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VERSION 3 UPDATE SUMMARY

Environmental and social management planning as presented in Chapter 8 of the Version 2 EIS/EA document remains the same.

References to comment responses and supplemental documentation that pertain to environmental management and social management planning are provided throughout this Chapter within the appropriate sections.

8.0 ENVIRONMENTAL AND SOCIAL MANAGEMENT PLANNING

Based on the findings and predictions outlined in Chapter 6, the following section outlines two preliminary impact management plans: an Environmental Management Plan (EMP) and a Social Management Plan (SMP).

The purpose of environmental management and social management planning is to consider and develop proper measures and controls to decrease the potential for environmental degradation during all phases of the Project, and to provide clearly defined action plans and emergency response procedures to account for human and environmental health and safety.

Information collected throughout the implementation of these plans will be used to evaluate predictions made in the environmental assessment of the Project, and allow OHRG to make corrective plans and take corrective actions where necessary.

The organization of this chapter is as follows:

- Section 8.1 describes the **mechanisms for implementation** of the plans including:
 - Osisko's environmental and social objectives.
 - Roles and responsibilities for the program.
 - Planned information management and reporting.
- Section 8.2 describes the **environmental management and monitoring plans** including:
 - The main environmental components.
 - Considerations related to potential effects from the Project.
 - Planned mitigation measures by component.
 - A summary of objectives and planned monitoring activities.
 - A preliminary structure of the developed programs.
 - Initial cost structure for compliance monitoring and reporting.
- Section 8.3 describes the **social management plan** including:
 - A description of local and Aboriginal committees.
 - A description of planned benefit enhancement measures.
 - A preliminary follow-up plan.
 - A summary of follow-up consultation.

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The plans presented in the following sections should be considered preliminary. Finalization of these plans will occur through consultation with federal and provincial government agencies, Aboriginal groups, the public and other stakeholders. Pertinent legislation, regulations, industry standards, documents and legislative guides were considered in the planning process, and will be followed in the finalization and implementation of the plans. The proposed schedule for finalization of the Environmental and Social Management Plans is provided below:

- Q4 2013 – Submit Final EIS/EA Report
- Q1 2014 – Form Atikokan-OHRG Consultation Committee
- Q2 2014 – Consult on Monitoring Plans
- Q3 2014 – Finalize Construction Monitoring Plans
- Q4 2014 – Receive EIS/EA Approval
- Q1 2015 – Begin Project Construction
- Q1 2016 – Finalize Operations Monitoring Plans
- Q1 2027 – Finalize Closure Monitoring Plan

The above schedule depends on the outcome of the Feasibility Study due to be completed in 2014, at which point it will be decided whether the Project will proceed as scheduled. If the Project is delayed, then the implementation of the follow-up programs will be similarly delayed.

8.1 Plan Implementation

Environmental and social management planning will take place within the context of Osisko's corporate objectives. These objectives have been developed as part of the broader Sustainable Development planning, and are reviewed regularly.

8.1.1 Osisko's Environmental and Social Objectives

Osisko has defined specific environmental and social objectives as part of its annual Sustainable Development reporting. The broad goals and objectives below provide direction to the detailed on-site management plans that will be developed and implemented as part of the Hammond Reef Gold Project.

- Reduce environmental impacts and keep a long-term outlook:
 - Continuous improvement of our environmental management systems.
 - Continuous improvement of our activities to enhance compliance and reduce impacts.
 - Minimize greenhouse gas emissions through reductions and offsets.
 - Minimize fresh water usage and maximize recycling of water.
 - Invest in research and development at our project sites.
 - Invest time and money in responsible and progressive closure planning.

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- Support community development by maximizing local and regional benefits:
 - Create jobs and favour local purchases.
 - Facilitate local business development and maximize indirect economic benefits.
 - Improve public infrastructure in our communities.
 - Share the wealth with our communities.

8.1.2 Roles and Responsibilities

In addition to the participation of OHRG in environmental and social management planning for the Project, it is anticipated that government, public, Aboriginal and local communities will participate as outlined below.

8.1.2.1 Government Agencies

Version 3 Update: The Ontario Ministry of Natural Resources and Forestry (MNR) will be included in the list of appropriate regulators to be consulted during the development of the Environmental Monitoring Plan at the permitting phase of the Project, as per the response to MNR-14B (see Addendum Part B; Table B-1).

Both provincial and federal agencies are anticipated to be included in monitoring plan development and in the provision of ongoing advice for the environmental management plan. It is anticipated that a lead agency will be identified to provide direction which could include:

- Feedback on identified objectives.
- Feedback on design of monitoring studies.
- Review of monitoring reports.
- Verification of the effectiveness of mitigation.
- Recommendation for adaptive management measures.
- Posting of monitoring program notices and results on the Agency's Internet site.

8.1.2.2 Aboriginal Communities

OHRG has initiated and engaged a number of Aboriginal committees that will provide focussed communications between OHRG and the communities, and identify ways that the Project can provide ongoing benefits to identified Aboriginal communities.

OHRG formed First Nations committees with Lac des Mille Lacs First Nation and the member nations of the Fort Frances Chiefs Secretariat, based on the conditions of the signed Resource Sharing Agreement.

OHRG also formed a committee with the Métis Nation of Ontario and member communities based on the conditions in a signed Memorandum of Understanding (MoU). As detailed in Chapter 7, The Métis Consultation Committee has met regularly throughout the Project planning process. Ongoing communications and identification of shared interests is planned to continue with the MNO through the existing Métis Consultation Committee.

Further details regarding the committees are outlined in Section 8.3.

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8.1.2.3 Town of Atikokan

A social monitoring committee will be established which will be modelled after the existing Malartic/Osisko Community Committee. The mandate of the Atikokan/OHRG Committee will be to provide a direct link for communications between community members and OHRG. Information about the Project will be shared with the Committee, and Committee members will disseminate this information to the community at large. In turn, community members can approach the Committee with their concerns, and the Committee can share these community concerns with OHRG.

8.1.2.4 Osisko Hammond Reef Gold Ltd.

OHRG will work with the provincial and federal authorities to develop a detailed monitoring and follow-up program. The monitoring program will be implemented by OHRG in consultation with federal and provincial agencies, Aboriginal communities, and other stakeholders, as appropriate.

OHRG's responsibilities include:

- Implementing and funding the follow-up program.
- Training employees and contractors on commitments.
- Analyzing the results.
- Implementing adaptive management measures where required.
- Reporting on the results and outcomes of the program.

8.1.3 Reporting and Information Sharing

8.1.3.1 Compliance Monitoring Results

Compliance monitoring results will be reported annually and discussed with regulators. The results of monitoring, as they relate to the findings of external audits, will be reported to national authorities as applicable. Compliance reporting requirements are identified in Section 8.2.

8.1.3.2 Stakeholder and Aboriginal Communications

Regular public meetings and stakeholder communications will take place to report on various aspects of the Project. OHRG will periodically publish a Community News Brief in local papers to report on topics of interest and provide clear communication at key milestones in the Project. The list of reported issues will be based on community feedback and concerns and could include:

- Operation production and performance, plans and exploration.
- Community involvement, including Aboriginal engagement.
- Environmental and social monitoring results.
- Human Resources information.

The main areas of concern heard from Project stakeholders to date have been protection of environmental integrity, employment opportunities, perspectives of Project development and regional economic impact, and involvement of Aboriginal people in the Project.

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8.2 Environmental Planning, Monitoring and Compliance

An Environmental Management Plan (EMP) is a living document that must consider predicted impacts to the environment, monitoring data and programs, and means for compliance (present and future) to applicable guidelines and regulations. Planning allows for proactive decision making with regards to mitigation of potential impacts. Once construction and operations commence, monitoring is an integral part of evaluating the effectiveness of the plan and planning process. Monitoring and analysis of monitoring results then allows for adaptive management of the site and adjustment of management plans or mitigation measures to reduce or eliminate potential for impact should the monitoring results differ from predictions. Throughout all of these phases, compliance objectives and requirements must be met as defined by the regulating authorities.

The objective of the EMP is to set out clearly the key components of environmental management for the Project and such that the following concepts are realized throughout the construction, operation, closure and post-closure phases of the Project:

- Negative impacts on the physical and biological environments are mitigated.
- Benefits that will arise from the development of the Project are enhanced.
- Compliance with existing legislation and consistency with provincial guidelines and best practice is achieved.

The Project has been planned and will be implemented with health and safety as the first priority. A brief description of **health and safety planning** was included in Chapter 1 and is further discussed in the context of Environmental Management in Section 8.2.1.

The environmental effects assessment (Chapter 6) predicted potential effects to both the **physical and biological environment** based on the existing environmental conditions described in Chapter 3, and the Project Description as described in Chapter 5, and there is confidence in the predicted results. Management of the physical and biological environment includes consideration of the predicted impacts, implementation and mitigation, monitoring, and means for compliance. OHRG's commitments to protecting the physical and biological environment are part of the Environmental Management Plan as outlined in Sections 8.2.2 and 8.2.3. Closure and post closure are included in the evaluation.

Finally, an assessment of potential effects of **malfunctions and accidents** was included in Chapter 6. OHRG's emergency preparedness and response planning is the final component of the Environmental Management Plan outlined in Section 8.2.4.

It is recognized that some factors that affect the outcomes of the predictive models may change and, therefore, one of the objectives of the Environmental Management Plan is to conduct monitoring programs to verify that the predicted outcomes are being achieved. As a result, on-going monitoring throughout the construction, operations, closure and port-closure phases will be conducted.

Where monitoring during the course of implementation of the Environmental Management Plan shows that the mitigation measures proposed are not achieving the desired results, contingency measures would be enacted that would enhance or add to existing mitigation measures such that the resulting impacts would be low or negligible.

Compliance monitoring will form a part of the Environmental Management Plan, and will be determined by specific conditions included in the permits and approvals that are issued by the various agencies. As a result, in the

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following sections, general monitoring requirements associated with these instruments have been identified. Should unforeseen conditions arise where operations are in non-compliance with the permits or approvals discussion would be entered into with the issuing authority to develop plans to achieve compliance.

8.2.1 Health and Safety

Osisko's corporate Environmental Health and Safety policy is provided in Appendix 1.IV. As per the policy, OHRG is committed to:

- Evaluating each of its activities in terms of the potential impacts and risks for the natural, human and social environments, with the goal of prevention and protection.
- Designing and using its facilities with proven technologies and the most efficient techniques in order to minimize the impact and risk to the environment and to the health and safety of people.
- Putting into place and maintaining emergency action plans to mitigate effects of unforeseen events.

The Health and Safety management system previously in place during the OHRG exploration project will be applied directly to the constructions and operations phases of the Project. The management system was developed with the intent of meeting, as a minimum, the legislative requirements within the Occupational Health and Safety Act and Regulations for Mines and Mining Plants. The Internal Responsibility System (IRS) in place at Hammond Reef includes provisions for the Health and Safety Responsibilities of all levels of management, employees and contractors.

Table 8-1 provides a summary of some examples related to Health and Safety planning, monitoring and compliance. It should be noted that OHRG is committed to complying with all federal and provincial legislation related to workplace and worker health and safety.

8.2.2 Physical Environment

Version 3 Update: Supplemental details related to monitoring are provided in MTCS-6, MTCS-6B, MTCS-7, MTCS-7B and T-64 (Archeological monitoring during Mitta Lake drainage); T-22 (potable water sources); EAB Wasterwater-7 (regulations); MNRF 7B and MNRF 7C (TMF Reclaim Pond water quality); MNRF 4 and MNRF 4B (water taking and effluent discharge); and, T-16 and T(3)-01 (air quality). See Addendum Part A; Table A-1 and Addendum Part B; Table B-1 for responses to comments.

Details related to the Canada/US Air Quality Agreement are provided in A-3.

Project-environment interactions were evaluated and an assessment of potential effects was carried out based on identified VECs, as outlined in Section 6.1 Physical Effects Assessment. Where potential effects were identified, mitigation measures were applied. Remaining environmental changes were assessed; those identified to be low or moderate were considered for inclusion in the Environmental Management Plan.

Table 8-2 provides information related to management/mitigations as applied for each physical aspect identified; compliance or management monitoring objectives; and potential adaptive management strategies that could be considered depending on monitoring results. Preliminary monitoring considerations for each component of the physical environment including proposed monitoring parameters, locations and methods, and proposed measurement frequency and duration are provided in Tables 8-3 through 8-7.

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8.2.2.1 Air Quality and Vibration

Version 3 Update: Details related to air quality and vibration monitoring and mitigation are provided in responses to A-9, A-10 and T-16 (construction and operation phases); MOE-Air 4, MOE-Air 4B, T-15, T-18, R(2)-03, R(2)-10 (best management practices); T(3)-01 (proposed air quality monitoring framework); and T(3)-07 (vibration due to blasting). See Addendum Part A; Table A-1 and Addendum Part B; Table B-1 for responses to comments.

The air quality and vibration monitoring and follow-up program is designed to be appropriate to the scale of the Project and the effects identified through the environmental assessment process. The program is intended to confirm the methods used to estimate the Project emissions and the effectiveness of in-design mitigation measures, and in doing so, assess if alternative mitigation strategies are required to minimize emissions from the Project and their impacts. Four specific activities are recommended to verify the predicted effects of the Project on the atmospheric environment:

- Verification of silt loadings on the roads
- Source testing to confirm process emissions
- Ambient air monitoring for indicator compounds that are greater than 51% of the MOE POI Limits and not included in the source testing program
- Vibration monitoring

Monitoring programs considerations for the atmospheric environment during the operations phase are presented in Table 8-3.

8.2.2.2 Hydrology

Version 3 Update: Additional information related to contingency measures for low flow and water level conditions in Marmion Reservoir are provided in the supplemental document: 'Contingency Measures to Eliminate Water Taking from Marmion Reservoir during Low Water Level and Outflow Periods at Raft Lake Dam – Hammond Reef Gold Project' provided in Part D of the Addendum to the Version3 EIS/EA, and in responses to MNR-4, MNRF-4, MNRF-4B, MOE Hydrology 4, MOE Hydrology 4B, MOE SW-11C, MNRF-WTCM 2, MNRF-WTCM 3, T-52, T-58 and T(2)-07. See Addendum Part A; Table A-1 and Addendum Part B; Table B-1 for responses to comments.

Details of supplemental baseline hydrometric monitoring are provided in response to MOE Hydrology 5.

OHRG will prepare a comprehensive water monitoring program that will include groundwater quality, surface water quality, levels and flows along with meteorology and flow metering of all pumped water. With respect to the Hydrology monitoring program, the objectives will be to:

- Verify the accuracy of the predicted changes in flows and lake water levels in site, local and regional scale watercourses and water bodies.
- Confirm the assumptions underlying the predicted changes (e.g., water takings, effluent discharges, runoff rates).

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- Support the implementation of adaptive management measures to address previously unanticipated changes.
- Satisfy compliance monitoring requirements included in Environmental Compliance Approvals and Permits to Take Water issued by the Ontario Ministry of the Environment pursuant to the Ontario *Water Resources Act* and in *Fisheries Act* Authorizations issued by Fisheries and Oceans Canada and authorizations issued pursuant to the Navigable Waters Act (if applicable).
- Field studies will consist of flow and water level monitoring in site, local and regional scale watercourses and water bodies identified as potentially being affected by Project activities and at key points in the Project's water management system to confirm and update estimates of water takings, effluent discharges and water recycling. Field monitoring activities for Hydrology will be coordinated with monitoring activities for other disciplines where appropriate, to reduce costs and increase efficiency.

A preliminary list of proposed monitoring stations for consideration is provided in Table 8-4. These will be modified as permitting requirements are determined. The final Program may be modified as monitoring results are analysed and may result in elimination of some locations and/or addition of other locations. Existing flow and lake water level monitoring stations that are currently operating will continue to be operated throughout the period prior to the construction phase and thereafter throughout the four phases of the Project (construction, operations, closure and post-closure). Monitoring at new stations will be initiated prior the start of the construction phase, to establish existing conditions, and will continue through the operations phase until closure.

In addition to carrying out field studies, the following secondary data in electronic format will be sourced on an annual basis throughout the four phases of the Project:

- On-site precipitation, temperature and evaporation data collected at the Project meteorological station (Atmospheric Environment TSD).
- Precipitation and temperature data collected at Environment Canada's Atikokan (AUT) meteorological station.
- Flow and water level data for Lac des Mille Lacs, the Lower Marmion Reservoir and the Upper Marmion Reservoir collected by H2O Power Limited Partnership and Valerie Falls Limited Partnership (Brookfield Renewable Energy Group) as part of compliance monitoring under the Seine River Water Management Plan (Boileau 2004).

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8.2.2.3 Hydrogeology

Version 3 Update: Additional information related to hydrogeological monitoring around the perimeter of the TMF is provided in the response to T(3)-08 and in the supplemental document: 'Federal Information request T(3)-08 – Compiled Response Documents and Relevant Communications' provided in Part D of the Addendum to the Version 3 EIS/EA. See Addendum Part A; Table A-1 and Addendum Part B; Table B-1 for responses to comments.

The hydrogeology component of the water monitoring program is designed to allow for long-term monitoring of the effects of Project activities on groundwater levels and groundwater quality within the LSA throughout all stages of the Project. The recommended program will comprise the measurement of groundwater levels (or water pressures) at a number of locations within the Project Site. Data logging pressure transducers will be used to obtain a continuous record of groundwater level fluctuations at select monitoring locations that will be supported by quarterly manual depth to water measurements. Groundwater level/pressure monitors will be located within and adjacent to the open pits and integrated with the program to monitor pit slopes during excavation.

As a minimum, four groundwater level monitoring nests will be established adjacent to the shoreline of Upper Marmion Reservoir for the operations phase to monitor groundwater levels around the open pits, including two at the southwest end of the west pit. It is expected that these nests will be completed with screens set to depths of 10 m and 30 m below the elevation of Upper Marmion Reservoir (415 masl). Within each open pit, sump water levels will be regularly monitored along with groundwater pressures on pit slopes. The location, design of and monitoring frequency at locations to be established will be developed as part of pit slope stability monitoring program.

With the exception of the area of open pit mining, groundwater monitoring locations will be selected primarily based on water quality considerations; and will likely include monitoring at the following general areas:

- Perimeter monitoring at the WRMF, PPCP, effluent treatment plant, low-grade ore stockpile, overburden stockpile and the TMF.
- Perimeter monitoring at the worker accommodation camp.
- Adjacent to areas of chemical/fuel storage and maintenance facilities.

It is expected that approximately 20 monitoring well nests will be established at the Project Site (including existing well nests where these can be retained) as part of a comprehensive water monitoring program to monitor groundwater quality at these facilities. Groundwater level measurements will also be obtained on a regular basis at any observation well installed for the purpose of monitoring groundwater quality. Similarly, up to five groundwater monitoring wells (including existing wells where these can be retained) are expected to be established in the immediate proximity of surface water level and flow monitoring stations (where access allows for monitoring well installation) to monitor the relationship between groundwater and surface water.

The Groundwater monitoring program will be modified as specific permitting requirements are determined. The program will be conducted on an adaptive management basis and may be modified as monitoring results are analysed, which may result in elimination of some locations and/or addition of other locations.

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The proposed groundwater level and quality monitoring programs are summarized in Table 8-5. The groundwater monitoring programs would be initiated in the construction phase and would continue through the operations phase until closure.

8.2.2.4 Water Quality

Version 3 Update: Supplemental information related to water quality monitoring is provided in responses to MNRF-7B and MNRF-7C (TMF Reclaim Pond); MNDM 1, MNDM 2, T-38, T-51, T(2)-03 (pit water monitoring at closure); T-41, T-42 and T(2)-17 (ground water monitoring); T-47 (updated water quality updated program); EAB Wastewater-3 (ministry approval); and T(3)-08 (TMF seepage). See Addendum Part A; Table A-1 and Addendum Part B; Table B-1 for responses to comments.

The water quality monitoring program initiated during the baseline studies will be continued through the construction, operations and closure phases. The purpose of the program is to verify predictions made during the impact assessment, evaluate regulatory compliance with the permitting requirements and provide a basis for effective water quality management on-site. The number of locations monitored will be reduced from the baseline studies to focus on Lizard Lake, Sawbill Bay and Lynxhead Bay, and the watercourses draining from the Project Site (i.e., the MSA). A more focused list of parameters will be monitored quarterly, including metals and ions that the baseline studies and modeling have indicated may increase during construction and operations. This will include TSS, sulphate, chloride and a suite of metals (ICP scan) as well as arsenic, selenium and mercury. The sampling program (locations sampled, parameters included and frequency of sampling) may be modified depending on other monitoring requirements that may be identified under any approvals or permits and will be coordinated with hydrogeology and hydrology sampling efforts and locations where possible to ensure there is minimal duplication.

A detailed Water Quality monitoring plan will be developed once the monitoring requirements under other Acts and Regulations that may apply to the Project have been determined. The program will be conducted on an adaptive management basis and may be modified as monitoring results are analysed, which may result in elimination of some locations/parameters and/or addition of other locations. Proposed water quality monitoring considerations are provided in Table 8-6. This will be supplemented by monitoring requirements as required under the various permits.

8.2.2.4.1 Sampling Parameters

Water quality samples will be submitted for the following laboratory analyses:

- **Physical parameters:** pH, alkalinity, conductivity, dissolved oxygen, total dissolved solids and total suspended solids, total organic carbon (TOC) and dissolved organic carbon (DOC)
- **Major ions:** calcium, magnesium, potassium, sodium, sulphate, chloride, and fluoride
- **Nutrients:** nitrate, nitrite, ammonia, total phosphorus and phosphate
- **Organics:** oil and grease, phenols
- **Metals:** total and dissolved (including mercury)
- **Cyanide:** total and free

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All chemical analyses will be carried out with detection limits suitable for comparison to the relevant surface water quality criteria or guidelines (Provincial Water Quality Objectives (PWQO) and Canadian Water Quality Guidelines (CWQG)).

8.2.2.5 Geochemistry

A geochemistry monitoring plan will be developed and implemented by OHRG to confirm the characteristics of the materials mined, placed or otherwise used in construction. Preliminary geochemistry monitoring considerations are provided in Table 8-7.

The plan will include confirmation samples at a rate that considers the mine schedule, existing geochemical data, and follows appropriate guidance documents such as MEND (2009) or INAP (2012) as is required under O.Reg 240/00 under the Mining Act of Ontario. Samples will be analyzed using appropriate test methods for assessment of ARD/metal leaching potential, to confirm that the samples fall within the range identified, tested and described in the Geochemistry, Geology and Soils TSD. The results of analysis of geochemical characterization samples will be evaluated as part of on-going management of the Project Site. Since the development of a geochemical sampling program is contingent upon development of a detailed mine plan, the details of the program will be developed when a mine plan has been completed in the detailed design phase of the Project.

8.2.3 Biological Environment

Version 3 Update: Supplemental information related to biological environment mitigation measures is provided in responses to T(2)-11 (large wildlife species); T(2)-10 (migratory birds); MNDM 3, MNRF 14, MNR-EM 1 and T-54 (revegetation); MNR-EM3, MNRF 10B and MNRF 15 (fishing and hunting policies). See Addendum Part A; Table A-1 and Addendum Part B; Table B-1 for responses to comments.

Environmental management planning for potential effects to the biological environment will be focussed on activities and components that were assessed in Chapter 6 as having a low or moderate effect. The effects of the Project on the biological environment were assessed giving consideration to the following environmental components:

- Terrestrial ecology
 - Wetland Vegetation
 - Forest Vegetation
 - Wildlife Groups
 - Wildlife Individuals
- Aquatic ecology
 - Aquatic Habitat
 - Fish and Benthic Communities
 - Fish Species
 - Fish Tissue

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Project-environment interactions were evaluated and an assessment of potential effects was carried out based on identified VECs, as outlined in Section 6.2, Biological Effects Assessment. Where potential effects were identified, mitigation measures were applied. Remaining environmental changes were assessed; those identified to be low or moderate were considered for inclusion in the Environmental Management Plan.

Table 8-8 provides information related to management/mitigations as applied for the biological environment; compliance or management monitoring objectives; and potential adaptive management strategies that will be implemented or could be considered depending on monitoring results. Preliminary monitoring considerations for each component of the biological environment including proposed monitoring parameters, locations and methods, and proposed measurement frequency and duration are provided in Tables 8-9 and 8-10.

8.2.3.1 Terrestrial Environment

Version 3 Update: Supplemental information related to monitoring plans for migratory birds is provided in the response to T(3)-06 (see Addendum Part A; Table A-1). Responses to T(2)-09 and T(3)-05 provide details regarding the identification of areas with higher potential of nesting bird mortality, including Common Nighthawk, and identification of associated monitoring and mitigations plans.

OHRG will prepare a comprehensive Terrestrial Ecology monitoring program based on the residual effects predicted in the Terrestrial Ecology assessment. The objectives of the Terrestrial Ecology monitoring program will be to:

- Verify the accuracy and predictions of the EIS/EA Report;
- Confirm the effectiveness of mitigation measures, and in doing so, determine if new mitigation strategies are required;
- Ensure successful colonization of native plants in regenerating areas;
- Ensure effectiveness of mitigation measures;
- Protect active nests;
- Protect bird populations;
- Improve the waste management program;
- Evaluate the effectiveness of the wildlife management plan; and
- Evaluate the effectiveness of bat habitat compensation measures.

Monitoring program considerations for Terrestrial Ecology including proposed methods, frequency and duration are provided in Table 8-9.

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8.2.3.2 Aquatic Environment

Version 3 Update: Supplemental information related to monitoring plans for the aquatic environment is provided in the response to T(3)-07 (see Addendum Part A; Table A-1).

An Aquatic Environment monitoring program will be designed and implemented to confirm water quality, flow and water level alteration predictions generated during surface water modelling. If the monitoring program establishes that Project-related effects on the aquatic environment are greater than predicted, fish habitat suitability and utilization studies will be triggered on aquatic features (APIs) and/or specific VECs.

The environmental monitoring program will include an Environment Effects Monitoring (EEM) program to during operations through to closure, details of which will follow EC/MOE requirements. The EEM will be developed when the Project becomes subject to the Regulations.

Preliminary monitoring considerations for the Aquatic environment are provided in Table 8-10. The majority of the monitoring activities will be completed as part of the monitoring of habitat offset projects included in the No Net Loss Plan and/or the Environmental Effects Monitoring Plan. These are described in more detail in the Aquatic TSD.

8.2.3.2.1 Final No Net Loss Plan

Version 3 Update: Supplemental information related the No Net Loss Plan and offsetting measures is described in response to MNR-AH, MNR-EM 2, T-26 and T(3)-07. See Addendum Part A; Table A-1 and Addendum Part B; Table B-1 for responses to comments.

Fish habitat 'compensation' refers to 'offsetting' under the current Fisheries Act, 'No Net Loss Plan' (NNLP) refers to 'Offsetting Plan' and 'Harmful Alteration, Disruption or Destruction (HADD)' refers to 'Serious Harm'.

A conceptual NNLP/Habitat Offset Plan to offset habitat losses due to the project has been completed and is included in the Aquatic TSD. This document has been reviewed and approved in principle by DFO. A final NNLP/Habitat Offset plan to offset habitat losses attributed to the Project will be completed and submitted along with the *Fisheries Act* Authorization Request and the MMER Schedule 2 listing application. It includes adequate compensation (e.g., creation of new habitat units) to fully offset identified direct and indirect effects to habitat. It is expected that the final NNLP will be a living document as it may require amendment periodically. New HADDs may be added to the list already generated in the conceptual NNLP, which will subsequently require compensation (e.g., if effects of a particular stream crossing cannot be completely mitigated). The final NNLP will include details of the timing and location of construction of compensation works, and a monitoring schedule for each form of compensation. Where monitoring determines that habitat gain objectives have not been met as planned, additional compensation measures will be designed and implemented. In the final NNLP, habitat compensation to address losses from the scheduling of water bodies for tailings and waste rock disposal (to address requirements of the MMER Schedule 2) will be presented separately from habitat compensation for other project-related losses due to physical HADD under Section 35 of the *Fisheries Act*.

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Bill C-38, passed in June 2012, amends the *Fisheries Act* to focus on the protection of fish that support commercial, recreational or Aboriginal fisheries and to more effectively manage activities that pose the greatest threat to these fisheries. Habitat policy, including “no net loss” is currently under review to ensure consistency with the Act’s focus on managing threats to recreational, commercial and Aboriginal fisheries. While a number of policy documents are now available and DFO is offering general guidance under these new changes, they have yet to be passed in legislation. When new direction regarding habitat management policy becomes available, it may require that final NNLP/Habitat Offset Plan be amended.

The NNLP will also include compliance and effectiveness monitoring programs to evaluate if the compensation measures function as proposed.

8.2.3.2.2 Scheduling of Waterbodies under Metal Mining Effluent Regulation

Using a natural water body frequented by fish for tailings disposal requires an amendment to the MMR, which is a federal legislative action. The MMR, enacted in 2002, were developed under subsections 34(2), 36(5) and 38(9) of the *Fisheries Act* to regulate the deposit of mine effluent, waste rock and tailings into natural waters frequented by fish. These regulations, administered by Environment Canada, apply to the TMF and the WRMF components of the Project. Environment Canada (2011) outlines a specific process that is required to utilize a natural water body for metal mine waste disposal. This process requires preparation of an assessment of alternatives for mine waste disposal for consideration (Chapter 4) and public and Aboriginal consultations on the EA, including on possible amendments to the MMR. OHRG will be required to submit all required documentation to Environment Canada and may be asked to provide additional background information necessary in the preparation of the regulatory amendment package. Within the TMF, APIs #1, #2, #6, #47 and #48 will likely require scheduling under the Regulations. API #11, within the WRMF will likely also require scheduling.

8.2.3.2.3 Environmental Effects Monitoring (MMER)

The MMR under the *Fisheries Act* directs metal mines to conduct Environment Effects Monitoring (EEM) as a condition governing the authority to deposit effluent. EEM is a science-based performance measurement tool used to assess the adequacy of the regulations. EEM studies are designed to detect and measure changes in aquatic ecosystems (i.e., receiving environments). The metal mining EEM program is an iterative system of monitoring and interpretation phases that is used to assess the effectiveness of environmental management measures, by evaluating the effects of effluents on fish, fish health, fish habitat and the use of fisheries resources by humans. Long-term effects are assessed using regular cyclical monitoring and interpretation phases designed to investigate the impacts on the same parameters and locations. In this way, both a spatial and temporal characterization of potential effects to assess changes in receiving environments are obtained. Study elements include fish population and fish habitat assessments, benthic invertebrate surveys, fish tissue analyses, effluent characterization, sub-lethal toxicity and water quality monitoring.

The first EEM study design must be submitted not later than 12 months after the day on which the mine becomes subject to the Regulations. The first interpretative report must be submitted not later than 30 months after the date on which the mine becomes subject to the Regulations or not later than 42 months after the date on which it becomes subject to the Regulations, if the mine has submitted a report utilizing historical biological monitoring information. Subsequent interpretative reports are submitted 36 or 72 months after the day on which the most recent interpretative report was required to be submitted, depending on the results of the previous interpretative report.

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8.2.3.2.4 Construction Monitoring

Field monitoring will be performed to ensure that the mitigation measures implemented during construction successfully minimize adverse environmental effects. Monitoring will focus on the effects of any sediment release and deposition during construction. Post-construction monitoring will be conducted in watercourses affected by the road culvert crossings to evaluate the effects of any sediment releases and deposition at crossing sites, and to evaluate fish passage potential (e.g., hydraulics) through culverts. The effectiveness of habitat reclamation following construction will also be evaluated. Monitoring will be adaptive in that, if changes to fish and fish habitat are detected, appropriate remedial actions will be implemented and subsequent monitoring programs adjusted to ensure the effectiveness of remedial actions and future operations.

A standardized monitoring procedure will be developed so that monitoring data can be used to validate impact predictions. Various environmental variables may be monitored during construction, depending on the concerns and crossing objectives:

- Suspended sediment load before, during and after construction to provide feedback to construction personnel and document the zone of influence and changes in water quality.
- Substrate composition before, during and after construction to document areas of sedimentation.
- Watercourse flows during construction to ensure that fish passage and minimum flows are maintained.
- Monitoring during blasting and diversion procedures.
- Confirm that specific crossing objectives have been achieved.
- Observe and document actual effects.
- Observe and document recovery.
- Determine the need for maintenance of structures and mitigation measures.
- Fulfil explicit mitigation and compensation requirements.

8.2.3.2.5 Blast Monitoring and Collection of Supplementary Fish Habitat Information (Sawbill Bay)

To assess potential for vibration impact as development of the open pits approaches the final pit design, blasting operations will be monitored during initial pit development to obtain site-specific data on the potential for damaging vibrations to affect adjacent aquatic habitats. Baseline studies on habitat use, specifically timing and locations of spawning, have not been completed. It is recommended that these studies be undertaken to effectively mitigate the effects of blast vibration on fish in Sawbill Bay. These data also will be useful in evaluating the effects of construction of the retaining wall adjacent to the west pit, on fish habitat. The fish and data from fish habitats studies will be combined with the site-specific blast monitoring data to develop guidance as to when, if at all, blast designs should be altered to accommodate vibration levels at the nearest active spawning beds and to assess the effectiveness of blast mitigation on fish.

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8.2.4 Emergency Preparedness and Response and Contingency Planning

Version 3 Update: Responses to MNR-ER 1 and MNRF 16B (see Addendum Part B; Table B-1) provide details of the of the local community support for emergency response and local monitoring committee to be established on the subject.

The following is a preliminary discussion related to main components emergency response and contingency planning. As per the requirements of the Environmental Emergencies Regulations of the Canadian *Environmental Protection Act*, OHRG will develop an environmental emergency plan for any substances stored on site at the appropriate volumes. Detailed planning will be completed following EA approval and activities will be adapted once the program is implemented, to meet conditions encountered in the field. The detailed plan will be periodically reviewed and updated following a continuous improvement process throughout the construction, operations, closure and post-closure of the Project.

Potential accidents that were identified in the effects assessment (Chapter 6) include the following:

- Road accident on main access road resulting in a fuel spill or hazardous material spill from a truck.
- Fuel tank rupture or hazardous material spill on Mine Site.
- Tailings pipeline rupture.
- Spill of tailings water from TMF reclaim pond.
- TMF tailings dam failure.
- Flyrock

In addressing emergency preparedness and response, the EMP will identify the environmental risks, evaluate the risks and provide risk management measures to minimize negative effects. Some additional aspects that are considered for contingency purposes and planning include:

- Medical emergency.
- Fire safety.
- Pit slope failure.
- Excessive Pit inflow.
- Floods and Droughts.
- Loss of communication.
- Explosion.

Together the potential accidents, contingency measures and associated environmental risks will form the basis for development of a **Risk Management Plan** that will be developed for the Project following EA approval. The items listed are not intended to provide a comprehensive listing, but rather provide an example of aspects that will be included in the plan.

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Table 8-11 provides information related to management/mitigations as applied for each response or contingency identified; compliance or management monitoring expectations; and potential adaptive management strategies that will be implemented or could be considered depending on monitoring results. Additional discussion specifically related to the some of the components identified is provided following the summary table.

8.2.4.1 Fire Safety

OHRG will maintain the capability to respond to fires on or near the Project. To achieve this, OHRG will:

- Maintain adequate pumping capacity all times to meet anticipated fire suppression requirements.
- Develop and implement procedures for making sure that the potential for fires in the vicinity of the Project is minimized on an ongoing basis.
- Maintain fire-fighting equipment in good working order.

Training is one of the most essential parts of fire preparedness. Fire suppression basic training will be provided to OHRG staff and contractors. The degree of wildfire risk inherent in a Project activity is based on its potential to cause sparks. As the fire hazard increases so does the need to modify work procedures in order to reduce the chance of starting a fire (Table 8-12). A risk characterization exercise of Project activities will be part of the Fire Prevention and Preparedness Plan.

During periods of high to extreme fire hazard, the potential to inadvertently cause a wildfire increases greatly. Mining representatives should consider altering their work practices to further reduce the chance of causing wildfire during the high fire hazard conditions. The table below outlines the incremental prevention measures that are expected to be included in a Fire Prevention and Preparedness Plan and should be followed as the fire hazard increases.

8.2.4.2 Floods and Droughts

The Ore Processing Facility and supporting infrastructure are constructed on higher ground that would not be susceptible to flooding within the Upper Marmion Reservoir system.

A **storm water management system** will be implemented to ensure safe water levels are maintained in the Project facilities. Monitoring of hydrology and storm events will allow staff to determine when to:

- The need to divert excess non-contact water to local water bodies.
- The required capacity for contact water is available in the PPCP.
- The need for the tailings facility spillway to release excess water.

Drought may affect the ability to provide the water required for processing. During periods of drought, water storage in the TMF could be increased to provide sufficient water to meet operating needs.

The effects of drought can be mitigated through storing of excess water when climatic conditions indicate that a potential water shortage may occur in the future. This type of adaptive management practice will minimize the effects of the Project on water levels in Upper Marmion Reservoir and permit the Project to continue operations.

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8.2.4.3 Tailings Dam Safety

Project tailings dams were designed according to Canadian Dam Association (CDA) Guidelines and Ontario MNR Guidelines. The MNR has authority to approve dams in Ontario and CDA guidelines are referenced in the Ontario Mine Closure regulations. The design of the tailings dam was completed by Golder Associates Ltd. and will be peer reviewed by an independent expert in tailings dam construction and operation.

In addition, the Mining Association of Canada (MAC) provides guidelines for best practices for management of tailings dams. OHRG intends to develop a customized tailings management system, (an Operations Management and Surveillance (OMS) Manual), that address the specific needs of OHRG, local regulatory and community requirements. The management system will include:

- A framework for tailings management.
- Sample checklists for implementing the framework through the life cycle of a tailings facility.

The framework will offer a foundation for managing tailings in a safe and environmentally responsible manner through the full life cycle of a tailings facility from site selection and design, through construction and operation, to eventual decommissioning and closure.

The tailings management framework will be expanded into checklists that address the various stages of the life cycle. These checklists will provide a basis for developing a customized management system, operating procedures and manuals, exposing gaps within existing procedures, identifying training requirements, communicating with Communities of Interest, obtaining permits, conducting internal audits, and aiding compliance and due diligence, at any stage of the life cycle.

8.2.4.4 Spill Management

Accidental releases of controlled materials into the aquatic or terrestrial environment could cause acute local damage to those environments. The main risks to the aquatic and terrestrial environment due to an accident or malfunction throughout the Project include the accidental release of:

- hydrocarbons
- tailings
- process water (before treatment).

Appropriate spill response will be initiated should an incident occur and spills will be contained to minimize the areas affected in order to prevent migration to surface waters and to minimize any potential for impact. The potential for damaging fuel spills can be minimized by ensuring that fuel will be shipped to the Project site using licensed carriers, using compartmentalized vehicles equipped with spills containment materials. Drivers will be trained in the use of the materials. Consistent with good operating practice, the fuel storage area has been designed with double-walled tanks to hold 110% of expected capacity.

For tailings, the pipeline has been designed with berming to prevent lateral migration of any spilled materials from a pipeline rupture, and with containment areas in low points along the route. The system will be equipped with flow monitoring devices that will provide automatic shutoff of the pumps. In addition, in the event of a rupture, additional containment has been provided along the pipeline route that is designed to contain 2 hours pumping volume of tailings.

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8.2.4.4.1 Minimizing Negative Effects – Spills

A **Spill Management Plan** will be developed to ensure the negative effects of spills are minimized.

- Spills to terrestrial habitats would be cleaned up as soon as possible following the spill and would include soils testing to ensure that any contaminated soils are also removed.
- Spills to aquatic habitats would require containment followed by cleanup of spills.
- Spilled fuels would be appropriately remediated on site or removed by licensed contractors.
- Soils would be tested during a spill cleanup and adjacent soils that exceed acceptable levels will also be remediated or removed.

OHRG is committed to documenting spills, and further understand their cause so that spills can be minimized. Our spill response procedure will generally include the following step-wise approach:

- 1) Notify your supervisor immediately.
- 2) Ensure your own personal health and safety is protected.
- 3) Stop what you are doing and contain the spill.
- 4) Notify the environmental department.
- 5) Recover the spilled product.
- 6) Put all contaminated materials into an identified spill container.
- 7) Fill out an environmental incident report.
- 8) Implement recommendations.

A **system of safety berms and containment areas** will be included in the Project design.

- Spilled fuels would be contained within the bermed area.
- Effects on aquatic life would be minimized though appropriate containment measures implemented immediately following any spill.
- Berming of the route and containment areas will prevent migration of tailings to adjacent areas of the environment.
- As a result, spills will collect in the containment areas constructed at low points along the pipeline route that are designed to contain 2 hours pumping volume of tailings.

An **Emergency response plan** will be developed with the intention of ensuring cleanup will be quickly implemented to minimize potential effects. Trigger levels for initiating a plan response will be developed and included in the plan, and will be communicated to workforce supervisors as part of their training.

Some additional land disturbance will result from a spill that would affect limited areas of adjacent terrestrial habitat, primarily through subsequent cleanup activities. The effects are predicted to be localized, and affected areas can be re-vegetated to restore most of the original habitat function.

As such, the effects from a tailings pipeline rupture would be minor on the terrestrial environment.

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8.2.4.5 Contingency Planning and Continuous Improvement

OHRG will follow a Continuous Improvement Process order to improve processes and environmental management. The fundamentals of this process involve a Plan-Do-Check-Act philosophy. Plans are established based on input from stakeholders. From those plans mitigation and monitoring actions are determined. During operations, the plans are implemented and in-design mitigation measures are put in place.

The effectiveness of mitigation measures is checked through a series of monitoring and reporting activities as defined during the formation and implementation of the plan and as identified within this EIS/EA Report. A periodic review of the monitoring information and data then leads to actions which can be taken to improve the effectiveness of the mitigation measures. Initial contingency actions are identified in Tables 8-2, 8-8 and 8-11.

It is expected that OHRG will conduct an annual management and contingency planning review meeting followed by review and updating of contingency plans and standard operating procedures if necessary. The objective of this process will be to identify measures that will improve the safety and security of workers, decrease the potential for environmental impacts and ensure that appropriate contingency measures are considered and available should they be required.

8.2.5 Preliminary Cost Estimate

Costs associated with monitoring plans will be developed in detail following EA approval, based in part on the programs and measures as identified in this section. Some preliminary considerations related to monitoring costs are provided below and include:

- Cost and maintenance of Environmental, Health and Safety Department, workforce training, and environmental staff on site (six full-time staff at \$75K per person = \$450K/yr. – salary only).
 - Facilities – laboratory and office space (to be included in capital costs).
 - Minimum of two full-time training staff (one on-site) are required and will work on a rotational basis.
 - Minimum of four full-time environmental staff (two on-site at any given time) are required and will work on a rotational basis.
- Laboratory analyses costs (estimated at \$1 million per year).
- Annual inspections and special programs.
 - Geotechnical / Geochemical inspection (\$50 K/yr.).
 - Pit Stability inspection (\$50 K/yr.).
 - Vibration Monitoring (\$ 50K/yr.).
 - Hydrology \$300 K/yr.
 - Hydrogeology (\$1 million initial cost plus \$100 K/yr. monitoring).
 - Conducting of an Aquatic Environmental Effects Monitoring Plan (\$500K/yr.).
- Review and reporting (\$500K/yr.).

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For the purpose of preliminary cost estimation it is assumed that a monitoring budget of \$2 million to \$3 million per year will be required. These estimates will be included in the feasibility costs for the project and will require refinement and updating as the plans are fully developed following EA approval.

8.3 Social Management Planning

Version 3 Update: Supplemental information related to fishing and hunting monitoring and mitigation is provided in MNR-EM3 (monitoring committee to be established); and MNR 15 and MNR 10B (fishing and hunting policies and surveys) (see Addendum Part B; Table B-1).

Osisko identified community support as an important corporate social objective in the 2012 Sustainable Development Report. Osisko's corporate objective is to support community development by maximizing local and regional benefits. OHRG plans to maximize local benefits by creating jobs and favouring local purchases, facilitating local business development, improving public infrastructure and sharing the wealth with the local and Aboriginal communities.

The socio-economic assessment and Aboriginal findings presented in Chapter 6, Effects Assessment are considered in the following Social Management Plan. These findings are based on community consultation activities such as meetings and workshops as presented in Chapter 7, Public and Aboriginal Engagement.

The overall objectives of the following Social Management Plan is to provide the means for OHRG to work together with the Local and Aboriginal Communities to:

- Understand community needs.
- Clarify community expectations.
- Communicate OHRG's development plans.
- Identify mutually beneficial business opportunities.
- Identify potential independent business opportunities.

The following Social Management Plan was developed to address the avoidance of, minimization of, and/or compensation for negative socio-economic effects and the enhancement of positive benefits that could result from the Project.

8.3.1 Atikokan/OHRG Committee

Version 3 Update: Supplemental information related to the Atikokan/OHRG Committee is provided in response to MNDM-6 and MNDM-7 (see Addendum Part B; Table B-1).

A local monitoring committee will be established to allow for ongoing communications with the local members of the public. The mandate of the Atikokan/OHRG Committee will be to provide a direct link for communications between community members and OHRG. Information about the Project will be shared with the Committee, and Committee members will disseminate this information to the community at large. In turn, community members can approach the Committee with their concerns, and the Committee can share these community concerns with OHRG.

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It is anticipated that the Atikokan/OHRG Committee will be formed prior to the construction phase of the Project, likely in 2014. The structure of the committee will be based on the key parameters to be monitored and is anticipated to include representatives from the following sectors:

- Recreation and tourism.
- Emergency response and preparedness.
- Health and wellness.
- Education and training.
- Municipal infrastructure and services.

The Atikokan/OHRG Committee will also include two Osisko staff members. The committee is anticipated to meet on a quarterly basis and will be consulted throughout all phases of the Project.

As part of Osisko's move towards commercial production at Canadian Malartic in 2011, an independent Monitoring Committee was set up in the Town of Malartic to facilitate ongoing communications with the public and ensure the long term well-being of the community of Malartic is represented. In 2011, the Malartic/Osisko Committee had six members and one coordinator. In 2011, the committee met 12 times. Committee members were able to represent the local community and reached out to community members through:

- Participation in regional mining conferences.
- Meeting with local politicians.
- Participation in Chamber of Commerce activities.
- Meetings with Osisko's management.

OHRG will work with the Atikokan/OHRG Committee to develop measures that contribute to the quality of life of the local populations, including improvements to local infrastructure as may be required.

OHRG will continue to provide **community sponsorships and support** throughout the Project phases. OHRG will follow the same model developed at the Canadian Malartic Project, where a long-term beneficiary fund was created. The general criteria for selection of projects supported by the Atikokan/OHRG Committee will be their capacity to improve the cultural, social, physical, educational and environmental components of life for as many Atikokan residents as possible.

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8.3.2 Aboriginal Committees

OHRG has initiated a number of Aboriginal committees that will provide focussed communications between OHRG and the communities, and identify ways that the Project can provide ongoing benefits to identified Aboriginal communities. In December 2010, OHRG signed a Resource Sharing Agreement with the member nations of the FFCS and the Lac des Mille Lacs First Nation. OHRG's commitment to providing benefits to First Nations has been ongoing throughout the exploration phase of the Project

Environment Committee Mandate: Reviews environmental findings and shares environmental information with community. Supports OHRG management in the development, operation and closing of its project by recommending environmental, archeological and historical considerations relating to the participation of the First Nation peoples or partnered communities in the Project.

Training, Employment and Economic Development Committee Mandate: Identify training, employment and economic opportunities and recommend investment projects and initiatives.

Social and Cultural Committee Mandate: To provide cross-cultural training to Osisko and First Nations partners by seeking advice through elders and leaders. Determine and advise on necessary cultural activities for events and activities.

Throughout the construction and operations phases of the Project, the established Social and Cultural Committee will provide oversight and direction for appropriate ceremonies that should take place during Project meetings. The committee will also promote cross cultural awareness and bring forward suggestions for cultural investment opportunities.

- Incorporation of Traditional Knowledge
- Traditional Use Information
- Ojibway Language

Ongoing consideration of traditional use information can contribute to the evaluation of potential effects and their significance, effectiveness of proposed mitigation, and consideration of follow-up monitoring.

In March 2012, OHRG signed a Memorandum of Understanding (MoU) with the Métis Nation of Ontario, including four identified Métis community councils (Kenora, Sunset Country, Northwest and Atikokan). The MoU allowed for the formation of a Métis Consultation Committee that has met regularly throughout the Project planning process. It is anticipated that a similar committee will be formed prior to the construction phase, likely in 2014. The structure of the committee will be dictated based on a negotiated agreement between Osisko and the Métis Nation of Ontario. Based on the success of consultation activities throughout the exploration phase, it is anticipated that the structure of the committee will be similar to the consultation committee engaged throughout the exploration phase, which included the president of each of the four identified Métis communities, the Captain of the Hunt and the Regional Chair, as well as two Osisko staff members, or as mutually agreed upon between Osisko and the Metis communities.

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8.3.3 Benefit Enhancement

The Project is predicted to have a positive effect on employment and training. Through ongoing community consultation, OHRG has identified some measures that will further enhance the economic and education benefits of the Project.

OHRG plans to work with local academic institutions such as school boards to develop specialized labour skills in the workforce. On site and on the job training will be a focus as well as upgrading of workforce skills.

OHRG will continue to share anticipated workforce and equipment requirements information with Aboriginal communities and local economic development corporations. Employment opportunities, and their corresponding job postings, will be communicated to the local and Aboriginal communities in a timely manner. OHRG will implement a hire local priority policy, and seek out business opportunities within the local community.

OHRG will continue to promote the utilization of Aboriginal and local enterprises whenever possible in supplying goods and/or services required during each phase of the project. Procurement policies that favour local businesses will be implemented.

The criteria used for the evaluation and awarding of all contracts by OHRG include cost competitiveness, continuity of supply, quality of work and timeliness. Targeted employment, training and business opportunities will be identified through work with local committees.

Throughout consultation, OHRG has heard from Aboriginal communities that Aboriginal culture is important. OHRG has worked with Aboriginal communities to respect customs and provide capacity for traditional ceremonies at the Project site and within the communities.

OHRG has provided capacity for Metis community feasts and a Metis Traditional Knowledge Study in the Project area, both which provide tangible support for the Métis Way of Life.

8.3.4 Follow-Up Plan

Social indicators will be identified and confirmed through ongoing consultation. These indicators will be included in a detailed social management plan and will be based on measurements that can be compared over time with those presented in Chapter 3 Baseline Conditions.

Social indicators and detailed social monitoring will be developed in cooperation with the Atikokan/OHRG Committee and Aboriginal Committees established as the Project planning process moves forward.

Monitoring will facilitate the adaptive management of socio-economic effects, many of which are inherently unpredictable. In practice, the monitoring will be based both on ongoing data collection and consultations, and will also use secondary data sources where available.

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8.3.4.1 Construction Monitoring

Consultation on construction monitoring activities is planned for Q2 2014. Consultation will include a committee meeting where the following topics will form the basis of discussion:

- Planned monitoring framework
- Parameters, methods, duration and frequency of monitoring
- Opportunities for community involvement in monitoring activities
- Preferred mechanism for sharing monitoring results

Osisko will also prepare and present community information materials for review by the committee members. Committees will be asked to provide feedback on the preferred method of sharing of information materials with the communities, and be directly involved in communications efforts. A follow up meeting will take place to provide committee members with the opportunity to share community feedback on monitoring plans.

Consultation on operations monitoring is planned to take place prior to operations phase in 2016 and closure monitoring consultation will likely take place in 2027.

Three separate committees will be engaged and consulted on the topic of environmental and social monitoring for the Project. The First Nations committee has already been formed, and consultation with Métis and the public has also been ongoing throughout the exploration phase of the Project.

8.3.5 Follow-Up Consultation

OHRG will continue to engage with Project stakeholders, including the local Atikokan/OHRG and Aboriginal communities and consider their comments throughout the Project planning process.

The following broad goals will provide the framework for a follow up consultation plan:

- Share land use information and reporting with First Nations communities: OHRG has collected traditional use information from elders and community members. This information has been shared in a presentation form with the participants of the study; however, OHRG has also committed to providing a report to the communities.
- Respond to questions and concerns heard at open house events: Throughout the community open house events OHRG heard questions and concerns from community members. OHRG will endeavor to provide responses to the comments in a timely and meaningful way.
- Information sharing of EA results: OHRG will prepare and deliver summary presentations that capture the predicted environmental effects and proposed mitigation measures presented in the EIS/EA Report.
- Notice of Submission of Closure Plan: OHRG will circulate a formal Notice when the Certified Closure Plan is submitted to the government.