

**Greenstone Gold Mines**  
**Environmental Assessment Compliance Monitoring**  
**Annual Compliance Report**  
**(Reporting Period March 12 2019 to March 27 2020)**

**Hardrock Project**

MECP Reference	EA Reference No. 14175; EA File No. EA-02-10 [Provincial EA Notice of Approval Condition 5]
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**APPENDICES**

- Appendix A Notice of Approval (Provincial EA Conditions) Registry
- Appendix B Mitigation, Commitment, Monitoring Registry

## 1. Introduction

Greenstone Gold Mines GP Inc. (GGM) proposes to construct, operate and ultimately decommission/close a new open pit gold mine, process plant, and associated ancillary facilities, collectively known as the Hardrock Project (the Project).

The Project's environmental assessment (EA) was approved by the Ministry of the Environment, Conservation and Parks (MECP), as outlined in the Notice of Approval to Proceed with the Undertaking (Notice of Approval, dated March 12, 2019).

This report is submitted to meet the Provincial Annual Compliance Report (ACR) requirements (Condition 5 of the Notice of Approval, which is discussed further in Section 4.1). As specified in the Condition, the first ACR is required no later than 30 days following the one-year anniversary of the Date of Approval. Therefore, the first ACR will be submitted April 12 2020, with annual reports due April 12 each year. ACR's will be submitted to the Director of the Environmental Approvals Branch for the public record and MECP review.

In addition to Conditions 5 there are other Provincial conditions that require reporting within the ACR. These include Condition 6.6 (addressed in Section 2.2 below), Condition 8.3 (addressed in Section 2.3 below) and Condition 14.6 which will be addressed in future ACR's as applicable.

## 2. Project Update

### 2.1 Construction

Construction of the Project was anticipated to be initiated on March 01 2020. As of the date of this ACR construction had not commenced and a construction decision date is still to be determined by GGM. While not the only consideration, a key factor in making a construction decision is progress made on obtaining required permits which encountered delays with MECP during 2019.

### 2.2 Annual Complaint Summary

Provincial condition 6.6 requires GGM to provide a summary of the complaints and inquiries received and how they were addressed or responded to as part of the ACR. Over the past reporting period, there were no complaints received related to any aspects of the environment or Project development.

### 2.3 Community

GGM engages with Indigenous communities<sup>1</sup> on an on-going basis. The Community Specific Consultation Plans referenced in Condition 8.3 (including subcomponents a through j) have been updated in collaboration with the communities and Plans have been completed.

GGM has continued to work closely with local Indigenous communities on a regular basis since the EA

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<sup>1</sup> The Notice of Approval states Indigenous means Animiigoo Zaagligan Anishinaabek A(ZA), Aroland First Nation (AFN), Ginoogaming First Nation (GFN), Long Lake 58 First Nation (LLFN), Métis Nation of Ontario (MNO), Region 2 Greenstone Metis Council, Red Sky Metis Nation of Ontario (RSMIN).

Notice of Approval was issued. GGM has established Environmental Advisory Committees (EACs) with each of the Indigenous communities and provides capacity support to Red Sky Métis Independent Nation (RSMIN) to review permit-related materials. The EACs include members from the communities as well as their technical advisors and they meet on a regular basis to review permit applications, review Environmental Management and Monitoring Plans (EMMPs) and discuss any questions or concerns.

To date, the EACs have reviewed all the draft permit applications that are listed in Table 3-1 as well as the EMMPs referenced in Appendix A and B. Each permit application submitted has included a Record of Consultation, specific to the topics of that permit and can be referred to for detailed information on consultation related to permitting. The EACs have provided a method for open and transparent dialog on the permits and EMMPs and ensures that the communities input is being incorporated prior to finalization.

GGM has also hired an environmental monitor from each of the following communities: AFN, AZA, GFN, LLFN and MNO. Monitors will be onsite during Project construction and operation to participate in carrying out the various environmental monitoring programs.

### 3. Permitting/Approvals Update

A status update on the permitting/approval process for the Project is provided in Table 3-1.

*Table 3-1: Permitting/Approval Status Summary:*

Permit	Approving Authority	Status
Paragraph 35(2)(b) Fisheries Act Authorization (PATH No. 14-HCAA-00498)	Fisheries and Oceans Canada	Approved November 21, 2019
Closure Plan	Ministry of Energy, Northern Development and Mines	Approved January 8, 2020
Aggregate Permit – S1 Pit (Permit No. 626463)	Ministry of Natural Resources and Forestry (MNRF)	Approved March 6, 2020
Aggregate Permit – S4 Pit (Permit No. 626461)	MNRF	Approved March 6, 2020
Aggregate Permit – T2 Pit	MNRF	Submitted to MNRF for approval on March 30 2020
Amendment of Schedule 2 of the Metal and Diamond Mining Effluent Regulations	Environment and Climate Change Canada	Offset Plan submitted in June, 2019
Permit to take Water (PTTW) - Temporary ETP (Ref No. 7432-BF4KMC)	MECP	Submitted to MECP for approval on August 22, 2019
Environmental Compliance Approval (Industrial Sewage Works (ECA (ISW)) - Temporary ETP (Ref No. 1714-BFBQV8)	MECP	Submitted to MECP for approval on August 22, 2019
PTTW – Surface Water Intake (Ref No. 4406-BK6J8N)	MECP	Submitted to MECP for approval on December 21, 2019
PTTW – Construction (South Side) (Ref No. 1000077335)	MECP	Submitted to MECP for approval on January 29, 2020

Permit	Approving Authority	Status
ECA (ISW) – Construction (South Side) (Ref No. 9311-BKMMGA)	MECP	Submitted to MECP for approval on January 8, 2020.
<i>Lakes and Rivers Improvement Act (LRIA) Work Permit for Goldfield Creek Diversion</i>	MNRF	Submitted to MNRF for approval on December 23, 2019.
<i>Lakes and Rivers Improvement Act (LRIA) Work Permit for Site Culverts</i>	MNRF	Submitted to MNRF for approval on December 20, 2019.
Land Use Permit under the <i>Public Lands Act</i> for the Works Involved in the Temporary Discharge to Kenogamisis Lake	MNRF	Submitted to MNRF for approval on December 20, 2019.
Land Use Permit under the <i>Public Lands Act</i> for the Works Involved in the Temporary Water Taking to Kenogamisis Lake	MNRF	Submitted to MNRF for approval on November 22, 2019.

## 4. Annual Compliance Report (ACR) Requirements

### 4.1 Provincial Regulatory Background

The ACR was developed for the Project based on Condition 5 of the Minister signed Notice of Approval to Proceed with Undertaking:

- 5.1 *The Proponent shall prepare an Annual Compliance Report outlining the results of the Environmental Assessment Compliance Monitoring Program.*
- 5.2 *The first Compliance Report shall be submitted to the Director for review no later than 30 days following the one-year anniversary of the Date of Approval and shall outline the results of the Environmental Assessment Compliance Monitoring Program for the period of one year from the Date of Approval*
- 5.3 *Each subsequent Annual Compliance Report shall be submitted no later than one year following the submission of the previous Annual Compliance Report and shall outline the results of the Environmental Assessment Compliance Monitoring Program following the submission of the previous Annual Compliance Report.*
- 5.4 *The Proponent shall continue to submit an Annual Compliance Report each year following the Date of Approval until all the conditions in this Notice of Approval are satisfied or until such time as the Director determines that the proponent is no longer required to do so. The Director shall notify the Proponent in writing should the Director determine that the Proponent is no longer required to submit an Annual Compliance Report*
- 5.5 *Once all conditions of this Notice of Approval have been satisfied, the Proponent shall notify the Director in writing that the final Annual Compliance report is being submitted, and that all conditions in this Notice of Approval have been satisfied. The Ministry will confirm whether all conditions have been satisfied and the Director will state this in writing to the Proponent.*
- 5.6 *The Proponent shall retain either on the Site or in another location approved by the Director a copy of each Annual Compliance Report that has been submitted to the Ministry until such time*

*as the Director determines that the Proponent is no longer required to do so. The Director shall notify the Proponent in writing should the Director determine that the Proponent is no longer required to retain copies of the Annual Compliance Reports that have been submitted.*

5.7 *The Proponent shall make each Annual Compliance Report that has been submitted to the Director, and any associated documentation, available to any Ministry designate in a timely manner when requested to do so.*

## 4.2 Report Content Requirements

In accordance with the Provincial EA Notice of Approval, along with the Compliance Monitoring Plan submitted to fulfill Condition 4 of the Provincial EA Notice of Approval (submitted to MECP on April 09 2020), this ACR contains the following:

- Notice of Approval (Provincial EA Conditions) Registry
- Mitigation, Commitments and Monitoring Registry

This report covers the reporting period March 12 2019 to March 27 2020.

## 4.3 Notice of Approval (Provincial Conditions) Registry

As per the Compliance Monitoring Plan, GGM maintains a Notice of Approval Registry that tabulates the conditions of approval and maintains the status tracking on an ongoing basis. The Registry for the current reporting period is provided in Appendix A.

The status of each condition is tracked in the Registry as follows for complete items:

- **Complete:** Compliance items which have been met, with applicable document referenced.
- **Complete (with “Perpetual (on-going)” reminder):** Compliance items which have been incorporated in EMMPs or other document and require implementation going forward (for example, on-going monitoring requirements, or compliance items that are more general or administrative in nature).
- **Complete (with “Recurrences”):** Compliance items which have been incorporated or referenced/acknowledged in EMMPs or other document and include follow up compliance requirements with specific due dates.

Where an item is applicable later in the life of mine those items are tracked as “in-progress”, “not yet started”, or “on-hold” (with applicable reminders or re-occurrence dates).

## 4.4 Mitigation, Commitments and Monitoring List

At the conclusion of the Final EA review, GGM provided a complete list of all commitments. A registry of the commitments list that reports status of completion is provided as Appendix B. The Registry will be updated on a regular basis and no less frequently than annually during construction, operation and active closure phases of the Project. The same status criteria as described in Section 4.3 have been applied.

## 4.5 Compliance Status Summary

Provincial conditions and mitigation, commitments and monitoring that pertain to early construction requirements have been completed by GGM. Items that are not complete/in-progress/not started will

be actioned according to GGM's construction/operation schedule. An approximate statistical summary of the information presented in Appendices A and B for this reporting period is as follows:

- 82% Complete
- 14% In Progress
- 3% Not Yet Started
- <1% On Hold