

Identifier	Topic	Reference to EIS/EA Report	Summary of Comment	Proponent's Response	Subsequent Comment
			<i>Date: March 2014</i>	<i>Date: June 2015</i>	
MNR-Closure	Closure		<p>Once the requirements of the current EMP have been addressed (see previous comment), the mitigation and contingency/non-compliance components of the revised EMP need to be carried into the rehabilitation plan to ensure that rehabilitation of the site meets the goal of mitigating the biological and physical effects from the project.</p> <p>To meet the purpose of supporting the EA, the Conceptual Closure plan needs to include a commitment for additional consultation efforts to address the social, economic, environmental, and First Nation interests of the day, at the time of closure. This consultation is needed to assist in decision making with regards to land use designation (i.e., is the land suitable and preferred for recreation, tourism, other industrial uses etc).</p> <p>As well, this section needs to contain a decommissioning assessment as identified in the ToR.</p>	<p>The closure plan is outlined in the Conceptual Closure and Rehabilitation Plan TSD. Mitigation measures are defined and described throughout the EA and TSDs and the contingency/non-compliance strategies are defined in Chapter 8 of the EA. The effects of the proposed conceptual closure plan have been assessed for the relevant physical and biological components of the environment and the results of these assessments are documented in Table 6-57 (Environmental Assessment Matrix for Closure and Post-Closure Phase) of the Final EIS/EA.</p> <p>The goal of the closure plan, and associated monitoring considerations, is not to fully restore the site the pre-existing condition as this cannot be practically or economically done (e.g., in the TMF, WRMF and pit areas). As detailed in the Conceptual Closure and Rehabilitation Plan, the goal for the Closure Phase of the Project is to restore the site to an acceptable land use. This will include re-vegetation with native species and post-closure monitoring of re-vegetated areas as outlined in the CCP.</p> <p>The closure plan presented in the EA is conceptual and closure planning is ongoing. The certified closure plan is in development in consultation with the Ministry of Northern Development and Mines (MNDM). Closure plans are subject to O. Reg. 240/00 of the mining Act and MNDM is the lead agency. A formal consultation plan for the closure phase of the Project is part of the regulated closure planning process under the mandate of MNDM. Under O. Reg. 240/00, as amended by O. Reg. 307/12, the Director of Mine Rehabilitation will provide written direction to Canadian Malartic with respect to the requirements for consultation with Aboriginal groups, and such consultation will be a condition for filing the certified closure plan. Canadian Malartic is currently reviewing the draft certified closure plan with MNDM. As per the requirements of the Mining Act, the certified closure plan will not be submitted to MNDM until EA Approval has been received.</p> <p>The original estimate of 78 years for the open pits to flood was based on continuous pumping of water from the site and TMF into the pits. Upon further consideration, it is expected that the site water will be of suitable quality for discharge and, to mitigate the potential for extended impacts to water levels in Marmion Reservoir, the pit lake filling water balance was modified to account for the release of site water after a period of 5 years. The details of the revised pit flooding mode are provided in Part B of the Version 2 Conceptual Closure and Rehabilitation Plan TSD.</p> <p>Predicted open pit water quality after pit flooding is provided in Table 4-15 of the Site Water Quality TSD. The detailed results of geochemical modeling of the pit flooding are provided in Appendix 4.III and Appendix 4.IV of the Site Water Quality TSD. If site water quality is deemed to be unsuitable for release during the closure phase, it will continue to be pumped to the pits as they fill.</p>	
			<p>It is required under the Environmental Assessment Act, to identify the decommissioning phase of the project. Although it is expected the Closure Plan will</p>		

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			<p>address many elements of decommissioning of the site under the Mining Act, the EA needs to address such things as land use, habitat restoration, recreational/social/economic interests that are not captured under the Closure Plan. MNR is not requesting a 'formal consultation plan' at this stage. But a section in the EA should address consultation commitments at closure; such as where the ToR, pg 20 states there will be consultation prior to the Closure Plan submission. This should be carried over to the EA.</p> <p>The response does not clearly address the contradiction. The objectives of re-vegetation will be important at closure. There needs to be a description in the EA of a commitment for a detailed vegetation plan at closure and the types of techniques that may be considered. The plan to re-vegetate aggregates, surface tailing and overburden stockpiles only, may not be adequate. The plan will need to address objectives defined through consultation. That is; there are different re-vegetation expectations for habitat restoration, for aesthetics and for stabilization.</p> <p>There is still some confusion and this is a little misleading. Large water bodies will never be part of the aquatic ecosystem, and water quality impacts to Marmion and the pit lake need to be defined.</p> <p><i>The report refers to the collected pond water as being good enough to be released, but if not acceptable it will be pumped back into the PPCP or reused in the process or treated and released. How will this happen? What would the water be needed for in closure? How will it be treated?</i></p> <p>It should be acknowledged that this component of the project will not be covered under this EA and may be subject to other EA processes before approval.</p> <p>Why has the estimated pit filling duration changed from 78 to 218 years? Was there a change in plan for discharge or modification to the pit flood model? If so please explain why and the rationale of the amended time frame - this a drastically different time line than the Draft EA.</p> <p>MNR disagrees with the use and definition of 'restoration'. Restoration means that the area will be brought back to baseline conditions. This is not the plan, so the EA will need to define their 'rehabilitation' plan. As previously mentioned, the plan will need to consider objectives defined through consultation. That is; there are different re-vegetation expectations for habitat restoration, for aesthetics and for stabilization. A change from lowland to upland will result in a different habitat. There are models available to provide a better prediction of what the site will return as. Please provide results of model runs to address this.</p>		