

Clean Air Metals Inc

Thunder Bay North Critical Minerals Project

Biodiversity Management Plan	
Revision History:	
Final Plan:	December 24, 2021
Revised Plan:	April 13, 2023

1 PURPOSE

Clean Air Metals is committed to the preservation of biodiversity throughout all stages of project development, from exploration through to mine closure. Our overall goal throughout the life of the Project is to mitigate the impacts (if any) on the surrounding biodiversity or to enhance the overall biodiversity and habitats within the areas we operate.

The intent of this Biodiversity Management Plan is to assess and mitigate the potential for adverse negative impacts to biodiversity on the Thunder Bay North project site during exploration activities.

2 What is Biodiversity?

At the 1992 Earth Summit in Rio de Janeiro, the United Nations Convention on Biological Diversity (CBD) was signed by 157 governments; it has since been ratified by 188 countries. The CBD defines biodiversity as: *the variability among living organisms from all sources including among other things, terrestrial, marine and other aquatic ecosystems and the ecological complexes of which they are part; this includes diversity within species, between species and of ecosystems.*

In December of 2022, The United Nations Biodiversity Conference, known as COP 15, was held in Montreal. At that conference, the Post-2020 Global Biodiversity Framework (Convention on Biological Diversity) was adopted. *The framework provides a strategic vision and a global roadmap for the conservation, protection, restoration and sustainable management of biodiversity and ecosystems for the next decade.*

The combination of a diversity of life forms and their interactions with each other and with the rest of the environment has made Earth a uniquely habitable place for humans. Biodiversity sustains human livelihoods and life itself. The interdependence between people and biodiversity is most apparent for some indigenous peoples, who may lead a subsistence lifestyle and be critically dependent on biodiversity, or whose culture and history are intimately associated with the natural environment and systems. In many western cultures, although our dependence on biodiversity has become less tangible and apparent, it remains critically important.

3 REGULATORY CONTEXT

In Ontario, early exploration projects are subject to *Ontario Regulation 308/12: Exploration Plans and Exploration Permits*. The Provincial Standards for Early Exploration are required to be followed for early exploration projects.

Federally, there are two acts that address biodiversity: the *Species at Risk Act* and the *Migratory Bird Convention Act*.

Provincially the *Endangered Species Act*, *Fish and Wildlife Conservation Act* and the *Provincial Policy Statement* apply to biodiversity.

4 METHODOLOGY

Clean Air Metals is committed to achieving a net positive impact on biodiversity. We achieve this through operational management plans and consultation with Indigenous Rights Holders and local interest groups. A key framework we utilize to limit our negative impact on biodiversity is the mitigation hierarchy outlined by the Mining Association of Canada.

- Avoid creating any negative impact on biodiversity from the outset of a project.
- Minimize negative impacts on biodiversity at every opportunity.

- Rehabilitate or restore negatively impacted ecosystems.
- If an ecosystem cannot be restored, offset impacts by restoring other degraded habitats.

4.1 Identification of Biodiversity Indicators

In order for CAM to reduce the potential for negative impacts to biodiversity as a result of project requirements, the habitats and species present must be assessed. CAM will have a qualified biologist identify the habitat types for each area of mineral exploration based on available Forest Resource Inventory (FRI) data. If available, ground truthing may be utilized to confirm the accuracy of the FRI data in the area of potential impacts. Within each habitat type, the potential terrestrial species at risk present will be assessed.

4.2 Management Plans

CAM will use existing management plans to reduce the potential for negative biodiversity impacts related to our early exploration work. These include:

- Invasive Species Management Plan – used to manage the potential for both terrestrial and aquatic invasive species being brought to the TBN Site.
- Migratory Birds Management Plan – used to manage the potential for impacts to breeding birds during any potential clearing of trees and shrubs during the breeding bird window.
- Species at Risk Management Plan – used to ensure that CAM exploration activities do not contravene the Species at Risk legislation.

4.3 Rehabilitation

Where CAM identifies critical biodiversity habitat that cannot be avoided or potential impacts otherwise mitigated during exploration activities, these areas will be identified, characterized and a detailed rehabilitation plan prepared and implemented. In the unlikely event that a Site cannot be fully avoided or rehabilitated, CAM will identify nearby degraded habitats (as a result of non-CAM related activities) that can be rehabilitated.

Site rehabilitation will avoid use of non-native species of plants and will minimize disturbance to the land during rehabilitation (i.e. hand seeding or tree planting).

5 MONITORING AND REPORTING

5.1 Roles and Responsibilities

Role	Responsibility
Chief Operating Officer	<ul style="list-style-type: none"> • Overall accountability for CAM adherence to the plan
Vice President of Exploration	<ul style="list-style-type: none"> • Collaborate with the Director of Permitting, Sustainability and Community Relations to ensure this management plan is adhered to • Ensure exploration staff are trained and understand this management plan
Director of Permitting, Sustainability and Community Relations	<ul style="list-style-type: none"> • Communicate compliance obligations to management, staff and contractors • Ensure that critical biodiversity habitat is identified and locations communicated to VP Exploration • Develop and oversee rehabilitation and/or compensation plans, as required. • Monitor activities for compliance with the management plan • Ensure recording of activities to ensure compliance with this management plan
Employees / Contractors	<ul style="list-style-type: none"> • Ensure they are trained in the implementation of this management plan • Participate in the implementation and monitoring of this management plan • Ensure field activities follow this management plan

6 REFERENCES

Government of Ontario: 2018. Provincial Standards for Early Exploration.

Government of Ontario: Ontario Regulation 308/12: Exploration Plans and Exploration Permits. Available from: <https://www.ontario.ca/laws/regulation/120308>

Mining Association of Canada. 2020. TSM Biodiversity Conservation Management Protocol. Available from: <https://mining.ca/resources/guides-manuals/tsm-biodiversity-conservation-management-protocol-2020/>

United Nations Environment Programme. July 5, 2021. Convention on Biological Diversity. Available from: <chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://www.cbd.int/doc/c/abb5/591f/2e46096d3f0330b08ce87a45/wg2020-03-03-en.pdf>