memorandum of understanding, dated June 21, 2014, as amended by an Addendum dated February 1, 2016 (collectively, the "MOU"), Trelawney, a wholly-owned subsidiary of IAMGOLD, and the Métis Nation of Ontario intend to	Y	Y	Y	Y	IBA	

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		<p>continue to develop a positive relationship and, should the Project receive regulatory approval, further commit to reaching an agreement on an Impact Benefit Agreement if commercially reasonable terms can be arrived at by the parties in accordance with the MOU. The agreement will aim to address mutually agreeable interests such as (i) terms for financial benefits, (ii) compensation relating to any specific and identifiable Project impacts which are not otherwise resolved through mitigation or accommodation, and (iii) other key areas including training, employment, environmental monitoring/management and business opportunities.</p> <p>- Commitment: IAMGOLD will continue to engage with the Métis community to address community priorities and potential impacts arising from the Project in accordance with the mechanisms outlined in the MOU.</p> <p>- Standard: n/a</p>						
EA-MT84	Traditional Land and Resource Use	<p>EER Mitigation Commitment 84 - Plant Harvesting (traditional) – contamination of vegetation from use of chemical agents for vegetation management along transmission line alignment.</p> <p>- Mitigation: Vegetation clearing will avoid the use of chemical agents.</p> <p>- Commitment: No use of chemical agents for vegetation clearing along transmission line right of way; use of mechanical vegetation management only.</p> <p>- Standard: n/a</p>	N	N	Y	N	Terrestrial Systems & Habitat Biodiversity Management and Monitoring Plan	

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Tracking No.	Category	Commitment	Design/Planning	Construction	Operation	Closure		
EA-MT85	Socio-economic	EER Mitigation Commitment 85 - Obstruction of the viewscape. - Mitigation: Limit the design height of the MRA to 150 meters. Removal of the trapper's cabin on Three Duck Lakes. - Commitment: Mitigation and management measures inherent within the Project design that limit the extent of the visual effects includes: selection of one MRA, located further away from receptors and limiting the design height of the MRA to 150 m. Additionally, the trapper's cabin on Three Duck Lakes, given its location with respect to Project components, will be negotiated for removal to limit visual aesthetics, air quality and noise and vibration effects from the Project. - Standard: n/a	Y	Y	N	N	Design/Engineering records Proof of cabin removal	
EA-MT86	Socio-economic	EER Mitigation Commitment 86 - Labour Market / Population Demographics – local employment. - Mitigation: Support employment of local community members where possible. - Commitment: Support employment for local community members (First Nation, Métis communities and Gogama) including opportunities to support environmental monitoring activities. - Standard: n/a or as established in negotiated agreements.	N	Y	Y	N	Human Resources Management Plan Socio-economic/ Community Management Plans IBA	
EA-MT87	Socio-economic	EER Mitigation Commitment 87 - Labour Market / Population Demographics– cultural awareness training. - Mitigation: Cultural awareness training. - Commitment: Develop a cultural awareness-training program and require employees and contractors to complete the training. - Standard: n/a or as established in negotiated agreements.	N	Y	Y	N	Human Resources Management Plan	

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EA-MT88	Socio-economic	EER Mitigation Commitment 88 - Public Utilities – demands on Gogama’s wastewater treatment capacity. - Mitigation: Work with Gogama Local Service Board. - Commitment: Continue to support Gogama Local Services Board to identify ways to improve Gogama’s wastewater treatment capacity. - Standard: n/a	N	Y	Y	N	Record of Consultation	
EA-MT89	Socio-economic	EER Mitigation Commitment 89 - Business Opportunities – monitor/report on local and regional procurement. - Mitigation: Establish a system to monitor and report on local and regional content with mechanisms to adapt procurement policies where required. - Commitment: Establish a system to monitor and report on local and regional content with mechanisms to adapt procurement policies, where required. - Standard: n/a or as established in negotiated agreements.	N	Y	Y	N	Human Resources Management Plan Socio-economic/ Community Management Plans IBA	
EA-MT90	Socio-economic	EER Mitigation Commitment 90 - Labour Market / Population Demographics – employee training and development. - Mitigation: Provide on-the-job Common Core training to workers. - Commitment: Provide on-the-job Common Core training to assist local and regional workers to develop mining-specific skills or develop partnerships with existing initiatives. Employees would be part of IAMGOLD’s Performance Management Process and development needs and opportunities would be identified through this process. - Standard: n/a or as established in negotiated agreements	N	Y	Y	N	Human Resources Management Plan Socio-economic/ Community Management Plans IBA	

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Tracking No.	Category	Commitment	Design/Planning	Construction	Operation	Closure		
EA-MT91	Socio-economic	EER Mitigation Commitment 91 - Labour Market / Population Demographics – training to access Project employment. - Mitigation: Support and/or provide training and education in local communities, where possible. - Commitment: Support and/or provide education and training for potential employees from local communities (Aboriginal communities and members of Gogama). Initiate discussions with potential partners for developing youth mentorship programs. Work with appropriate community contacts to identify training needs, develop relevant training plans, and identify potential participants. - Standard: n/a or as established in negotiated agreements.	N	Y	Y	N	Human Resources Management Plan	
EA-MT92	Socio-economic	EER Mitigation Commitment 92 - Unidentified Project-related socio-economic / community effects. - Mitigation: Management plan to address potential Project-related socio-economic / community effects. - Commitment: IAMGOLD will work with potentially affected Aboriginal groups to develop a socio-economic / community management plan to address potential Project-related socio-economic / community effects identified through the environmental assessment process and/or at later stages of the Project. - Standard: n/a or as established in negotiated agreements.	N	Y	Y	Y	Socio-economic/ Community Management Plans	
EA-MT93	Socio-economic	EER Mitigation Commitment 93 - Labour Market / Population Demographics – local suppliers. - Mitigation: Implement a procurement process that promotes Aboriginal and local suppliers. - Commitment: Develop and implement a procurement process that promotes suppliers from the local community (First Nations, Métis and Gogama). - Standard: n/a or as established in negotiated agreements.	N	Y	Y	Y	Socio-economic/ Community Management Plans IBA	

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Tracking No.	Category	Commitment	Design/Planning	Construction	Operation	Closure		
EA-MT94	Socio-economic	EER Mitigation Commitment 94 - Business Opportunities – Encourage local suppliers. - Mitigation: Implement a procurement process that encourages Aboriginal and local suppliers. - Commitment: Implement a procurement process that encourages suppliers from local Aboriginal communities and Gogama. - Standard: n/a or as established in negotiated agreements or Closure Plan.	N	Y	Y	Y	Socio-economic/ Community Management Plans IBA	
EA-MT95	Socio-economic	EER Mitigation Commitment 95 - Business Opportunities – support local businesses through procurement process. - Mitigation: Support capacity building for local businesses. - Commitment: Increase capacity building for local businesses during the Construction and Operations phases to help them effectively bid for opportunities in the Closure and Post-closure phases. - Standard: n/a or as established in negotiated agreements or Closure Plan.	N	Y	Y	Y	Socio-economic/ Community Management Plans IBA	
EA-MT96	Socio-economic	EER Mitigation Commitment 96 - Community Health Conditions – long distance phone service for worker health. - Mitigation: Provide access to long distance phone service for employees. - Commitment: Provide access to long-distance calls and internet connections to help maintain healthy family relationships. - Standard: n/a	N	Y	Y	Y	Human Resources Management Plan	
EA-MT97	Socio-economic	EER Mitigation Commitment 97 - Community Health Conditions – demands on local health services. Emergency Services – demands on local emergency services - Mitigation: Provide for basic worker health care. - Commitment: Provide immediate access to care if required to minimize additional demands on off-site community health	N	Y	Y	Y	Human Resources Management Plan Socio-economic/ Community Management Plans	

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Tracking No.	Category	Commitment	Design/Planning	Construction	Operation	Closure		
		facilities. - Standard: n/a					IBA	
EA-MT98	Socio-economic	EER Mitigation Commitment 98 - Community Health Conditions – health management. - Mitigation: Provide information on health-related issues such as nutrition, sexually transmitted infections, alcohol abuse etc. to workers. - Commitment: Provide information on health-related issues such as nutrition, sexually transmitted infections, alcohol abuse etc. to workers to promote a healthy living culture in surrounding communities. - Standard: n/a	N	Y	Y	Y	Human Resources Management Plan	
EA-MT99	Socio-economic	EER Mitigation Commitment 99 - Community Health Conditions – unsafe driving conditions potentially leading to traffic accidents. - Mitigation: Provide worker transportation to and from Project site. - Commitment: IAMGOLD will consider bussing from communities that are beyond a reasonable commuting distance, e.g., Timmins and Sudbury. - Standard: n/a	N	Y	Y	Y	Human Resources Management Plan	
EA-MT100	Socio-economic	EER Mitigation Commitment 100 - Housing and Temporary Accommodations – on-site camp. - Mitigation: Develop on-site camp. - Commitment: Develop on-site camp while supporting the needs of commuters from across the regional study area through the provision of transportation services. - Standard: n/a	N	Y	Y	Y	Human Resources Management Plan	

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Tracking No.	Category	Commitment	Design/Planning	Construction	Operation	Closure		
EA-MT101	Socio-economic	EER Mitigation Commitment 101 - Housing and Temporary Accommodations – demands for housing. - Mitigation: Monitor indicators of Project housing effects and adapting management measures. - Commitment: Monitor indicators of Project housing effects and adapting management measures with the local study area communities and appropriate agencies. - Standard: n/a	N	Y	Y	Y	Human Resources Management Plan	
EA-MT102	Socio-economic	EER Mitigation Commitment 102 - Education – training to facilitate access to employment. - Mitigation: Support post-secondary education of workers. - Commitment: Encourage and support post-secondary education of workers (including scholarships for programs related to mining for First Nation and Métis students). - Standard: n/a	N	Y	Y	Y	Human Resources Management Plan	
EA-MT103	Socio-economic	EER Mitigation Commitment 103 - Emergency Services – demands on local emergency services. - Mitigation: Maintain open communication with local service providers to monitor existing social issues. - Commitment: Maintain open communication with local service providers to monitor existing social issues. Indicators will be selected with input from these service providers so that any Project effects are identified and managed properly by responsible parties. - Standard: n/a	N	Y	Y	Y	Human Resources Management Plan	

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Tracking No.	Category	Commitment	Design/Planning	Construction	Operation	Closure		
EA-MT104	Socio-economic	EER Mitigation Commitment 104 - Other Community Services and Infrastructure – demands on local medical services. - Mitigation: Implement the Zero Harm policy at the Project site. - Commitment: Implement the Zero Harm policy and associated health and safety plans that could assist in promoting a safety culture in local communities, potentially reducing demands on local medical services. - Standard: n/a	N	Y	Y	Y	Human Resources Management Plan	
EA-MT105	Socio-economic	EER Mitigation Commitment 105 - Transportation – road safety training. - Mitigation: Road safety awareness training. - Commitment: Implement regular road safety awareness training for workers and contractors. - Standard: n/a	N	Y	Y	Y	Transportation and Traffic Management Plan	
EA-MT106	Socio-economic	EER Mitigation Commitment 106 - Transportation – highway safety and conflicts with large equipment transport. - Mitigation: Schedule major equipment delivery and removal. - Commitment: Schedule major equipment delivery and removal at off-peak travel times, where practical. - Standard: Ministry of Transportation (MTO) Highway Traffic Act	N	Y	Y	Y	Transportation and Traffic Management Plan	
EA-MT107	Socio-economic	EER Mitigation Commitment 107 - Transportation – conflicts with other traffic. - Mitigation: Schedule shuttle bus travel. - Commitment: Schedule shuttle bus travel at off-peak travel times to avoid traffic conflicts with other commuters, school buses and recreation traffic. - Standard: n/a	N	Y	Y	Y	Transportation and Traffic Management Plan	

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Tracking No.	Category	Commitment	Design/Planning	Construction	Operation	Closure		
EA-MT108	Socio-economic	EER Mitigation Commitment 108 - Transportation – traffic volumes at peak travel times. - Mitigation: Schedule shifts to limit the number of daily shuttle buses. - Commitment: Schedule shifts so that not all construction workers travel off-site on the same days, and thereby limiting the number of daily shuttle buses. - Standard: n/a	N	Y	Y	N	Transportation and Traffic Management Plan	
EA-MT109	Socio-economic	EER Mitigation Commitment 109 - Transportation – effects on highway infrastructure. - Mitigation: Transport oversized loads in parts. - Commitment: Transport oversized loads in parts to the mine site, if possible, to limit load stress on highway surfaces and obstruction of other traffic. - Standard: MTO – Highway Traffic Act O.Reg., 413/05	N	Y	Y	Y	Transportation and Traffic Management Plan	
EA-MT110	Socio-economic	EER Mitigation Commitment 110 - Transportation – potential for wildlife-vehicular accidents. - Mitigation: Report wildlife sightings on highways. Implement a wildlife observation log for all mammals (and road kill) on or near the Project roads. - Commitment: Report wildlife sightings on highways and on or near Project roads to inform workers and identify areas where wildlife is persistently present. - Standard: n/a	N	Y	Y	Y	Transportation and Traffic Management Plan Terrestrial Systems & Habitat Biodiversity Management and Monitoring Plan	
EA-MT111	Socio-economic	EER Mitigation Commitment 111 - Labour Market / Population Demographics – further training. - Mitigation: Identify and implement basic skills and technical training for Aboriginal and local community members to upgrade marketable skills and increase capacity, where possible. - Commitment: Identify and implement basic skills and technical training for Aboriginal and local community members to upgrade	N	N	Y	Y	Human Resources Management Plan IBA	

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		marketable skills and increase capacity. - Standard: n/a or as established in negotiated agreements or Closure Plan.						
EA-MT112	Socio-economic	EER Mitigation Commitment 112 - Business Opportunities – procurement process. - Mitigation: Implement a procurement policy that structures opportunities in terms of package size and bid evaluation to reflect Aboriginal and local capabilities. - Commitment: Implement a procurement policy that structures opportunities in terms of package size and bid evaluation to reflect local capabilities, where practicable. - Standard: n/a or as established in negotiated agreements or Closure Plan.	N	N	Y	Y	IBA	
EA-MT113	Socio-economic	EER Mitigation Commitment 113 - Labour Market / Population Demographics – job placement assistance. - Mitigation: Offer company services linking workers with local social services that provide job placement assistance. - Commitment: IAMGOLD will facilitate access to external job placement or community services, etc. to transition laid-off or downsized employees into career opportunities as available - Standard: n/a or as established in negotiated agreements or Closure Plan.	N	N	N	Y	Human Resources Management Plan	
EA-MT114	Socio-economic	EER Mitigation Commitment 114 - Labour Market / Population Demographics – employment relations. - Mitigation: Develop an employment community relations program - Commitment: Develop an employment community relations program to provide appropriate parties with plans and progress throughout the life of the Project.	N	N	N	Y	Human Resources Management Plan	

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		- Standard: n/a or as established in negotiated agreements or Closure Plan.						
EA-MT115	Socio-economic	EER Mitigation Commitment 115 - Labour Market / Population Demographics – closure planning. - Mitigation: Work with local communities to develop a Project closure strategy that will minimize potential adverse effects of Project closure on regional communities. - Commitment: Engage and support local communities to develop specific strategies and actions as part of the closure plan that minimizes potential adverse closure effects on the regional communities. - Standard: n/a or as established in negotiated agreements or Closure Plan.	N	N	N	Y	Human Resources Management Plan	
EA-MT116	Socio-economic	EER Mitigation Commitment 116 - Labour Market / Population Demographics –future site use. - Mitigation: Engage and support local and regional communities and stakeholders in planning decisions relating to future use of the Project site. - Commitment: Engage and support local and regional stakeholders in planning decisions for future use of the Project site that might benefit the regional economy or contribute to community pride, cohesiveness, and sense of place. - Standard: n/a or as established in negotiated agreements or Closure Plan.	N	N	N	Y	Human Resources Management Plan	
EA-MT117	Socio-economic	EER Mitigation Commitment 117 - Labour Market / Population Demographics – connect workers and employment opportunities. - Mitigation: Support the establishment of local/regional job opportunities roster/forum accessible for workers. - Commitment: Support local communities and government efforts to connect workers to a local/regional job opportunities forum prior to Project closure.	N	N	N	Y	Human Resources Management Plan	

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		- Standard: n/a or as established in negotiated agreements or Closure Plan.						
EA-MT118	Socio-economic	EER Mitigation Commitment 118 - Labour Market / Population Demographics – support for small business development. - Mitigation: Post information on site for workers about other services agencies in the region that support small business ventures and planning. - Commitment: Inform workers about regional service agencies that support small business ventures and planning, if available. - Standard: n/a or as established in negotiated agreements or Closure Plan.	N	N	N	Y	Human Resources Management Plan	
EA-MT119	Socio-economic	EER Mitigation Commitment 119 - Other Community Services and Infrastructure –closure effects on employment. - Mitigation: Inform and/or provide employees with access to resources to support transition to other employment. - Commitment: Inform employees of resources to help support employment training, provide information about available financial assistance programs, and career development initiatives. - Standard: n/a	N	N	N	Y	Human Resources Management Plan	
EA-MT120	Socio-economic	EER Mitigation Commitment 120 - Housing and Temporary Accommodations – resident retention after Project closure. - Mitigation: Support local economic diversification programs that could facilitate resident retention after Project closure. - Commitment: Support local economic diversification programs that could facilitate resident retention after Project closure. - Standard: n/a	N	N	N	Y	Human Resources Management Plan	

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EA-MT121	Socio-economic	EER Mitigation Commitment 121 - Business Opportunities – entrepreneurial economic development. - Mitigation: Support local entrepreneurial development. - Commitment: Support local entrepreneurial development for a diverse range of industries in order to lay foundations of post-operations economic diversification. - Standard: n/a	N	N	N	Y	Human Resources Management Plan	
EA-MT122	Socio-economic	EER Mitigation Commitment 122 - Business Opportunities – communicate contract terminations effectively. - Mitigation: Communicate with affected businesses to prepare for the effects of contract termination. - Commitment: Communicate with affected businesses to prepare for the effects of contract termination. - Standard: n/a or as established in negotiated agreements or Closure Plan	N	N	N	Y	Human Resources Management Plan	
EA-MT123	Archaeology and Heritage	EER Mitigation Commitment 123 - Exposure of potential marine archaeological resources or values. - Mitigation: Monitor the dewatering of Côté Lake, as per previous requirements of MTCS. - Commitment: A licensed archaeologist and First Nation monitor is required to monitor the dewatering event. - Standard: n/a (as requested by the MOECC and agreed to by MTCS).	N	Y	N	N	Archaeology and Heritage Management Plan	
EA-MT124	Archaeology and Heritage	EER Mitigation Commitment 124 - Disturbance to archaeological sites. - Mitigation: Archaeological assessments Stages 1, 2, 3 and 4, as required - Commitment: Archaeological assessment at identified areas when sub-surface impacts are anticipated; monitoring, as required, of secondary impacts (i.e. erosion) when present - Standard: MTCS Regulations	Y	Y	Y	Y	Archaeology and Heritage Management Plan	



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EA-MT125	Archaeology and Heritage	<p>EER Mitigation Commitment 125 - Storage of artifacts.</p> <ul style="list-style-type: none"> - Mitigation: Transfer excavated artifacts to a public storage and curation facility for long-term protection - Commitment: Active consultation with MFN to coordinate the transfer of all artifact collections in accordance with MTCS protocols after analysis has been completed along with a community presentation. An MTCS collection transfer form will be completed by the surrendering licensee(s) and MFN and collections shall be curated to such standards in a public institution or other location as approved by MTCS. - Standard: MTCS Regulations 	N	Y	Y	Y	Archaeology and Heritage Management Plan	
EA-MT126	Archaeology and Heritage	<p>EER Mitigation Commitment 126 - Site-Specific Mitigation Measures and Future Work for Archaeological Sites</p> <p><i>Comply with site-specific Archaeology commitments as proposed in Appendix C2 of the Environmental Effects Review Report. Commitments include future work recommendations and protection measures for identified sites.</i></p>	Y	Y	Y	Y	Archaeology and Heritage Management Plan	

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Appendix B

EA Monitoring Commitments Registry



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EA-MN1	Air Quality	EER Monitoring Commitment 1 - Total Suspended Particulate (TSP) - Parameter: Total Suspended Particulate (TSP). - Monitoring Method: High Volume (hi-vol) samplers. - Standard: Ontario Reg.419/05 air quality standard for TSP (24 hr averaging time). - Frequency / Timeframe: One sample every 6 days. - Location: Three locations (to be determined) triangulating the site to provide upwind / downwind assessment.	N	Y	Y	N	Air Quality Management and Monitoring Plan	
EA-MN2	Air Quality	EER Monitoring Commitment 2 - Metals - Parameter: Metals. - Monitoring Method: Analysis of hi vol TSP samples collected (filter). - Standard: Ontario Reg.419/05 air quality standards for metals. The metals to be monitored will be identified in the Ambient Monitoring Plan that will be submitted to the Ministry of the Environment and Climate Change (MOECC) prior to initiating the monitoring program. - Frequency / Timeframe: Select TSP filters (highest loading) to be analysed monthly. - Location: Three locations (to be determined), triangulating the site to provide upwind / downwind assessment.	N	Y	Y	N	Air Quality Management and Monitoring Plan	
EA-MN3	Air Quality	EER Monitoring Commitment 3 - NOx/SO2 - Parameter: NOx/SO2. - Monitoring Method: Passive samplers. - Standard: Screening Level to be established based upon Alberta's proposed Air Monitoring Directive and Ontario's AAQC for other averaging times. - Frequency / Timeframe: Monthly samples. - Location: Co-located with the hi-vol samplers.	N	Y	Y	N	Air Quality Management and Monitoring Plan	

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EA-MN4	Noise and Vibration	<p>EER Monitoring Commitment 4 - Vibration Levels (PPV), construction or operational vibration</p> <ul style="list-style-type: none"> - Parameter: Vibration Levels (PPV), construction or operational vibration. - Monitoring Method: Vibration monitor. - Standard: NPC-103, NPC-119. - Frequency / Timeframe: PPV to be monitored at the closest receptor location (<1 km) at least once in a year during blasting operations. Vibration monitors to be setup to record PPV for each blast. Vibration monitor to record instantaneous blast vibration levels during the blasting period. - Location: Specific sensitive receptors to be determined within the study area based on blasting at that time. Typically, the closest sensitive receptor to the blast vibration can be used to represent a group of receptors. 	N	Y	Y	N	Noise and Vibration Management and Monitoring Plan	
EA-MN5	Noise and Vibration	<p>EER Monitoring Commitment 5 - A-weighted decibels (dBA), construction noise</p> <ul style="list-style-type: none"> - Parameter: A-weighted decibels (dBA), construction noise. - Monitoring Method: Noise Monitor. - Standard: NPC-103. - Frequency / Timeframe: Noise to be monitored for a minimum period of 1 week at any receptor closer than 1 km from the construction activity. Noise monitor to record hourly sound levels, over 24/7 period, during the monitoring period. - Location: When construction is within 1 km of any sensitive noise receptor defined within the regional study area. When a group of receptors fall within the 1 km range of construction activity, the closest receptor can be taken as the representative location for monitoring, if it is shown to have the highest exposure to construction noise for a group of receptors. 	N	Y	Y	Y	Noise and Vibration Management and Monitoring Plan	

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EA-MN6	Noise and Vibration	<p>EER Monitoring Commitment 6 - A-weighted decibels (dBA), operations noise</p> <ul style="list-style-type: none"> - Parameter: A-weighted decibels (dBA), operations noise. - Monitoring Method: Noise Monitor. - Standard: NPC-103. - Frequency / Timeframe: Noise level to be monitored at the closest receptor location (<1 km) at least once per year between the initial operation period (Year 1) and mid-operation period (Year 7) to confirm NPC-300 criteria are not exceeded. Noise monitor to record hourly sound levels for a minimum period of 1 week. - Location: Specific sensitive receptors to be determined within the study area based on operations at that time. Typically, the closest sensitive receptor to the operational noise can be used to represent a group of receptors. 	N	N	Y	N	Noise and Vibration Management and Monitoring Plan	
EA-MN7	Noise and Vibration	<p>EER Monitoring Commitment 7 - Decibels (dBL), construction or operational blasting noise</p> <ul style="list-style-type: none"> - Parameter: Decibels (dBL), construction or operational blasting noise. - Monitoring Method: Noise Monitor. - Standard: NPC-103, NPC-119. - Frequency / Timeframe: Noise level to be monitored at the closest receptor location (<1 km) at least once per year during blasting operations. Noise monitor to be setup to record noise levels for each blast. Noise monitor to record instantaneous sound levels, during the blasting period. - Location: Specific sensitive receptors to be determined within the study area based on blasting at that time. Typically, the closest sensitive receptor to the blast noise can be used to represent a group of receptors. 	N	Y	Y	N	Noise and Vibration Management and Monitoring Plan	

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EA-MN8	Groundwater	EER Monitoring Commitment 8 - Groundwater monitoring - Parameter: Groundwater monitoring. - Monitoring Method: Installation of well nests, if necessary, adjacent to select hydrological monitoring stations, which allows determination of interactions between groundwater and surface water. - Standard: Good Industry Practice. - Frequency / Timeframe: Manual measurements will occur quarterly. - Location: At select hydrological monitoring stations.	N	Y	Y	Y	Water Management and Monitoring Plan	
EA-MN9	Groundwater	EER Monitoring Commitment 9 - Groundwater levels around the open pit - Parameter: Groundwater levels around the open pit - Monitoring Method: Monitoring wells instrumented with data loggers to obtain continuous records of groundwater levels along with quarterly manual depth to groundwater measurements. - Standard: Good Industry Practice. - Frequency / Timeframe: Water level transducers will be set to record on a half-hourly basis. Manual measurements will occur quarterly. - Location: Deep groundwater monitoring well nests at select locations around the perimeter of the open pit.	N	Y	Y	Y	Water Management and Monitoring Plan	
EA-MN10	Groundwater	EER Monitoring Commitment 10 - Groundwater levels around the Mine Rock Area (MRA) and Tailings Management Facility (TMF) - Parameter: Groundwater levels around the Mine Rock Area (MRA) and Tailings Management Facility (TMF). - Monitoring Method: Monitoring wells instrumented with data loggers to obtain continuous records of groundwater levels along with quarterly manual depth to groundwater measurements. - Standard: Good Industry Practice. - Frequency / Timeframe: Water level transducers will be set to record on a half-hourly basis. Manual measurements will occur quarterly.	N	Y	Y	Y	Water Management and Monitoring Plan	

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		- Location: Up to 15 existing well locations and up to 10 new well locations around the perimeter of the MRA and TMF.						
EA-MN11	Groundwater	<p>EER Monitoring Commitment 11 - Groundwater levels in vicinity of surface water features</p> <p>- Parameter: Groundwater levels in vicinity of surface water features to assess interactions between groundwater and surface water.</p> <p>- Monitoring Method: Monitoring wells instrumented with data loggers to obtain continuous records of groundwater levels along with quarterly manual depth to groundwater measurements.</p> <p>- Standard: Good Industry Practice.</p> <p>- Frequency / Timeframe: Water level transducers will be set to record on an half-hourly basis. Manual measurements will occur quarterly.</p> <p>- Location: Monitoring well nests adjacent to select hydrological monitoring stations.</p>	N	Y	Y	Y	Water Management and Monitoring Plan	
EA-MN12	Surface Water	<p>EER Monitoring Commitment 12 - Surface water level (lakes and streams)</p> <p>- Parameter: Surface water level (lakes and streams).</p> <p>- Monitoring Method: Automatic water level recorder (transducer) along with manual staff gauge measurements.</p> <p>- Standard: Good Industry Practice.</p> <p>- Frequency / Timeframe: Water level transducers will be set to record on a half-hourly basis. Manual staff gauge measurements will occur quarterly and will be surveyed to a geodetic datum annually.</p> <p>- Location: Selected existing locations*, additional new stations in waterways and realignments surrounding the infrastructure footprint.</p> <p>* Existing locations may require upgrades or improvements for long term monitoring.</p>	N	Y	Y	Y	Water Management and Monitoring Plan and Hydrometric Monitoring Plan	

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EA-MN13	Surface Water	EER Monitoring Commitment 13 - Streamflow (lake outflows and streams) - Parameter: Streamflow (lake outflows and streams). - Monitoring Method: Standard velocity-area stream current methodology. - Standard: Environment Canada (1981) Hydrometric Field Manual – Measurement of Streamflow. - Frequency / Timeframe: Initially quarterly, frequency may be reduced as natural variability is addressed. - Location: Selected existing locations*, additional new stations in waterways and realignments surrounding the infrastructure footprint. * Existing locations may require upgrades or improvements for long term monitoring.	N	Y	Y	Y	Water Management and Monitoring Plan and Hydrometric Monitoring Plan	
EA-MN14	Surface Water	EER Monitoring Commitment 14 - Meteorological parameters - Parameter: Meteorological parameters including air temperature, relative humidity, wind speed, wind direction, solar radiation and total precipitation. - Monitoring Method: Meteorological sampling equipment located on 10 m tower. - Standard: Environment Canada (1992) Atmospheric Environment Service (AES) Guidelines for Co-operative Climatological Autostations. - Frequency / Timeframe: Parameters will be recorded on an hourly-time interval, data downloaded quarterly. - Location: Continue sampling at the current location.	N	Y	Y	Y	Water Management and Monitoring Plan	

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EA-MN15	Surface Water	EER Monitoring Commitment 15 - Environment Canada Mollie River Streamflow station - Parameter: Environment Canada Mollie River Streamflow station - Monitoring Method: Desktop review using available records from Environment Canada. - Standard: Good Industry Practice. - Frequency / Timeframe: Monthly review, annual summary. - Location: Mollie River Streamflow gauging station.	N	Y	Y	Y	Water Management and Monitoring Plan and Hydrometric Monitoring Plan	
EA-MN16	Surface Water	EER Monitoring Commitment 16 - Water Levels at Ontario Power Generation (OPG). Mesomikenda Lake Dam - Parameter: Water Levels at Ontario Power Generation (OPG). Mesomikenda Lake Dam. - Monitoring Method: Desktop review using available records from OPG. - Standard: Good Industry Practice - Frequency / Timeframe: Annual review and summary. - Location: Mesomikenda Lake dam.	N	Y	Y	Y	Water Management and Monitoring Plan and Hydrometric Monitoring Plan	
EA-MN17	Surface Water	EER Monitoring Commitment 17 - Water usage from freshwater sources - Parameter: Water usage from freshwater sources. - Monitoring Method: Flow meter capable of recording instantaneous and total daily volume. - Standard: Ontario Water Resources Act (Section 34) - Frequency / Timeframe: Daily - Location: Mesomikenda Lake or other freshwater source.	N	N	Y	N	Water Management and Monitoring Plan	
EA-MN18	Surface Water	EER Monitoring Commitment 18 - Discharge to the environment - Parameter: Discharge to the environment. - Monitoring Method: Flow meter or calibrated flow conveyance feature capable of providing instantaneous and total daily volume. - Standard: Ontario Water Resources Act (Section 53). - Frequency / Timeframe: Daily. - Location: Polishing pond outlet.	N	N	Y	N	Water Management and Monitoring Plan	

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EA-MN19	Surface Water	EER Monitoring Commitment 19 - Water transfer - Parameter: Water transfer. - Monitoring Method: Flow meter capable of recording. instantaneous and total daily volume. - Standard: Good Industry Practice. - Frequency / Timeframe: Daily. - Location: MRA collection ponds, mine water pond, reclaim pond, polishing pond.	N	N	Y	N	Water Management and Monitoring Plan	
EA-MN20	Surface Water	EER Monitoring Commitment 20 - Reservoir Water Levels - Parameter: Reservoir Water Levels. - Monitoring Method: Manual staff gauges or automatic water level sensors. - Standard: Good Industry Practice. - Frequency / Timeframe: Monthly. - Location: MRA collection ponds, mine water pond, reclaim pond, polishing pond.	N	N	Y	N	Water Management and Monitoring Plan	
EA-MN21	Water Quality	EER Monitoring Commitment 21 - Surface water quality - Monitoring Method: Surface water grab sample collection using in- field filtering and preservation, as required. Quality assurance / quality control samples such as blind duplicates, trip blanks, field blanks and filter blanks will be collected during each sampling event to represent a minimum of 10% of the samples. - Standard: Provincial Water Quality Objectives (PWQO) and Canadian Water Quality Guidelines (CWQG), with laboratory detection limits suitable for comparison to these guidelines. Metal Mining Effluent Regulations (MMER) and Ontario Regulation 560/94. Concentrations in mine-exposed areas will also be compared to baseline and reference area values. - Frequency / Timeframe: Sampling events will be conducted during all Project phases at a frequency sufficient to detect changes in water quality; the frequency will depend on the station location and will aim to capture a range of flow conditions, as required. The frequency of effluent monitoring will meet federal and provincial	N	Y	Y	Y	Water Management and Monitoring Plan Construction Phase Environmental Compliance Approval (Approval # 6493- BXGLVZ)	

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		<p>effluent discharge requirements.</p> <p>- Location: Project site components: open pit sump, seepage collection ponds, mine water pond, reclaim pond, polishing pond and domestic sewage effluent outlets as appropriate to the mine phase. Surface water receivers: Moore Lake, Chester Lake, Little Clam Lake, Clam Lake, Three Duck Lakes (upper, middle and lower basins), Mollie River between Three Duck Lakes and Dividing Lake, Dividing Lake, Bagsverd Lake, Unnamed Lake #6, Schist Lake, Neville Lake, Mesomikenda Lake (upper basin) and downstream from the local study area (downstream from Mesomikenda Lake and Dividing Lake). Samples will also be collected in appropriate reference areas.</p> <p>- Parameter: Surface water quality samples will be analyzed for various general chemistry, metals, ions, nutrients, cyanide species, a radionuclide, organic parameters, and total and methyl mercury. The parameters suite may be reduced if it can be demonstrated that any of the tests are not applicable. Additional parameters may be considered depending on site-specific characteristics. Parameter list: Temperature, pH, alkalinity, acidity, conductivity, hardness, dissolved oxygen, oxygen-reduction potential (ORP), total suspended solids, total dissolved solids, dissolved organic carbon, total organic carbon, biological oxygen demand (BOD), chemical oxygen demand (COD), calcium, chloride, fluoride, magnesium, potassium, sodium, sulphate, aluminum, antimony, arsenic, barium, beryllium, bismuth, boron, cadmium, chromium, cobalt, copper, iron, lead, lithium, manganese, mercury, methyl mercury, molybdenum, nickel, selenium, silicon, silver, strontium, thallium, tin, titanium, tungsten, uranium, vanadium, zinc, zirconium, nitrate, nitrite, total ammonia, phosphate, phosphorus, cyanide species (total, free, weakly acid dissociable [WAD]) and radium-226. In addition, organic contaminants (i.e. oil and grease, phenols and polycyclic aromatic hydrocarbons) will be analyzed at select stations during select sampling rounds.</p>						

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EA-MN22	Water Quality	<p>EER Monitoring Commitment 22 - Groundwater quality</p> <ul style="list-style-type: none"> - Monitoring Method: Groundwater sample collection using pumping techniques and in-field filtering and preservation, as required. Quality assurance / quality control samples such as blind duplicates, trip blanks, field blanks and filter blanks will be collected during each sampling round. - Standard: Ontario Drinking Water Standards (ODWS), PWQO and CWQG, with laboratory detection limits suitable for comparison to these guidelines. MMER and Ontario Regulation 560/94. - Frequency / Timeframe: Sampling events will be conducted during all Project phases at a frequency sufficient to detect changes in water quality; the frequency will therefore depend on the station location and will aim to capture a range of flow conditions, as required. The frequency of effluent monitoring will meet federal and provincial effluent discharge requirements. - Location: Groundwater monitoring wells around the MRA, ore stockpiles, and TMF, polishing pond and landfill (if constructed). - Parameter: Groundwater quality samples will be analyzed for various general chemistry, major ions, metals nutrients, cyanide species and organic parameters. The parameters suite may be reduced if it can be demonstrated that any of the tests are not applicable. Additional parameters may be considered depending on site-specific characteristics. Parameter list: Temperature, pH, alkalinity, acidity, conductivity, hardness, dissolved oxygen, oxygen-reduction potential (ORP), total dissolved solids, dissolved organic carbon, total organic carbon, calcium, chloride, fluoride, magnesium, potassium, sodium, sulphate, aluminum, antimony, arsenic, barium, beryllium, bismuth, boron, cadmium, chromium, cobalt, copper, iron, lead, lithium, manganese, mercury, molybdenum, nickel, selenium, silicon, silver, strontium, thallium, tin, titanium, tungsten, uranium, vanadium, zinc, zirconium, nitrate, nitrite, total ammonia, phosphate, phosphorus, and cyanide species (total, free, weakly acid dissociable [WAD]). In addition, analysis and organic contaminants (i.e. total 	N	Y	Y	Y	Water Management and Monitoring Plan	

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		petroleum hydrocarbons, phenols and polycyclic aromatic hydrocarbons) will be analyzed, if required, at select locations during select sampling rounds.						
EA-MN23	Water Quality	<p>EER Monitoring Commitment 23 - Sediment quality</p> <p>- Parameter: Sediment quality samples will be analyzed for major ions, metals, nutrients (total nitrogen, total phosphorus), carbonate, organic carbon, sulphate, sulphide, particle size, total cyanide, total and methyl mercury.</p> <p>The parameters suite may be reduced if it can be demonstrated that any of the tests are not applicable. Additional parameters may be considered depending on site-specific characteristics.</p> <p>- Monitoring Method: Sampling method will be consistent with that described for the aquatic monitoring program (i.e., grab or core sample).</p> <p>- Standard: Ontario's Provincial Sediment Quality Objectives (PSQO) and the Canadian Sediment Quality Guidelines (CSQG). Concentrations in mine-exposed areas will also be compared to baseline and reference area values.</p> <p>- Frequency / Timeframe: Sampling events will be conducted at a frequency sufficient to detect changes in sediment quality, and harmonized with the Environmental Effects Monitoring (EEM) as practicable.</p> <p>- Location: Lakes where changes to water quality are expected. Harmonized with EEM as practicable.</p>	N	Y	Y	N	<p>Water Management and Monitoring Plan</p> <p>Construction Phase Environmental Compliance Approval (Approval # 6493-BXGLVZ)</p>	
EA-MN24	Terrestrial Biology	<p>EER Monitoring Commitment 24 - Wildlife-project interactions</p> <p>- Parameter: Wildlife-project interactions (incidents).</p> <p>- Monitoring Method: Site surveillance monitoring to identify the species, number, and location of wildlife incidents and risks to wildlife. The information provides direct feedback for adaptive management of Project operations, Project designs and effectiveness of mitigation.</p> <p>- Standard: n/a.</p> <p>- Frequency / Timeframe: Frequency of interactions will be recorded</p>	N	Y	Y	N	Terrestrial Systems & Habitat Biodiversity Management and Monitoring Plan	

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		as they occur. - Location: Project Site.						
EA-MN25	Terrestrial Biology	EER Monitoring Commitment 25 - Wildlife observations - Parameter: Wildlife observations. - Monitoring Method: Record incidental observations of Common Nighthawk and Bank Swallow on wildlife logs. - Standard: n/a. - Frequency / Timeframe: Continuous. - Location: Project Site.	N	Y	Y	N	Terrestrial Systems & Habitat Biodiversity Management and Monitoring Plan	
EA-MN26	Fish and Fish Habitat	EER Monitoring Commitment 26 - Aquatic Biology / Water - TSS and turbidity - Parameter: Water- TSS and turbidity. - Monitoring Method: Standard Methods and water quality multi-meter. - Standard: 1 mg/L TSS and 1 Nephelometric Turbidity Unit (NTU) as Method Detection Limits (MDLs). - Frequency / Timeframe: Daily. - Location: Downstream of active construction areas.	N	Y	N	N	Aquatic Management and Monitoring Plan Construction Phase Environmental Compliance Approval (Approval # 6493-BXGLVZ)	
EA-MN27	Fish and Fish Habitat	EER Monitoring Commitment 27 - Aquatic Biology / Noise and Vibration - Parameter: Noise and Vibration. - Monitoring Method: Acoustic monitoring to confirm the predicted effects of blasting in the Open Pit. - Standard: DFO guideline for instantaneous underwater over pressure of 100 kPa for various fish habitats and a 13 mm/sec vibration guideline for various spawning habitats (Wright and Hopky 1998). - Frequency / Timeframe: During Construction and within the first two years of Operations. - Location: South east bay of Clam Lake and the north bay of New Lake.	N	Y	Y	N	Noise and Vibration Management and Monitoring Plan	

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EA-MN28	Fish and Fish Habitat	<p>EER Monitoring Commitment 28 - Water - metals, pH, nutrients, hardness, dissolved organic carbon, alkalinity</p> <p>- Parameter: Water - metals, pH, nutrients, hardness, dissolved organic carbon, alkalinity.</p> <p>The parameters suite may be reduced if it can be demonstrated that any of the tests are not applicable. Additional parameters may be considered depending on site-specific characteristics.</p> <p>- Monitoring Method: Surface water grab sample collection using in-field filtering and preservation, as required. Inductively Coupled Plasma Mass Spectrometry (ICP-MS).</p> <p>Quality assurance /quality control samples such as blind duplicates, trip blanks, field blanks and filter blanks will be collected during each sampling event to represent a minimum of 10% of the samples.</p> <p>- Standard: (MDL< PWQO/CWQG standards). Concentrations in mine-exposed areas will also be compared to baseline and reference area values.</p> <p>- Frequency / Timeframe: Sampling events will be conducted during all project phases at a frequency sufficient to detect changes in water quality; the frequency will therefore depend on the station location and will aim to capture a range of flow conditions, as required monitoring will be conducted until conditions are stable or less than guidelines for the protection of aquatic life.</p> <p>- Location: Downstream of Project discharge and in all areas potentially affected by mine related discharges as well as in appropriate reference areas.</p>	N	Y	Y	Y	<p>Aquatic Management and Monitoring Plan</p> <p>Construction Phase Environmental Compliance Approval (Approval # 6493-BXGLVZ)</p>	
EA-MN29	Fish and Fish Habitat	<p>EER Monitoring Commitment 29 - Sediment-metals, total organic carbon, grain size, mercury and methyl mercury</p> <p>- Parameter: Sediment-metals, total organic carbon, grain size, mercury and methyl mercury.</p> <p>The parameters suite may be reduced if it can be demonstrated that any of the tests are not applicable. Additional parameters may be considered depending on site-specific characteristics.</p> <p>- Monitoring Method: Surficial sediment collected from grab or core</p>	N	Y	Y	Y	<p>Aquatic Management and Monitoring Plan</p> <p>Construction Phase Environmental Compliance Approval (Approval # 6493-BXGLVZ)</p>	

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		sample (top depositional layer). Method detection limits will be less than federal and provincial water quality guidelines. - Standard: Ontario's Provincial Sediment Quality Objectives and the Canadian Sediment Quality Guidelines. Concentrations in mine-exposed areas will also be compared to baseline and reference area values. - Frequency / Timeframe: Every 3 years during Operations and twice following Closure. - Location: Locations downstream of Project discharge and reference areas.						
EA-MN30	Fish and Fish Habitat	EER Monitoring Commitment 30 - Benthic invertebrate community - Parameter: Benthic invertebrate community. - Monitoring Method: Depositional sampling using petite Ponar, reduced to 500 micron and identified to lowest practical level. - Standard: EEM under Federal Metal Mining Effluent Regulations (MMER) and Canadian-Ontario Agreement (COA) requirements under OWRA. - Frequency / Timeframe: Every 3 years during Operations and twice following Closure. - Location: Locations downstream of the Project discharge and reference areas.	N	Y	Y	Y	Aquatic Management and Monitoring Plan Construction Phase Environmental Compliance Approval (Approval # 6493-BXGLVZ)	
EA-MN31	Fish and Fish Habitat	EER Monitoring Commitment 31 - Fish community - Parameter: Fish community. - Monitoring Method: Collect fish (small-bodied and large bodied) using standardized collection methods. Identify and enumerate and determine relative abundance. - Standard: EEM under MMER and COA requirements under OWRA. - Frequency / Timeframe: Every 3 years during Operations and twice following Closure. - Location: Locations downstream of the Project discharge and habitats affected by watercourse realignments.	N	Y	Y	Y	Aquatic Management and Monitoring Plan Construction Phase Environmental Compliance Approval (Approval # 6493-BXGLVZ)	

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EA-MN32	Fish and Fish Habitat	<p>EER Monitoring Commitment 32 - Fish health</p> <ul style="list-style-type: none"> - Parameter: Fish health. - Monitoring Method: Two sentinel species – either a non-destructive study design (i.e. 100 individuals for length, weight and age) or a lethal survey (40 males and 40 females for length, weight, age, liver weight, gonad weight, egg size and fecundity). Measures of abnormalities on all fish collected. - Standard: EEM under MMER and COA requirements under OWRA. - Frequency / Timeframe: Every 3 years during Operations and twice following Closure. - Location: Locations downstream of the Project discharge and reference areas. 	N	Y	Y	Y	<p>Aquatic Management and Monitoring Plan</p> <p>Construction Phase Environmental Compliance Approval (Approval # 6493-BXGLVZ)</p>	
EA-MN33	Fish and Fish Habitat	<p>EER Monitoring Commitment 33 - Fish tissue</p> <p>Parameter: Fish tissue.</p> <p>Monitoring Method: Non-lethal biopsy tissue sampling methods will be used to collect skinless, boneless muscle samples (5 g filet) from live individuals.</p> <p>Samples will be analyzed for total mercury. Samples will be weighed and acid digested prior to analysis using a variant of “Environmental Protection Agency Method 1631- mercury in water by oxidation, purge and trap, and cold vapour atomic fluorescence spectrometry”. Using this technique, low method detection limits of approximately 1 ng Hg/g wet tissue weight can be achieved.</p> <p>Standard: Health Canada and Ministry of the Environment and Climate Change consumption benchmarks.</p> <p>Frequency / Timeframe: Every 3 years during Operations and twice following Closure or until mercury concentrations in fish are stable or equal to reference areas.</p> <p>Location: In areas affected by stream realignments and reference areas.</p>	N	Y	Y	Y	<p>Aquatic Management and Monitoring Plan</p> <p>Construction Phase Environmental Compliance Approval (Approval # 6493-BXGLVZ)</p>	

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EA-MN34	Traditional Land and Resource Use	<p>EER Monitoring Commitment 34 - Project effects on Indigenous traditional activities / traditional land use</p> <ul style="list-style-type: none"> - Parameter: Project effects on Indigenous traditional activities / traditional land use. - Monitoring Method: IAMGOLD will continue to discuss potential Project effects on traditional activities with potentially affected Indigenous communities throughout the life of the Project. Should additional information regarding an Indigenous community's traditional practices become available, IAMGOLD will review and consider any potential effects, and develop and implement necessary mitigation measures as appropriate. - Standard: n/a. - Frequency / Timeframe: Continuous - Location: n/a. 	N	Y	Y	Y	Traditional Land and Resource Use Follow-Up Program	
EA-MN35	Socio-economic	<p>EER Monitoring Commitment 35 - Project-related socio-economic effects on Aboriginal and non-Aboriginal populations</p> <ul style="list-style-type: none"> - Parameter: Project-related socio-economic effects on Aboriginal and non-Aboriginal populations. - Monitoring Method: Socio-economic / Community Management Plan to monitor and respond to Project effects on Aboriginal and non-Aboriginal populations. Ongoing consultation with affected Aboriginal communities and stakeholders. - Standard: n/a. - Frequency / Timeframe: Continuous. - Location: n/a. 	N	Y	Y	Y	Socio-economic/ Community Management Plans	

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EA-MN36	Socio-economic	EER Monitoring Commitment 36 - Number, skill sets and positions held by local, First Nation and Métis persons and contractors at the Project site - Parameter: Number, skill sets and positions held by local, First Nation and Métis persons and contractors at the Project site (direct employment with IAMGOLD as well as contract employment). - Monitoring Method: Database system maintained by IAMGOLD Human Resources or others as required. - Standard: n/a. - Frequency / Timeframe: Annually for the life of the Project. - Location: n/a.	N	Y	Y	Y	Human Resources Management Plan	
EA-MN37	Socio-economic	EER Monitoring Commitment 37 - Number of employees moving into regional study area communities from outside of the region - Parameter: Number of employees moving into regional study area communities from outside of the region. - Monitoring Method: Database system maintained by IAMGOLD Human Resources or others as required. - Standard: n/a. - Frequency / Timeframe: Annually for life of the Project. - Location: n/a.	N	Y	Y	Y	Human Resources Management Plan	
EA-MN38	Socio-economic	EER Monitoring Commitment 38 - Number of employees taking cultural awareness training as part of their on-boarding procedure - Parameter: Number of employees taking cultural awareness training as part of their on-boarding procedure. - Monitoring Method: Database system maintained by IAMGOLD Human Resources or others as required. - Standard: n/a. - Frequency / Timeframe: Annually for life of the Project - Location: n/a.	N	Y	Y	Y	Human Resources Management Plan	

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EA-MN39	Socio-economic	EER Monitoring Commitment 39 - Number of local employees or local applicants obtaining IAMGOLD-funded training to access Project employment - Parameter: Number of local employees or local applicants obtaining IAMGOLD-funded training to access Project employment. - Monitoring Method: Database system maintained by IAMGOLD Human Resources or others as required. - Standard: n/a. - Frequency / Timeframe: Annually for life of the Project - Location: n/a.	N	Y	Y	Y	Human Resources Management Plan	
EA-MN40	Socio-economic	EER Monitoring Commitment 40 - Number of local employees obtaining upgrade training to access higher-paid positions with IAMGOLD - Parameter: Number of local employees obtaining upgrade training to access higher-paid positions with IAMGOLD. - Monitoring Method: Database system maintained by IAMGOLD Human Resources or others as required. - Standard: n/a. - Frequency / Timeframe: Annually for life of the Project - Location: n/a.	N	Y	Y	Y	Human Resources Management Plan	
EA-MN41	Socio-economic	EER Monitoring Commitment 41 - Number of local employees making successful transition to new work after closure - Parameter: Number of local employees making successful transition to new work after closure. - Monitoring Method: Database system maintained by IAMGOLD Human Resources or others as required. - Standard: n/a. - Frequency / Timeframe: Starting towards the end of the Operations phase as production levels decline until completion of the Closure phase - Location: n/a.	N	N	Y	Y	Human Resources Management Plan	



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Document Title	Appendix B – EA Monitoring Commitments Registry			
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Tracking No.	Category	Commitment	Design/Planning	Construction	Operation	Closure		
EA-MN42	Socio-economic	<p>EER Monitoring Commitment 42 - Number of local or First Nation and Métis companies hired for decommissioning and closure contracts</p> <p>- Parameter: Number of local or First Nation and Métis companies hired for decommissioning and closure contracts.</p> <p>- Monitoring Method: Database system maintained by IAMGOLD Human Resources or others as required.</p> <p>- Standard: n/a.</p> <p>- Frequency / Timeframe: Closure phase</p> <p>- Location: n/a.</p>	N	N	N	Y	Human Resources Management Plan	

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Document Title	Compliance Monitoring Program Report			
Document No.	IMG-ENV-CMPR-100	Revision	3.0	



Appendix C

Provincial EA Conditions Registry



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Document Title	Appendix C – Provincial EA Conditions Registry			
Document No.	IMG-ENV-CMPR-100	Revision	3.0	

Appendix C – Provincial EA Conditions Registry



Commitment List and Information			Implementation Schedule				Documentary Compliance Proof / Evidence to be Maintained on File (subject to change)	Compliance Status (this column will be populated in annual compliance reports)
Tracking No.	Category	Commitment	Design/Planning	Construction	Operation	Closure		
EA-PC2.1	General	Provincial EA Condition 2.1 - General Requirements - The Proponent shall comply with the provisions in the Environmental Assessment, which are hereby incorporated into this Notice of Approval by reference, except as provided in the conditions of this Notice of Approval and as provided in any other approval or permit that may be issued for the Site.	Y	Y	Y	Y	Annual Compliance Reports	
EA-PC2.2	General	Provincial EA Condition 2.2- General Requirements - These conditions of the Notice of Approval do not prevent more restrictive conditions being imposed under other statutes.	Y	Y	Y	Y	Annual Compliance Reports	
EA-PC3.1	General	Provincial EA Condition 3.1 - Public Record - Where a document, plan or report is required to be submitted to the Ministry, the Proponent shall provide two copies of the final document, plan or report to the Director: a copy for filing in the specific public record file maintained for the Undertaking, and a copy for use by Ministry staff. The Proponent shall provide additional copies of the documents required for the public record file to the following for access by the public: a) Regional Director; b) District Manager; and c) IAMGOLD Corporation office in Gogama, Ontario	Y	Y	Y	Y	Record of Consultation (submissions) Document availability at IAMGOLD Gogama office	
EA-PC3.2	General	Provincial EA Condition 3.2 - Public Record - The EAB file number EA 05-09-02 and "EAIMS" file number 13022 shall be quoted on all documents submitted by the Proponent pursuant to Condition 3.1 of this Notice of Approval.	Y	Y	Y	Y	Record of Consultation (submissions)	

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Tracking No.	Category	Commitment	Design/Planning	Construction	Operation	Closure		
EA-PC3.3	General	Provincial EA Condition 3.3 - Public Record - Without removing the requirement to comply with the foregoing Public Record conditions, the Proponent should also provide the documents itemized above on the Proponent's website for the Undertaking and through other means, as it considers appropriate.	Y	Y	Y	Y	Community Communication Plan	
EA-PC4.1	EA Errata	Provincial EA Condition 4.1 - Environmental Assessment Report - The Proponent shall post the Cote Gold Environmental Assessment Errata document dated June 15, 2015 on the Proponent's website for the Undertaking. The Proponent shall update the Summary of the Environmental Assessment Report to reflect the addition of the Errata and to itemize what sections of the Environmental Assessment Report have been impacted by it, and shall post the updated Summary on the website. - The Proponent shall update the Table of Contents of the Environmental Assessment Report to reflect that the Errata is included as part of Environmental Assessment Report, and shall post the updated Table of Contents on the website.	Y	N	N	N	Website posting	
EA-PC5.1	Compliance Monitoring Program Report	Provincial EA Condition 5.1 - Compliance Monitoring Program Report - The Proponent shall prepare and submit to the District Manager and Director, and make available to the public on the Proponent website, an Environmental Assessment (EA) Compliance Monitoring Program.	Y	N	N	N	Compliance Monitoring Program Report Community Communication Plan Record of Consultation (submission)	
EA-PC5.2	Compliance Monitoring Program Report	Provincial EA Condition 5.2 - Compliance Monitoring Program Report - The Compliance Monitoring Program Report shall be submitted 60 days before the start of Construction or by such other date as may be agreed to in writing by the District Manager and Director.	Y	N	N	N	Compliance Monitoring Program Report Record of Consultation (submission)	
EA-PC5.3	Compliance Monitoring	Provincial EA Condition 5.3 - Compliance Monitoring Program Report - The Compliance Monitoring Program Report shall describe how the Proponent will monitor its fulfilment of:	Y	N	N	N	Compliance Monitoring Program Report	

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Tracking No.	Category	Commitment	Design/Planning	Construction	Operation	Closure		
	Program Report	1) The provisions of the Environmental Assessment pertaining to mitigation measures, public consultation, and additional studies and work to be carried out; 2) All other commitments made by the Proponent during the Environmental Assessment process including the Commitments Registry as contained in the Environmental Assessment Commitment Tables dated February 8, 2016; and 3) The conditions included in this Notice of Approval.						
EA-PC5.4	Compliance Monitoring Program Report	Provincial EA Condition 5.4 - Compliance Monitoring Program Report - The Compliance Monitoring Program Report must contain an implementation schedule for Construction, operations, and closure, as well as for monitoring during Construction, operations and closure.	Y	N	N	N	Compliance Monitoring Program Report	
EA-PC5.5	Compliance Monitoring Program Report	Provincial EA Condition 5.5 - Compliance Monitoring Program Report - When the Proponent submits the Compliance Monitoring Program Report to the District Manager and Director, the Proponent shall append a statement indicating that the Compliance Monitoring Program Report is intended to fulfil Condition 5 of this Notice of Approval.	Y	N	N	N	Compliance Monitoring Program Report Record of Consultation (submission)	
EA-PC5.6	Compliance Monitoring Program Report	Provincial EA Condition 5.6 - Compliance Monitoring Program Report - The District Manager or Director may require the Proponent to amend the Compliance Monitoring Program Report at any time. Should an amendment be required, the District Manager/Director will notify the Proponent, in writing, of the required amendment and the date by which the Proponent must complete the amendment and submit it to the District Manager/Director.	Y	Y	Y	Y	Compliance Monitoring Program Report Record of Consultation (submission)	
EA-PC5.7	Compliance Monitoring Program Report	Provincial EA Condition 5.7 - Compliance Monitoring Program Report - The Proponent shall carry out the Compliance Monitoring Program, as detailed in the Compliance Monitoring Program Report, and as it may be amended by the District Manager/Director.	N	Y	Y	Y	Annual Compliance Reports	

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Tracking No.	Category	Commitment	Design/Planning	Construction	Operation	Closure		
EA-PC5.8	Compliance Monitoring Program Report	Provincial EA Condition 5.8 - Compliance Monitoring Program Report - The Proponent shall make the documentation resulting from the fulfillment of the Compliance Monitoring Program available to the District Manager or Director upon request, in a timely manner, when so requested by Ministry staff in relation to an on-Site inspection, an audit, a pollution incident report, or compliance.	Y	Y	Y	Y	Record of Consultation (proof of submission of requested documentation)	
EA-PC6.1	Annual Compliance Reporting	Provincial EA Condition 6.1 - Compliance Reporting - The Proponent shall prepare an annual Compliance Report which describes its compliance with the conditions of approval set out in this Notice of Approval, and which describes the results of the Proponent's Environmental Assessment Compliance Monitoring Program required by Condition 5 of this Notice of Approval.	N	Y	Y	Y	Annual Compliance Reports	
EA-PC6.2	Annual Compliance Reporting	Provincial EA Condition 6.2 - Compliance Reporting - The first annual Compliance Report shall be submitted to the District Manager and Director and made available to the public on the Proponent website within one year from the start of Construction and shall cover all activities of the previous 12-month period.	N	Y	N	N	Annual Compliance Reports; Record of Consultation Community Communication Plan	
EA-PC6.3	Annual Compliance Reporting	Provincial EA Condition 6.3 - Compliance Reporting - Subsequent Compliance Reports shall be submitted to the District Manager and Director, and made available to the public, on or before the anniversary of the start of Construction each year thereafter, until it has submitted its final Compliance Report. Each Compliance Report shall cover all activities of the previous 12 month period.	N	Y	Y	Y	Annual Compliance Reports Record of Consultation Community Communication Plan	
EA-PC6.4	Annual Compliance Reporting	Provincial EA Condition 6.4 - Compliance Reporting - Once all conditions in this Notice of Approval have been satisfied, the Proponent shall indicate in its annual Compliance Report that the Compliance Report is its final Compliance Report, and that all conditions in this Notice of Approval have been satisfied. The District Manager and Director may vary the time at which the Proponent is to provide its final Compliance Report and will state this in writing to the Proponent.	N	N	N	Y	Annual Compliance Report (final submission) Record of Consultation	

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Tracking No.	Category	Commitment	Design/Planning	Construction	Operation	Closure		
EA-PC6.5	Annual Compliance Reporting	Provincial EA Condition 6.5 - Compliance Reporting - The Proponent shall retain, either on Site or in another location approved by the District Manager or Director, a copy of each of the annual Compliance Reports and any associated documentation of compliance monitoring activities.	N	Y	Y	Y	Maintenance of all files/records in a designated location	
EA-PC6.6	Annual Compliance Reporting	Provincial EA Condition 6.6 - Compliance Reporting - The Proponent shall make the Compliance Reports and associated documentation available to the District Manager and Director in a timely manner when requested to do so by Ministry staff.	N	Y	Y	Y	Record of Consultation (proof of submission of requested documentation)	
EA-PC7.1	Complaint Protocol	Provincial EA Condition 7.1 - Complaint Protocol - The Proponent shall prepare and implement a Complaint Protocol that sets out how it will deal with and respond to inquiries and complaints received during the design, construction, operation, and closure of the Undertaking.	Y	Y	Y	Y	Management of Community Grievances	
EA-PC7.2	Complaint Protocol	Provincial EA Condition 7.2 - Complaint Protocol - The Proponent shall submit the Complaint Protocol to the District Manager and Director, for the public record, 60 days before the start of Construction or such other date as may be agreed to in writing by the District Manager/Director.	Y	N	N	N	Management of Community Grievances Record of Consultation (submission)	
EA-PC7.3	Complaint Protocol	Provincial EA Condition 7.3 - Complaint Protocol - The District Manager or Director may require the Proponent to amend the Complaint Protocol at any time. If an amendment is required, the District Manager/Director will notify the Proponent in writing of the required amendment and the date by which the Proponent must complete the amendment and submit it to the District Manager/Director.	Y	Y	Y	Y	Management of Community Grievances Record of Consultation (submission)	
EA-PC7.4	Complaint Protocol	Provincial EA Condition 7.4 - Complaint Protocol - The Proponent shall carry out the Complaint Protocol, as it may be amended by the District Manager/Director.	Y	Y	Y	Y	Management of Community Grievances	

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Tracking No.	Category	Commitment	Design/Planning	Construction	Operation	Closure		
EA-PC8.1	Community Communicati on Plan	Provincial EA Condition 8.1 - Community Communication Plan - The Proponent shall prepare and implement a Community Communication Plan that sets forth: a) How the Proponent will disseminate information to interested persons; b) How the Proponent will notify interested persons and keep them informed about Site activities; and, c) What procedures the Proponent will use to keep interested persons apprised of information about documents related to the Undertaking, and when and how the Proponent will make updated information and documents available to them.	Y	Y	Y	Y	Community Communication Plan	
EA-PC8.2	Community Communicati on Plan	Provincial EA Condition 8.2 - Community Communication Plan - The Proponent shall submit a Community Communication Plan to the Director 60 days before the start of Construction or by such other date as may be agreed to in writing by the Director.	Y	N	N	N	Community Communication Plan Record of Consultation (submission)	
EA-PC8.3	Community Communicati on Plan	Provincial EA Condition 8.3 - Community Communication Plan - The Proponent shall implement the Community Communication Plan during construction, operations, and closure phases of the Undertaking.	Y	Y	Y	Y	Community Communication Plan	
PC9.1	Consultation	Provincial EA Condition 9.1 - Consultation with Aboriginal Communities '- The Proponent shall prepare, in consultation with the Aboriginal Communities that were notified of the Undertaking during the Environmental Assessment process, an Aboriginal Consultation Plan that sets forth: a) How, during the planning, design, Construction, operation, monitoring and closure of the Undertaking, the Proponent will consult with the Aboriginal Communities that were notified of the Undertaking during the Environmental Assessment; b) How the Proponent will fulfill all commitments made to Aboriginal communities during the Environmental Assessment process, including ongoing consultation about the planning, design,	Y	N	N	N	Indigenous Consultation Plan Record of Consultation	

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Tracking No.	Category	Commitment	Design/Planning	Construction	Operation	Closure		
		<p>construction, operation, monitoring and closure of the Undertaking;</p> <p>c) How the Proponent will notify Aboriginal Communities, using a Notification Protocol, if archaeological resources or Aboriginal remains are encountered during the life of the Undertaking;</p> <p>d) How the Proponent will issue notices and updates on key steps in the planning, design, Construction, operation, and closure of the Undertaking, including how the Proponent will inform the Aboriginal Communities that were notified of the Undertaking during the Environmental Assessment as to when impacting activities will occur so that interested communities have reasonable opportunity to carry out specific cultural practices beforehand, as they consider appropriate.</p>						
EA-PC9.2	Consultation	<p>Provincial EA Condition 9.2 - Consultation with Aboriginal Communities</p> <p>- 90 days before the start of Construction or by such other date as may be agreed to in writing by the Director, the Proponent shall submit the Aboriginal Consultation Plan to the Director, with an outline of how the Proponent consulted on it as per Condition 9.1 above.</p> <p>MECP Clarification (April 2019): Condition 9.2 provides the date for which a plan for consultation with Aboriginal communities needs to be submitted to the ministry (90 days before the start of construction). It would seem beneficial to all parties for the proponent to develop this plan as soon as possible. The MECP suggests the proponent submit the plan for consultation with Aboriginal communities, including input on the plan, no more than 120 days from today's date or no less than 90 days prior to construction, whichever comes first. The MECP looks forward to receiving a copy of this plan for review.</p>	Y	N	N	N	<p>Indigenous Consultation Plan</p> <p>Record of Consultation</p>	

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Tracking No.	Category	Commitment	Design/ Planning	Construction	Operation	Closure		
EA-PC9.3	Consultation	Provincial EA Condition 9.3 - Consultation with Aboriginal Communities - Once the Director is satisfied with the Aboriginal Consultation Plan, the Proponent shall implement the Aboriginal Consultation Plan during the planning, design, Construction, operation, and closure of the Undertaking.	Y	Y	Y	Y	Indigenous Consultation Plan	
EA-PC10.1	Archaeology and Heritage	Provincial EA Condition 10.1 - Archaeological Assessment - If during the life of the Undertaking any archaeological resources are discovered, all Construction activities within 100 metres of the archaeological resources will cease immediately and a licensed archaeologist will be retained to carry out the necessary fieldwork in compliance with Section 48(1) of the Ontario Heritage Act.	N	Y	Y	Y	Archaeology and Heritage Management Plan	
EA-PC10.2	Archaeology and Heritage	Provincial EA Condition 10.2 - Archaeological Assessment - Archaeological resources that require removal from the place where they are discovered will be transferred to a public institution selected through consultation with local Aboriginal communities, in consultation with the Ministry of Tourism, Culture and Sport. A Ministry of Tourism, Culture and Sport collection transfer form will be completed by the surrendering licensee and the institution accepting the materials. Collection shall be curated to current standards.	N	Y	Y	Y	Archaeology and Heritage Management Plan Indigenous Consultation Plan Record of Consultation	

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Tracking No.	Category	Commitment	Design/Planning	Construction	Operation	Closure		
EA-PC11.1	Water Quality	<p>Provincial EA Condition 11.1 - Surface Water Quality</p> <p>- When applying for an industrial sewage works Environmental Compliance Approval, the Proponent shall provide, to the satisfaction of the Ministry, updated baseline data and assessment of potential impacts from the discharge of seepage and effluent to specific surface water receivers.</p> <p>MECP Clarification (April 2019): There is a need for up-to-date information to support provincial approvals and permitting due to: 1) The time elapsed since data collection for the EA. The surface water data in the EA was obtained about 5 to 7 years ago (samples collected September 2011 to June 2014). 2) The modified project design.</p> <p>These changes will alter the geographic area affected by the mine and alter the potential for impacts to surface water at a given location. 3) The resulting changes in potential for impact to individual streams and lakes. The assessment of potential impact from mine discharge of seepage and effluent to surface water receivers provided in the EA was for a project design that has since changed. As such, it is essential that the proponent provide: (a) an updated pre-development baseline data to define current conditions within potentially impacted watersheds and to establish a starting point for detection of changes over time, and (b) an updated evaluation of seepage and treated effluent discharge impacts on surface water.</p>	Y	N	N	N	Permit approval or proof of the Ministry's satisfaction with the submitted information	

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Commitment List and Information			Implementation Schedule				Documentary Compliance Proof / Evidence to be Maintained on File (subject to change)	Compliance Status (this column will be populated in annual compliance reports)
Tracking No.	Category	Commitment	Design/Planning	Construction	Operation	Closure		
EA-PC11.2	Water Quality	<p>Provincial EA Condition 11.2 - Surface Water Quality</p> <p>- Prior to submitting its application for an industrial sewage works Environmental Compliance Approval, the Proponent shall develop, to the satisfaction of the Ministry's Regional Technical Support Section, receiver-based effluent discharge criteria consistent with provincial water management policies and Procedure B-1-5 (Deriving Receiving-Water Based, Point-Source Effluent Requirements for Ontario Waters, July 1994). If necessary, the Proponent shall propose enhanced treatment or alternate treatment to achieve receiver-based effluent discharge criteria. The Proponent shall submit these materials to the Environmental Compliance Approval Director when applying for its industrial sewage works Environmental Compliance Approval.</p> <p>MECP Clarification (April 2019): The proposed discharge locations for treated effluent have changed and discharge at those locations was not part of the EA. The proponent needs to develop receiver-based effluent discharge criteria acceptable to the MECP Regional Technical Support for the construction and operation phases, prior to beginning construction of site infrastructure.</p>	Y	N	N	N	Permit approval or proof of the Ministry's satisfaction with the submitted information	
EA-PC11.3	Water Quality	<p>Provincial EA Condition 11.3 - Surface Water Quality</p> <p>- When developing receiver-based effluent discharge criteria, the Proponent shall provide, to the satisfaction the Ministry's Regional Technical Support Section, updated baseline data to characterize temporal variability, and to ensure data adequacy for the provincial approval process and for statistical design of the Environmental Compliance Approval monitoring program. The updated baseline data shall include depth-stratified sampling from Neville and Mesomikenda Lakes during summer thermal stratification.</p> <p>MECP Clarification (April 2019): The proponent should consult with MECP Regional Technical Support about the implications for baseline data collection needs arising from changes in project design that</p>	Y	N	N	N	<p>Compliance Monitoring Program Report</p> <p>Permit approval or proof of the Ministry's satisfaction with the submitted information</p> <p>Annual Compliance Reports noting changes to program</p>	

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Tracking No.	Category	Commitment	Design/Planning	Construction	Operation	Closure		
		<p>have occurred since the EA. Prior to discussion with MECP Regional Technical Support, the proponent should provide the MECP with: a) summary of all baseline surface water sampling (e.g. water, sediment, aquatic biology, limnology, hydrology, fish tissue mercury) done to date (locations, dates, parameters, method detection limits, descriptive statistics, QA/QC); b) electronic EXCEL spreadsheet(s) containing the baseline data; and c) statistical design of the baseline monitoring program for detecting change over time through the construction phase and operation phase. A comprehensive and robust baseline surface water monitoring program is necessary to support provincial approvals and permitting. The statistical design and sampling plan for the monitoring program are part of evaluating baseline data adequacy. If gaps in baseline data are identified, the period prior to construction is the window of opportunity for collecting additional samples from waterbodies exposed to potential impacts from construction and operations. Please note, the need for depth-stratified sampling is triggered by existence of thermal stratification and not a depth criterion. The EA and Environmental Effects Review report have documented thermal stratification of lakes in the project area, including lakes that will receive treated effluent or potential seepage. Depth stratified sampling remains applicable. Eligible lakes should be identified as part of baseline data optimization, in consultation with MECP Technical Support. Any changes to the lakes that will require depth stratified sampling should be documented in the Compliance Monitoring Program (refer to Condition 5). Rationale and justification for these changes should be provided in the Compliance Monitoring Program.</p>						

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Tracking No.	Category	Commitment	Design/Planning	Construction	Operation	Closure		
EA-PC11.4	Water Quality	<p>Provincial EA Condition 11.4 - Surface Water Quality</p> <p>- When developing receiver-based effluent discharge criteria, the Proponent shall submit an assessment of mine-origin nutrient impacts to surface water that have been completed to the satisfaction of the Ministry's Regional Technical Support Section. This assessment shall include updated baseline data with additional multiple years of low-level total phosphorus samples in proposed receivers of domestic sewage effluent and mine effluent, and multiple years of end-of-summer (mid-August to mid-September) temperature and dissolved oxygen profiles from the deepest locations in Neville Lake and every basin of Mesomikenda Lake. The Proponent shall evaluate the potential for mine development (effluent discharge, changes in land use, altered hydrology) to impact thermal and dissolved oxygen habitat for lake-dwelling cold water fish species, including in Neville Lake and Mesomikenda Lake, and if necessary shall develop mitigation measures such as receiving water-based effluent criteria for nutrients. The Proponent shall include these details in its mine-origin nutrient impact assessment.</p> <p>MECP Clarification (April 2019): This condition remains applicable. Nutrient impact assessment and design of mitigation (if necessary) remains a requirement for this undertaking. Two lakes are named in this condition, but the changes in project design since the EA will result in additional lakes being exposed to changes in nutrient inputs as a consequence of watershed development and treated effluent discharge. The mine-origin nutrient impact assessment should evaluate the effect of development within lake watersheds and effluent discharge criteria on: a) lake water chemistry, including comparison to the Provincial Water Quality Objective for total phosphorus, and b) cold water fish habitat (dissolved oxygen and temperature). The EA and Environmental Effects Review report identified the following lakes as containing cold water fish species: Attach, Bagsverd, Chester, Cote, Dividing, Lower Three Duck, Middle</p>	Y	N	N	N	<p>Compliance Monitoring Program Report</p> <p>Permit approval or proof of the Ministry's satisfaction with the submitted information</p> <p>Annual Compliance Reports noting changes to program</p>	

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		Three Duck, Upper Three Duck, Neville, Mesomikenda, Schist, and Weeduck. The nutrient impact assessment must identify and include all lakes exposed to changes in nutrient inputs as a consequence of watershed development and treated effluent discharge. It is the understanding of MECP Regional Technical Support that Bagsverd Lake and Three Duck Lake (Upper) are not the only lakes exposed to potential increased nutrient loading. The mine-origin nutrient impact assessment, including identification of affected lakes, should be submitted for review and feedback as part of consultation with MECP Regional Technical Support. Any changes to the lakes that will be monitoring should be documented in the Compliance Monitoring Program (refer to Condition 5). Rationale and justification for these changes should be provided in the Compliance Monitoring Program.						
EA-PC12.1	Groundwater	<p>Provincial EA Condition 12.1 - Groundwater</p> <p>- The Proponent shall submit to the Environmental Compliance Approval Director a waste rock adaptive management approach proposal, prepared to the Ministry's satisfaction, which outlines the Proponent's strategy for ensuring that waste material that is potentially acid generating (based on geochemical monitoring) will ultimately be randomly distributed in the waste rock area during Construction, operations and closure phases of the Undertaking. The Proponent shall submit its waste rock adaptive management approach proposal with its industrial sewage Environmental Compliance Approval application and in its Closure Plan submission to the Ministry of Northern Development and Mines.</p> <p>MECP Clarification (April 2019): Conditions 12.1 to 12.4 remain applicable. It should be noted that any hydrogeological investigation and modelling conducted for the EA may have limited applicability to the new proposal. Project design changes include relocations of the Tailings Management Facility, mine rock and overburden stockpiles, plant site, accommodations, and waterway re-alignments. These changes</p>	Y	N	N	N	<p>Permit approval or proof of the Ministry's satisfaction with the submitted information</p> <p>Proof of inclusion in the Closure Plan submission</p>	

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		alter the geographic area and the groundwater flow systems affected by the mine, as well as the potential for groundwater seepage impacts to surface waters. Collection of geological and hydrogeological field data will be required to characterize the new geographic location of the Tailings Management Facility and the new location will require the development of a new hydrogeological model (refer to Condition 12.2 and Condition 12.3).						
EA-PC12.2	Groundwater	<p>Provincial EA Condition 12.2 - Groundwater</p> <p>- The Proponent shall submit a hydrogeological model sensitivity analysis with the submission of its industrial sewage Environmental Compliance Approval application to the Environmental Compliance Approval Director and Permit to Take Water application. The Proponent shall assess the model's sensitivity to changes in the hydraulic conductivity of each model layer, both individually and across a wider range of realistic values, to demonstrate that it can accurately represent field test results.</p> <p>MECP Clarification (April 2019): Conditions 12.1 to 12.4 remain applicable. It should be noted that any hydrogeological investigation and modelling conducted for the EA may have limited applicability to the new proposal. Project design changes include relocations of the Tailings Management Facility, mine rock and overburden stockpiles, plant site, accommodations, and waterway re-alignments. These changes alter the geographic area and the groundwater flow systems affected by the mine, as well as the potential for groundwater seepage impacts to surface waters. Collection of geological and hydrogeological field data will be required to characterize the new geographic location of the Tailings Management Facility and the new location will require the development of a new hydrogeological model (refer to Condition 12.2 and Condition 12.3).</p>	Y	N	N	N	Permit approval or proof of the Ministry's satisfaction with the submitted information	

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EA-PC12.3	Groundwater	<p>Provincial EA Condition 12.3 - Groundwater</p> <p>- To the satisfaction of the Ministry, the Proponent shall collect geological and hydrogeological field data and carry out modelling to adequately characterize seepage pathways from the tailings management facility, and develop: robust mitigation measures; a visual inspection program; a seepage monitoring program; a groundwater monitoring program; and a tailings management facility seepage contingency plan including an explanation of what mechanisms will trigger the application of the seepage contingency plan. The Proponent shall submit this information to the Environmental Compliance Approval Director together with its industrial sewage works Environmental Compliance Approval application and Permit to Take Water application.</p> <p>MECP Clarification (April 2019): Conditions 12.1 to 12.4 remain applicable. It should be noted that any hydrogeological investigation and modelling conducted for the EA may have limited applicability to the new proposal. Project design changes include relocations of the Tailings Management Facility, mine rock and overburden stockpiles, plant site, accommodations, and waterway re-alignments. These changes alter the geographic area and the groundwater flow systems affected by the mine, as well as the potential for groundwater seepage impacts to surface waters. Collection of geological and hydrogeological field data will be required to characterize the new geographic location of the Tailings Management Facility and the new location will require the development of a new hydrogeological model (refer to Condition 12.2 and Condition 12.3).</p>	Y	N	N	N	Permit approval or proof of the Ministry's satisfaction with the submitted information	

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EA-PC12.4	Groundwater	<p>Provincial EA Condition 12.4 - Groundwater</p> <p>- The Proponent shall provide specific details regarding waste rock pile seepage and runoff collection, monitoring, treatment and contingencies in support of its industrial sewage works Environmental Compliance Approval application and in its Closure Plan submission to the Ministry of Northern Development and Mines.</p> <p>MECP Clarification (April 2019): Conditions 12.1 to 12.4 remain applicable. It should be noted that any hydrogeological investigation and modelling conducted for the EA may have limited applicability to the new proposal. Project design changes include relocations of the Tailings Management Facility, mine rock and overburden stockpiles, plant site, accommodations, and waterway re-alignments. These changes alter the geographic area and the groundwater flow systems affected by the mine, as well as the potential for groundwater seepage impacts to surface waters. Collection of geological and hydrogeological field data will be required to characterize the new geographic location of the Tailings Management Facility and the new location will require the development of a new hydrogeological model (refer to Condition 12.2 and Condition 12.3).</p>	Y	N	N	N	<p>Permit approval or proof of the Ministry's satisfaction with the submitted information</p> <p>Proof of inclusion in the Closure Plan submission</p>	
EA-PC13.1	Polishing Pond Discharge Pipeline Alignment	<p>Provincial EA Condition 13.1 - Polishing Pond Discharge Pipeline Alignment</p> <p>- Prior to obtaining Ministry of Natural Resources and Forestry approval to construct the polishing pond discharge pipeline, the Proponent shall submit, to the satisfaction of the Timmins District Planner at the Ministry of Natural Resources and Forestry, a report that describes the polishing pond discharge pipeline's proposed alignment from the polishing pond to the effluent discharge location.</p> <p>MECP Clarification (April 2019): The Ministry of Natural Resources and Forestry has identified that Condition 13.1 and Condition 13.2 are no longer applicable because of changes to the project since the</p>	Y	N	N	N	Compliance Monitoring Program Report	

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		approval of the EA. However, this condition and the rationale for why it is no longer applicable should be documented in the Compliance Monitoring Program Report (refer to Condition 5)						
EA-PC13.2	Polishing Pond Discharge Pipeline Alignment	<p>Provincial EA Condition 13.2 - Polishing Pond Discharge Pipeline Alignment</p> <p>- The report shall, at a minimum, describe: a) The preferred pipeline alignment; b) The activity and works required for the construction of the pipeline; c) Potential impacts from the pipeline to fish and wildlife, and proposed mitigation steps; d) Details of property ownership over lands where the pipeline will be located; and, e) Best management practices acceptable to the Ministry of Natural Resources and Forestry, for the construction of the pipeline.</p> <p>MECP Clarification (April 2019): The Ministry of Natural Resources and Forestry has identified that Condition 13.1 and Condition 13.2 are no longer applicable because of changes to the project since the approval of the EA. However, this condition and the rationale for why it is no longer applicable should be documented in the Compliance Monitoring Program Report (refer to Condition 5)</p>	Y	N	N	N	Compliance Monitoring Program Report	
EA-PC14.1	Transmission Line	<p>Provincial EA Condition 14.1 - Transmission Line Crossing at Mesomikenda Lake</p> <p>- Prior to obtaining the necessary approvals in order to construct the transmission line, the Proponent shall consult with staff at the Ministry of Natural Resources and Forestry's Timmins District Office about the final details regarding the transmission line crossing at Mesomikenda Lake.</p> <p>MECP Clarification (April 2019): The Ministry of Natural Resources and Forestry has identified that Condition 14.1 and Condition 14.2 are no longer applicable because of changes to the project since the approval of the EA. However, this condition and the rationale for why it is no longer applicable should be documented in the Compliance Monitoring Program Report (refer to Condition 5)</p>	Y	N	N	N	Compliance Monitoring Program Report	

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EA-PC14.2	Transmission Line	<p>Provincial EA Condition 14.2 - Transmission Line Crossing at Mesomikenda Lake</p> <p>- The Proponent shall then prepare a report, to the satisfaction of the Ministry of Natural Resources and Forestry, that at a minimum will describe: a) The final location of the transmission line crossing at Mesomikenda Lake; b) The activity and works required for the construction of the transmission line crossing at Mesomikenda Lake; c) Potential impacts to fish and wildlife from the construction of the transmission line crossing at Mesomikenda Lake, and proposed mitigation steps; d) Details of property ownership over lands where the transmission line crossing will be located; and, e) Best management practices, acceptable to the Ministry of Natural Resources and Forestry, for the construction of the transmission line crossing at Mesomikenda Lake.</p> <p>MECP Clarification (April 2019): The Ministry of Natural Resources and Forestry has identified that Condition 14.1 and Condition 14.2 are no longer applicable because of changes to the project since the approval of the EA. However, this condition and the rationale for why it is no longer applicable should be documented in the Compliance Monitoring Program Report (refer to Condition 5)</p>	Y	N	N	N	Compliance Monitoring Program Report	
EA-PC15	General	<p>Provincial EA Condition 15</p> <p>- The Proponent shall provide copies of the reports referenced in Conditions 13 and 14, plus its applications for Permits to Take Water and Environmental Compliance Approvals, to the Aboriginal Communities that were notified of the Undertaking during the Environmental Assessment process, when it submits those materials to the Ministry of Natural Resources and Forestry and the Ministry, respectively.</p> <p>MECP Clarification (April 2019): This condition requires the proponent to provide copies of reports and applications for Permits to Take Water and Environmental Compliance Approvals to</p>	Y	N	N	N	<p>Compliance Monitoring Program Report</p> <p>Indigenous Consultation Plan</p> <p>Record of Consultation</p>	

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		Aboriginal communities. It would be good practice for the proponent to provide these reports and applications to communities in advance of providing them to the MECP, in order to incorporate comments or concerns from communities. The MECP's expectation is that if reporting for permits and approvals is required, then the proponent will share these reports with communities. The proponent should continue to engage these communities through the current phases of the project, in the absence of any consultation plan (refer to Condition 9). Any changes to types of reports/applications that will be provided to Aboriginal communities should be documented in the Compliance Monitoring Program (refer to Condition 5). Rationale and justification for these changes should be provided in the Compliance Monitoring Program.						
EA-PC16.1	Tailings Management	<p>Provincial EA Condition 16.1 - Tailings Management and Related Climate Change Considerations</p> <ul style="list-style-type: none"> - The Proponent shall fulfill all requirements and commitments related to tailings management, including maintaining a sufficient water cover over deposited tailings and fulfilling monitoring requirements detailed in provincial regulatory documents, including the Closure Plan and any other permits and approvals associated with the Undertaking. - In addition, the Proponent shall consider deterrent systems to ward off bird and animal life from accessing the tailings management area and polishing pond during operation and decommissioning. <p>MECP Clarification (April 2019): Although, a water cover over the tailings was not considered as a TMF design element in the EA, this condition remains applicable because of the importance of appropriately managing the tailings to protect the surrounding environment (i.e. if the ore being mined has the potential to have acid rock drainage).</p>	Y	N	Y	Y	<p>OMS Manual</p> <p>Closure Plan</p>	
EA-PC16.2	Tailings Management	Provincial EA Condition 16.2 - Tailings Management and Related Climate Change Considerations	Y	Y	Y	Y	Annual Compliance Reports (proof of assessment)	

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		<p>- The Proponent shall assess and utilize provincial, national and international industry best practices for tailings management and water management containment facilities as they relate to climate change and the increasing frequency of severe weather abnormalities. The management of tailings, based on this assessment, shall be done in a manner adequate to ensure the appropriate management of any contaminants that may be present during and beyond the operating life of the Undertaking.</p> <p>- The Proponent shall, as part of the Compliance Reports required under Condition 6, or otherwise specified in writing by the Director, provide details to the Ministry on how actions required by this condition have been considered in the project design, operations and the Closure Plan for the Undertaking.</p>						
EA-PC17.1	Terrestrial Biology	<p>Provincial EA Condition 17.1 - Protection of Biodiversity and the Terrestrial Systems and Habitat Monitoring Plan</p> <p>- The Proponent shall assess and utilize best practices to protect the biodiversity of existing species within the area of the Undertaking. In consultation with the Aboriginal Communities that were notified of the Undertaking during the Environmental Assessment, and building on the baseline studies already completed during the Environmental Assessment process including aquatic resources, terrestrial and species at risk baselines, the Proponent shall establish a pre-Construction biodiversity baseline and report on biodiversity levels within the area of the Undertaking. The Proponent shall, as part of the Compliance Reports required under Condition 6 or as otherwise specified in writing by the Director, provide details to the Ministry on how the requirements set out in this condition have been and are being met.</p> <p>MECP Clarification (April 2019): Conditions 17.1 to 17.3 remain applicable. The proponent is required to build on the baseline work and assess and utilize best practices. As part of compliance reporting, the proponent should provide details to the MECP and the</p>	Y	N	N	N	<p>Terrestrial Systems & Habitat Biodiversity Management and Monitoring Plan</p> <p>Indigenous Consultation Plan</p> <p>Record of Consultation</p> <p>Annual Compliance Reports</p>	

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		MNRF on how the requirements set out in these conditions are being met (refer to Condition 17.1). Also, the MNRF has confirmed the need for a monitoring plan and look forward to reviewing a draft plan. The approved EA made predictions about impacts to terrestrial systems and habitats, as well as proposed mitigation to address these impacts. A Terrestrial Systems and Habitat Monitoring Plan is still required to guide how the predictions made during the EA will be verified and how effectiveness of mitigation implemented is subsequently assessed. It is the MNRF's expectation that the plan will describe the predicted species and habitat responses through mine life and closure, and layout the specific methods that will be followed to assess these, including periodicity of monitoring for ungulates, furbearers, avian species, and their associated habitat. Any changes to monitoring periodicity should be documented in the Compliance Monitoring Program (refer to Condition 5). Rationale and justification for these changes should be provided in the Compliance Monitoring Program.						
EA-PC17.2	Terrestrial Biology	Provincial EA Condition 17.2 - Protection of Biodiversity and the Terrestrial Systems and Habitat Monitoring Plan In addition to fulfilling all commitments with regard to rehabilitating wildlife habitat and terrestrial systems, the Proponent shall consult with the Ministry of Natural Resources and Forestry and with the Aboriginal Communities that were notified of the Undertaking during the Environmental Assessment on the development of a monitoring plan for terrestrial systems and habitat. The Proponent shall prepare a draft monitoring plan before the start of Construction, and shall provide a draft of it to the Ministry of Natural Resources and Forestry and the Aboriginal Communities for review before the plan is finalized. The monitoring plan for terrestrial systems and habitat shall at a minimum include: a) The monitoring of ungulates and furbearers in impacted and reference locations. This monitoring would include winter track surveys prior to construction and regularly during operations to determine trends in the frequency and	Y	N	N	N	Terrestrial Systems & Habitat Biodiversity Management and Monitoring Plan Compliance Monitoring Program Report Indigenous Consultation Plan Record of Consultation	

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		<p>extent of habitat utilization within affected habitat types and to confirm the presence and/or absence of species at risk in the area potentially affected by the Undertaking; and b) The monitoring of avian species in impacted and reference locations. This monitoring would include a reasonable number of avian point counts every year to determine trends in the frequency and extent of habitat utilization within affected habitat types and to confirm the presence and/or absence of species at risk in the area potentially affected by the Undertaking.</p> <p>MECP Clarification (April 2019): Conditions 17.1 to 17.3 remain applicable. The proponent is required to build on the baseline work and assess and utilize best practices. As part of compliance reporting, the proponent should provide details to the MECP and the MNRF on how the requirements set out in these conditions are being met (refer to Condition 17.1). Also, the MNRF has confirmed the need for a monitoring plan and look forward to reviewing a draft plan. The approved EA made predictions about impacts to terrestrial systems and habitats, as well as proposed mitigation to address these impacts. A Terrestrial Systems and Habitat Monitoring Plan is still required to guide how the predictions made during the EA will be verified and how effectiveness of mitigation implemented is subsequently assessed. It is the MNRF's expectation that the plan will describe the predicted species and habitat responses through mine life and closure, and layout the specific methods that will be followed to assess these, including periodicity of monitoring for ungulates, furbearers, avian species, and their associated habitat. Any changes to monitoring periodicity should be documented in the Compliance Monitoring Program (refer to Condition 5). Rationale and justification for these changes should be provided in the Compliance Monitoring Program.</p>						

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EA-PC17.3	Terrestrial Biology	<p>Provincial EA Condition 17.3 - Protection of Biodiversity and the Terrestrial Systems and Habitat Monitoring Plan</p> <p>- The Proponent shall carry out the plan during Construction, operation and closure of the Undertaking. The purpose of the monitoring plan is to verify the accuracy of the predictions the Proponent made during the Environmental Assessment about the Undertaking's impacts on terrestrial systems and habitat, to monitor the effectiveness of rehabilitation efforts for wildlife habitat and terrestrial environments, and to implement adaptive management measures to protect biodiversity within the area potentially affected by the Undertaking. The Proponent shall report on biodiversity baseline and results required by Condition 17.1 through the Terrestrial Systems and Habitat Monitoring Plan.</p> <p>MECP Clarification (April 2019): Conditions 17.1 to 17.3 remain applicable. The proponent is required to build on the baseline work and assess and utilize best practices. As part of compliance reporting, the proponent should provide details to the MECP and the MNRF on how the requirements set out in these conditions are being met (refer to Condition 17.1). Also, the MNRF has confirmed the need for a monitoring plan and look forward to reviewing a draft plan. The approved EA made predictions about impacts to terrestrial systems and habitats, as well as proposed mitigation to address these impacts. A Terrestrial Systems and Habitat Monitoring Plan is still required to guide how the predictions made during the EA will be verified and how effectiveness of mitigation implemented is subsequently assessed. It is the MNRF's expectation that the plan will describe the predicted species and habitat responses through mine life and closure, and layout the specific methods that will be followed to assess these, including periodicity of monitoring for ungulates, furbearers, avian species, and their associated habitat. Any changes to monitoring periodicity should be documented in the Compliance Monitoring Program (refer to Condition 5). Rationale</p>	N	Y	Y	Y	<p>Terrestrial Systems & Habitat Biodiversity Management and Monitoring Plan</p> <p>Annual Compliance Reports</p>	

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		and justification for these changes should be provided in the Compliance Monitoring Program.						
EA-PC18.1	Methyl Mercury	<p>Provincial EA Condition 18.1 - Methyl Mercury Monitoring</p> <ul style="list-style-type: none"> - To establish baseline conditions, the Proponent shall undertake monitoring of methyl mercury levels prior to dam construction as well as post dam construction to determine if methyl mercury levels in fish tissue and surface water have become elevated as a result of alterations to waterways. The mercury monitoring program shall include, but need not be limited to, data from lakes with water level increases (Bagsverd Lake, Chester Lake), lakes downstream of Chester Lake exposed to re-directed flow (Clam Lake), and other lakes exposed to potential effluent sulfate stimulation (Neville Lake). - The Proponent must conduct the methyl mercury sampling and analysis in accordance with Ministry guidance and protocols. The Proponent must prepare a study plan outlining the frequency of proposed sampling during the pre-dam construction and post-dam construction periods, and include this study plan in the Compliance Monitoring Program Report required by Condition 5 of this Notice of Approval. The results of the monitoring will be submitted to the District Manager and made available to the public on the proponent website. <p>MECP Clarification (April 2019): During the EA, the proponent received the MECP Northern Region guidance document for mercury monitoring. The proponent should consult with the MECP Regional Technical Support about the implications for baseline data collection needs arising from changes in project design that have occurred since the EA. A first step is for the proponent to provide the MECP with the baseline data collected to date (refer to Condition 11.3), including low-level mercury (total, methyl) in water and mercury in fish tissue. The proponent should also consult with the MECP Regional Technical Support when selecting monitoring locations. Any changes to monitoring locations should be documented in the</p>	Y	Y	Y	N	<p>Compliance Monitoring Program Report</p> <p>Aquatic Management and Monitoring Plan</p>	

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		Compliance Monitoring Program (refer to Condition 5). Rationale and justification for these changes should be provided in the Compliance Monitoring Program.						
EA-PC19.1	General	Provincial EA Condition 19.1 - Review of the Environmental Assessment - If, within 5 years of the date on this Notice of Approval, the Proponent has not submitted its applications for Environmental Compliance Approvals and Permits to Take Water to the relevant Ministry Directors, then the Proponent shall engage with the Aboriginal Communities that were notified of the Undertaking during the Environmental Assessment process in order to conduct a review of the Environmental Assessment to determine if there have been any changes in the uses of lands and resources around the Site for traditional purposes by the Aboriginal Communities who were notified of the Undertaking during the environmental Assessment process.	Y	N	N	N	Project schedule	
EA-PC19.2	General	Provincial EA Condition 19.2 - Review of the Environmental Assessment - The Proponent shall prepare a report that sets out the findings of its review and includes a record of consultation with Aboriginal communities that participated in it, and submit it no later than 90 days after the 5 year anniversary of the date of this Notice of Approval to the Director who will confirm whether the Proponent has complied with Condition 19.1, and to the Aboriginal Communities who were notified of the Undertaking during the Environmental Assessment process. This review report shall detail any changes in the uses of lands and resources around the Site for traditional purposes, and shall state whether and how the Environmental Assessment's effects analysis, anticipated impacts, and associated mitigation measures remain comprehensive and effective in light of these evolving land uses.	Y	N	N	N	Project schedule	

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EA-PC19.3	General	Provincial EA Condition 19.3 - Review of the Environmental Assessment - If the review report identifies uses of lands and resources around the Site for traditional purposes that were not considered in the Environmental Assessment, the review report will describe those changes and explain how impacts from the Undertaking on those practices will be mitigated.	Y	N	N	N	Project schedule	
EA-PC20.1	General	Provincial EA Condition 20.1 - Duration of Approval - If, within 10 years of the date on this Notice of Approval, the Proponent has not started Construction, the Proponent shall prepare a further report in consultation with the Aboriginal Communities that were notified of the Undertaking during the Environmental Assessment, and submit it to the Director, that shall detail any changes in the uses of lands and resources around the Site for traditional purposes, and shall state whether and how to show that the Environmental Assessment's effects analysis, anticipated impacts, and associated mitigation measures remain comprehensive and effective in light of these evolving land uses. If this further report identifies uses of lands and resources around the Site for traditional purposes that were not considered in the Environmental Assessment, the report must describe those changes and explain how impacts from the Undertaking on those practices will be mitigated. The further report shall also include a detailed description of: the consultation undertaken with the Aboriginal communities that were notified of the Undertaking during the Environmental Assessment in preparation of the report; the Undertaking's progress to that point in time; the reasons why Construction has not yet commenced; and a forecast of the likelihood that Construction will commence within the following five years.	Y	N	N	N	Project schedule	

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EA-PC20.2	General	Provincial EA Condition 20.2 - Duration of Approval - No later than 90 days after the 10-year anniversary of this Notice of Approval, the Proponent shall submit this further report to the Director who will confirm whether the Proponent has complied with Condition 20.1.	Y	N	N	N	Project schedule	
EA-PC20.3	General	Provincial EA Condition 20.3 - Duration of Approval - If Site Construction has not commenced within 15 years of the date of this Notice of Approval, the Approval will expire.	Y	N	N	N	Project schedule	
EA-PC21.1	Notice of Construction	Provincial EA Condition 21.1 - Notice of Construction '- 60 days prior to the start of Construction, or at such other time as may be stipulated in writing by the Director, the Proponent shall provide notification to the Director of the Proponent's intention to proceed with Construction of the Undertaking. If, since the date of the Notice of Approval shown below, significant changes have occurred to applicable regulatory regimes or to the existing environment around the Site and those changes could affect the Undertaking or result in any new potential adverse environmental effects from it, the Proponent shall include a description of those changes in its notice of Construction. The Proponent shall provide the notice of Construction to: the Director; the Regional Director of the Ministry; Northeast Regional Director of the Ministry of Natural Resources and Forestry; the Timmins Office Regional Supervisor of the Ministry of Northern Development and Mines; and any other relevant agencies that the Proponent or the Director determine may have an interest in any changes described in the notice of Construction.	Y	N	N	N	Notice of Construction submission	

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EA-PC22.1	Climate Change	<p>Provincial EA Condition 22.1 - Climate Change</p> <p>The Proponent shall ensure that the Undertaking is capable of adapting to climate change during all phases of the Undertaking, and to that end the Proponent shall:</p> <p>a) Plan its Construction practices, operational procedures and design of the Undertaking to respond to storms, flooding (including consideration of the 500-year flood level), drought or other severe weather events resulting from climate change;</p> <p>b) Design the post-closure aspects of the Site to ensure its resilience to climate change impacts, such as by maintaining an appropriate Site water balance and sufficient water cover over the tailings management area;</p> <p>c) Undertake an updated review of climate change scenarios at a point approximately two years prior to implementing final closure of the tailings management area to confirm or modify anticipated future hydrological conditions related to climate change scenarios;</p> <p>d) As part of the Compliance Reports required under Condition 6 above, or otherwise specified in writing by the Director, provide details to the Ministry on how climate change has been incorporated into the design of the Undertaking;</p> <p>e) Include these Climate Change considerations, as appropriate, in the Closure Plan or future Closure Plan amendments that it submits to the Ministry of Northern Development and Mines.</p> <p>MECP Clarification (April 2019): Although, a water cover over the tailings was not considered as a TMF design element in the EA, this condition remains applicable. The proponent should ensure that the undertaking is capable of adapting to climate change and designing aspects of the site to ensure its resilience to climate change impacts, such as by maintaining sufficient water cover over the tailings management area.</p>	Y	Y	Y	Y	<p>Annual Compliance Reports</p> <p>Design/Engineering records</p> <p>OMS Manual</p> <p>Water Management and Monitoring Plan</p> <p>Closure Plan amendments</p>	

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Tracking No.	Category	Commitment	Design/Planning	Construction	Operation	Closure		
EA-PC23.1	Best Management Practices Review	<p>Provincial EA Condition 23.1 - Best Management Practices and Best Available Technology</p> <p>- One year prior to the start of the Construction, operation, and closure phases of the Undertaking, or at such other time as may be stipulated in writing by the Director, the Proponent shall undertake reviews of the preferred methods for the following elements of the Undertaking, and shall prepare and submit written reports of the reviews to the Director: the ore processing plant, tailings management facility, mine water management, mine rock area and overburden management, process effluent treatment, water supply and discharge, watercourse realignments, waste management facilities and domestic sewage treatment, and mine closure. In the review reports, the Proponent shall explain whether and how the preferred methods for the aforementioned elements of the Undertaking continue to reflect industry best practices and the best technology available, and whether and how they continue to appropriately balance environmental, economic, and technical considerations. If, following the reviews, the Proponent determines that changes are necessary to the Construction, operation, and/or closure phases of the Undertaking, the Proponent shall include a description of those changes in the review reports.</p> <p>MECP Clarification (April 2019): This condition remains applicable. The proponent is in compliance with this condition through the submission of the Environmental Effects Review report. The Environmental Effects Review report was submitted to the MECP on September 11, 2018. However, this condition and the rationale for why the proponent is in compliance should be documented in the Compliance Monitoring Program Report (refer to Condition 5).</p>	Y	Y	Y	N	<p>Pre-construction: Record of Consultation (proof of submission of EER), Compliance Monitoring Program Report</p> <p>Pre-operation and pre-closure: Record of Consultation (proof of submission of review)</p>	
EA-PC24.1	General	<p>Provincial EA Condition 24.1 - Other Permits and Approvals</p> <p>- The Proponent shall obtain other necessary permits and approvals including, but not limited to, those to which it has committed in the Environmental Assessment.</p>	Y	Y	Y	Y	Permits and approvals obtained throughout Project life	



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EA-PC25.1	General	Provincial EA Condition 25.1 - Construction, Operation, Maintenance, Commitments and Contracts In carrying out the Undertaking, the Proponent shall: a) Fulfil the commitments it made in the Cote Gold Environmental Assessment process, including those made in the Environmental Assessment and in the Proponent's responses to comments received during the formal Environmental Assessment public comment periods; b) Meet the regulatory standards applicable throughout the life of the Undertaking, including regarding the Construction, operation and maintenance of the Undertaking. The applicable standards include the conditions of approval contained within this Notice of Approval; c) Obtain any necessary approvals, permits or licenses; and, d) Require that its contractors, subcontractors, and employees likewise fulfill all applicable conditions and meet all applicable regulatory standards.	Y	Y	Y	Y	Annual Compliance Reports Relevant audit and inspection records associated with the implementation of the management plans Contractual documents Training records	
EA-PC26.1	General	Provincial EA Condition 26.1 - Amending Procedures - Prior to implementing any proposed changes to the Undertaking, the Proponent shall determine what Environmental Assessment Act requirements are applicable to the proposed changes and shall fulfill those Environmental Assessment Act requirements. If a contemplated change to the Undertaking would result in no new net effects, it shall be considered a minor amendment. In such cases, the Proponent will be required to provide an Addendum to the Ministry to document the change and demonstrate that there are no new net effects associated with it. The Proponent shall consult with the Ministry about any consultation requirements that may apply, and whether any changes can be permitted without an amendment to the Environmental Assessment.	Y	Y	Y	Y	Record of Consultation (proof of submission of EER, and any future addendum) Reviews of material project changes since the EER	

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Appendix D

Compliance Status for MECP-Specified Conditions



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Appendix D – Compliance Status for MECP-Specified Conditions



Commitment List and Information			Implementation Schedule				Compliance Status
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Conditions Related to Project Optimization							
EA-PC13.1	Polishing Pond Discharge Pipeline Alignment	<i>Provincial EA Condition 13.1 - Polishing Pond Discharge Pipeline Alignment</i> Prior to obtaining Ministry of Natural Resources and Forestry approval to construct the polishing pond discharge pipeline, the Proponent shall submit, to the satisfaction of the Timmins District Planner at the Ministry of Natural Resources and Forestry, a report that describes the polishing pond discharge pipeline's proposed alignment from the polishing pond to the effluent discharge location. <u>MECP Clarification (April 2019)</u> : The Ministry of Natural Resources and Forestry has identified that Condition 13.1 and Condition 13.2 are no longer applicable because of changes to the project since the approval of the EA. However, this condition and the rationale for why it is no longer applicable should be documented in the Compliance Monitoring Program Report (refer to Condition 5)	Y	N	N	N	<i>Compliance tracking complete – condition to be archived.</i> Condition is related to the Project described in the Environmental Assessment (EA) and is not applicable to the optimized Project as described in the Environmental Effects Review (EER). The Ministry has agreed with this determination, confirming that the Ministry of Natural Resources and Forestry (MNRF) has identified that Condition 13.1 and Condition 13.2 are no longer applicable because of changes to the Project following the approval of the EA.

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EA-PC13.2	Polishing Pond Discharge Pipeline Alignment	<p><i>Provincial EA Condition 13.2 - Polishing Pond Discharge Pipeline Alignment</i></p> <p>The report shall, at a minimum, describe: a) The preferred pipeline alignment; b) The activity and works required for the construction of the pipeline; c) Potential impacts from the pipeline to fish and wildlife, and proposed mitigation steps; d) Details of property ownership over lands where the pipeline will be located; and, e) Best management practices acceptable to the Ministry of Natural Resources and Forestry, for the construction of the pipeline.</p> <p><u>MECP Clarification (April 2019)</u>: The Ministry of Natural Resources and Forestry has identified that Condition 13.1 and Condition 13.2 are no longer applicable because of changes to the project since the approval of the EA. However, this condition and the rationale for why it is no longer applicable should be documented in the Compliance Monitoring Program Report (refer to Condition 5)</p>	Y	N	N	N	<p><i>Compliance tracking complete – condition to be archived.</i></p> <p>Condition is related to the Project described in the EA and is not applicable to the optimized Project as described in the EER.</p> <p>The Ministry has agreed with this determination, confirming that the MNRF has identified that Condition 13.1 and Condition 13.2 are no longer applicable because of changes to the Project following the approval of the EA.</p>
EA-PC14.1	Transmission Line	<p><i>Provincial EA Condition 14.1 - Transmission Line Crossing at Mesomikenda Lake</i></p> <p>Prior to obtaining the necessary approvals in order to construct the transmission line, the Proponent shall consult with staff at the Ministry of Natural Resources and Forestry's Timmins District Office about the final details regarding the transmission line crossing at Mesomikenda Lake.</p> <p><u>MECP Clarification (April 2019)</u>: The Ministry of Natural Resources and Forestry has identified that Condition 14.1 and Condition 14.2 are no longer applicable because of changes to the project since the approval of the EA. However, this condition and the rationale for why it is no longer applicable should be documented in the Compliance Monitoring Program Report (refer to Condition 5)</p>	Y	N	N	N	<p><i>Compliance tracking complete – condition to be archived.</i></p> <p>Condition is related to the Project described in the EA and is not applicable to the optimized Project as described in the EER.</p> <p>The Ministry has agreed with this determination, confirming that the MNRF has identified that Condition 14.1 and Condition 14.2 are no longer applicable because of changes to the Project following the approval of the EA.</p>

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EA-PC14.2	Transmission Line	<p><i>Provincial EA Condition 14.2 - Transmission Line Crossing at Mesomikenda Lake</i></p> <p>The Proponent shall then prepare a report, to the satisfaction of the Ministry of Natural Resources and Forestry, that at a minimum will describe: a) The final location of the transmission line crossing at Mesomikenda Lake; b) The activity and works required for the construction of the transmission line crossing at Mesomikenda Lake; c) Potential impacts to fish and wildlife from the construction of the transmission line crossing at Mesomikenda Lake, and proposed mitigation steps; d) Details of property ownership over lands where the transmission line crossing will be located; and, e) Best management practices, acceptable to the Ministry of Natural Resources and Forestry, for the construction of the transmission line crossing at Mesomikenda Lake.</p> <p><u>MECP Clarification (April 2019)</u>: The Ministry of Natural Resources and Forestry has identified that Condition 14.1 and Condition 14.2 are no longer applicable because of changes to the project since the approval of the EA. However, this condition and the rationale for why it is no longer applicable should be documented in the Compliance Monitoring Program Report (refer to Condition 5)</p>	Y	N	N	N	<p><i>Compliance tracking complete – condition to be archived.</i></p> <p>Condition is related to the Project described in the EA and is not applicable to the optimized Project as described in the EER.</p> <p>The Ministry has agreed with this determination, confirming that the MNRF has identified that Condition 14.1 and Condition 14.2 are no longer applicable because of changes to the Project following the approval of the EA.</p>

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EA-PC23.1	Best Management Practices Review	<p><i>Provincial EA Condition 23.1 - Best Management Practices and Best Available Technology</i></p> <p>One year prior to the start of the Construction, operation, and closure phases of the Undertaking, or at such other time as may be stipulated in writing by the Director, the Proponent shall undertake reviews of the preferred methods for the following elements of the Undertaking, and shall prepare and submit written reports of the reviews to the Director: the ore processing plant, tailings management facility, mine water management, mine rock area and overburden management, process effluent treatment, water supply and discharge, watercourse realignments, waste management facilities and domestic sewage treatment, and mine closure. In the review reports, the Proponent shall explain whether and how the preferred methods for the aforementioned elements of the Undertaking continue to reflect industry best practices and the best technology available, and whether and how they continue to appropriately balance environmental, economic, and technical considerations. If, following the reviews, the Proponent determines that changes are necessary to the Construction, operation, and/or closure phases of the Undertaking, the Proponent shall include a description of those changes in the review reports.</p> <p><u>MECP Clarification (April 2019):</u> This condition remains applicable. The proponent is in compliance with this condition through the submission of the Environmental Effects Review report. The Environmental Effects Review report was submitted to the MECP on September 11, 2018. However, this condition and the rationale for why the proponent is in compliance should be documented in the Compliance Monitoring Program Report (refer to Condition 5).</p>	Y	Y	Y	N	<p><i>Compliance tracking complete for pre-construction phase. Condition remains active.</i></p> <p>Submission of the EER report: September 11, 2018.</p> <p>The Ministry has confirmed that IAMGOLD has complied with this condition through the submission of the EER report in written correspondence to IAMGOLD in February 2019.</p> <p>The EER report documents optimizations to the project design as a result of the Côté Gold Project Prefeasibility Study and also documented the review of mitigation and best management practices outlined in the EA and updated these commitments to current standards, as applicable.</p> <p>This condition remains applicable for reviews to be conducted pre-operation and pre-closure.</p>

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Documentation of Changes to Specific Activities							
EA-PC11.3	Water Quality	<p><i>Provincial EA Condition 11.3 - Surface Water Quality</i></p> <p>When developing receiver-based effluent discharge criteria, the Proponent shall provide, to the satisfaction the Ministry's Regional Technical Support Section, updated baseline data to characterize temporal variability, and to ensure data adequacy for the provincial approval process and for statistical design of the Environmental Compliance Approval monitoring program. The updated baseline data shall include depth-stratified sampling from Neville and Mesomikenda Lakes during summer thermal stratification.</p> <p><u>MECP Clarification (April 2019)</u>: The proponent should consult with MECP Regional Technical Support about the implications for baseline data collection needs arising from changes in project design that have occurred since the EA. Prior to discussion with MECP Regional Technical Support, the proponent should provide the MECP with: a) summary of all baseline surface water sampling (e.g. water, sediment, aquatic biology, limnology, hydrology, fish tissue mercury) done to date (locations, dates, parameters, method detection limits, descriptive statistics, QA/QC); b) electronic EXCEL spreadsheet(s) containing the baseline data; and c) statistical design of the baseline monitoring program for detecting change over time through the construction phase and operation phase. A comprehensive and robust baseline surface water monitoring program is necessary to support provincial approvals and permitting. The statistical design and sampling plan for the monitoring program are part of evaluating baseline data adequacy. If gaps in baseline data are identified, the period prior to construction is the window of opportunity for collecting additional samples from waterbodies exposed to potential impacts from construction and operations. Please note, the need for</p>	Y	N	N	N	<p>Depth stratified sampling occurs quarterly in the following lakes: Attach Lake, Bagsverd Lake Main Arm, Bagsverd Lake South Arm, Chester Lake, Chain Lake, Clam Lake, Dividing Lake, Little Clam Lake, Lower Three Duck Lake (temperature string), Lower Three Duck Pond, Middle Three Duck Lake (temperature string), Upper Three Duck Lake (temperature string), Mesomikenda Lake, Moore Lake, Neville Lake, New Lake, Saw Peter Lake, Schist Lake, Unnamed Lake 2, Weeduck Lake.</p> <p>The refinements to the list of lakes that are included in the depth stratification monitoring program have been made to align with the Construction Phase Environmental Compliance Approval (ECA), Approval # 6493-BXGLVZ.</p>

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		depth-stratified sampling is triggered by existence of thermal stratification and not a depth criterion. The EA and Environmental Effects Review report have documented thermal stratification of lakes in the project area, including lakes that will receive treated effluent or potential seepage. Depth stratified sampling remains applicable. Eligible lakes should be identified as part of baseline data optimization, in consultation with MECP Technical Support. Any changes to the lakes that will require depth stratified sampling should be documented in the Compliance Monitoring Program (refer to Condition 5). Rationale and justification for these changes should be provided in the Compliance Monitoring Program.					
EA-PC11.4	Water Quality	<p><i>Provincial EA Condition 11.4 - Surface Water Quality</i></p> <p>When developing receiver-based effluent discharge criteria, the Proponent shall submit an assessment of mine-origin nutrient impacts to surface water that have been completed to the satisfaction of the Ministry's Regional Technical Support Section. This assessment shall include updated baseline data with additional multiple years of low-level total phosphorus samples in proposed receivers of domestic sewage effluent and mine effluent, and multiple years of end-of-summer (mid-August to mid-September) temperature and dissolved oxygen profiles from the deepest locations in Neville Lake and every basin of Mesomikenda Lake. The Proponent shall evaluate the potential for mine development (effluent discharge, changes in land use, altered hydrology) to impact thermal and dissolved oxygen habitat for lake-dwelling cold water fish species, including in Neville Lake and Mesomikenda Lake, and if necessary shall develop mitigation measures such as receiving water-based effluent criteria for nutrients. The Proponent shall include these details in its mine-origin nutrient impact assessment.</p>	Y	N	N	N	A comprehensive Surface Water Monitoring Plan (SWMP) – Ver 3, September 2, 2020, has been developed and agreed to with the MECP as part of the Construction Phase Environmental Compliance Approval (Approval # 6493-BXGLVZ). Table 1 of the SWMP lists the lakes that are being sampled as per the respective ECA, with the full list as follows: Attach Lake Outlet, Bagsverd Pond, Bagsverd Lake Outlet, Bagsverd Lake South Arm Outlet, Bagsverd Lake Tributary (station will be removed in 2021), Chain Lake Outlet, Chester Lake Outlet, Chester Lake Tributary, Clam Lake Outlet (station to be moved to New Lake Outlet in 2021), Côté Lake Outlet, Delaney Lake Outlet Stream, Dividing Lake Outlet, Little Clam Lake Outlet (station to be moved to New Lake Outlet in 2021), Lower

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		<p><u>MECP Clarification (April 2019)</u>: This condition remains applicable. Nutrient impact assessment and design of mitigation (if necessary) remains a requirement for this undertaking. Two lakes are named in this condition, but the changes in project design since the EA will result in additional lakes being exposed to changes in nutrient inputs as a consequence of watershed development and treated effluent discharge. The mine-origin nutrient impact assessment should evaluate the effect of development within lake watersheds and effluent discharge criteria on: a) lake water chemistry, including comparison to the Provincial Water Quality Objective for total phosphorus, and b) cold water fish habitat (dissolved oxygen and temperature). The EA and Environmental Effects Review report identified the following lakes as containing cold water fish species: Attach, Bagsverd, Chester, Cote, Dividing, Lower Three Duck, Middle Three Duck, Upper Three Duck, Neville, Mesomikenda, Schist, and Weeduck. The nutrient impact assessment must identify and include all lakes exposed to changes in nutrient inputs as a consequence of watershed development and treated effluent discharge. It is the understanding of MECP Regional Technical Support that Bagsverd Lake and Three Duck Lake (Upper) are not the only lakes exposed to potential increased nutrient loading. The mine-origin nutrient impact assessment, including identification of affected lakes, should be submitted for review and feedback as part of consultation with MECP Regional Technical Support. Any changes to the lakes that will be monitoring should be documented in the Compliance Monitoring Program (refer to Condition 5). Rationale and justification for these changes should be provided in the Compliance Monitoring Program.</p>					Three Duck Pond Outlet, Mesomikenda Lake Outlet, Mollie River Far-Field, Moore Lake Outlet Stream, Mouth of the unnamed Bagsverd Lake Tributary, Neville Lake Outlet, New Lake (station to be developed), Saw Peter Lake Outlet Stream, Schist Lake Outlet Stream, Three Duck Lakes (Lower) Outlet, Three Duck Lakes (Middle) Outlet, Three Duck Lakes (Upper) Outlet, Unnamed Lake #2 Outlet, Unnamed Lake #3 Outlet, Unnamed Lake #5 Outlet, Unnamed Lake #6, Unnamed Pond (South of open pit), Unnamed Tributary of Three Duck Lakes (Lower) and Weeduck Lake Outlet.

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EA-PC15	General	<p><i>Provincial EA Condition 15</i></p> <p>- The Proponent shall provide copies of the reports referenced in Conditions 13 and 14, plus its applications for Permits to Take Water and Environmental Compliance Approvals, to the Aboriginal Communities that were notified of the Undertaking during the Environmental Assessment process, when it submits those materials to the Ministry of Natural Resources and Forestry and the Ministry, respectively.</p> <p><u>MECP Clarification (April 2019)</u>: This condition requires the proponent to provide copies of reports and applications for Permits to Take Water and Environmental Compliance Approvals to Aboriginal communities. It would be good practice for the proponent to provide these reports and applications to communities in advance of providing them to the MECP, in order to incorporate comments or concerns from communities. The MECP's expectation is that if reporting for permits and approvals is required, then the proponent will share these reports with communities. The proponent should continue to engage these communities through the current phases of the project, in the absence of any consultation plan (refer to Condition 9). Any changes to types of reports/applications that will be provided to Aboriginal communities should be documented in the Compliance Monitoring Program (refer to Condition 5). Rationale and justification for these changes should be provided in the Compliance Monitoring Program.</p>	Y	N	N	N	The Indigenous Consultation Plan was developed and submitted to the MECP for review in December 2019. Incorporating feedback from the MECP, it was revised and resubmitted in March 2020 and was accepted by the MECP on April 1, 2020. Table 1 in the Indigenous Consultation Plan outlines a summary of how applications for Permits to Take Water and Environmental Compliance Approvals are shared with each Indigenous community notified of the Undertaking during the EA process, according to each community's stated preference as expressed to IAMGOLD during consultation on the draft Indigenous Consultation Plan. The Plan also outlines how IAMGOLD will engage Indigenous communities throughout all phases of the Project. IAMGOLD follows the direction of other permitting agencies (e.g., MNRF) related to engaging Indigenous communities related to other permitting processes in addition to the Permits to Take Water and Environmental Compliance Approval. Each time a permit application is shared with an Indigenous community, IAMGOLD prepares a brief, plain language summary of the permit purpose and contents, notifies the community via email and uploads the documentation onto Indigenous community SharePoint sites where

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							<p>each community can access current and past permit applications.</p> <p>The specific reports outlined in Conditions 13 and 14 will not be prepared, as they are related to the Project described in the Environmental Assessment (EA) and are not applicable to the optimized Project as described in the Environmental Effects Review (EER).</p>
EA-PC17.2	Terrestrial Biology	<p><i>Provincial EA Condition 17.2 - Protection of Biodiversity and the Terrestrial Systems and Habitat Monitoring Plan</i></p> <p>In addition to fulfilling all commitments with regard to rehabilitating wildlife habitat and terrestrial systems, the Proponent shall consult with the Ministry of Natural Resources and Forestry and with the Aboriginal Communities that were notified of the Undertaking during the Environmental Assessment on the development of a monitoring plan for terrestrial systems and habitat. The Proponent shall prepare a draft monitoring plan before the start of Construction, and shall provide a draft of it to the Ministry of Natural Resources and Forestry and the Aboriginal Communities for review before the plan is finalized. The monitoring plan for terrestrial systems and habitat shall at a minimum include: a) The monitoring of ungulates and furbearers in impacted and reference locations. This monitoring would include winter track surveys prior to construction and regularly during operations to determine trends in the frequency and extent of habitat utilization within affected habitat types and to confirm the presence and/or absence of species at risk in the area potentially affected by the Undertaking; and b) The monitoring of avian species in impacted and reference locations. This monitoring would include a reasonable</p>	Y	N	N	N	<p>Compliance tracking complete – condition to be archived.</p> <p>IAMGOLD prepared a Biodiversity Monitoring Plan for the Project. A draft version of the plan was circulated to the MNRF and Indigenous communities for review.</p> <p>The Biodiversity Monitoring Plan states that monitoring will be conducted:</p> <ul style="list-style-type: none"> • During the first two years of construction; • In the first year following the completion of construction and at three-year intervals thereafter for the first 10 years of operations, and at five-year intervals after year 10 until completion of operations; and • In years 5, 10, 15 and 20 post closure. <p>The periodicity of monitoring outlined in the Biodiversity Monitoring Plan aligns with</p>

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		<p>number of avian point counts every year to determine trends in the frequency and extent of habitat utilization within affected habitat types and to confirm the presence and/or absence of species at risk in the area potentially affected by the Undertaking.</p> <p><u>MECP Clarification (April 2019):</u> Conditions 17.1 to 17.3 remain applicable. The proponent is required to build on the baseline work and assess and utilize best practices. As part of compliance reporting, the proponent should provide details to the MECP and the MNRF on how the requirements set out in these conditions are being met (refer to Condition 17.1). Also, the MNRF has confirmed the need for a monitoring plan and look forward to reviewing a draft plan. The approved EA made predictions about impacts to terrestrial systems and habitats, as well as proposed mitigation to address these impacts. A Terrestrial Systems and Habitat Monitoring Plan is still required to guide how the predictions made during the EA will be verified and how effectiveness of mitigation implemented is subsequently assessed. It is the MNRF's expectation that the plan will describe the predicted species and habitat responses through mine life and closure, and layout the specific methods that will be followed to assess these, including periodicity of monitoring for ungulates, furbearers, avian species, and their associated habitat. Any changes to monitoring periodicity should be documented in the Compliance Monitoring Program (refer to Condition 5). Rationale and justification for these changes should be provided in the Compliance Monitoring Program.</p>					<p>industry practice of monitoring avian and other wildlife species every three years. Consultation with MNRF on the draft monitoring plan and incorporation of their comments occurred in January 2019.</p>

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Methyl Mercury Monitoring Plan							
EA-PC18.1	Methyl Mercury	<p><i>Provincial EA Condition 18.1 - Methyl Mercury Monitoring</i></p> <p>- To establish baseline conditions, the Proponent shall undertake monitoring of methyl mercury levels prior to dam construction as well as post dam construction to determine if methyl mercury levels in fish tissue and surface water have become elevated as a result of alterations to waterways. The mercury monitoring program shall include, but need not be limited to, data from lakes with water level increases (Bagsverd Lake, Chester Lake), lakes downstream of Chester Lake exposed to re-directed flow (Clam Lake), and other lakes exposed to potential effluent sulfate stimulation (Neville Lake).</p> <p>- The Proponent must conduct the methyl mercury sampling and analysis in accordance with Ministry guidance and protocols. The Proponent must prepare a study plan outlining the frequency of proposed sampling during the pre-dam construction and post-dam construction periods, and include this study plan in the Compliance Monitoring Program Report required by Condition 5 of this Notice of Approval. The results of the monitoring will be submitted to the District Manager and made available to the public on the proponent website.</p> <p><u>MECP Clarification (April 2019)</u>: During the EA, the proponent received the MECP Northern Region guidance document for mercury monitoring. The proponent should consult with the MECP Regional Technical Support about the implications for baseline data collection needs arising from changes in project design that have occurred since the EA. A first step is for the proponent to provide the MECP with the baseline data collected to date (refer to Condition 11.3), including low-level mercury (total, methyl) in water and mercury in fish tissue. The proponent should also consult with the MECP Regional Technical Support when selecting monitoring locations. Any changes to</p>	Y	Y	Y	N	<p><i>Compliance tracking complete for pre-construction phase. Condition remains active and applicable for the undertaking of the monitoring program.</i></p> <p>As required by the Condition, the study plan has been appended to the Compliance Monitoring Program Report (Appendix E – Methyl Mercury Monitoring Plan).</p> <p>In consultation with the MECP, monitoring requirements have been updated to align with the optimized site layout. As presented in the EER, Bagsverd Lake and Chester Lake are no longer required to re-direct flow and water levels are not anticipated to be impacted. However, MECP has specified further monitoring requirements with the construction of the watercourse realignment channels, flooding of New Lake, and potential increases in sulphate concentrations downstream of mine activity. During baseline conditions the following lakes will be monitored monthly during ice-free conditions for total and dissolved methylmercury, total mercury and sulphate in water: Chester Lake Outlet, Clam Lake Outlet (relocated to WRC1 Outlet once constructed), New Lake Outlet, Three Duck Lake Upper Outlet, Three Duck</p>

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Commitment List and Information			Implementation Schedule				Compliance Status
Tracking No.	Category	Commitment	Design/Planning	Construction	Operations	Closure	
		monitoring locations should be documented in the Compliance Monitoring Program (refer to Condition 5). Rationale and justification for these changes should be provided in the Compliance Monitoring Program.					<p>Lake Middle Outlet, Three Duck Lake Lower Outlet, Unnamed Lake 2 Outlet, Schist Lake Outlet Upstream of Unnamed Lake 6, Lower Three Duck Pond Outlet, Mollie Lake Outlet, Dividing Lake Outlet, Bagsverd Lake Outlet, Neville Lake Outlet. Statistical analysis will be conducted on baseline water concentration data to determine if a lower sampling frequency can yield similar results in terms of concentration ranges and variability. Total mercury in fish tissue and sediment will be monitored in a number of lakes for either potential effects of flooding and increases in sulphate and / or potential effects resulting from increases in sulphate only. This will occur once during baseline and then every three years following construction to harmonize with the Metal and Diamond Mining Effluent Regulations. Small-body fish sampling will occur every year for the first three years and then every three years to align with large-body fish sampling. The lakes to be monitored for potential effects of flooding and increases in sulphate include: Chester Lake, Upper Three Duck Lake, Middle Three Duck Lake, Lower Three Duck Lake, New Lake (Post-construction only), Clam Lake, Unnamed Lake 2 (reference) and Schist Lake (reference). The lakes to be monitored for potential effects of sulphate increases include: Mollie Lake, Lower</p>

IAMGOLD Corporation – Côté Gold Project				 
Document Title	Appendix D – Compliance Status for MECP-Specified Conditions			
Document No.	IMG-ENV-CMPR-100	Revision	3.0	

Commitment List and Information			Implementation Schedule				Compliance Status
Tracking No.	Category	Commitment	Design/Planning	Construction	Operations	Closure	
							Three Duck Pond, Dividing Lake, Bagsverd Lake and Neville Lake.

IAMGOLD Corporation – Côté Gold Project				
Document Title	Compliance Monitoring Program Report			
Document No.	IMG-ENV-CMPR-100	Revision	3.0	

Appendix E

Mercury Environmental Monitoring Plan

IAMGOLD Corporation



Côté Gold Project

Mercury Environmental Monitoring Plan



Document Number	IMG-ENV-MEMP-300
Document Owner	Côté Gold Project Environmental Department
Document Author	Cynthia Russel, Minnow
Revision	2.0
Revision Date	August 11, 2020
Ministry of Environment, Conservation and Parks file numbers: EAB (EA 05-09-02), EAIMS (13022)	

Technical Memo

Date: June 10, 2020

To: Dave Brown, IAMGOLD Corporation

From: Cynthia Russel, Kim Connors, Minnow Environmental Inc.

RE: **Mercury Environmental Monitoring Program, Côté Gold Project**

This technical memo describes the Mercury Environmental Monitoring Program for the Côté Gold Project and is intended to satisfy Condition 18.1 of the Provincial Environmental Assessment (EA) approval. The monitoring program and the outcome of the monitoring program are to be included in the Compliance Monitoring Program Report (CMPR).

IAMGOLD Corporation (IAMGOLD) is planning to construct, operate, and eventually rehabilitate a new open pit gold mine as part of the Côté Gold Project (Project). The Project is located approximately 20 km southwest of Gogama, 130 km southwest of Timmins, and 200 km northwest of Sudbury (Figure 1). The proposed development of the Project will partially or fully overprint several water features and will include the flooding of terrestrial habitats for watercourse realignment (WRC1 and WRC2) and the creation of a new lake (Figure 1).

Context

Mercury is a naturally occurring chemical element, however, under certain conditions, in the presence of microorganisms, mercury present in the environment can be transformed from an inorganic form to an organic form and vice versa. One of the organic forms, methylmercury, is readily absorbed by living organisms such as fish. Methylmercury production resulting from the impoundment of water has been well-documented and is mainly attributable to the flooding of large quantities of labile organic matter (vegetation and soil surface layers) containing inorganic mercury. When submerged in water, this organic matter is subject to bacterial decomposition, which transforms the inorganic mercury present in the flooded organic matter into methylmercury. The methylmercury then becomes available for uptake in the food web through aquatic organisms at the bottom of the food chain such as zooplankton, or benthic organisms and is biomagnified through the food chain, reaching maximum concentrations in piscivorous fish. Research from Canadian hydroelectric reservoirs shows that peak levels of methylmercury occur in adults of large-bodied, relatively long-lived fish species, about three-to-eight years after impoundment before returning to baseline levels 10 to 20 years after peak levels are reached (Bodaly et al. 2004, 2007; Schetagne et al. 2003).

Mercury methylation can also occur as a result of sulphate release to the natural environment. Sulphate acts as an electron acceptor for sulphate reducing bacteria (SRB). SRB are the primary promoters of mercury methylation in wetland environments, and the stimulation of SRB growth leads to increased rates of methylmercury production.

Monitoring Program Requirements

This mercury Environmental Monitoring Program (EMP) has been developed to assess the potential risk for increased methylmercury production in the aquatic environment as a result of Project development.

IAMGOLD is required to conduct methylmercury monitoring in water, sediment, and fish tissue to comply with the Project's Federal and Provincial conditions of approval and commitments resulting from the EA and Environmental Effects Review (EER) process, as outlined in Table 1.

Table 1: EA and EER Conditions and Commitments

Topic	Requirement	Source Reference
Methylmercury monitoring	To establish baseline conditions, the Proponent shall undertake monitoring of methylmercury levels prior to dam construction as well as post dam construction to determine if methylmercury levels in fish tissue and surface water have become elevated as a result of alterations to waterways. The mercury monitoring program shall include, but need not be limited to, data from lakes with water level increases (Bagsverd Lake, Chester Lake ¹), lakes downstream of Chester Lake exposed to re-directed flow (Clam Lake ¹), and other lakes exposed to potential effluent sulfate stimulation (Neville Lake ¹). The Proponent must conduct the methylmercury sampling and analysis in accordance with Ministry guidance and protocols. The Proponent must prepare a study plan outlining the frequency of proposed sampling during the pre-dam construction and post-dam construction periods and include this study plan in the Compliance Monitoring Program Report required by Condition 5 of this Notice of Approval. The results of the monitoring will be submitted	Provincial EA Condition 18.1

¹ The list of lakes to be monitored is associated with the original EA plan which included the flooding terrestrial habitat of a number of lakes. However, the revised mine plan presented in the EER will only result in flooding in New Lake, a tributary of South Arm of Bagsverd Lake which will be overprinted by the Reclaim Pond and WRC1 and WRC2 (Figure 1). Therefore, the areas potentially affected by flooded terrestrial habitats are limited to New Lake, Upper Three Duck (downstream of New Lake and WRC2), the South Arm of Bagsverd Lake and Chester Lake (downstream of WRC1).

	to the District Manager and made available to the public on the proponent website.	
Follow-up program related to the health of Indigenous peoples	Monitoring methylmercury concentrations in surface water and fish tissue of northern pike, walleye, lake whitefish or yellow perch in all water bodies where an increase in water level is predicted as a result of the Designated Project, as well as all other water bodies directly connected to realignment channels ² , to confirm methylmercury levels do not increase. Methylmercury monitoring shall be implemented from the beginning of construction and occur every three years during the construction and operation phases. Starting at the beginning of the decommissioning phase, monitoring shall occur every five years for 25 years.	Federal EA Condition 6.4.3
Monitoring of fish tissue during Operations and Closure phases	<p>Method: Non-lethal biopsy tissue sampling methods will be used to collect skinless, boneless muscle samples (5 g filet) from live individuals.³</p> <p>Samples will be analyzed for total mercury. Samples will be weighed, and acid digested prior to analysis using a variant of "Environmental Protection Agency Method 1631- mercury in water by oxidation, purge and trap, and cold vapour atomic fluorescence spectrometry". Using this technique, low method detection limits of approximately 1 ng Hg/g wet tissue weight can be achieved.</p> <p>Location: In areas affected by stream realignments and reference areas.</p> <p>Frequency: Every 3 years during Operations and twice following Closure or until mercury concentrations in fish are stable or equal to reference areas.</p>	EA/EER Commitment (EER Appendix C3 – Monitoring)
Reduce potential for methylmercury	Prior to construction of realignment channels and dams, the Proponent shall remove terrestrial vegetation and organic soils that will be flooded as a result of the Designated Project.	Federal EA Condition 6.2

² See list of areas to be monitoring in surface water in Table 2 and fish tissue in Table 3.

³ A biopsy tissue plug typically yields 20 mg ww of sample. A 5 g filet sample will result in fish lethality and therefore, a non-lethal biopsy sample will be collected for mercury which can readily achieve required detection limits.

	Terrestrial vegetation and organic soils will be removed prior to flooding.	EA/EER Commitment (EER Appendix C1 – Mitigation)
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Prior to the construction of watercourse realignments (WRC1 and WRC2; Figure 1 and 2) and New Lake, vegetation and the top organic soil (0.5 to 1.5 m) will be removed in order to limit available mercury sources in these areas consistent with Federal EA Condition 6.2.

Monitoring Program Outline

In order to assess the potential effects of flooding associated with the Project development and the potential effects of predicted increases in sulphate⁴ concentrations in the waters downstream of the mine during operations, a mercury EMP has been developed. The mercury EMP includes water, sediment, and fish tissues monitoring.

Water sampling will be conducted monthly during the open-water season during baseline data collections (fall of 2019 to fall of 2021⁵). The frequency of water monitoring may be reduced during operations should statistical analysis demonstrate that similar data (mean, standard deviation) can be realized with fewer samples. Water sampling will be collected at 13 locations which includes two reference locations (Schist Lake outlet and Unnamed Lake 2 outlet; Table 2 and Figure 2). Samples will be analyzed for total and methylmercury (see below) and/or sulphate depending on the rationale for monitoring (i.e., flooding, sulphate concentrations or both; Table 2).

Sediment and fish tissue monitoring will be conducted every three years in 13 lakes (Table 3 and Figure 2). While Environment and Climate Change Canada (ECCC) has stipulated that mercury monitoring be conducted every 5 years for 25 years, an interval of every three years is proposed in order to harmonize with the Metal and Diamond Mining Effluent Regulations (MDMER) Environmental Effects Monitoring (EEM) Program. Should results following three cycles show no effects in terms of increasing mercury concentrations, the Project should consider applying for a cessation of this monitoring requirements as research indicates that peak concentrations are observed three to eight years following flooding and concentrations return to baseline in 10 to 20 years (Bodaly et al. 2004, 2007, Schetagne et al. 2003).

⁴ Sulphate can be a stimulant for sulphur reducing bacteria which play a key role in the conversion of inorganic mercury to methylmercury. It should be noted that predicted sulphate concentrations are low with the maximum predicted concentration 39 mg/L at a few locations, but most lakes are predicted to have sulphate concentrations less than 10 mg/L. Sulphate will be monitored as part of the routine water quality monitoring program and through this program as well.

⁵ Fall 2019 to fall 2021 will be used as the baseline period for surface water monitoring.

While some of the required baseline monitoring has previously been conducted, additional monitoring will be undertaken in 2020 to augment the baseline data to comply with the program described herein. The methodology for each component of the program is described below.

Water

The water quality component of the mercury EMP will include *in situ* field measurements (temperature [°C], dissolved oxygen [%], mg/L], pH [pH units], and specific conductance [μ S/cm]) at each sampling station. In addition, a vertical depth profile will be taken quarterly⁶ in each lake to identify stratification and dissolved oxygen concentrations. Water samples will be collected at the outlet of lakes potentially affected by flooding of terrestrial habitats or by an increase in surface water sulphate concentrations. A complete list of station locations is provided in Table 2 and shown in Figure 2. Routine water quality monitoring will also be conducted as per regulatory requirements and described in the water EMP.

Sampling Methodology

Water samples will be collected 0.5 m below the surface and should be collected by a two-person crew practicing the Clean Hands/Dirty Hands Technique (Attachment A). Total (unfiltered) mercury and total and dissolved (filtered) methylmercury will be collected for analysis to provide for more effective comparisons to regulatory standards. Filtered samples will be filtered in the field using an inline (syringe) filter (0.45 μ m) and preserved as indicated by the laboratory. Following collection, water chemistry samples will be placed in coolers and subsequently stored at 4 °C prior to shipment to an accredited laboratory for analysis. Water samples will be analyzed for both total mercury and total and dissolved methylmercury. Quality assurance and quality control (QA/QC) for water sampling will include the collection and analysis of field duplicates (on 10% of samples), as well as assessment of laboratory duplicates, spike recoveries and blank analyses. Total mercury will be analyzed using the SnCl₂ reduction method, gold amalgam trapping, with fluorescence detection (EPA1631e). Methylmercury will be measured using a methylation step followed by purge and trap/GC separation and fluorescence detection (EPA1631). Laboratory reporting limits of 0.1 ng/L for total mercury and 0.02 ng/L for total and dissolved methylmercury will be targeted. Water quality will be compared to appropriate guidelines and potentially affected lakes will be compared to the reference lake(s)⁷ as well as to water quality prior to construction.

⁶ Quarterly profiles will be collected once in the winter, spring, summer and fall.

⁷ Currently Schist Lake and Unnamed Lake 2 are proposed to be used as reference lakes. Should monitoring results suggest that these lakes are not comparable to the potentially mine-affected lakes during baseline, alternative reference lake will be considered.

Sediment

The sediment quality component of the mercury EMP will include characterization of sediment physical and chemical properties in 13 lakes potential influenced by either flooding or sulphate concentrations (Table 3 and Figure 2). During baseline sediment cores will be collected from five stations in the deepest basin of each respective lake, representative of the most profundal⁸ area, which will be located using bathymetry maps and a depth sounder. At each station the top 1 cm slice will be collected for analysis with one core in each lake also sampled over a range of sediment depths (core profile to 5 cm depth). Following baseline, the program will be reduced to surface 1 cm monitoring at all five stations (i.e., the core profile sampling will not be continued but rather provide reference data over time)⁹. Sediment cores will be collected using a Tech Ops corer¹⁰, and will be deployed from a boat with care taken to control the rate of descent and to maintain the corers vertical position once it reaches the bottom.

Sampling Methodology

The Tech Ops corer is a gravity corer that collects samples in 4-inch ("; 10.16 centimeter [cm]) diameter core tubes. Core collection relies on a combination of surface tension within the core and suction supplied by an automatic seal (plunger assembly) that shuts in response to sampler retrieval (upward pull). Following core retrieval, an extruder head will be inserted into the bottom of the core tube to prevent sediment slippage. The core tube will be removed from the corer, and the extruder head will be used to push the sediment upwards to the top of the core tube with care taken to minimize the suspension of fines. Once near the top, an extrusion collar marked in 1 cm intervals will be carefully aligned on the top of the tube and the sediment will be extruded upward into the collar. A core slicer will be used to collect one sample per core (0-1 cm) at five stations per lake. At one station in each lake (deepest), the top 5 cm of sediment (core profile; corresponding to 0-1 cm, 1-2 cm, 2-3 cm, 3-4 cm, and 4-5 cm) will be collected during baseline. To ensure sufficient sample size in the top first centimetre, a second core will be collected and the top first centimetre will be removed and added to the 0-1 cm sample to form a composite sample.

Core samples will be rejected if there is evidence of slippage, that the core did not penetrate the substrate vertically, or that the sediment-water interface is disturbed within the core. Each sample will be placed into a re-closable polyethylene bags for subsequent analysis of total organic

⁸ The profundal zone is the deep zone of a lake which consists of fine sediment free of vegetation, below the range of effective light penetration.

⁹ Sediment deposition rates in northern Ontario are low and the top 5 cm will likely provide more than 50 years of baseline comparison, therefore repeating this analysis is not necessary.

¹⁰ If a Tech Ops corer is not feasible due to sediment characteristics, then a KB corer or suitable alternative may be used.

carbon (TOC), grain size¹¹, nutrients (total kjeldahl nitrogen [TKN], total phosphorus), mercury (total and methyl) and metals (full inductively coupled plasma mass spectrometry [ICP-MS] scan including sulphate). All sediment chemistry samples will be placed in coolers and subsequently stored at 4°C prior to shipment to an accredited laboratory for analysis¹².

Sediment sampling QA/QC will include the collection and analysis of a field duplicate sample, as well as assessment of laboratory duplicate, spike recovery, and blank samples. Total and methylmercury in sediment will be analyzed using methods for aqueous samples. Laboratory reporting limits of 0.4 µg/g (wet weight) for total mercury and 0.1 µg/g (wet weight) for methylmercury will be targeted. Sediment quality will be compared to appropriate guidelines, and affected lakes will be compared to the reference lake as well as to sediment quality prior to construction using a before-after/control-impact (BACI) Analysis of Variance (ANOVA) model. The BACI model assesses changes in the difference in concentration between control (i.e., reference) and impact (e.g., affected by watercourse realignment) areas in one time period ("before") compared to another ("after").

Fish

The Ministry of the Environment [now the Ministry of the Environment, Conservation and Parks (MECP)], Northern Region guidance (MOE 2010) will be followed to sample fish tissue for the assessment of mercury concentrations. Twenty northern pike (NP), and five composite young-of-the-year (YOY) yellow perch samples (YP) will be collected from 13 lakes (Table 3 and Figure 2)¹³ during baseline. In subsequent surveys 10 NP and five composite YP YOY samples will be collected to monitor tissue concentrations during operations. Northern pike have been selected as they are ubiquitous in the adjacent watersheds and are a top predator and therefore expected to demonstrate the highest mercury concentrations¹⁴. Yellow perch will be used as the forage fish as they are ubiquitous and readily captured as juveniles. Sampling YOY provides an indication of annual changes in mercury uptake within resident fish. A variety of fishing techniques will be used. NP will be captured using hoop nets, with short-set gill nets deployed only if catch-per-unit-effort (CPUE) is low. YP YOY will be captured by seine nets and minnow traps. All fish captured will be identified, enumerated, and sampled prior to release at the capture location. NP will be collected every three years following construction, and YOY YP will be collected every year

¹¹ TOC and grain size will only be analyzed in the 0-1 cm horizon.

¹² Total and methylmercury analysis may be conducted at a separate laboratory and as such may need to be placed in a separate sampling container and handling of the sample may require freezing the sample prior to analysis.

¹³ Recent research indicates that the fraction of methylmercury in tissue represents 95% of total mercury concentrations (S. Bhavsar, MOECC personal comm. March 17, 2015). Thus, measuring total mercury in tissue is an accurate surrogate for methylmercury.

¹⁴ If densities of northern pike are too low in any lake for the sampling protocol, an alternative sport fish may be used.

for the first three years, then every third year for 25 years or until a reduction in scope is agreed upon with ECCC and MECP.

Sampling Methodology

NP will be sampled for length and weight, and scales will be collected for aging. Cleithra (jaw bones) will be collected on any mortalities for age confirmation. Non-lethal sampling of one muscle plug for total mercury analysis will be performed on 20 NP of similar size during baseline and 10 NP during subsequent surveys, targeting fish of a size greater than 40 cm. In short, one muscle plug will be taken from each fish by inserting a 4 millimeter (mm) biopsy punch into the dorsal musculature and applying light pressure while turning (twisting) the punch. The tissue sample will be removed from the biopsy punch using a clean pair of forceps, the skin removed, and the remaining tissue placed in a sterile, labelled vial. Tissue samples will be stored in a cooler on ice until transferred to a freezer. Following tissue sample collection, the dermal hole will be repaired with vetbond™ and using the available fish scales from the specimen. The fish is then put in a recovery bath and following revival, returned to the water column.

YOY YP will be sampled for length and weight, and five samples each consisting of 5 to 10 individuals less than 100 mm in length will be composited for whole body total mercury analysis¹⁵. Forage fish are used due to their limited home range and that their body burdens represent the bioavailability of mercury for the year that they were sampled in that area. Whole body samples will be placed in a labelled Whirl-pak™ sample bag, stored in a cooler on ice until transferred to a freezer.

QA/QC measures will include 10% field duplicate samples (duplicate muscle plugs). Tissue samples will be analyzed by cold vapour-atomic absorption (CVAAS) for total mercury at an accredited laboratory (target laboratory reporting limit, LRL: 0.4 ng/g wet weight)¹⁶. Mercury tissue concentrations will be screened against the advisory levels published by the Ministry of Environment and Climate Change (MECP; MOECC 2015)¹⁷ as well as the Canadian Environmental Quality Guideline for the protection of wildlife consumers of aquatic life (0.033 mg/kg; Canadian Council of Ministers of the Environment 2000). In addition, relationships between mercury concentrations in fish muscle tissue and age will be explored by waterbody. The relationship between individual fish weight and length (i.e., condition; NP and YP) and age-at-length or weight (i.e., growth; NP) will be plotted by waterbody. Once plotted, the data will be compared among lakes, including before and after construction, using the BACI ANOVA

¹⁵ A dorsal spine or otoliths may be collected to confirm age if fish are suspected to be greater >1+.

¹⁶ Flett Research Ltd. is an accredited laboratory that specializes in mercury analysis.

¹⁷ The lowest advisory level for sensitive populations (women of child-bearing age and children under 15) is 0.06 mg/kg, while the complete restriction level is 0.5 mg/kg. The lowest advisory level for the general population is 0.15 mg/kg, while the complete restriction level is 1.8 mg/kg.

model to evaluate any spatial differences that might suggest areas of differing productivity, or otherwise unusual population features. Differences in tissue mercury concentrations in relation to length will be explored among areas using analysis of covariance (ANCOVA).

Quality Assurance Plan

The quality assurance plan includes a number of components and procedures, outlined below, that will be implemented to assure the quality and integrity of data produced by the Project Mercury EMP. All study personnel must be appropriately trained and experienced for their respective technical responsibilities, whether in the field, laboratory, or office. All members of the Project team are expected to contribute toward healthy and safe work conditions by being familiar with and complying with applicable Health and Safety Procedures.

Consistency is an important component of a quality management program. To minimize errors and to maintain comparability of data over time, standard operating procedures (SOPs) should be followed for sample collection methods, calibration, maintenance of field instruments, and proper sample handling and laboratory submission procedures. Any short-term deviations from the specified methods should be documented in field notes, along with appropriate rationale detail and conveyed as appropriate in the technical reports in which the data are presented.

Quality Control

Quality control (QC) samples are taken in the field and in the laboratory. General guidelines for the type of QC samples required to track and minimize the effects of bias and imprecision in the sampling effort are outlined below. The number of QC samples should correspond to a minimum of 10% of the total number of samples taken in the sampling period the QC samples are intended to represent.

Laboratory reporting limits (LRL) are the smallest concentration of an analyte that can be measured with a defined certainty of being distinguishable from a blank sample. LRLs vary depending on the analyte, sample matrix, analytical method, and instrumentation used. Analytical LRLs should be less than the environmental quality guidelines to which the data will be compared and preferably half that value or lower since analytical precision is reduced at concentrations approaching the LRL (McQuaker 1999). LRLs will be periodically reviewed with the analytical laboratory responsible for sample analyses and adjusted over time, if necessary, to reflect any changes in laboratory methods or instrumentation, or the requirements of data users.

Data Quality Assessment

The overall objective of a quality assurance program is to control measurement errors to acceptable levels, thus ensuring the data are of known quality and are useful. A Data Quality Assessment (DQA) involves the process of evaluating how well QC requirements were met. The DQA will be performed before the data are analyzed and interpreted relative to the study objectives. All relevant data will be presented in final reports. Any observations that may affect the reliability of the collected data with respect to serving the project objectives will be clearly identified.

Schedule and Reporting

Some of the baseline fish monitoring for total mercury was conducted in 2017 (Minnow 2020)), and will be used as baseline for the Mercury EMP. Additional baseline monitoring will be conducted in 2020 to augment the existing baseline data and provide a data set consistent with the program described herein is achieved. Pre-operational phase water monthly monitoring was initiated in 2019 (November) and sediment sampling was conducted in late summer 2019. The key components of the EMP are summarized in Table 3. A baseline report will be prepared in the year following the start of the construction phase. The timing of this submission will be coordinated with the timing of other deliverables associated with EA monitoring. YP YOY sampling will commence in September following construction and continue annually for the first three years. NP sampling will be conducted in September of the third year following the construction phase. A brief monitoring report will be prepared for the first two years, and a detailed report will be prepared for the third year. The detailed report will be submitted in the year following NP collection at a time to be coordinated with other EA reporting obligations. Following the first three-year report, sampling will continue on a three-year cycle. Should no meaningful statistical increase in mercury fish tissue concentration (< 2 standard deviations [SD]) be detected in the affected lakes compared to reference lakes or baseline following three cycles, it is recommended that a reduction in the timeline for the monitoring be pursued with regulators.

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Table 2: Water Quality Sampling Locations for Total and Methyl Mercury and Sulphate Monitoring, Côté Gold Project

Location	Identification	UTM Location (NAD 83, 17U)		Sampling Frequency	Flooding Effects	Sulphate Effects
		Easting	Northing		Mercury and Methylmercury	Sulphate
Chester Lake Outlet	CHLK	429899	5265330	Monthly ice-free during baseline ^b	✓	✓
Clam Lake Outlet ^a	CM	428622	5267120		✓	✓
New Lake Outlet	NL	TBD	TBD		✓	✓
Three Duck Lake Upper Outlet	3D-A	432192	5267018		✓	✓
Three Duck Lake Middle Outlet	3D-B	432074	5265519		✓	✓
Three Duck Lake Lower Outlet	3D-C	432866	5263627		✓	✓
Unnamed Lake 2 Outlet	UL2	428562	5273381		✓	✓
Schist Lake Outlet Upstream of Unnamed Lake 6 ^d	SL-1	427789	5269697		✓	✓
Lower Three Duck Pond	LTDP	432755	5263300		-	✓
Mollie Lake Outlet	MR	442689	5263330		-	✓
Dividing Lake Outlet	DIV	436103	5260628		-	✓
Bagsverd Lake Outlet	BDP	431341	5270640		-	✓
Neville Lake Outlet	NLO	TBD	TBD		-	✓

Note: TBD - To be determined in the field; UTM - Universal Transverse Mercator

^a The outlet of Clam Lake will be rerouted through Water Realignment Channel (WRC) 1 and then this station should be moved to the upstream end of WRC1.

^b Statistical analysis will be conducted on baseline water concentration data to determine if a lower sampling frequency can yield similar results in terms of concentration ranges and variability.

^c water will be analyzed to total mercury and total and dissolved methylmercury.

^d Station SL-1 will be moved in the summer of 2020 closer to the Schist Lake outlet to be upstream of a tributary stream entering near this location.

Table 3: Summary of Mercury Environmental Monitoring Plan

Study Components			Monitoring for the Effects of Flooding and Sulphate Increase						Monitoring for Effects of Sulphate Increase Only					
			Water Quality ^g		Sediment Quality	Fish Tissue		Water Quality ^g		Sediment Quality	Fish Tissue			
			In Situ	Chemistry		Northern Pike	Yellow Perch YOY	In Situ	Chemistry		Northern Pike	Yellow Perch YOY		
Location			See list on Table 2		Chester Lake, Upper Three Duck Lake, Middle Three Duck Lake, Lower Three Duck Lake, New Lake (Post-construction only), Clam Lake, Unnamed Lake 2 (reference) and Schist Lake (reference)				See list on Table 2		Mollie Lake, Lower Three Duck Pond, Dividing Lake, Bagsverd Lake and Neville Lake			
Sample Type			Surface at each sampling location, and a vertical depth profile at deepest location in each lake	Surface water	Core slices representing surface sediment (0-1 cm)	Non-lethal muscle plug ^c	Whole body		Surface at each sampling location, and a vertical depth profile at deepest location in each lake	Surface water	Core slices representing surface sediment (0-1 cm)	Non-lethal muscle plug	Whole body	
Sample Number			One measurement per location or depth for each parameter	One set of samples per lake, at the outlet.	Five stations per lake, one sample per core (0-1 cm) at each station with one station (deepest) sampled at 0-1, 1-2, 2-3, 3-4 and 4-5 cm during baseline, then 0-1 cm at the five stations during operations	20 fish during baseline and 10 following flooding, one sample per fish	5 composite samples consisting of 5 to 10 individual fish		One measurement per location or depth for each parameter	One set of samples per lake, at the outlet.	Five stations per lake, one sample per core (0-1 cm) at each station with one station (deepest) sampled at 0-1, 1-2, 2-3, 3-4 and 4-5 cm during baseline, then 0-1 cm at the five stations during operations	20 fish during baseline and 10 following flooding, one sample per fish	5 composite samples consisting of 5 to 10 individual fish	
Frequency			Quarterly ^g	Monthly ice -free during baseline ^c	Baseline, and once per three-year cycle post-construction for three cycles	Baseline, and once per three-year cycle post construction for three cycles ^d	Baseline, once per year for the first three years post construction, then once per three-year cycle for two additional cycles ^d		Quarterly ^g	Monthly ice -free during baseline ^c	Baseline, and once per three-year cycle post-construction for three cycles	Baseline, and once per three-year cycle post construction for three cycles ^d	Baseline, once per year for the first three years post construction, then once per three-year cycle for two additional cycles ^d	
Parameters			Temperature, dissolved oxygen, pH, specific conductance	Sulphate, Total Mercury and Total and Dissolved Methylmercury	TOC, grain size ^a , mercury (total and methyl), sulphate ^f	Total mercury ^b and aging	Total mercury ^b		Temperature, dissolved oxygen, pH, specific conductance	Sulphate	TOC, grain size ^a , mercury (total and methyl)	Total mercury ^b and aging	Total mercury ^b	
DQO	Analytical Laboratory Reporting Limits (LRL)		n/a	Sulphate 0.5 mg/L; Total mercury: 0.1 ng/L Total and Dissolved Methylmercury: 0.02 ng/L	Total mercury: 0.4 ng/g Methylmercury: 0.1 ng/g	Total mercury: 0.4 ng/g wet weight			n/a	Sulphate 0.5 mg/L	Total mercury: 0.4 ng/g Methylmercury: 0.1 ng/g	Total mercury: 0.4 ng/g wet weight		
	Blank Analysis	Field Blank		<LRL	n/a	n/a				<LRL	n/a	n/a		
		Field or Laboratory Blank		<LRL	n/a	n/a				<LRL	n/a	n/a		
	Laboratory Precision	Laboratory Replicates		≤25% RPD	≤35% RPD	≤30% RPD				≤25% RPD	≤35% RPD	≤30% RPD		
	Accuracy	Recovery of Blank Spike		80-120%	75-125%	75-125%				80-120%	75-125%	75-125%		
		Recovery Matrix Spike		75-125%	75-125%	75-125%				75-125%	75-125%	75-125%		
		Recovery of Certified Reference Material, QC Standards		85-115%	70-130%	70-130%				85-115%	70-130%	70-130%		

Notes: DQO - Data Quality Objectives; RPD - Relative Percent Difference in the case of duplicate samples; n/a - not applicable.

^a TOC and grain size will only be measured on the surface sample (0-1 cm).

^b In fish tissue, total mercury is largely methyl mercury and is therefore representative of the organic mercury present in the fish sampled.

^c Statistical analysis will be conducted on baseline water concentration data to determine if a lower sampling frequency can yield similar results in terms of concentration ranges and variability.

^d Should increases in fish tissue mercury concentrations be observed monitoring will continue every 3 years until concentrations are within the range of background or baseline whichever is higher. The need for continued monitoring will be determined by the MECP following review of the data from three completed cycles.

^e Additional monitoring other than mercury and sulphate is included in the water quality plan for the site.

^f Sediment will also be analyzed for nutrients and metals (ICP-MS)

^g Profiles will be collected quarterly, once in the winter, spring, summer, and fall.