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January 13, 2010

Mr. Fred Hunter Executive Director Moose Cree First Nation P.O. Box 190 Moose Factory, Ontario POL 1W0

Dear Mr. Hunter:

Re: Comments on Detour Lake Power Project Terms of Reference

We are in receipt of your letter of January 4, 2010 with comments from your consultant DPRA responding to the Detour Lake Power Project Proposed Terms of Reference (ToR). Thank you for taking the time to review the ToR and providing your comments and suggestions. Attached is a table summarizing / paraphrasing the comments received along with Detour Gold's response.

We look forward to continuing to actively engage you in the Detour Lake Project and trust you will find responses to your comments satisfactory. If you have any additional comments or questions, please don't hesitate to contact us.

Sincerely,

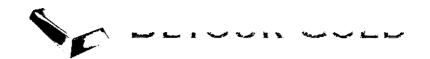
Derek Teevan

VP Aboriginal and Government Affairs

Cc: Sheila Daniel, AMEC Earth & Environmental Alex Blasko, Ontario Ministry of Environment Ernest Rickard, MCFN Negotiation Team



Summary of Moose Cree Comments	Detour Gold (DG) Response
Section 3 - No information is provided on the amount of effort required for construction of the DLPP components. Without an explicit commitment by the proponent regarding employing First Nation members or Aboriginal companies in construction of the DLPP (either in absolute numbers or a percentage of the total construction labour required), First Nations are unsure of the proponent's intended role for them in project construction. [paraphrased] Section 4 – The description of the project is not extensive enough. The DLPP should be described in enough detail that the audience may fully understand the scope, magnitude and duration of potential impacts. Properly scaled maps are also required. [paraphrased]	DG is currently actively engaged in negotiations with the Moose Cree First Nation on an Impact Benefits Agreement that will specify employment and procurement opportunities. Workforce requirements will be provided within the Environmental Assessment (EA) document at a level of detail appropriate for the Detour Lake Power Project (DLPP). The scope, magnitude and duration of potential impacts of the DLPP will be detailed within the EA document as indicated in the ToR. DG will continue to actively engage the Moose Cree First
Section 5 - None of the screening criteria for project alternatives addressed First Nations. The aspect that comes closest to addressing First Nation concerns is "sensitive environmental features". If the proponent wants to assure First Nations that their concerns will be addressed in the issue of considering project alternatives, it would be best that at least 1 aspect directly address First Nation concerns.	Nation in the preparation and review of the Environmental Review for the DLPP to help ensure that potential environmental impacts are understood. The screening criteria were defined based on Page 16 of the MOE guide for "Preparing and Reviewing Terms of Reference for Environmental Assessments in Ontario" DG is working with local aboriginal groups to collect Traditional Knowledge (TK) within a 5 km buffer centred on the preferred power line route (Alternative A).
	One of the goals of the TK studies is to identify sites that should be avoided because of their value(s) and use by Aboriginal groups. Avoidance measures will be determined in full consultation with the potentially affected Aboriginal Group.
Section 5 - 3 considerations that may over-ride the screening criteria were identified, none of which either directly or indirectly address First Nations. The consideration that comes closest to addressing First Nation concerns is "substantive and unnecessary disruption to the natural or socio-economic environment compared with other viable alternatives". If the proponent wants to assure First Nations that their concerns will be addressed in the issue of considering project alternatives, it would be best that at least 1 of the over-riding considerations directly address First Nation concerns.	DG has defined the "socio-economic" environment to include consideration of Aboriginal use and values associated with the land. This definition of socio-economic (or "human") environment will be given in the EA document to help readers understand the evaluation and assessment of alternatives.
The conclusion to Section 5.1, while valid, provides very little substantive information to back up the conclusion. For the sake of clarity, more substantive information should be provided in the conclusion regarding alternatives to the DLPP.	The method for evaluating and ultimately selecting the preferred means of supplying power to the Detour Lake Project was outlined in the document. Sources of information used to evaluate the Alternatives were identified in the text. Further information will be provided on request.
Section 5 - The rejection of routing alternative "E" strictly on the grounds of First Nation concerns demonstrates that despite the lack of explicitly Aboriginal screening criteria or considerations for rejecting an alternative, the proponent is aware of – and at least to some degree sensitive to – First Nation concerns/issues.	Noted



Summary of Moose Cree Comments	Detour Gold (DG) Response
In the conclusion to Section 5.2 for the sake of clarity, more substantive information should be provided in the conclusion regarding alternative methods for providing power to the Detour mine project. [paraphrased]	The method for evaluating and ultimately selecting the most preferred Alternative route was clearly outlined in the document. Sources of information used to evaluate the Alternatives were identified in the text.
Section 6 - Should either provide some information on how Valued Ecosystem Components (VECs) will be identified or (if they are identified in Table 6) refer to the table of Environmental Components on p.41 of the ToR.	The means of selecting VECs will be described in the EA document.
Section 6 – In the "Overall Evaluation" subsection, there is no specific mention of Species at Risk although they are referenced on page 20 under the list of information to be reviewed. Mentioning specific species at risk would	Species at Risk were considered as biological organisms in consideration of Effects (adverse) to the Natural Environment.
strengthen this section of the ToR. [paraphrased]	Potential impacts to species at risk will be considered in the EA document as appropriate.
Section 6 - The list of types of data to be collected regarding the socio-economic environment does not include either demographic data or economic data for First Nations and local communities. Demographic and economic data are standard forms of socio-economic data included in environmental assessments; including this information would strengthen this section of the ToR.	Demographic and economic data will be included in the description and assessment of the human environment in the EA document as appropriate.
Section 6 – In the "Overall Evaluation" subsection, it is not clear how the data will be used to make various assessment decisions. Including a description of how data collected will be used to make assessment decisions would strengthen this section of the ToR	The EA document will evaluate the merits of identified alternatives utilizing the information source identified in the ToR (and others) as appropriate. The data sources will provide the background information in order to ensure that the decisions made are well-informed.
Section 7 - The choice of a one-kilometre buffer zone on either side of the ROW as the focus of assessment would seem reasonable in most cases. However, the assessment should include a similar potential zone of impact with respect to any access roads or ancillary developments since these may have environmental impacts. [paraphrased]	Access road and ancillary development and buffer zones where applicable, will be considered within the EA document.
Section 7 - Five species of risk are identified. Including a description of the ranges or habitats of these five species at risk within the context of the project route (as was provided to some degree on Section 7.6 (Wildlife)) — especially since their status warrants more attention than wildlife in general — would produce a more "balanced" description of the environment and therefore strengthen this section of the ToR. [paraphrased]	Species at risk as applicable to the proposed development DLPP will be considered fully within the EA document
Section 8 - The assessment of the environmental effects should consider much more than accidents and malfunctions. It should consider impacts on habitat, (particularly habitat for Species at Risk), noise, waste management, stream and river crossings. Including these would strengthen this section of the ToR.	The text was intended to indicate that environmental effects of the undertaking under normal operating conditions will be considered, as well as resulting from accidents and malfunctions for completeness.
Section 10 - It would be much more effective (and appropriate) if a monitoring program (rather than simply a monitoring framework) is presented as part of the EA report.	The ToR indicated that a monitoring framework will be provided and would include compliance and effects monitoring as appropriate and follow-up programs.
Information regarding when and who will develop the monitoring framework/program and who will determine whether it is adequate would strengthen the ToR.	



Summary of Moose Cree Comments	Detour Gold (DG) Response
Section 10 - Socio-economic monitoring (e.g., employment numbers, number of contracts) is not mentioned. Since socio-economic monitoring is a standard component of any project monitoring framework or monitoring program, including socio-economic monitoring in the ToR would strengthen the ToR. [paraphrased]	The environmental assessment will consider monitoring of the environment as appropriate.
Section 11 - The proponent appears to satisfy provincial government's Aboriginal considerations for a Consultation Plan.	Noted
Section 11 – The various activities described as being contained in the Consultation Plan do not mention use of Aboriginal language. If this information is not provided in Ojibway, Cree and/or Oji-Cree, some segments of the First Nation community population may be excluded. [paraphrased]	Information materials that are targeted will be provided in local language for Aboriginal communities as requested and as reasonable.
Section 13 – In Table 4 regarding "ROW Management Alternatives", input from local First Nations is identified as to be considered in the EA for "the use of mechanical methods to manage vegetation regrowth" and "use of herbicides to manage vegetation regrowth". This inclusion is important as these matters may be of concern to local First Nations and/or may affect traditional activities in the area. The lack of including First Nation concerns in the rest of the table is not a significant issue, as Section 5 of the ToR describes how First Nation concerns have caused route E (which is the only routing option close to a First Nation community) to be abandoned.	Noted
Section 13, Table 6 – Of the 5 socio-cultural aspects identified, one (heritage and cultural resources) mentions First Nations in the "Item to be Profiled" column. In the absence of mentioning First Nations as a data source for 4 of the 5 socio-cultural aspects and all 5 of the terrestrial environment components, it can be assumed that First Nations will not be contacted as an information source on these environmental components. Not collecting TK from local First Nations on all terrestrial environment items and socio-cultural items (as well as some aquatic environment items such as fisheries and aquatic habitat) may result in incomplete information on these environmental components	DG has been in contact with local aboriginal groups Nations since 2007 and is working collaboratively with these groups to gather and determine potential effects of the DLPP on their traditional land uses, and cultural values in part through the collection of TK.
Section 13, Table 6 - The potential data sources for each criterion/indicator is not provided (as per Section 4.2.7 of the Code of Practice for Preparing and Reviewing Terms of Reference for Environmental Assessments in Ontario. Inclusion of potential data sources for each criterion/indicator would strengthen this section of the ToR.	Potential data sources are provided were identified in Table 7 which follows Table 6. The EA document will include a comprehensive reference list / bibliography.



Summary of Moose Cree Comments	Detour Gold (DG) Response
Section 13, Table 7 lists nine potential data sources. The third of the potential data sources is explicitly Aboriginal: it states "TK studies with local First Nations". The ninth potential data source may have First Nations implied, as it states "Information that may be provided by stakeholders through the EA process" – this could include First Nation communities and First Nation organizations. Not explicitly identifying First Nations in the description of the ninth potential data source could imply that the proponent may view TK studies as the only First Nation source of environmental data (i.e., not considering members of First Nation communities or First Nation organizations as potential sources of environmental data) Section 13 – Table 8 identifies 3 First Nations: Moose Factory, Taykwa Tagamou, and Wahgoshig. The proponent	DG has requested and provided support so that each of the potentially affected aboriginal communities can gather TK about their past and current use of the land that may be impacted by the DLPP. The TK studies include many aspects of the current and historic natural environment including wildlife, plants, soils/terrain, fish, water as well as human environment including trails/transportation corridors, camps/cabins, and burial or ceremonial areas. Knowledgeable members of the communities have been invited to accompany environmental field surveys including archaeological investigations and caribou tracking, and will continue to be invited as appropriate.
appears to be sufficiently aware of the First Nation communities in the vicinity of the proposed project Appendix A (p. A-1) - The introduction to the Consultation	Noted
Plan identifies Aboriginal people as a stakeholder group for the ToR and EA processes. The proponent appears to be aware of the need to consult First Nation communities during both the ToR and EA processes	
Appendix A (p. A-2) - The description of the Consultation Plan framework states that MOE's "Code of Practice: Consultation in Ontario's Environmental Assessment Process" dictates that a Consultation Plan must "indicate how potentially interested and affected persons, including Aboriginal peoples, will be identified, notified and consulted". The proponent appears to be aware of the provincial government's Aboriginal considerations for a Consultation Plan.	Noted
Appendix A (p. A-3) - DG's consultation policy includes and explicitly identifies Aboriginal peoples in its stated commitment "to developing the Detour Lake Project in the spirit of full and open dialogue with local and regional stakeholders". The proponent appears to be sufficiently aware of the importance of – and need to – consult First Nation peoples as part of the ToR and EA processes	Noted
Appendix A (p. A-3) - DG's consultation policy includes a commitment to "using varied and culturally appropriate engagement activities" to ""engage and share information in an open, honest and transparent manner". DG's principles of engagement includes "flexible", stating that it will "ensure that meaningful opportunities for input [from interested individuals and stakeholders] are provided". The proponent appears to be sufficiently aware of the importance of using engagement activities that are suitable to First Nation cultures	Noted



Summary of Moose Cree Comments	Detour Gold (DG) Response
Appendix A (p. A-4) - The proponent states that Aboriginal stakeholders (First Nations, Métis) were one of the categories of key stakeholders identified early in the consultation stage. Of the 4 criteria for identifying interested stakeholders, one explicitly addresses First Nations, stating "Aboriginal groups with traditional lands encompassing the Project site and its related proposed infrastructure. The other 3 criteria are proximity to the project; past or current interest in similar projects or developments in the region; and interest in potential biophysical and socio-economic environmental effects of the project. The proponent appears to be sufficiently aware of the importance of identifying First Nations as key stakeholders at the outset of the ToR and EA consultation processes	Noted
Appendix A (p. A-5) - The proponent states that, out of recognition that some Aboriginal communities will require support to participate meaningfully in the EA process, DG has been working on Memorandums of Understanding (MOUs) with Aboriginal communities in the region. These MOUs provide for agreeable terms for supporting Aboriginal participation. The proponent appears to be sufficiently aware of the fact that challenges to meaningful participation of First Nations in EA processes can exist, and has made efforts (through MOUs) to address these challenges.	Noted
Appendix A (p. A-6) - The consultation purpose of Phase 1 – which specifically identifies Aboriginal groups (among other stakeholder) mentions "building positive working relationships" and "during this phase, agreements were being negotiated that set in place the expectations and process by which consultation and participation in the preparation of the EA". No other stated "purpose" within Phases 2 – 4 specifically address Aboriginal peoples or issues. The value of creating agreements with Aboriginal groups early in the consultation process is realized by the proponent.	Noted
Appendix A (pp. A-6 to A-11) - The consultation objectives for Phases 1 through 3 and the description of Phase 4 specifically identify or mention Aboriginal communities. Specifically identifying Aboriginal communities in the consultation objectives for each phase of the Consultation Plan will enable First Nations to hold the proponent accountable for consulting them throughout the ToR, EA and post-approvals periods for the project. [paraphrased] Appendix A (pp. A-6 to A-11) — Aboriginal communities are identified in the consultation activities for Phases 1 through 3 and in the description of Phase 4. Specifically identifying Aboriginal communities in the consultation activities for each phase of the Consultation Plan will enable First Nations to hold the proponent accountable for consulting them	Plain language summaries will be provided in appropriate Aboriginal languages to promote understanding and engagement as requested and as reasonable.
throughout the ToR, EA and post-approvals periods for the project. The absence, however, of any mention of producing plain language summaries in appropriate Aboriginal languages is a matter of concern.	



Summary of Moose Cree Comments	Detour Gold (DG) Response
Appendix A (pp. A-6 to A-11) – Regarding activities in Phase 2 and 3 the absence of any mention of producing plain language summaries and newsletters in appropriate Aboriginal languages is a matter of concern.	Noted. Plain language summaries will be provided in appropriate Aboriginal languages to promote understanding and engagement as requested and as reasonable.
Appendix A (p. A-12) – In the Table of preliminary DLPP stakeholders Moose Cree First Nation is correctly identified as an Aboriginal community that should be consulted for this project. [paraphrased]	Noted
Appendix A (p. A-13) - The consultation criteria appear to be adequate. These consultation criteria are key to establishing whether or not consultation for the ToR and EA processes were sufficient. If First Nations have any issue with the consultation processes, they must have bearing on these consultation criteria. [paraphrased]	Noted
Appendix A, Attachment 1 – In the Table of proposed ToR and EA notice publication and posting locations the appropriate First Nation communities and newspaper have been identified. [paraphrased]	Noted
Appendix A, Attachment 2 – In the Table of proposed ToR and EA document review locations the appropriate First Nation communities have been identified. [paraphrased]	Noted
Appendix B (p. B-2) – In the Table of publication and posting locations the appropriate First Nation communities and newspaper have been identified (is consistent with those listed in the Consultation Plan). [paraphrased]	Noted
Appendix B (p. B-3) – In the Table of ToR document review locations the appropriate First Nation communities have been identified (is consistent with those listed in the Consultation Plan). [paraphrased]	Noted
Appendix B (pp. B-4 to B-7) – In the Table the appropriate First Nation communities and organizations have been identified. [paraphrased]	Noted
Appendix C (p. C-2) – In the Table of publication and posting locations the appropriate First Nation communities and newspapers have been identified (is consistent with those listed in the Consultation Plan). [paraphrased]	Noted
Appendix C (p. C-3) – In the Table the appropriate First Nation communities and organizations have been identified. [paraphrased]	Noted
Record of Consultation, Section 3 - While it cannot be expected that the draft ToR or proposed ToR documents be translated into Cree syllabics, it is noteworthy that no mention of smaller materials such as notifications and notices of commencement being made available in any Aboriginal language.	Noted. Information about the project will be provided in appropriate Aboriginal languages to promote understanding and engagement as requested and as reasonable.
Record of Consultation, Section 3 - The last bullet under the heading "Evaluation Criteria" states that "all Aboriginal groups requiring support for reviewing the ToR are supported by DG, so that meaningful consultation can occur". Providing Aboriginal communities/organizations with support to review the ToR demonstrates the proponent's understanding of capacity constraints within First Nation communities and organizations.	DG is actively negotiating agreements with First Nations and Métis people that will include provisions for increasing capacity to actively and meaningfully participate in the environmental assessment and throughout all subsequent phases of the project.



Summary of Moose Cree Comments	Detour Gold (DG) Response
Record of Consultation, Section 4 - Table 2 (Key Interests and Concerns Identified During Phase 1 Consultation) lists 7 key interests/concerns, two of which are Aboriginal in subject matter. This appears to satisfy the Code of Practice for Preparing and Reviewing Terms of Reference for Environmental Assessments in Ontario. [paraphrased]	Noted
Record of Consultation, Section 4 - Table 3 (Key Interests and Concerns Identified to Date During Phase 2 Consultation on ToR) lists 7 key interests/concerns, two of which are clearly Aboriginal, and one more is potentially Aboriginal. This appears to satisfy the Code of Practice for Preparing and Reviewing Terms of Reference for Environmental Assessments in Ontario.	Noted
Record of Consultation, Appendix A, Table APPA-1 - Table identifies all forms of contact with Aboriginal communities/ organizations during Phase 1 of the project. This appears to satisfy the Code of Practice for Preparing and Reviewing Terms of Reference for Environmental Assessments in Ontario.	Noted
Record of Consultation, Appendix A, Table APPA-4 - Table identifies all forms of contact with Aboriginal communities/organizations (to date) during Phase 2 of the project. This appears to satisfy the Code of Practice for Preparing and Reviewing Terms of Reference for Environmental Assessments in Ontario.	Noted
Record of Consultation, Appendix A, Table APPD-6 - The table notes of 3 comments provided by the Moose Cree First Nation / Moose Band Development. Proponent's response to each comment is included in the table. Appears to satisfy the Code of Practice for Preparing and Reviewing Terms of Reference for Environmental Assessments in Ontario.	Noted

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MOOSE CREE FIRST NATION



P.O. Box 190 Moose Factory, ON POL 1W0

Tel: (705) 658-4619 Fax: (705) 658-4734

July 16th, 2010

Alex Blasko
Ministry of Environment
Environmental Assessment and Approvals Branch
Project Coordination Section
14th Floor
2 St Clair Ave W
Toronto, Ontario
M4V 1L5

Dear Mr. Alex Blasko.

RE: Review of the Individual Environmental Assessment for the Detour Lake Power Project(230 kV Transmission Line Power Supply)

Please find attached Moose Cree First Nation's Review of the Individual Environmental Assessment for the Detour Lake Power Project (230 kV Transmission Line Power Supply). In our review you will find that we raised a number of key concerns and issues with the Detour Lake power project. We have attempted to list out the deficiencies of the EA and suggested potential solutions to positively address them.

If the recommendations put forward in our review are addressed by the proponent, we feel we will be able to move forward in a constructive direction with Detour Gold.

Sincerely,

Chief Norm Hardisty, Jr. Moose Cree First Nation

P.O. Box 190

Moose Factory, Ontario

POL 1W0

705-658-4619 ext. 250 (work)

705-363-7347 (cell)

705-658-4734 (fax)

norm.hardisty@moosecree.com

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June 11, 2007

Moose Cree First Nation
Chief Patricia Faries-Akiwenzie and Council
P.O. Box 190
Moose Factory, ON P0L 1W0
Phone: (705) 658-4619 / fax (705) 658-4734

(affiliated with Mushkegowuk Council)

Mrs. Lillian Trapper – Moose Cree Lands & Resources 36 Birch St. South Timmins, ON P4N 2A5 Phone: (705) 268-3594

Dear Mrs. Trapper

Subject: 2007 Exploration activities at the Detour Gold's project "Detour Lake Property" located in the Porcupine Division

Detour Gold Corporation would like to inform the Moose Cree First Nation ("MCFN") of some recent changes in the ownership of the Detour Lake Property and of our recent activities on the property.

Detour Gold acquired 100% of Pelangio's rights in the Detour Lake Property on January 31, 2007. We initiated our exploration program in January of this year, and are currently conducting diamond drilling with four rigs on the former Detour Lake Mine site, which is currently in reclamation following the closure of the mine in 1999. The Detour Lake Mine was formerly operated by Placer Dome, and Goldcorp Canada Ltd. has succeeded to Placer Dome's reclamation liabilities and is rehabilitating the property in accordance with the mine closure plan filed by Placer Dome in January 1995.

Detour Gold would like the opportunity to discuss with MCFN our current program of activities for the Detour Lake Property. Since Detour Gold hopes to operate in this area for many years, we believe it is important for Detour Gold and MCFN to understand each other's interests in the area to reduce any misunderstandings and to work together for our mutual benefit.

To begin this process, we would like to arrange a meeting with you and other members of the MCFN community the week of July 9th if possible, to introduce our management team and outline our current plans. At this meeting, we would provide a detailed presentation regarding the project, including with respect to environmental issues. We would also like to discuss with you and other interested members of the MCFN community:

- any questions or concerns you may have regarding our planned activities
- any impact you feel our plans may have on your traditional activities in the area
- training and employment opportunities for members of the MCFN community
- opportunities for members of the MCFN community to bid on supply and services contracts
- a communications protocol to ensure the MCFN community is kept informed of developments on the Detour Lake Property and has an opportunity to participate in key decisions affecting its interests

If the week of July 9th is a convenient date for you, please let me know, and I will make detailed arrangements for the meeting. Otherwise, please let me know if there is another more convenient date.

Detour Gold is committed to working with all communities in the area to develop the Detour Lake Property for our mutual benefit. I look forward to meeting with you and other members of the MCFN community soon to begin building this relationship.

Yours truly,

Gerald Panneton President & CEO

Detour Gold Corporation

CC.

Mr. Rob Ferguson, Ministry Development Mines, Ontario

Mr. Gord Yule, Ministry Development Mines, Ontario

Mr. Roger Aubertin, Project Manager, Detour Lake Property

Detour Gold Corporation, Board of Directors

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Declaration of the Moose Cree First Nation July 24, 2008

We the Moose Cree people are the original people of this land, the Creator has given us this land as our home;

The Creator gave us our spiritual beliefs, our languages, our culture, and this place on Earth which provided us with all our needs;

Our ancestors have lived in this land since time immemorial, drawing on the animals, fish and plants for our sustenance;

We are charged by the Creator with the duty of preserving and protecting the land for our future generations;

The non-native newcomers made a Treaty with our forefathers, in which they recognized and agreed that we would continue to live on and harvest from the lands forever.

When our forefathers signed the treaty we made it clear we were not giving up our land, we understood making the treaty as sharing the land in a way that preserved our rights to the land;

Today, our homeland is being threatened by resource development, including, mining, forestry, hydro development, and wind energy;

We have long been generous with the newcomers to our land, the time has come for us to remind everyone this is our homeland;

We have a duty to balance economic growth and our cultural use to ensure our cultural survival as Cree people;

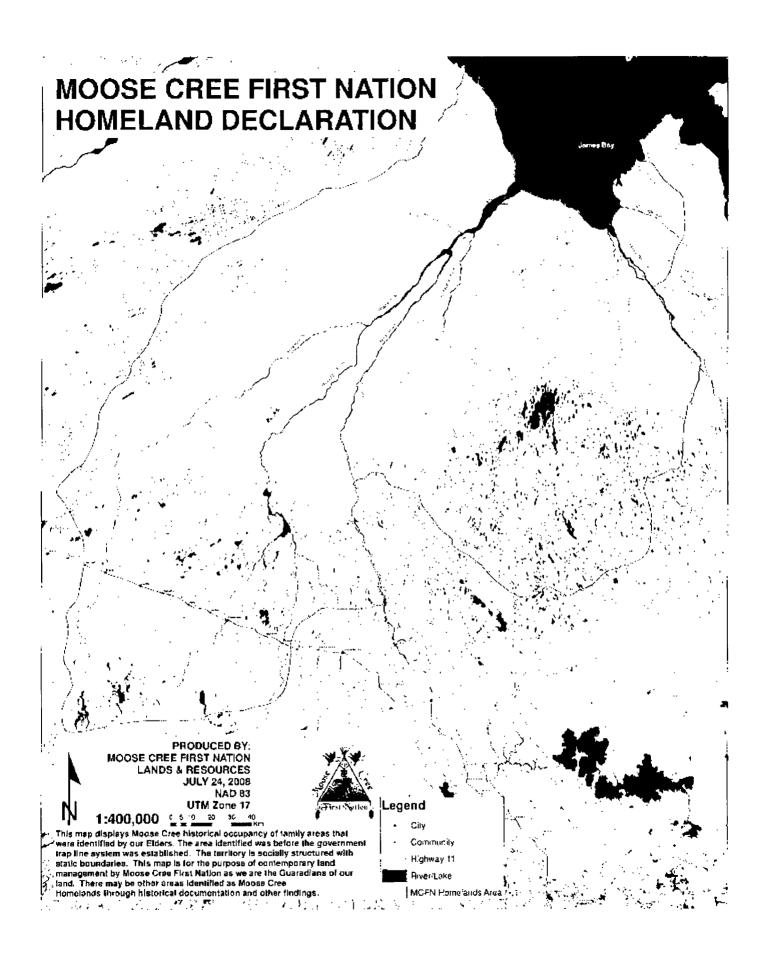
We the Moose Cree declare our homeland based on occupancy and use:

We are not opposed to all development but you must get our consent prior to any development occurring within our homeland;

We want to implement the spirit of our treaty to ensure we also benefit from the resources of our land and that we can continue as guardians of our land;

The Treaty created a nation-to-nation relationship with Canada;

The Moose Cree are a sovereign nation and we will control our own destiny.



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October 28, 2008

Norman Hardisty, Chief Moose Cree First Nation PO Box 190 Moose Factory, ON POL 1W0

Dear Chief Hardisty,

As you are aware, Detour Gold is currently in the process of developing a Memorandum of Understanding (MOU) with the Moose Cree First Nation, which has traditional lands that could potentially be affected by the re-development of the former Detour Lake mine site, including its associated power line that was recently decommissioned.

Although we understand that the MolJ will take some time to negotiate and finalize, it is important that we move ahead with certain studies which are critical to the permitting process. These studies should ideally be completed before the snow falls.

As part of the permitting process to re-develop the mine site, and to protect local cultural heritage values. Detour Gold is planning to undertake archaeological studies of new areas adjacent to the Detour Lake mine site that could potentially be developed, along with investigations of the power line routing, which would use the same right-of-way (ROW) as the prior line. The archaeological studies would be carried out under the direction of John Pollock, a licensed archaeologist, of Woodland Heritage Services (WHS).

Timing for the archaeological studies is constrained by the seasons, in that field work for most elements is best carried out during the snow free period. To avoid unnecessary delays in archaeological data collection, we would like to develop a cooperative work arrangement with the Moose Cree First Nation to undertake the archaeological field work this fall, while the MOU is being completed.

One possible arrangement could be for Woodland Heritage to work jointly with the Mushkegowuk Environmental Research Centre (MERC), and for MERC in turn to facilitate the direct involvement of the Moose Cree in the project, including the hiring of community members to assist with the Traditional Ecological Knowledge (TEK) gathering and archaeological field investigations. Alternatively, if the Moose Cree prefers, we could strike a working arrangement with your local Land and Resources unit which would be a workable solution as well.

The focus of TEK gathering at this stage would be on cultural heritage values that could have a bearing on archaeological field investigations. The reason for this is that TEK held by community members would greatly assist the planning and direction of archaeological field investigations. Broader aspects of TEK gathering could be addressed separately. TEK data would



The focus of TEK gathering at this stage would be on cultural heritage values that could have a bearing on archaeological field investigations. The reason for this is that TEK held by community members would greatly assist the planning and direction of archaeological field investigations. Broader aspects of TEK gathering could be addressed separately. TEK data would be collected through confidential questionnaires with the data to remain confidential, and only disclosed at the discretion of the First Nation.

Archaeological Stage I (Site Potential) and Stage 2 (Follow-up Field Testing) would be conducted (weather permitting) following the acquisition of sufficient information from the TEK studies to guide the field program. The field investigations would focus on areas where new ground disturbing development could potentially occur, and in areas identified from the TEK research, together with sites along the former transmission line ROW exhibiting higher archaeological potential such as major water and esker crossings.

Once you have had a chance to consider this proposal, Detour Gold would like to immediately work with your community to determine how best to carry out the TEK studies and archaeological field programs.

Respectfully yours,

Detour Gold Corporation

Gerald S. Prinneton

President & Chief Executive Officer

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Moose Cree First Nation P.O Box 190, Moose Factory, ON POL 1W0

ATTENTION: Fred Hunter, Executive Director

Review of the Individual Environmental Assessment for the Detour Lake Power Project (230 kV Transmission Line Power Supply)



7501 Keele St, Suite 300 Concord, ON L4K 1Y2 Tel: 905.660.1060, ext. 230

Fax: 905.660.7812

E-mail: timm.rochon@dpra.com

July 9, 2010

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EXECUTIVE SUMMARY

Detour Gold provided the Moose Cree First Nation with a copy of its Individual Environmental Assessment (EA) for the Detour Lake Power Project (230 kV Transmission Line Power Supply). The due date for comment on the EA was June 18, 2010; however, the Moose Cree First Nation (MCFN) was granted an extension. DPRA was contracted to review the Individual EA in order to assist the MCFN in submitting its comments on the EA. The primary focus of the review was on the issues of environmental and socio-economic issues of concern to the MCFN.

The EA document generally follows the Terms of Reference (TOR) approved by the Minister of the Environment and provides a fairly clear description of the project, the environment, potential alternatives, environmental effects, consultation to date, and proposed mitigation/monitoring. The process of determining the net effect of each potential effect is transparent and easy to understand.

However, DPRA has identified ten (10) issues of concern – some quite significant -- through its review of the EA document. They are:

- 1. Lack of incorporation of Traditional Knowledge and Land Use Studies
- 2. Not including buffer zones for access roads and ancillary developments
- 3. Incomplete socio-economic data on First Nations (compared to non-Aboriginal communities)
- 4. No mention of traditional hunting and fishing activities in either the description of the environment or estimation of project impacts
- 5. No inclusion of Aboriginal considerations in the selection of alternatives
- 6. No use of Valued Ecosystem Components
- 7. Imprecision of the "Duration" environmental effect attribute
- 8. No mention of Aboriginal languages being used in consultation activities
- 9. Lack of monitoring for wildlife and socio-economic effects
- 10. Lack of protocol for Aboriginal complaints

In this report, each issue of concern is briefly described, and a solution proposed. Many of these issues can be addressed relatively easily by the proponent, and by implementing them, the result will be a clearer and more rigorous EA. If the recommendations for these **ten** issues of concern are addressed by the proponent, the Moose Cree First Nation's concerns as a First Nation with traditional territory in the project area and a community that could potentially benefit economically from this project will be protected.



1 - INTRODUCTION

This section of the report summarizes the purpose of the review and structure of the report

1.1 PURPOSE OF THE REVIEW

Detour Gold Corporation proposes to construct a 230 kV transmission line to the proposed Detour Lake gold mine site to connect to the Ontario electrical grid at Island Falls, in order to provide the mine with a supply of power for construction, operation and closure. This is called the Detour Lake Power Project (DLPP). Detour Gold produced a Terms of Reference (TOR) for the proposed DLPP – which the Moose Cree First Nation reviewed and commented on: this TOR was approved by the Ontario Minister of the Environment in March 2010.

Detour Gold has subsequently completed an Individual Environmental Assessment (EA) in accordance with the Approved Terms of Reference and *The Code of Practice: Preparing and Reviewing Environmental Assessments in Ontario (October 2009)*. Detour Gold held public information sessions in various communities in March and April 2010; and again in May 2010. The Environmental Assessment was made available for public review from April 30 until June 18, 2010. The Moose Cree First Nation (MCFN) was granted an extension beyond the June 18 date.

DPRA has been contracted by the Moose Cree First Nation to review the DLPP Individual EA, and provide advice to the First Nation regarding its sufficiency, so that the community can respond to the invitation for comments. It is important that any areas of concern regarding the EA be raised, as the review process has been mandated by the Government of Ontario to provide stakeholders (including First Nations) with the opportunity to note deficiencies or areas of concern so that these can be addressed by the proponent.

1.2 ORGANIZATION OF THE REPORT

This report is organized as follows:

Section 1 - Introduction

Section 2 – Scope of the Review

Section 3 - Summary of Key Concerns and Solutions

Section 4 – Presentation of Issues (by EA Section)

2 – SCOPE OF THE REVIEW

This section of the report discusses the scope of the assignment and documents reviewed during the review.

2.1 SCOPE OF WORK

DPRA's review of the DLPP Individual EA focused primarily on the adequacy of the description of the environment (including socio-economic aspects), environmental effects analysis and mitigation measures. This is important because much of the proposed power project route (and the Detour mine itself) is within the traditional territory of the Moose Cree First Nation and any impacts on the physical environment can potentially impact Moose Cree economic and traditional activities within this territory; similarly,

construction of the DLPP could have employment and economic impacts on the MCFN. Secondary attention was given to the assessment of alternatives and consultation to date.

2.2 DOCUMENTS REVIEWED

One primary document has been reviewed for this assignment: the DLPP Individual EA.

Since the EA has been produced in order to fulfil provincial requirements, appropriate sections of the Environmental Assessment Act (1990), the Code of Practice for Consultation in Ontario's Environmental Assessment Process and the Code of Practice for Preparing and Reviewing Environmental Assessments in Ontario were reviewed for this assignment. Also, since the MCFN reviewed and commented on the Terms of Reference (TOR) for this EA, the TOR and the MCFN's response to the TOR were also reviewed.

3 - SUMMARY OF KEY CONCERNS & SOLUTIONS

As a whole, the Individual EA fulfils Sections 6.1(1) and 6.1(2) of the Environmental Assessment Act, and both the Code of Practice for Consultation in Ontario's Environmental Assessment Process and Code of Practice for Preparing and Reviewing Environmental Assessments in Ontario. Further, the province's requirements for Aboriginal consultation appear to have been mostly satisfied in the proponent's Consultation activities (Appendix H to the EA) – the exception is discussed in Section 3.9 below.

The following sections of the EA are satisfactorily covered:

- Section 1 Introduction
- Section 2 Identification of Proponent
- Section 3 Regulatory Framework
- Section 4 Terms of Reference Requirements
- Section 5 Description of the Proposed Undertaking
- Section 10 Flexibility to Accommodate New Circumstances
- Section 11 Other Approvals Required
- Section 13 References

Also, the following issues are satisfactorily covered in the EA:

- Inclusion of Aboriginal issues in the Methodology
- Description (and map) of the MCFN traditional territory
- Socio-economic benefits to First Nations
- Detail used in identifying the preferred option
- Impacts on Aboriginal cultural resources
- Compensation for potential losses to Aboriginal trappers
- Assessment of cumulative effects
- Agreements with Aboriginal communities

3.1 HIGHLIGHTS OF ISSUES OF CONCERN

DPRA has identified ten (10) issues of concern, through its review of the EA document:

- 1. Lack of incorporation of Traditional Knowledge and Land Use Studies
- 2. Not including buffer zones for access roads and ancillary developments
- 3. Incomplete socio-economic data on First Nations (compared to non-Aboriginal communities)

- 4. No mention of traditional hunting and fishing activities in either the description of the environment or estimation of project impacts
- 5. No inclusion of Aboriginal considerations in the selection of alternatives
- 6. No use of Valued Ecosystem Components
- 7. Imprecision of the "Duration" environmental effect attribute
- 8. No mention of Aboriginal languages being used in consultation activities
- 9. Lack of monitoring for wildlife and socio-economic effects
- 10. Lack of protocol for Aboriginal complaints

Each issue of concern is briefly described below; proposed solutions are included in the brief description of each issue. These issues of concern should be considered by DG in light of the Code of Practice for Preparing and Reviewing Environmental Assessments in Ontario, Section 3.2.6 (p.12) which states, "The level of detail presented in an environmental assessment should be sufficient... to assure interested persons that the proposed undertaking is technically feasible and achieves environmental protection".

3.2 LACK OF INCORPORATION OF TRADITIONAL KNOWLEDGE AND LAND USE STUDIES

Concern: As per Section 4.2.3 (p.20) of *The Code of Practice: Preparing and Reviewing Environmental Assessments in Ontario*, "The environmental assessment is also to include a list and explanation of the tools (for example, studies, tests, surveys, mapping) used to provide the description of the environment". Given the fact that the proponent has previously stated that it is working collaboratively with local Aboriginal groups to gather and determine potential effects of the DLPP in part through the collection of TK, one would expect the Traditional Knowledge (TK) obtained through this collaborative work would be included in the EA and identified as such. However, there is no evidence of TK having been used in the describing the environment in this EA. *In this regard, the EA is deficient*.

Proposed Solution: If Traditional Knowledge has been used in describing the environment, it should be acknowledged as such in Section 6.1 the EA document; if it has not been used, an explanation for the lack of TK for a study that covers the traditional territory of several First Nations needs to be provided in the EA document. In addition, the proponent should describe how Traditional Knowledge will be considered going forward and should ascertain that the approach is satisfactory to the First Nation.

Concern: According to the EA, Section 6.6.6, traditional land use studies are currently being conducted by several First Nation communities. The section refers to Table 6-18 for the status of each traditional land use study. However, Table 6-18 provides the status of Traditional Knowledge (TK) studies – which are not synonymous with traditional land use studies. It is therefore not clear whether these communities have been conducting traditional land use studies or TK studies. Since the findings of these land use studies could impact the assessment of impacts made in the EA, but the studies are not yet complete, the EA document is presently deficient.

Proposed Solution: The EA should be deemed complete only after Traditional Land Use Studies have been completed and the findings of these studies have been considered by the proponent, and these considerations integrated by the proponent into the EA document.

3.3 NOT INCLUDING BUFFER ZONES FOR ACCESS ROADS AND ANCILLARY DEVELOPMENTS

Concern: The MCFN's review of the DLPP TOR suggested that a one-kilometre potential zone of impact be applied to any access roads or ancillary developments; to which the proponent replied that the point would be addressed in the EA document. However, there is no evidence in the EA that the point has even been considered

Proposed Solution: Considering the commitment it made in its response to the MCFN regarding the Draft TOR, the proponent should either (a) include the one-kilometre potential zone of impact be applied to any access roads or ancillary developments to the study area and include it in its description of the environment and description of environmental effects; or (b) provide a clear explanation in the EA document why it has decided not to include the one-kilometre potential zone of impact be applied to any access roads or ancillary developments to the study area.

3.4 INCOMPLETE SOCIO-ECONOMIC DATA ON FIRST NATIONS (COMPARED TO NON-ABORIGINAL COMMUNITIES)

Concern: The EA includes statistics on employment characteristics, median personal and household incomes for non-Aboriginal communities, but not the same information on Aboriginal communities (which the proponent states are not available). However, there is no evidence that the proponent made any effort to obtain this important Aboriginal socio-economic data. Given the fact that Section 3.2.5 (p.11) of The Code of Practice: Preparing and Reviewing Environmental Assessments in Ontario, states that it expects proponents to transition to original field work, surveys, etc. for analysis and evaluation in the later stages of the environmental assessment planning process", it would appear that the proponent has not done its due diligence in collecting socio-economic data in First Nation communities that is comparable to the socio-economic data of non-Aboriginal communities. In this regard, the EA is deficient.

Proposed Solution: The proponent should conduct the necessary research work, in consultation and cooperation with the First Nation communities identified in the EA, to collect accurate data on employment characteristics, median personal and household incomes in these communities, and include this data in Section 6.6.4 the EA document.

3.5 NO MENTION OF TRADITIONAL HUNTING AND FISHING ACTIVITIES IN EITHER THE DESCRIPTION OF THE ENVIRONMENT OR ESTIMATION OF PROJECT IMPACTS

Concern: While the EA identifies trapping as a First Nation traditional activity, it does not state whether or not hunting, fishing, or harvesting plants (for various possible purposes) are practiced by First Nations within the study area. In absence of even mention of these activities, it cannot be determined whether the proponent has adequately determined the extent of traditional activities within the DLPP study area. In this regard, the EA is deficient.

Proposed Solution: If the proponent has determined that no traditional activities other than trapping are conducted by First Nations in the study area, this should be clearly stated in Section 6.6.5 of the EA document. If the proponent has not determined whether hunting, fishing, or harvesting plants are conducted by First Nations in the study area, studies need to be conducted to determine this and the findings of the studies should be included in the EA document.

Concern: The lack of addressing traditional hunting and fishing in Environmental Effects - Traditional Land Uses (Section 8.16), combined with he lack of information regarding hunting, fishing or other traditional activities within the DLPP study area (in Section 6.6.5 of the EA) is an information gap. In this regard, the EA is deficient.

Proposed Solution: If the proponent has determined that no traditional activities other than trapping are conducted by First Nations in the study area, this should be clearly stated in Section 8.16 of the EA document. If the proponent has not determined whether hunting, fishing, or harvesting plants are conducted by First Nations in the study area, studies need to be conducted to determine this and the determination of impacts on these activities – or mention that these activities are not engaged in by First Nations in the study area – should be included in Section 6.18 of the EA document.

3.6 NO INCLUSION OF ABORIGINAL CONSIDERATIONS IN THE SELECTION OF ALTERNATIVES

Concern: The MCFN's report on the Draft TOR stated that none of the screening criteria for the project or the considerations that may over-ride the screening criteria directly address First Nation concerns. In response, the proponent had stated that this point will be addressed in the EA document. However, there is no evidence that the point has been addressed in the EA document.

Proposed Solution: The proponent should consider either (a) modifying one of the screening criteria and/or over-riding considerations or (b) provide an additional screening criterion/over-riding consideration that directly addresses First Nation concerns in Section 7.1.1 of the EA, considering the commitment it made in its response to the MCFN regarding the Draft TOR.

3.7 NO USE OF VALUED ECOSYSTEM COMPONENTS

Concern: The Draft TOR, Section 6, p. 18 (Effects on the Natural Environment) stated that "primary considerations are in regard to Valued Ecosystem Components." However, nowhere in the EA document itself are Valued Ecosystem Components either referred to or identified. Valued Ecosystem Components (VECs) are an important component of Environmental Assessment methodology; in their absence, all ecosystem components may be treated "equally" although from an ecosystemic perspective some components are more significant than others. The absence of identifying VECs in this EA document and their direct use in the EA analysis is a deficiency.

Proposed Solution: The proponent should identify the VECs used in Section 8 the EA, the methodology used to identify these VECs, and apply the VECs in its assessment of project's net effects by project phase.

3.8 IMPRECISION OF THE "DURATION" ENVIRONMENTAL EFFECT ATTRIBUTE

Concern: Section 8.19.1 of the EA (Assessment of Effects – Methodology) describes the six attributes and level of effects, but does not provide any temporal measure (timespans) for Levels I through III as they apply to the attribute of "Duration". Similarly, the descriptions of "Duration" Level I as being "short term; does not occur beyond construction phase" and Level III as being "long term; occurs beyond decommissioning phase" are too vague for an EA process to provide a meaningful level of detail and therefore to be deemed "rigorous".

Proposed Solution: Define "Duration" Levels I through III in terms of months/years in Section 8.19.1 of the EA document in order to provide significant clarity and precision to this environmental effect attribute.

3.9 NO MENTION OF ABORIGINAL LANGUAGES BEING USED IN CONSULTATION ACTIVITIES

Concern: Section 9 of the EA document does not mention whether or not any materials used in the various consultation activities with Aboriginal groups were produced in Aboriginal languages. If consultations with these communities were conducted only in English, there is a risk of a significant proportion of the First Nation communities being insufficiently consulted in this EA process.

Proposed Solution: If Aboriginal languages (e.g., Cree, Ojicree) were used in the First Nation community consultations, this information should be included in Section 9 of the EA document; if no Aboriginal languages were used in the Aboriginal consultation, a convincing explanation as to how the use of only English language satisfies the Aboriginal consultation component of the EA is required.

3.10 LACK OF MONITORING FOR WILDLIFE AND SOCIO-ECONOMIC EFFECTS

Concern: Wildlife is an aspect of the environment that could be conceivably impacted by the project. However, the list of aspects of the environment that will be inspected as part of environmental monitoring does not include wildlife monitoring. Also, Section 12.2 of the EA document states that Detour Gold will engage stakeholders, Aboriginal people and local communities in discussions on an ongoing basis to "help monitor any effects to the socio-cultural environment and identify mutually satisfactory ways to mitigate negative or enhance positive effects". However, no protocol for monitoring wildlife or socio-economic impacts on First Nations – which is much stronger than a vague commitment to ongoing discussions – is identified in the EA document. In this regard, the EA is deficient.

Proposed Solution: Include a Wildlife Monitoring Protocol and Socio-Economic Monitoring Protocol in Section 12.2 of the EA document. Alternatively, commit to developing such protocols with the First Nations within 3 months of any EA approval.

3.11 LACK OF PROTOCOL FOR ABORIGINAL COMPLAINTS

Concern: Section 12.2 commits Detour Gold to a formal complaints procedure to provide "Aboriginal communities a voice during the construction, operation and decommissioning phase of the DLPP". While this commitment is satisfactory, a clear protocol with timeframes and a dispute resolution mechanism would strengthen the proponent's commitment.

Proposed Solution: Include a Protocol for Aboriginal Complaints in Section 12.2 of the EA document.



4.0 PRESENTATION OF ISSUES (BY EA SECTION)

This section of the report presents the findings of DPRA's review of the Individual EA in the form of a table. The table identifies issues, section by section. For each issue identified, specific points and significance of the issue are provided. If the text in "Significance of Issue" is in bold, it is an issue of concern. All such issues of concern are identified – with solutions proposed – in Section 3 of this report.

Individual Environmental Assessment - DLPP

Sub-Issue/Section of EA	Issue	Specific Points	Significance of Issue
1.0 Introduction	NONE	N/A	N/A
2.0 Identification of Proponent	NONE	NA	N/A
3.0 Regulatory Framework	NONE	N/A	N/A
4.0 Terms of Reference Requirements	NONE	N/A	N/A
5.0 Description of the Proposed Undertaking	NONE	N/A	N/A
6.1 Description of the Environment – Background on Approach	Traditional Knowledge (TK)	Given the fact that the Proponent's response to the MCFN's 20th point regarding the Draft TOR was, DG has been in contact with local aboriginal groups Nations [sic] since 2007 and is working collaboratively with these groups to gather and determine potential effects of the DLPP in part through the collection of TK, it must be assumed that: (a) TK has been collected and (b) the TK is of value and should be included and identified as such in the EA document. However, no description of the collection and use of TK in the description of either the environment (Section 6.0) or environmental effects (Section 8.0) is provided in the EA.	As per Section 4.2.3 (p.20) of The Code of Practice: Preparing and Reviewing Environmental Assessments in Ontario, "The environmental assessment is also to include a list and explanation of the tools (for example, studies, tests, surveys, mapping) used to provide the description of the environment". The absence of a description of the collection and use of Traditional Knowledge (TK) as part of the EA process – in the light of DG's response to this point in the MCFN's review of the Draft TOR – is a deficiency.
6.3 Description of the Environment – Aquatic Environment	Traditional Knowledge	No evidence of Traditional Knowledge being collected or used in describing the aquatic environment.	The absence of Traditional Knowledge regarding the aquatic environment – or a statement explaining why Traditional Knowledge had not/could not be used – makes the description of the aquatic environment appear to be incomplete.



Sub-Issue/Section of EA	Issue	Specific Points	Significance of Issue
6.4 Description of the Environment – Terrestrial Resources	Traditional Knowledge	No evidence of Traditional Knowledge being collected or used in describing the aquatic environment; nor is traditional knowledge included as a data source for terrestrial information in Table 6-8.	The absence of Traditional Knowledge regarding terrestrial resources – or a statement explaining why Traditional Knowledge had not/could not be used – makes the description of terrestrial resources appear to be incomplete.
6.6.1 Transportation Network	Access Roads and Ancillary Developments	The MCFN's review of the DLPP TOR (12th point) stated: The choice of a one-kilometre buffer zone on either side of the ROW as the focus of assessment would seem reasonable in most cases. However, the assessment should include a similar potential zone of impact with respect to any access roads or ancillary developments. The proponent's response to the point was "to be addressed in EA document". However, neither the description of the Human Environment (Section 6.6) nor the description of the Transportation Network (Section 6.631) include a potential zone of impact for access roads/ancillary developments.	This point has not been addressed in the EA document.
6.6.2 Communities	Traditional Territory	The Moose Cree First Nation (MCFN) is briefly described in this section; its traditional territory is mapped in Figure 6-11.	This information is satisfactory.
6.6.2 Communities	Socio-Economic Data	Available MCFN population and language statistics are provided in this section.	This information is satisfactory.
6.6.3 Populations	Socio-Economic Data	The section provides population trends for non-Aboriginal communities in the study area, but not for Aboriginal communities, which means that there is no comparability of data. However, given the sparse nature of First Nation – especially since Census data does not separate Moose Cree First Nation from Moosonee – such data may not be available. Table 6-12 and Table 6-13 provide population data on non-Aboriginal and Aboriginal communities, respectively. The MCFN is identified as a data source for the community's population figures.	This information is satisfactory.

Sub-lesue/Section of FA	esile	Specific Points	Significance of Issue
6.6.4 Economy, Labour and Business	Socio-Economic Data	This section provides a brief overview of economic activities and labour force in the study area, and refers to employment characteristics of non-Aboriginal communities (Table 6-14) and median personal and household incomes for non-Aboriginal communities (Table 6-15). The two tables noted that this information was not available for First Nation communities in the study area.	This information is generally satisfactory, but the socio- economic baseline information is not complete without labour force, employment and household income information from First Nation communities. There is no evidence from the EA document that any effort was made (e.g., direct sourcing) to obtain this information other than look at Statistics Canada data. However, as per Section 3.2.5 (p. 11) of The Code of Practice: Preparing and Reviewing Environmental Assessments in Ontario, "Proponents should be aware that while available and published data can be used in the earlier steps in the environmental assessment planning process, it is expected that there will be a transition to original field work, surveys, etc. for analysis and evaluation in the later stages of the environmental assessment planning process." Additional efforts to obtain the First Nation data should be included in this section of the document. If none were made, they should be undertaken to ensure a full and complete EA section.
6.6.5 Land Use – Hunting, Fishing and Trapping	Traditional Activities	The only First Nation traditional activity identified in this section is trapping; there is no information to indicate whether or not hunting and fishing are engaged in the DLPP study area, or whether such information was even collected as part of the EA.	If First Nations are engaged in hunting and/or fishing in the DLPP study area and this information is not included in the EA, then the estimated impacts of the project on these species may be inaccurate.
6.6.6 Traditional Land Use	Traditional Land Uses	This section describes the process of Aboriginal peoples in the area conducting Traditional Land Use Studies (supported by Detour Gold) and the status of each Study. However, it does not either include the findings or summarize the findings of the Taykwa Tagamou Nation's study (which, as per Table 6-18 was in Interim Final Report stage); nor does it include – or refer – to the TTN Traditional Land Use Study in Appendix B (Related Studies and Reports). The only traditional land use information provided are: Orgoing	As Traditional Land Use Studies can provide important information that can influence the estimated impacts of the project, any and all Traditional Land Use Studies should be included in the EA. Further, the EA should not be deemed complete until all Traditional Land Use Studies (currently being conducted by the Taykwa Tagamou Nation, Wahgoshig First Nation, Metis Nation of Ontario, MCFN and Trapper Family) are completed.

Sub-Issue/Section of EA	Issue	Specific Points	Significance of Issue
		dialogue with Aboriginal people about the project has indicated that the land, lakes and streams that can be accessed from Highway 652 and from the previous transmission line corridor are currently used and were historically used for hunting, fishing and travel routes (p.62), information on traplines and associated trap cabins (p.63) and mention that the Stage 2 Archaeological Study found that the DLPP Study Area has cultural significance for the WFN (p.63).	
7.1.1 Alternatives to the DLPP	Aboriginal considerations in selection of alternatives	The MCFN's review of the DLPP TOR (3 rd point) stated: While the 10 screening criteria have been adapted from the Ministry of Environment (specific document not identified in the ToR) – and therefore presumably satisfy provincial EA requirements – if the proponent wants to assure First Nations that their concerns will be addressed in the issue of considering project alternatives, it would be best that at least 1 aspect directly address First Nation concerns.	This point has not been addressed in the EA document.
		The proponent's response to the point was "to be addressed in EA document". However, the 10 criteria listed in the EA, Section 7.1.1 are identical to those listed in the TOR.	
7.1.1 Alternatives to the DLPP	Aboriginal considerations in selection of alternatives	The MCFN's review of the DLPP TOR (4th point) stated: 3 considerations that may over-ride the screening criteria were identified, none of which either directly or indirectly address First Nations, and suggested that, if the proponent wants to assure First Nations that their concerns will be addressed in the issue of considering project alternatives, it would be best that at least 1 of the over-riding considerations directly address First Nation concerns.	This point has not been addressed in the EA document.
		The proponent's response to the point was "to be addressed in EA document". However, the 10 criteria listed in the EA, Section 7.1.1 are identical to those listed in the TOR.	

Cirb-lesiie/Section of EA	Olisal	Specific Dointe	Significance of leane
7.2 Methodology	Inclusion of Aboriginal Issues	Under the heading "Effects (adverse) to the Human Environment (p. 104), the example of the negative effect given is regarding Aboriginal peoples.	This information is satisfactory.
7.3 Alternatives to the DLPP	Socio-Economic Benefits to First Nations	This section mentions socio-economic initiatives targeted to Aboriginal groups as a result of Memoranda of Understanding, Letters of Intent and Impact Benefit Agreements between local Aboriginal groups and Detour Gold.	This information is satisfactory.
7.4 Alternatives Methods of the DLPP	Sufficiency of Detail in Identifying Preferred Option	For each routing refinement (Sec. 7.4.1), pole/tower alternatives (Sec. 7.4.2), and ROW management alternatives (Sec. 7.4.3), sufficient descriptions are provided regarding each option along 5 criteria, including adverse effects on the biophysical and human environments. The evaluation of alternatives is clear and conclusions fit the analysis.	This information is satisfactory.
8.0 Environmental Effects and Mitigation Measures	Valued Ecosystem Components	The Draft TOR, Section 6, p. 18 (Effects on the Natural Environment) stated that "primary considerations are in regard to Valued Ecosystem Components." However, nowhere in the EA document itself are Valued Ecosystem Components either referred to or identified.	Valued Ecosystem Components (VECs) are an important component of Environmental Assessment methodology; in their absence, all ecosystem components may be treated "equally" although from an ecosystemic perspective some components are more significant than others. The absence of identifying VECs in this EA document and their direct use in the EA analysis is a deficiency.
8.10 Environmental Effects - Wildlife and Birds	Impacts on Traditional Activities	The EA (p. 129) states that First Nation trappers will be compensated if construction subjects them to interference and that broader compensation will be provided to First Nations "for interference along registered trappines with traditional pursuits involving hunting and trapping related to the DLPP". However, fishing is not mentioned, nor is hunting outside registered traplines mentioned.	The lack of addressing traditional hunting and fishing in this section, combined with he lack of information regarding hunting, fishing or other traditional activities within the DLPP study area (in Section 6.6.5 of the EA) is an information gap.

Sub-Issue/Section of EA	Issue	Specific Points	Significance of Issue
8.14 Ervironmental Effects - Socio-economics	Impacts on First Nations	The section identifies employment opportunities and business opportunities as being the primary socioeconomic impacts of the project (construction) and states that employment and business commitments are being negotiated with Aboriginal communities. No adverse socio-economic impacts are identified in this section.	The issue of compensation for potential losses to trapping (which is the only potential negative socioeconomic impact on First Nations in the region) is addressed in Section 8.10.
8.16 Environmental Effects - Traditional Land Uses	Impacts on Traditional Activities	The EA identifies and describes potential project effects on traditional land uses such as plant harvesting, wildlife and fish, access to areas used for traditional purposes, culturally significant areas, influx on non-Aboriginal people for hunting, increases of traffic and therefore wildlife roadkill, herbicides and EMF radiation. Each potential impact is convincingly addressed within the context of the DLPP and its design/implementation. The conclusion that there will be no significant negative impacts on traditional activities is convincing.	This information is satisfactory.
8.17 Environmental Effects – Heritage and Cultural Resources	Impacts on Aboriginal Cultural Resources	This section is well described; mitigation measures are adequate.	This information is satisfactory.
8.19.1 Assessment of Effects - Methodology	Interpretation of "Duration"	The methodology section describes the six attributes and level of effects quite clearly. However, the attribute of "Duration" as described in this section does not provide any temporal measure. Tables 8-3, 8-4 and 8-5 (which summarize the net effects of each project phase) only provide information such as <i>Short term</i> ; does not occur beyond construction phase (for Level I) and <i>Long term</i> ; occurs beyond decommissioning phase (for Level III).	More precision regarding duration would increase the rigour of this section of the EA and the defensibility of its assessment of effects.
8.21.2 Cumulative Effects Assessment	Assessment of Cumulative Effects	This section states that the only other project expected in the region is the Detour Lake open pit mine and anticipates the impacts of this project, given that it is currently being assessed through another EA process.	This information is satisfactory.

Sub-lesue/Section of FA	elissi	Specific Points	Significance of Issue
8.21.2 Cumulative Effects Assessment	Agreements with Aboriginal Communities	This section states that the agreements that Detour Gold is pursuing with each Aboriginal group in the region do not distinguish between the various phases or components (e.g., permanent power supply; the mine) of the Detour Lake project. It also provides a description of the aspects expected to be covered by these agreements (environmental protection; employment, training and business opportunities; social and cultural awareness and protection; dispute resolution; other matters), but that the agreements are confidential.	This information is satisfactory.
9.0 Consultation Plan and Consultation to Date	Consultation activities in Aboriginal languages	This section does not mention whether or not any materials used in the various consultation activities with Aboriginal groups were produced in Aboriginal languages (e.g., Cree, Ojicree). Also, the communication materials provided in Appendix H (Consultation) are all in English.	Consultation with Aboriginal communities – especially in the more remote/rural parts of Northeastern Ontario – cannot be deemed to have been fully engaging the communities if information is provided solely in English.
10.0 Flexibility to Accommodate New Circumstances	NONE	N/A	N/A
11.0 Other Approvals Required	NONE	NVA	N/A
12.2 Proposed Monitoring	Wildlife Monitoring Protocol	The list of aspects of the environment that will be inspected as part of environmental monitoring does not include wildlife monitoring.	To b rigorous, the EA document should include a wildlife monitoring protocol and describe it in sufficient detail.
12.2 Proposed Monitoring	Socio-Economic Monitoring	This section (p. 199) states that Detour Gold will engage stakeholders, Aboriginal people and local communities in discussions on an ongoing basis to "help monitor any effects to the socio-cultural environment and identify mutually satisfactory ways to mitigate negative or enhance positive effects".	There must be a clear socio-economic monitoring protocol developed to monitor impacts on aspects of importance to First Nations.
12.2 Proposed Monitoring	Formal Complaints	This section (p. 199) commits Detour Gold to a formal complaints procedure to provide "Aboriginal communities a voice during the construction, operation and decommissioning phase of the DLPP".	This commitment is satisfactory, but a clear protocol with timeframes and a dispute resolution mechanism are needed.



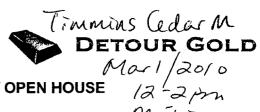
PEER REVIEW OF INDIVIDUAL ENVIRONMENTAL ASSESSMENT DETOUR LAKE POWER PROJECT

Sub-Issue/Section of EA	issue	Specific Points	Significance of Issue
13.0 References	NONE	N/A	N/A

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DETOUR LAKE PROJECT COMMUNITY OPEN HOUSE March 2010

COMMENT FORM

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	you have any comments, concerns or suggestions related to the Closure Plan e Project?
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EVALUATION

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Personal information is protected under authority of the Freedom of Information and Protection of Privacy Act, Section 32, and is used solely for the purpose of evaluating and improving the Project assessment. Individuals will not be identified in any public documents or used for any purpose other than this project.

Completed forms can be left with a member of our team or faxed/mailed to:

Detour Gold Corporation, 200 Bay Street, Suite 2040, Box #23, Toronto, ON M5J 2J1 Fax: 416.304.0814 Email: info@detourgold.com



DETOUR LAKE PROJECT COMMUNITY OPEN HOUSE March 2010 March 2010

COMMENT FORM

2	What suggestions do you have for avoiding or mitigating potential effects (or enhancing
2.	benefits) from the proposed Detour Lake Project?
3.	Do you have any comments, concerns or suggestions related to the Closure Plan for the Project?
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EVALUATION

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DETOUR GOLD

DETOUR LAKE PROJECT COMMUNITY OPEN HOUSE 12-2 pm March 2010 Metis

COMMENT FORM

2.	What suggestions do you have for avoiding or mitigating potential effects (or enhancing benefits) from the proposed Detour Lake Project?
3.	Do you have any comments, concerns or suggestions related to the Closure Plan for the Project?
(op	otional) Name:
	Organization or Affiliation (if applicable):



EVALUATION

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Detour Gold Corporation, 200 Bay Street, Suite 2040, Box #23, Toronto, ON M5J 2J1 Fax: 416.304.0814 Email: info@detourgold.com

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Size: 74KB (75,269 bytes)

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COMMENT FORM

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Detour Gold Corporation, 200 Bay Street, Suite 2040, Box #23, Toronto, ON M5J 2J1 Fax: 416.304.0814 Email: info@detourgold.com

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COMMENT FORM

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DETOUR LAKE PROJECT COMMUNITY OPEN HOUSE TINE March 2010

COMMENT FORM

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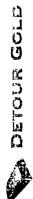
Completed forms can be left with a member of our team or faxed/mailed to:

Detour Gold Corporation, 200 Bay Street, Suite 2040, Box #23, Toronto, ON M5J 2J1 Fax: 416.304.0814 Email: info@detourgold.com

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Location: Leglar Meadows Immins-Metro

Name	Company (if applicable)	Address	Phone	E-mail	Would you like to be on our project mailing list? (YN)
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DETOUR GOLD

DETOUR LAKE PROJECT COMMUNITY OPEN HOUSE

Location: Leolar Meadows - Timmins - Metis
Date: March 1,2010

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DETOUR LAKE PROJECT COMMUNITY OPEN HOUSE

SIGN-IN FORM

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SIGN-IN FORM
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Date: March 1/2010

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Location: Cocheque 12pm Jerry Date: Mar 2/2 010

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SIGN-IN FORM

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Date: Maru 24/2010

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SIGN-IN FORM

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DETOUR LAKE PROJECT COMMUNITY OPEN HOUSE

SIGN-IN FORM

Location: New Publication Posts

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Modified: Tuesday, Oct 05, 2010 12:31:51 PM



October 29, 2008

Chief Dwight Sutherland Taykwa Tagamou Nation R.R. #2, Brower Township P.O. Box 3310 Cochrane, ON, POL 1C0

Dear Chief Sutherland,

As you are aware, Detour Gold is currently in the process of developing a Memorandum of Understanding (MOU) with the Taykwa Tagamou Nation, which has treaty rights that could potentially be affected by the re-development of the former Detour Lake mine site, including its associated power line that was recently decommissioned.

Although we understand the MoU will take some time to negotiate and finalize, it is important that we move ahead with certain studies which are critical to the permitting process. These studies should ideally be completed before the snow falls.

As part of the permitting process to re-develop the mine site, and to protect local cultural heritage values, Detour Gold is planning to undertake archaeological studies of new areas adjacent to the Detour Lake mine site that could potentially be developed, along with investigations of the power line routing, which would use the same right-of-way (ROW) as the prior line. The archaeological studies would be carried out under the direction of John Pollock, a licensed archaeologist, of Woodland Heritage Services (WHS).

Timing for the archaeological studies is constrained by the seasons in that field work for most elements is best carried out during the snow free period. To avoid unnecessary delays in archaeological data collection, we would like to develop a cooperative work arrangement with the Taykwa Tagamou Nation to undertake the archaeological field work this fall, while the MOU is being completed.

As suggested by you, at our July 23, 2008 meeting in Cochrane, WHS would seek to work with the Mushkegowuk Environmental Research Centre (MERC), and for MERC in turn to facilitate the direct involvement of members of the Taykwa Tagamou Nation, including the hiring of community members to assist with Traditional Ecological Knowledge (TEK) gathering and archaeological field investigations. Such an arrangement has been used successfully in the past.

The focus of TEK gathering at this stage would be on cultural heritage values that could have a bearing on archaeological field investigations. The reason for this is that TEK held by community members would greatly assist the planning and direction of archaeological field



investigations. Broader aspects of TEK gathering could be addressed separately. TEK data would be collected through confidential questionnaires with the data to remain confidential, and only disclosed at the discretion of the First Nation.

Archaeological Stage 1 (Site Potential) and Stage 2 (Follow-up Field Testing) would be conducted (weather permitting) following the acquisition of sufficient information from the TEK studies to guide the field program. The field investigations would focus on areas where new ground disturbing development could potentially occur, and in areas identified from the TEK research, together with sites along the former transmission line ROW exhibiting higher archaeological potential such as major water and esker crossings.

Once you have had a chance to consider this proposal, Detour Gold would like to immediately work with your community to determine how best to carry out the TEK studies and archaeological field programs.

Respectfully yours,

Detour Gold Corporation

Gerald S. Papheton

President & Chief Executive Officer

Name: Transmittal.tif

Size: 21KB (21,435 bytes)

Modified: Tuesday, Oct 05, 2010 12:01:41 PM



To:

Vince Deschamps, AECOM

512 Woolwich St, Suite 2 Guelph,

From:

Sheila Daniel

ON N1H 3X7

Date:

September 8, 2010

Project

Detour Lake Project

Project

TC81510

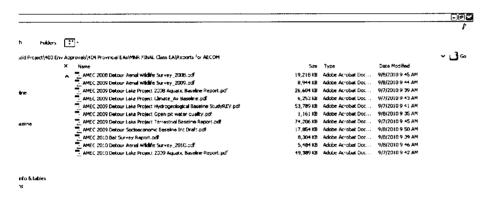
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copies: Title

Format / Media:



For your information For your review and comment For your approval and return As requested

AMEC Earth & Environmental, a division of AMEC Americas Limited 160 Traders Blvd. East, Suite 110 Mississauga, Ontario Canada L4Z 3K7 Tel +1 (905) 568-2929 Fax +1 (905) 568-1686

Name: Ttn_080613_dgc Request For Meeting.tif

Size: 66KB (67,565 bytes)

Modified: Tuesday, Oct 05, 2010 12:31:55 PM



Chief Dwight Sutherland Taykwa Tagamou First Nation PO BOX 3310, RR #3 Cochrane, ON POL 1C0

June 13, 2008

Dear Chief Sutherland,

I am writing to request a meeting with you and the Council of the Taykwa Tagamou First Nation.

Detour Gold is a Canadian gold exploration and development company whose primary focus is to re-develop an historic gold mine - the Detour Lake property - located 135 kilometers northeast of Cochrane in Northern Ontario. The Detour Gold Project is in the feasibility planning stage, and if developed, would be developed on the same site as the former Detour Gold Mine which operated from 1983 to 1999, and was recently decommissioned by Placer Dome / Goldcorp.

Prior to formal engagement, Detour Gold and AMEC Earth & Environmental (retained by Detour Gold for environmental services for the project) would like to meet with you to build constructive, mutually beneficial relationship with your community and other First Nations who may have traditional lands in the project area. We would like to discuss with you:

- 1. the proposed project
- 2. your interest in the project, and
- 3. engagement protocols for your First Nation about the project.

In speaking with Cindy Linklater, we understand that you and the Council may be available to meet with us at 10 a.m. on Wednesday, June 25, 2008 at your offices in Cochrane. We will follow-up with a phone call to confirm our meeting.

We look forward to meeting with you and the Council.

Sincerely,

Gerald Panneton,

President & CEO, Detour Gold

cc by fax (705) 272-5785: Cindy Linklater, Executive Assistant to the Chief, Taykwa Tagamou

Name: Ttn_080721_meeting July 24th -politis Email.tif

Size: 66KB (67,412 bytes)

Modified: Tuesday, Oct 05, 2010 12:31:59 PM

MICE ATT Page 1 013

MICE ATTE TO Solle upon ACP Peter Politis (p.politis@forevergreen.ca) Monday, July 21, 2008 11:57 AM 'echilton'; rreimer@ontera.net; dwight_sutherland@hotmail.com; Gerald Panneton

Good Morning Everyone,

Subject: RE: detour gold meeting

Gerald Panneton

From: Sent:

To: Cc:

The meeting between Detour Gold, 'TTN and Five Nations energy is set as follows:

'Mike Metatawabin'; craigg@telus.net; david.simms@amcc.com

 Meeting Place is the Swan Castle Inn (Best Western) in Cochrane (across from the Rail Station).
 Time: 6:00 pm
 Supper will be served at 6:00 pm sharp. Please stand by for an Agenda to follow. - 4 PHYDRS THE SUBSTRATION The Agenda theme is a two part meeting to address OMENTONIAN SHOP Five nations energy inclusion in transmission line establishment. If IN Detour GOLD future socio-economic relationship. • SHOT CHATTACTO D PARKATOL → Impact benefits Agreement, Joint Ventures, etc. .) MA + work o scheduling a process to develop the respective relationship MOUT - WIN - WIN - CAMBON STRINGS I remain. Peter # BALL INTO THE CIVIL INCOME. -----Original Message--From: echilton [mailto:echilton@hurontel.on.ca] Sent: July-18-08 3:31 PM To: 'Peter Politis'; rreimer@ontera.net; dwight_sutherland@hotmail.com Cc: Mike Metatawabin Subject: RE: detour gold meeting Good afternoon, gentlemen!

This message is to inform you that I will be at your meeting on Wednesday, 6 p.m. whether it is in Cochrane or in Timmins. Let me know. Have a great and safe weekend! Ed

From: Peter Politis [mailto:p.politis@forevergreen.ca]

Sent: July 18, 2008 2:56 PM To: rreimer@ontera.net

Cc: 'Ed Chilton'; dwight sutherland@hotmail.com

Subject: RE: detour gold meeting

Hi fellows,

The meeting is to begin discussions with TTN and Detour reling term relationship and to inform Detour

of Five Nations interest in getting the power line job.

We will be with the President of Detour Gold, Gerald Panneton and his entourage. Great opportunity to position Five Nations as the preferred contractor for the job while using TTN relationship as a catalyst for this.

I hope this helps. Just let me now who will attend so I can draft an agenda and inform detour

----Original Message-----

From: Rod [mailto:fishingrod67@hotmail.com]

Sent: July-18-08 12:01 PM

To: Peter Politis **Cc:** Ed Chilton

Subject: FW: detour gold meeting

Pete:

I've been speaking with Ed in preparation for this meeting. Can you confirm who from Detour Gold will be there and what you anticipate the discussion will be about. Is this going to be about technical matters, discussion about who is going to build the line, who will own it, etc. .or just initial get to know the players kind of deal.

Please reply to both me and Ed.

Thanks.

Rod

Rod Reimer 705 360-4372 Phone 705 360-1698 Fax 705 360-3083 Cell

-----Original Message-----

From: Rod Reimer [mailto:rreimer@ontera.net]
Sent: Wednesday, July 09, 2008 4:39 PM

To: Ed Chilton

Subject: 'FW: detour gold meeting

Fyi. . .

Rod Reimer 705 360-4372 Phone 705 360-1698 Fax 705 360-3083 Cell

-----Original Message-----

From: Peter Politis [mailto:p.politis@forevergreen.ca]

Sent: Wednesday, July 09, 2008 2:07 PM

To: rreimer@ontera.net Subject: detour gold meeting

Detour Gold meeting with 'TTN re five nations doing the power line.

6:00 pm Wednesday July 23 for supper in Cochrane. Location to be confirmed.

Please confirm who will be attending so I can relay to Detour.

Thankx.

Peter Politis Senior Consultant, For Evergreen Innovative Strategies Inc. 705-272-8564 www.forevergreen.ca p.politis@forevergreen.ca

This email message is protected by Ctient Consultant confidentiality. All information is to be treated with the strictest of confidence and disclosed to no one else in any way, shape, or form. If you have received this message in error, or are not the intended recipient, you are to destroy it immediately. Please contact our office to let us know of the error.

Name: Ttn_081029_dgc Request For Tek-afi.tif

Size: 63KB (63,955 bytes)

Modified: Tuesday, Oct 05, 2010 12:32:03 PM



October 29, 2008

Chief Dwight Sutherland Taykwa Tagamou Nation R.R. #2, Brower Township P.O. Box 3310 Cochrane, ON, POL 1C0

Dear Chief Sutherland,

As you are aware, Detour Gold is currently in the process of developing a Memorandum of Understanding (MOU) with the Taykwa Tagamou Nation, which has treaty rights that could potentially be affected by the re-development of the former Detour Lake mine site, including its associated power line that was recently decommissioned.

Although we understand the MoU will take some time to negotiate and finalize, it is important that we move ahead with certain studies which are critical to the permitting process. These studies should ideally be completed before the snow falls.

As part of the permitting process to re-develop the mine site, and to protect local cultural heritage values, Detour Gold is planning to undertake archaeological studies of new areas adjacent to the Detour Lake mine site that could potentially be developed, along with investigations of the power line routing, which would use the same right-of-way (ROW) as the prior line. The archaeological studies would be carried out under the direction of John Pollock, a licensed archaeologist, of Woodland Heritage Services (WHS).

Timing for the archaeological studies is constrained by the seasons in that field work for most elements is best carried out during the snow free period. To avoid unnecessary delays in archaeological data collection, we would like to develop a cooperative work arrangement with the Taykwa Tagamou Nation to undertake the archaeological field work this fall, while the MOU is being completed.

As suggested by you, at our July 23, 2008 meeting in Cochrane, WHS would seek to work with the Mushkegowuk Environmental Research Centre (MERC), and for MERC in turn to facilitate the direct involvement of members of the Taykwa Tagamou Nation, including the hiring of community members to assist with Traditional Ecological Knowledge (TEK) gathering and archaeological field investigations. Such an arrangement has been used successfully in the past.

The focus of TEK gathering at this stage would be on cultural heritage values that could have a bearing on archaeological field investigations. The reason for this is that TEK held by community members would greatly assist the planning and direction of archaeological field



investigations. Broader aspects of TEK gathering could be addressed separately. TEK data would be collected through confidential questionnaires with the data to remain confidential, and only disclosed at the discretion of the First Nation.

Archaeological Stage 1 (Site Potential) and Stage 2 (Follow-up Field Testing) would be conducted (weather permitting) following the acquisition of sufficient information from the TEK studies to guide the field program. The field investigations would focus on areas where new ground disturbing development could potentially occur, and in areas identified from the TEK research, together with sites along the former transmission line ROW exhibiting higher archaeological potential such as major water and esker crossings.

Once you have had a chance to consider this proposal, Detour Gold would like to immediately work with your community to determine how best to carry out the TEK studies and archaeological field programs.

Respectfully yours,

Detour Gold Corporation

Gerald S. Papheton

President & Chief Executive Officer

Name: Ttn_081030_request For Meeting -gp Email.tif

Size: 68KB (69,404 bytes)

Modified: Tuesday, Oct 05, 2010 01:39:43 PM

From:

Gerald Panneton

Sent:

Thursday, October 30, 2008 11:03 AM

To:

'Dwight Sutherland'

Cc:

bryan_gelinas@hotmail.com; Brian Davey; 'Simms, David'; Laurie Gaborit

Subject:

Detour Gold request

Attachments:

Request Taykwa Tagamou FN letter_Oct 29.pdf

Importance:

High

Dear Chief Sutherland

It has been a while we have not met, and hopefully once the hunting season is over we can scheduled to meet in November to finalise the MoU

In the mean time, we do have a request to proceed with some archeological studies to facilitate our requirement prior to the winter snow.

Thank you very much for giving consideration to this request at your earliest convenience

Regards

Gerald Panneton

President & CEO
Detour Gold Corporation

Royal Bank Plaza North Tower 200 Bay Street, suite 2040 Box #23 Toronto, Ontario M5J 2J1

Phone 416 304 0800 Fax 416 304 0184

gpanneton@detourgold.com

From: For Evergreen Innovative Strategies Inc [mailto:p.politis@forevergreen.ca]

Sent: Wednesday, October 01, 2008 9:30 AM

To: Gerald Panneton

Cc: 'Dwight Sutherland'; bryan_gelinas@hotmail.com

Subject: RE: MoU comments letter

Thanks for the update Gerald.

Is there any way your team can keep a rolling document going between us? Normally we use Microsoft word and we turn the "track changes" on. This shows everyone's comments and changes on the same document and makes it much easier (and cheaper) to simply keep passing the same document back and forth with changes.

I'll hook up with TTN and we'll get some comments back to you when we've had a chance to review and analyze together.

Thankx,

Peter Politis,
Senior Consultant,
For Evergreen Innovative Strategies Inc.

Phone: (705) 272-8564 Fax: (705) 2724816

Email: p.politis@forevergreen.ca
Web: www.forevergreen.ca

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----Original Message-----

From: Gerald Panneton [mailto:GPanneton@detourgold.com]

Sent: Wednesday, October 01, 2008 7:30 AM

To: 'Dwight Sutherland'; For Evergreen Innovative Strategies Inc

Cc: 'brian gelinas'; Craig Goodings Blackberry; Laurie Gaborit; Brian Davey; Lisa Noseworthy

Subject: MoU comments letter

Importance: High

Dear Chief Sutherland.

Please find enclosed Detour Gold comments on the TTN MoU.

Regards

Gerald Panneton

President & CEO
Detour Gold Corporation

Royal Bank Plaza North Tower 200 Bay Street, suite 2040 Box #23 Toronto, Ontario M5J 2J1

Phone 416 304 0800 Fax 416 304 0184

gpanneton@detourgold.com

Phone: (705) 272-8564

Fax: (705) 2724816
Email: p.politis@forevergreen.ca
Web: www.forevergreen.ca

Name: Attach 1 Request Taykwa Tagamou Fn Letter_oct 29.tif

Size: 63KB (63,955 bytes)

Modified: Tuesday, Oct 05, 2010 01:39:39 PM



October 29, 2008

Chief Dwight Sutherland Taykwa Tagamou Nation R.R. #2, Brower Township P.O. Box 3310 Cochrane, ON, POL 1C0

Dear Chief Sutherland,

As you are aware, Detour Gold is currently in the process of developing a Memorandum of Understanding (MOU) with the Taykwa Tagamou Nation, which has treaty rights that could potentially be affected by the re-development of the former Detour Lake mine site, including its associated power line that was recently decommissioned.

Although we understand the MoU will take some time to negotiate and finalize, it is important that we move ahead with certain studies which are critical to the permitting process. These studies should ideally be completed before the snow falls.

As part of the permitting process to re-develop the mine site, and to protect local cultural heritage values, Detour Gold is planning to undertake archaeological studies of new areas adjacent to the Detour Lake mine site that could potentially be developed, along with investigations of the power line routing, which would use the same right-of-way (ROW) as the prior line. The archaeological studies would be carried out under the direction of John Pollock, a licensed archaeologist, of Woodland Heritage Services (WHS).

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investigations. Broader aspects of TEK gathering could be addressed separately. TEK data would be collected through confidential questionnaires with the data to remain confidential, and only disclosed at the discretion of the First Nation.

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Once you have had a chance to consider this proposal, Detour Gold would like to immediately work with your community to determine how best to carry out the TEK studies and archaeological field programs.

Respectfully yours,

Detour Gold Corporation

Gerald S. Papheton
President & Chief Executive Officer

Name: Ttn_aecom Letter Response Final.tif

Size: 194KB (198,009 bytes)

Modified: Tuesday, Oct 05, 2010 12:02:02 PM



July 16, 2010

Vince Deschamps Senior Environmental Planner AECOM 2-512 Woolwich Street Guelph, ON N1H 3X7

Dear Mr. Deschamps:

Re: Comments on Detour Lake Temporary Power Project, Environmental Review Report

We are in receipt of your letter of July 9, 2010 with comments responding to the Detour Lake Temporary Power Project, Environmental Assessment (EA) prepared for the Coral Rapids Power Limited Partnership who is working on behalf of the Taykwa Tagamou Nation.

For ease of review, we have included your comment and our response below.

Aquatic Environment

Comment:

",... there is no mention of Best Management Practices (BMPs) that would be put into place during the construction and installation of the diesel-fired generators,... In addition there should be mention that all generators and construction equipment will arrive on site in clean condition"

Response:

There will be no inwater work associated with the generators. Details regarding BMPs related to the aquatic environment were not included, as the generators are self-contained units. The only construction per se, is minor clearing and establishment of a stable base (compacted ground / aggregate or concrete), if needed. Appropriate BMPs will be utilized during the installation and operation of the generators. Detour Gold will ensure that generators / equipment brought to the site are not contaminated.

Noise:

Comment:

",... note clear from the report, however, is whether the proposed Construction Camp site,... was included in the noise analysis."



Response:

With respect to the construction camp, AMEC purposefully did not include this as a receptor which is consistent with other applications that have been made in the past. Since the camp is for the Detour Lake Project and the workers are/will be employed or contractors of Detour Gold, issues related to on-site worker exposure to noise is directed by the Ministry of Labour.

Air Quality:

Comment:

"with regards to TSP emissions, there were a couple of potential sources of emissions that do not appear to have been considered,.... fugitive dust emissions from vehicle traffic, and emissions from any construction being carried out on site"

"With regard to NOx, SOx, and CO emissions, it may have been advisable to include emissions from the various pieces of construction, transport and heavy equipment on-site. Although emissions from mobile sources are not typically included in Emission Summary and Dispersion Modeling (ESDM) reports,...

Response:

Fugitive Dusts

Fugitive dust emissions associated with vehicles and construction activities will be managed through the implementation of a BMP plan. Active dust control and site management measures that will be employed are proven to be effective in management the generation of dust at the source and are currently practiced at other mining projects. This commitment by Detour Gold to effectively manage fugitive dusts at the source will prevent dust emissions from construction activities and vehicular traffic from having a significant offsite effect.

The quantification and subsequent dispersion modeling of emissions from construction activities and vehicle traffic is not practicable due to the size of the project site. The construction equipment and vehicles could be spread out over the 265 square kilometers that make up the Detour Lake Project footprint (although the area of construction is much smaller), and the construction activities carried out would be highly variable. The dusts generated are also expected to settle within relative close proximity to their source, with the predominant coarse fraction (PM30) expected to settle within a few hundred feet of the road or activity.

Tailpipe Emissions from Construction and Transport Equipment

For reasons similar to those provided for particulate matter, the quantification and modeling of tailpipe emissions from diesel construction and transport equipment during the construction phase is not practicable for this site.

The predicted effects from the diesel combustion for power generation and other on-site portable engines are however, low. The predicted effects of NOx, SO2, and CO from the diesel generators used for power generation during construction were all well below the respective standards. For example, the Point of Impingement (POI) for NOx, for the 1-hour average time,



was 47% of the Ontario AAQC, and remains less than 50% of the Ontario AAQC with the baseline concentration considered. The offsite effects for CO and SO_2 are considered insignificant, with the POI concentrations less than 1% of the respective Ontario standards and AAQC.

Therefore the addition of onsite vehicle and construction equipment tailpipe emissions is not anticipated to have a significant effect on the predicted offsite effects, or alter the conclusion of the study that the Detour Lake Project construction phase will not have a significant effect on the air quality in the area surrounding the site.

On-Site Camp Receptors

The onsite camp was not considered as a receptor. No families are housed on site. The hours worked, living arrangements, compensation and exposure levels for the workers staying at the site are all governed by the Ministry of Labour and considered as part of Detour's agreements with the Ministry. This is consistent with past environmental assessments and MOE approvals for remote work camps at mining operations.

Consultation:

Comment:

"The process carried out for the consultation of an Environmental Review is adequate. AECOM is concerned with the methods used to notify the public and stakeholders."

Response:

Noted. The consultation process was guided by the requirements of the Ontario Codes of Practice for Consultation in Ontario's Environmental Assessment Process and for Preparing and Reviewing Environmental Assessments in Ontario, as well as the Guide to Environmental Assessment Requirements for Electricity Projects.

Comment:

"There should be copies of the Notice of Commencement and Notice of Completion in Appendix B(2), similar to the newspaper notices provided for the Public Information Centres (PICs)."

Response:

Copies of the Notices were provided in Appendix B(2). Copies of the tear sheets received are attached to this letter (they were requested from all of the newspapers, but not all were received; the Notice of Completion tearsheets were not available at the time of the printing of the ERR).

Comment:

"The date the Notice of Commencement was published should be included in the report, as well as the newspapers it was printed in."



Response:

Please see table below. This was inadvertently not included in the final document.

NOTICE OF COMMENCEMENT OF AN ERR PUBLICATION / POSTING LOCATIONS

Timmins Daily Press

Publication date: Monday to Saturday

Circulation: 8,500

Publish date: February 19 and 26, 2010

Cochrane Times Post

Publication: weekly on Thursday

Circulation: 2,600

Publish date: February 25, 2010

Wawatay News

Publication date: weekly on Thursday

Circulation: 9,300

Publish date: February 25 2009

Band Office, Moose Cree First Nation

Band Office, Taykwa Tagamou Nation Reserve

#6

Band Office, Wahgoshig First Nation Reserve

Timmins Métis Council
347 Spruce Street South
Timmins Ontario P4N 2N2

Northern Lights Métis Council

275 Fifteenth Ave.

Cochrane Ontario P0L 1C0

Comment:

"The report should also identify if copies of the Notice of Commencement were mailed out to specific stakeholders."

Response:

Notices were sent to the DLP mailing list of over 400 individuals representing 51 Aboriginal (First Nation and Métis) and stakeholder organizations including business, municipal, provincial and federal government and environmental organizations, as well as other interested parties who have been involved with the Project since 2007. These mail outs occurred either hardcopy or via email depending on the stakeholder's preference.

Comment:

"AECOM has also noticed that the notification for the PICs was published in more newspapers than the Notice of Completion."

Response:

A decision was made to advertise in a greater number of newspapers for public information sessions to be consistent with those newspapers in which advertisements for other Detour Lake Environmental Assessment notices appeared and to encourage involvement and robust consultation on the Detour Lake Project (including the DLTPP) as it is recognized that the public may not choose to access / comment on large documents. Based on a comment from the Ministry of Natural Resources it was decided to publish the Notice of Completion in the Northern



Voice rather than Wawatay News, as the Northern Voice was anticipated to reach more individuals local to the site.

We look forward to continuing to actively engage you in the DLTPP and trust you will find responses to your comments satisfactory.

If you have any additional comments or questions, please don't hesitate to contact us.

Sincerely,

Derek Teevan

VP Aboriginal and Government Affairs

2 profferes

Cc: Chief Linda Archibald, Peter Archibald, Tina Gagnon, Taykwa Tagamou Nation Merv McLeod, Sue Hartwig, representing Taykwa Tagamou Nation Jim Robertson, Detour Gold, Director Environment and Sustainability Sheila Daniel, AMEC Earth & Environmental Paula Allen, Alex Blasko, Ontario Ministry of Environment

Name: Ttn_aecom Letter Response.tif

Size: 34KB (33,896 bytes)

Modified: Tuesday, Oct 05, 2010 12:02:12 PM



June 29, 2010

Vince Deschamps Senior Environmental Planner AECOM 2-512 Woolwich Street Guelph, ON N1H 3X7

Dear Mr. Deschamps:

Re: Comments on Detour Lake Power Project, Individual Environmental Assessment

We are in receipt of your e-mail of June 17, 2010 with comments responding to the Detour Lake Power Project (DLPP) Individual Environmental Assessment (EA) on behalf of the Coral Rapids Power Limited Partnership who are working on behalf of the Taykwa Tagamou Nation.

Due to the length of the document of comments submitted, we have provided our response in a tabular format consistent with the Ministry of the Environment requirements, primarily based on your Table 1 (Summary of Concerns / Issues and Recommendations from the DLPP EA Technical Review, as well as other comments within the main text not captured within Table 1.

We look forward to continuing to actively engage you in the DLPP and trust you will find responses to your comments satisfactory.

If you have any additional comments or questions, please don't hesitate to contact us.

Sincerely,

Derek Teevan

VP Aboriginal and Government Affairs

2 proffered

Cc: Chief Linda Archibald, Peter Archibald, Tina Gagnon, Taykwa Tagamou Nation Merv McLeod, Sue Hartwig, representing Taykwa Tagamou Nation Jim Robertson, Detour Gold, Director Environment and Sustainability Sheila Daniel, AMEC Earth & Environmental Alex Blasko, Ontario Ministry of Environment

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Modified: Tuesday, Oct 05, 2010 12:42:38 PM

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Size: 7KB (6,386 bytes)

Modified: Tuesday, Oct 05, 2010 12:44:47 PM

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Modified: Tuesday, Oct 05, 2010 12:46:01 PM

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Size: 138KB (140,528 bytes)

Modified: Tuesday, Oct 05, 2010 12:46:25 PM

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Size: 12KB (11,732 bytes)

Modified: Tuesday, Oct 05, 2010 12:46:47 PM

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Modified: Tuesday, Oct 05, 2010 12:38:11 PM

Name: Filelist.tif

Size: 1KB (738 bytes)

Modified: Tuesday, Oct 05, 2010 12:38:17 PM