



PRODIGY
GOLD INCORPORATED

Magino Gold Project

MAGINO GOLD PROJECT

Finan Township, Algoma District, Ontario

ENVIRONMENTAL IMPACT STATEMENT

CHAPTER 2: APPROACH TO THE PREPARATION OF THE EIS

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2.0 APPROACH TO THE PREPARATION OF THE EIS

2.1 Environmental Assessment as a Planning and Design Tool

An Environmental Assessment (EA) is a tool intended to provide an effective means of integrating environmental factors into project planning, design and overall decision-making processes in a manner that promotes sustainable development and the wise management of natural resources. By conducting this EA, Prodigy Gold Incorporated (Prodigy) intends to:

1. Anticipate and avoid environmental problems through informed decisions on Project alternatives and trade-offs;
2. Identify and assess the significance of the environmental effects of the project;
3. Minimize the adverse effects and the long term legacy of the Project on the landscape; and
4. Promote, and where possible, enhance the Project's beneficial effects.

This Environmental Impact Statement (EIS), as a forward-looking planning tool used in the early stages of project development, is based on a precautionary or conservative approach. This approach is guided by professional judgement intended to address uncertainties in the assessment. This approach is consistent with Principle 15¹ of the 1992 Rio Declaration on Environment and Development. In keeping with this precautionary approach and Prodigy's desire to avoid and minimize adverse effects of the Project, a "mitigation by design" approach has been taken. Wherever possible, the Project has been planned and designed to avoid adverse environmental effects. This has been done through the selection of economically and technically feasible alternatives and control technologies, the careful configuration of Project components, and the implementation of best management practices. Major mitigation by design features are highlighted in Chapter 6 of this EIS.

An important component of this mitigation by design approach is the minimization of the long-term legacy of the Project on the landscape. As such, considerable effort has been placed on the rehabilitation of the mine site following its operation through the development of a Certified Closure plan.

Throughout the EIS, the Project has been conservatively considered in a thorough, transparent and traceable manner. With the exception of accidents and malfunctions, identified residual adverse effects are assumed to occur (i.e., probability of occurrence is assumed to be 1.0), and are assessed for their significance. The evaluation of potential effects is based on changes to the existing environment and not solely on regulatory compliance. This captures and assesses changes to the existing environment that may fall outside or below applicable regulatory frameworks.

¹ Principle 15 of the 1992 Rio Declaration on Environment and Development states that "Where there are threats of serious or irreversible damage, lack of full scientific certainty must not be used as a reason for postponing cost-effective measures to prevent environmental degradation".

Key assumptions used in the analysis are identified throughout Chapter 7. In some instances a “bounding” approach has been taken. This is when a credible “worst case” scenario is described and assessed, with the understanding that all other scenarios would have lesser effects. This assessment has taken into consideration the potential for Project expansion. As stated in the PFS, the current ore reserve is 105 Mt with an estimated additional mineral resource of 26 Mt (low grade ore). Furthermore, as the exploration program continues, it is likely that additional mineral resources will be identified. The decision to process these additional mineral resources (low grade ore) will be determined by economic conditions (gold prices and processing costs).

While mining of 550 Mt will occur over a 10 year time frame, it is expected that processing may extend to 15 years in order to process up to 150 Mt of gold bearing ores. This assumes a milling rate of up to 35,000 tpd. The Tailing Management Facility (TMF) is sized to accommodate 150 Mt of tailings, while the Mine Rock Management Facility (MRMF) is sized to stockpile up to 430 Mt. The EIS considers the effects assessment associated with these parameters. For the financial model and economic indicators we have maintained the values provided in the 2016 PFS.

Scientific uncertainty concerning the extent of potential effects is largely compensated for through the use of bounding conditions that typically reflect the outer range of possible conditions which could cause effects.

The degree of uncertainty concerning the prediction of effects has been further reduced through the use of best practices by experienced professionals; incorporation of actual measurement data where available and applicable; and use of approved models with a history of application. Specific details with respect to model uncertainties associated with the prediction of environmental effects are included in the applicable Technical Support Documents (TSD).

Throughout Chapter 7, proven mitigation measures and practices demonstrated to be effective on similar projects have been identified and will be implemented on the Project. Where avoidance was not considered possible or technically and economically feasible, or where proven mitigation measures and practices were not considered sufficiently protective, further mitigation and/or adaptive management measures are recommended. These measures represent Prodigy’s commitments that will be incorporated into the Project.

A variety of Follow-up Management Plans (FMP) will be developed for the Project in consultation with Aboriginal groups, regulatory agencies, and public stakeholders. These are presented in Table 2-1.

Table 2-1: List of Management Plans for the Magino Project

Document	Title	Description
General Management Plans		
TSD 20-1	Environmental Management System (EMS)	Describes the overarching framework for environmental, safety and health management
TSD 20-2	Health & Safety Management Plan	Focusses on occupational health and safety and requirements of the Occupational Health and Safety Act, R.S.O. 1990, c.O.1-Ontario
TSD 20-3	Emergency Response and Spill Prevention and Contingency Plan (ERSPC)	Aligns with Ontario Regulation 224/07 for requirements of the management of spill prevention and contingency
TSD 20-4	Hazardous Substances Management Plan	Focusses on hazardous material and hazardous waste.
TSD 20-5	Waste Management Plan	Focusses on non-hazardous waste
TSD 20-6	Construction Environmental Protection Plan	Outlines environmental protection procedures implemented for the construction activities
TSD 20-7	Crisis Management Plan	Provides procedures for coping with "Level 3" emergencies or catastrophic events at the site
TSD 20-8	Mine Material Management Plan	Outlines management of materials extracted from the mine pit
TSD 20-9	Site Security, Roads and Traffic Management Plan	
TSD 20-10	Fire Preparedness and Prevention Plan	
TSD 20-20	Preliminary Closure and Reclamation Plan	Describes site closure and post closure monitoring
VECs - Biophysical Valued Ecological Components Management Plans		
TSD 20-11	Air Quality and Noise Abatement Plan	Targets VECs of air quality, noise, vibration, greenhouse gases and climate change
TSD 20-12	Water Management Plan	Targets management of all water sources/streams at the site (quantity and quality)
TSD 20-13	Environmental Monitoring Plan	Regroups all environmental monitoring activities
TSD 20-14	Fish Habitat Compensation Plan	Satisfies requirements of the Fisheries Act
VSECs - Valued Socioeconomic Components Management Plans		
TSD 20-21	Human resources Management Plan	Focuses on employment opportunities for residents and Indigenous communities, training, and commercial opportunities

TSD 20-22	Historic Resources Plan	Focuses on the identification of historic and cultural sites
TSD 20-23	Public and Stakeholder Engagement Plan	Focuses on communication with stakeholders and other interested persons.

2.2 Aboriginal Engagement and Public Consultation

Under the *Canadian Environmental Assessment Act* (CEAA, 2012) and Ontario *Environmental Assessment Act* (1990), proponents are required to engage and consult with Aboriginal groups, the public, and other interested parties on a proposed development. The Canadian Environmental Assessment Agency (Agency) requires proponents to provide up-to-date information about a proposed development to the public and particularly to communities and groups that will potentially be affected by the project. This information is to be provided as early as possible in the project planning process. Prodigy's consultation and engagement program involves Aboriginal groups, communities, regional groups, and other identified parties in the area surrounding the proposed project. It includes discussions on the Project's components, alternative methods, baseline studies, potential effects, and proposed mitigation measures. Through its consultation and engagement program, Prodigy has developed a better understanding of local needs and priorities, key questions and comments, and established long-term working relationships. Some of the key issues raised during this program are identified in Chapters 12 and 13 of this EIS.

Prodigy's approach to Aboriginal engagement and public consultation has been guided by the following goals:

1. Ensure the planning process is clear, transparent, open, and inclusive to the public, interested parties, and affected Aboriginal groups;
2. Design all consultation/engagement activities to be flexible and responsive to input;
3. Document all comments, questions and responses; and
4. Use findings to inform the EA, including project design, mitigation, and opportunities for socio-economic benefits.

2.2.1 Aboriginal Engagement

2.2.1.1 Introduction

Prodigy is committed to developing and maintaining relationships with Aboriginal groups identified by government agencies and who may potentially be affected by the proposed Magino Mine. Information gathered through Aboriginal engagement activities has contributed to the preparation of the EIS and was used in evaluating the effectiveness of measures proposed to mitigate impacts.

Prodigy has engaged the following Aboriginal groups in the EA process as identified by the Agency and provincial government:

- Michipicoten First Nation;
- Missanabie Cree First Nation;
- Métis Nation of Ontario;

- Batchewana First Nation²;
- Red Sky Métis Independent Nation;
- Garden River First Nation; and
- Pic Mobert First Nation³.

Further detail on Aboriginal engagement activities for the Project is provided in Chapter 12: Aboriginal Engagement, and Appendix 7: Record of Aboriginal Communications.

2.2.1.2 Aboriginal Engagement Requirements

Aboriginal engagement for the Magino project is consistent with:

1. The Agency's November 2013 *Guidelines for the Preparation of an Environmental Impact Statement – Magino Gold Project* (Prodigy);
2. CEAA 2012;
3. The Ontario *Environmental Assessment Act*;
4. Code of Practice: Preparing and Reviewing Environmental Assessments in Ontario; and
5. Code of Practice: Consultation in Ontario's Environmental Assessment Process.

The November 2013 *EIS Guidelines* require Prodigy to engage with potentially affected Aboriginal groups in regards to:

- “effects of changes to the environment on Aboriginal peoples (health and socio-economic issues; physical and cultural heritage, including any structure, site or thing that is of historical, archaeological, paleontological or architectural significance; current use of lands and resources for traditional purposes); and
- potential impacts of the project on potential or established Aboriginal or Treaty rights”⁴.

Ontario's Code of Practice states that “Consultation with potentially affected Aboriginal communities is required... The proponent should discuss with Aboriginal communities how to prevent or mitigate any potential adverse effects the project may have on Aboriginal interests.”

In fulfilment of the above requirements, Chapter 12 of this EIS highlights Prodigy's Aboriginal engagement activities to date; how specific activities have “allowed Aboriginal groups to understand the project and evaluate its effects on their communities, activities, Aboriginal and Treaty rights and other interests”⁵; and, future planned engagement activities. Prodigy has kept a detailed record of all engagement activities and feedback received; Appendix 7 offers a detailed record of communications with Aboriginal groups.

In other sections of this EIS (Chapter 4: Existing Conditions; and Chapter 7: Effects Assessment), Prodigy has indicated “how input from Aboriginal groups was used in establishing the baseline conditions related to health and socio-economic, physical and cultural heritage and

² On June 13, 2014 the Agency identified Batchewana First Nation (BFN) as an additional Aboriginal group for Prodigy to consult in the EA.

³ At this time, Pic Mobert First Nation (PMFN) has declined participation in Prodigy's Magino Mine EA process. See Chapter 9 on Aboriginal Engagement for further detail.

⁴ CEAA. (2013, November). *Guidelines for the Preparation of an Environmental Impact Statement: Magino Gold Project*, Prodigy Gold Incorporated: page 17.

⁵ CEAA. (2013, November). *Guidelines for the Preparation of an Environmental Impact Statement: Magino Gold Project*, Prodigy Gold Incorporated: page 18.

current use of lands and resources for traditional purposes”, in addition to any other information or factors of importance to Aboriginal groups.

2.2.2 Public Consultation

2.2.2.1 Introduction

Prodigy has consulted with the communities of Dubreuilville, Wawa and White River, regional organizations, groups and other interested parties throughout the EA process. Further details on public consultation activities for the Project are provided in Chapter 13: Public Consultation; and Appendix 6: Record of Public and Stakeholder Communications.

2.2.2.2 Public Consultation Requirements

Public consultation for the Magino project is consistent with:

1. The Agency’s November 2013 *Guidelines for the Preparation of an Environmental Impact Statement – Magino Gold Project (Prodigy)*;
2. CEAA 2012;
3. The Ontario *Environmental Assessment Act*;
4. Code of Practice: Preparing and Reviewing Environmental Assessments in Ontario; and
5. Code of Practice: Consultation in Ontario’s Environmental Assessment Process.

One of the purposes of CEAA 2012, as stated in Section 4(e), is to “ensure that opportunities are provided for meaningful public participation during an environmental assessment”. Further, sub-section 19(3) states: “the environmental assessment of a designated project may take into account community knowledge”. Community knowledge refers to a body of knowledge and understanding accumulated and commonly held by a community and its members through continued existence in the area. The *Guidelines* state that Prodigy must incorporate into the EIS community knowledge to which it has access, or has acquired through public consultation activities, “in keeping with appropriate ethical standards and without breaking obligations of confidentiality”⁶.

Section 5.1 of the Ontario *Environmental Assessment Act* states, “When preparing ... an environmental assessment, the proponent shall consult with such persons as may be interested.” In addition, as required by the *Guidelines*, Chapter 13 describes Prodigy’s completed, ongoing, and proposed consultations with local communities, regional groups, and other interested parties⁷. Key comments made through public consultations to date, and Prodigy’s responses to these comments, are also documented in Chapter 13. This includes public questions and comments with regard to specific geographic areas or ecosystems of particular public concern, and their relation to the broader regional economy or environment; for example “the nature and sensitivity of the area within and surrounding the project and any planned or existing land and water use in the area”⁸.

⁶ CEAA. (2013, November). *Guidelines for the Preparation of an Environmental Impact Statement: Magino Gold Project*, Prodigy Gold Incorporated: page 9.

⁷ CEAA. (2013, November). *Guidelines for the Preparation of an Environmental Impact Statement: Magino Gold Project*, Prodigy Gold Incorporated: page 17

⁸ CEAA. (2013, November). *Guidelines for the Preparation of an Environmental Impact Statement: Magino Gold Project*, Prodigy Gold Incorporated: page 17.

In other sections of this EIS (Chapter 4: Existing Conditions; and Chapter 7: Effects Assessment) Prodigy has indicated how feedback received through public consultation has been used to inform the understanding of existing conditions, the selection of valued components (VC), Project alternatives, and potential effects and mitigation measures.

2.3 Government Agency Consultation

2.3.1 Introduction

Since 2012, Prodigy has actively engaged with government agencies on the proposed Project. Engagement activities will remain ongoing throughout the EA process and beyond, as Prodigy continues to develop strong, long-term working relationships.

The purpose of the consultation with agencies to date has been to:

- Inform government agencies about the nature of the project;
- Discuss EA requirements and options for how requirements can be addressed;
- Seek direction on Aboriginal groups which should be engaged in support of the government agencies' Duty to Consult; and
- Identify considerations of technical and scientific matters related to the jurisdiction of the government agencies (e.g., waste management, SAR).

2.3.2 Agencies Consulted

Prodigy has consulted the following government agencies during the preparation of this EIS:

- Candian Environmental Assessment Agency;
- Environment and Climate Change Canada;
- Department of Fisheries and Oceans;
- Natural Resources Canada;
- Transport Canada;
- Ministry of Northern Development and Mines;
- Ministry of Municipal Affairs and Housing;
- Ministry of the Environment and Climate Change;
- Ministry of Tourism, Culture and Sport;
- Ministry of Natural Resources and Forestry; and
- Ministry of Community and Social Services.

Prodigy will continue to work closely with government agencies to identify legislative expectations, measures for the efficient review and approval of the Magino Project and opportunities to enhance environmental protection and social benefits associated with this project.

2.4 Environmental Assessment Framework

The assessment of the Project is conducted within an overall EA framework comprised of:

1. Environmental components;
2. Valued Component;
3. Temporal boundaries;
4. Spatial boundaries;
5. Project alternatives;

6. Alternatives evaluation criteria;
7. Project components;
8. Project works and activities; and
9. Significance assessment criteria and effects levels.

2.4.1 Environmental Components and Valued Components

Fundamental features of the EA framework are the broad environmental components and the set of VC that give the EA its overall structure and focus. Six broad environmental components have been identified, namely:

- Atmospheric environment;
- Physical environment;
- Biological environment;
- Social environment;
- Economic environment; and
- Aboriginal interests.

Existing conditions relevant to each of these environmental components are described. These conditions represent the baseline upon which the likely effects of Project alternatives and the Project itself are assessed. The assessment of Project effects is conducted on a comprehensive set of VC.

VC refer to specific features of these six broad environmental components that may be affected by the Project and/or that have been identified to be of interest by Prodigy, government agencies, Aboriginal groups, or the public. The value of the VC relates not only to its role in the ecosystem or human communities, but also to the value people place on it. Prodigy has identified the VC deemed appropriate, including the ones identified in the EIS Guidelines and features identified in the MNR Class EA. It is noteworthy that the VC identified by Prodigy include, but are not limited to, the relevant environmental components specified by Section 5 of CEAA 2012, as well as SAR and their critical habitat, as per the requirement outlined in Section 79 of the *Species at Risk Act*. The VC are described in sufficient detail to allow a reviewer to understand their importance and assess the potential for environmental effects arising from the project activities.

The VC that are the main focus of the EA are evaluated according to key indicators using a set of measureable parameters. For the biological environmental VC, indicators are features such as a species or groups of species that are representative of the VC. For other environmental component VC, the indicators are simply important topic areas of concern from a regulatory perspective (e.g., noise, vibration, light) or from a community well-being perspective. For each indicator, one or more “measures” should be identified. Measures are the specific items or analytical parameters that are used to describe the magnitude of the effect on the VC. In many instances, they are quantifiable (i.e., area of habitat removed [ha], or concentrations of Contaminants of Concern [mg/L], etc.). Where qualitative analysis is used extensively, the selected measures represent those key considerations that determine the magnitude of the effect (e.g., presence or absence of a feature, likelihood of measurable effects on a VC).

2.4.2 Temporal and Spatial Boundaries

The EA framework also defines the temporal and spatial boundaries for the environmental components (with some modifications in some cases). Temporal boundaries correspond to the five Project development phases, namely:

- Phase 1: Environmental Assessment and Permitting (Current Phase);
- Phase 2: Site Preparation (up to one year);
- Phase 3: Construction (up to 2 years);
- Phase 4: Operations:
 - Mining (up to 10 years); and
 - Processing (up to 15 years)
- Phase 5: Closure and Rehabilitation:
 - Closure and Rehabilitation (up to 3 years); and
 - Post closure monitoring (until closure objectives are satisfied)

These phases are to be sufficiently flexible to capture the full range of effects of the Project on each VC.

Spatial boundaries define the geographical extent(s) within which environmental effects are considered. As such, these boundaries are the study areas adopted for the EA. The EIS Guidelines require that the study areas encompass the environment that can reasonably be expected to be affected by the Project, or which may be relevant to the assessment of cumulative effects. Specific study areas are identified that encompass each of the six environmental components.

In general, three study areas were selected for the assessment of the effects of the Project, namely the Regional Study Area (RSA), the Local Study Area (LSA) and the Project Study Area (PSA). These study areas and the rationales for their selection are described in Chapter 4:

- The RSA is the broadest in geographic scale and was defined on the basis of watersheds, political or administrative boundaries, or the limits of the modelling domain used for evaluating effects;
- The LSA is nested within the RSA and is focused on the area in which direct and indirect effects of mine construction, operation and closure may be expressed. As such, the LSA differed for each environmental component; and
- The PSA is nested within the RSA and LSA. It includes all areas within the Magino property boundary and includes all areas that would be directly disturbed by the Project.

2.4.3 Project Alternatives and Evaluation Criteria

Project alternatives form an important part of the EA framework and include both alternatives to the Project and the alternative methods of carrying out the Project.

The purpose of the Project is to extract gold from an identified ore body and to sell it on global commercial markets. This can only be accomplished through the mining and processing of the identified ore body. Due to the ore body being in a fixed location, there is no feasible alternate location or other alternative to the Project except for a “No Project” Alternative. A “No Project” Alternative would leave the ore body in place. The mine would not be developed, and the beneficial and adverse effects of the Project would not occur.

With respect to alternative methods, alternatives have been identified for each major Project component based on Prodigy's engineering and environmental studies, and taking into consideration input gained from local communities, Aboriginal communities, and government consultations. These alternatives represent those that are considered reasonable given the Project location, configuration of the ore body, the size of the Project site, and the available infrastructure both on-site and off-site.

The EA framework also includes two sets of criteria and their respective indicators for the evaluation of alternatives. The first set allows each alternative to be evaluated for its technical and economic feasibility. Those alternatives that are deemed to be both technically and economically feasible are evaluated further on a relative basis to identify a preferred alternative. This is accomplished using a more detailed set of evaluation criteria and indicators, namely:

- Technical performance and opportunities;
- Financial costs and risks;
- Effects on the natural environment (atmospheric, physical, and biological environments) and human health; and
- Effects on the social and economic environments and Aboriginal interests.

The alternatives identified through this evaluation as being most preferred are integrated into the Project design.

2.4.4 Project Components, Works, and Activities

The framework includes a set of Project components and Project works and activities that form the basis of the assessment. The Project components are those buildings and structures that comprise the Project, including associated ancillary works or enabling infrastructure that were identified through the alternatives assessment.

The Project works or activities describe how the site is to be prepared and how the Project components are to be constructed, operated, decommissioned or closed and rehabilitated.

2.4.5 Significance Assessment Criteria and Effects Levels

The EA framework is completed with a set of significance assessment criteria for each VC. The following types of significance assessment criteria were defined:

- Magnitude;
- Geographic Extent;
- Timing and Duration;
- Frequency;
- Degree of Irreversibility;
- Ecological Context; and
- Social Context.

VC-specific effects levels have been defined for each of these significance criteria. These criteria and their respective effects levels are applied to the anticipated residual effects of the Project. This allows for an overall determination to be made as to whether a residual effect is "significant" or "not significant".

2.4.6 Summary of the EA Framework

Table 2-2 provides a summary of the EA framework.

Table 2-2: Summary of Environmental Assessment Framework

FRAMEWORK ELEMENT	KEY FEATURE	DETAILED FEATURES
Environmental components	Six Environmental Components.	<p>The environmental components included in the EA framework are:</p> <ul style="list-style-type: none"> • Atmospheric environment; • Physical environment; • Biological environment; • Social environment; • Economic environment; and • Aboriginal interests.
Valued components	Thirty one VC. The rationale for the identification of the VC is provided in Chapters 7, 8 and 10.	<p>The number of VC identified for each environmental component are:</p> <ul style="list-style-type: none"> • Five VC relevant to the atmospheric environment; • Six VC relevant to the physical environment; • Eight VC relevant to the biological environment; • Four VC relevant to the social environment; • Three VC relevant to the economic environment; • Three VC relevant to Aboriginal interests; and • Two VC relevant to health.
Temporal boundaries	Temporal boundaries correspond to the five Project development phases.	<p>The five Project phases are:</p> <ul style="list-style-type: none"> • Environmental Assessment and Permitting; • Site Preparation; • Construction; • Operations - Mining and Processing; and • Closure and Rehabilitation (including post-closure).
Spatial boundaries	Three study areas.	<p>The three study areas are:</p> <ul style="list-style-type: none"> • RSA; • LSA; and • PSA.
Project alternatives	Due to the ore body being in a fixed location, there is no feasible alternate location or other alternative to mining the deposit except for a “No Project” Alternative. A “No Project” Alternative would leave the ore body in place.	<ul style="list-style-type: none"> • Six tailings disposal technologies; • Ten candidate sites for the disposal of mine waste (tailings and mine rock); • Two mining methods • Four ore processing alternatives; • Two ore processing location alternatives (on-site and off-site); • Three power supply alternatives; • Three local transmission line re-routing alternatives; • Five water supply alternatives; • Three non-hazardous, non-mine solid waste disposal alternatives; • Three access road alternatives; • Two on-site relocation of Goudreau Road alternatives; • Three staff accommodation alternatives; • Three mine pit closure alternatives; and • Two closure of mine tailings facility alternatives.

FRAMEWORK ELEMENT	KEY FEATURE	DETAILED FEATURES
Alternatives evaluation criteria	Screening criteria and detailed evaluation criteria and rating.	<p>Screening criteria are:</p> <ul style="list-style-type: none"> • Technical feasibility; and • Economic feasibility. <p>Detailed evaluation criteria are:</p> <ul style="list-style-type: none"> • Technical performance and opportunities; • Financial costs and risks; • Effects on the natural environment; • Effects on human health; • Effects on the social environment; • Effects on the economic environment; and • Effects on Aboriginal interests. <p>Alternative methods were rated as:</p> <ul style="list-style-type: none"> • Most preferred; • Somewhat preferred; and • Least preferred. <p>In some instances, the criterion did not apply to the set of alternatives under consideration.</p>
Project components	<p>The components that comprise the project have been categorized as:</p> <ul style="list-style-type: none"> • Plant area components; • Mine waste management area components; • Enabling infrastructure; and • Environmental management infrastructure. 	<p>Plant area components include:</p> <ul style="list-style-type: none"> • Primary ore crusher; • Conveyors; • Crushed rock stockpiles; • Process plant; • Ore stockpiles; • Facilities (e.g., truck shop, garage, laboratories, offices); • Chemical, fuel and hazardous materials management and storage facilities; • Water pipelines; and • Non-mining waste facilities. <p>Mine waste management area components include:</p> <ul style="list-style-type: none"> • Overburden stockpiles; • Mine Rock Management Facility; and • Tailings Management Facility. <p>Enabling Infrastructure includes:</p> <ul style="list-style-type: none"> • Staff accommodations; • Project roads; • Electrical transmission lines and substation; • Power generation equipment; • Potable water supply system; • Sewage treatment system; and • Site security. <p>Environmental Management infrastructure includes:</p> <ul style="list-style-type: none"> • Site water management system and monitoring.
Project works and activities	<p>Project works and activities were identified for four Project phases:</p> <ul style="list-style-type: none"> • Site Preparation; • Construction; 	<p>Site preparation phase works and activities include:</p> <ul style="list-style-type: none"> • Site clearing, grubbing and pre-stripping; • Workforce requirements and personnel management; and

FRAMEWORK ELEMENT	KEY FEATURE	DETAILED FEATURES
	<ul style="list-style-type: none"> • Operations; and • Closure and Rehabilitation (including the post-closure). <p>Consideration is also given to temporary suspension of operation or placement of the mine site into a state of inactivity.</p>	<ul style="list-style-type: none"> • Payroll and procurement. <p>Construction phase works and activities include:</p> <ul style="list-style-type: none"> • Closure of existing mine facilities; • Topsoil and overburden stripping and stockpiling; • Stream diversions, draining and backfilling of on-site waterbodies; • Construction of enabling infrastructure; • Construction of plant area components; • Construction of mining waste management components; • Construction of environmental management infrastructure and monitoring; • Workforce requirements and personnel management; • Payroll and procurement; and • Construction materials and personnel transport. <p>Operations phase works and activities:</p> <ul style="list-style-type: none"> • Operation of enabling infrastructure; • Open pit mining; • Operation and maintenance of ore processing and plant area facilities; • Chemical, fuel and hazardous waste management; • Mining waste management; • Progressive rehabilitation of mining waste management facilities; • Operation and maintenance of environmental management infrastructure; • Workforce requirements and personnel management; • Payroll and procurement; and • Construction materials and personnel transport. <p>Closure and rehabilitation phase works and activities include:</p> <ul style="list-style-type: none"> • Closure of explosives management facilities; • Closure of chemical, fuel and hazardous materials management facilities; • Closure of enabling infrastructure; • Closure of ore processing plant and plant area facilities; • Final rehabilitation of mining waste management area facilities; • Site rehabilitation; • Pit lake filling; and • Stabilization of Site rehabilitation, monitoring and maintenance.
<p>Significance assessment criteria and effects levels</p>	<p>Seven significance assessment criteria are used to determine if a residual effect is “significant” or “not significant”. Effects levels are defined on a scale of Low, Medium, or High.</p>	<p>The significance assessment criteria are:</p> <ul style="list-style-type: none"> • Magnitude; • Geographic Extent; • Timing and Duration; • Frequency; • Degree of Irreversibility; • Ecological Context; and • Social Context.

2.5 Use of Information

The following describes in general terms how various types of information have been used and are being treated throughout this EIS.

2.5.1 Existing Information

In preparing the EIS, Prodigy has made use of existing information relevant to the Project to the maximum extent. This information has been obtained largely from published and unpublished scientific literature, web pages, and mapping. Full bibliographic citations are provided throughout the EIS and relevant TSD.

2.5.2 Field Investigations and Scientific Studies

The results of a wide variety of field investigations and scientific studies have been used. The types of field investigation and scientific studies undertaken to establish existing conditions are summarized in Chapter 4 with details provided in the relevant TSD. For the purposes of the effects assessments on individual VC, the specific assessment methods are described in Chapter 7. This includes description of any modelling or analytical approaches used. Additional details are provided in the relevant TSD.

2.5.3 Aboriginal Traditional Knowledge

Sub-section 19(3) of *CEAA 2012* states that the EA of a designated project may take into account Aboriginal Traditional Knowledge (TK). Aboriginal TK “refers to knowledge acquired and accumulated by an Aboriginal community, through generations of living in close contact with nature”⁹. The *Guidelines* require Prodigy to incorporate into the EIS Aboriginal TK “to which it has access or that has been acquired through Aboriginal engagement activities, in keeping with appropriate ethical standards and without breaking obligations of confidentiality, if any”¹⁰.

Traditional Knowledge Studies (TKS), traditional land use studies and other reports have been provided by Michipicoten First Nation, Missanabie Cree First Nation, Métis Nation of Ontario (MNO)¹¹, the Batchewana First Nation and the Red Sky Métis Independent Nation. Information contained in the TKS/Traditional Land Use Studies has been referenced and integrated into the EIS, including a description of existing conditions, validation of assessment of environmental effects, and development of mitigation measures.

Documentation of TK in this EIS is in keeping with appropriate ethical standards and obligations of confidentiality to Aboriginal groups. Where specific Aboriginal TK is identified, agreement has been obtained from the Aboriginal group regarding the use, management and protection of their information during and after the EA.

⁹ CEAA. (2013, November). Guidelines for the Preparation of an Environmental Impact Statement: Magino Gold Project, Prodigy Gold Incorporated: page 9.

¹⁰ CEAA. (2013, November). Guidelines for the Preparation of an Environmental Impact Statement: Magino Gold Project, Prodigy Gold Incorporated: page 9.

¹¹ Prodigy began engagement with the BFN earlier in 2014 after CEAA added them to the list of groups to be engaged; discussions regarding the development of a TK study have not yet been initiated at the time of writing. At this time, PMFN has declined participation in Prodigy’s Magino Mine EA process; as such, they will not be preparing a TK study for the Magino Project.

2.5.4 Confidential Information

Prodigy is committed to promoting public participation throughout this EA process and beyond, and providing government, Aboriginal groups, communities, and other stakeholders with access to the information on which the EIS is based. All documents prepared or submitted by Prodigy or by any other stakeholder in relation to this EA are available to the public, upon request, either directly from Prodigy or from the Canadian Environmental Assessment Registry. Nevertheless, the EIS will not contain information that:

- Is sensitive or confidential (i.e., financial, commercial, scientific, technical, personal, cultural, or other nature);
- That has been treated consistently as confidential, and the person affected has not consented to the disclosure; or
- May cause harm to a person or harm to the environment through its disclosure.

Prodigy continues to consult with government, Aboriginal groups, local communities and other stakeholders regarding whether specific information should be treated as confidential.

2.6 References

Canadian Environmental Assessment Act, 2012 (S.C. 2012, c. 19, s. 52). (2014). Retrieved from the Justice Department of Canada website: <http://laws-lois.justice.gc.ca/eng/acts/C-15.21/index.html>

Métis Nation of Ontario. (2014). MNO Interim Registry Policy Package. Retrieved from the Métis Nation of Ontario website: <http://www.metisnation.org/registry/>.