



Island Gold District - Magino Mine

2024 Annual Report to the Impact Assessment Agency of Canada (IAAC)

Reporting Period January to December 2024, as per Environmental Assessment Decision Statement Conditions 2.9 and 2.10

Includes Schedule of Decision Statement Conditions (as per Decision Statement Condition 9.1) and Schedule of all Activities (as per Decision Statement Condition 9.2)

March 31, 2025

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LIST OF ACRONYMS

Batchewana First Nation	BFN
Canadian Council of Ministers of the Environment	CCME
Class Environmental Assessment for Resource Stewardship and Facility Development Projects	Class EA-RSFD
Certified Engineering Technologist	C.E.T.
Environment and Climate Change Canada	ECCC
Environmental Assessment	EA
Environmental Compliance Approval	ECA
Fisheries and Oceans Canada	DFO
Garden River First Nation	GRFN
Health Canada	HC
Impact Assessment Agency of Canada	IAAC
Kilometres	km
Liquified or compressed natural gas	LNG
Master of Science	M.Sc.
Metal and Diamond Mining Effluent Regulations	MDMER
Métis Nation of Ontario	MNO
Michipicoten First Nation	MFN
Million tonnes	Mt
Missanabie Cree First Nation	MCFN
Natural Resources Canada	NRCan
Nitrogen dioxide	NO ₂
Ontario Ministry of the Environment, Conservation and Parks	MECP
Master of Engineering Science	M.E.Sc.
Ontario Ministry of Natural Resources	MNR
Particulate matter	PM
Photoionization detector	PID
Professional Engineer	P. Eng.
Professional Geoscientist	P. Geo.
Protection of Aquatic Life	PAL
Red Sky Métis Independent Nation	RSMIN
Sulphur dioxide	SO ₂
Total suspended particulates/particles	TSP
Transport Canada	TC

EXECUTIVE SUMMARY - ENGLISH

Alamos Gold Inc. (Alamos) operates Magino Mine (the Project), located approximately 40 kilometres (km) northeast of Wawa, Ontario, in Finan Township, Algoma District. The site is accessed via Goudreau Road from the Township of Dubreuilville. The Project includes the construction, operation and closure of an open pit gold mine, with approximately 150 million tonnes (Mt) of ore and approximately 430 Mt of mine rock and associated infrastructure.

Federal environmental assessment (EA) approval for the Project was received via the Decision Statement issued on January 24, 2019, which was subsequently amended August 23, 2023 and again July 26, 2024. This Annual Report is submitted in compliance with condition 2.9 of the EA Decision Statement. It details activities undertaken to comply with each of the conditions in the EA Decision Statement during the reporting period of January to December 2024.

Under Prodigy Gold, a subsidiary of Argonaut Gold Inc., the Project began construction on February 19, 2021, and commercial production began November 1, 2023. On July 12, 2024, Alamos Gold acquired Prodigy Gold, and continued operations at Magino Mine as part of its greater Island Gold District operations.

2024 represents the first full year of operations at the Project. Notable aspects of the year, as described in this Annual Report, include:

- Ongoing engagement and monitoring:
 - Engaged with Indigenous groups throughout the year at monthly and quarterly meetings.
 - Conducted sampling/ monitoring of groundwater, surface water, sediment and air for parameters of ecological value and interest to human health.
 - Tracked wildlife observations, including bears, moose, snapping turtles, as well as migratory birds and their use of water bodies.
- 2024 successes:
 - Continued good relations with Indigenous groups, who did not identify any issues or adverse environmental effects.
 - Sampling/ monitoring results continue to indicate there is no adverse environmental effects requiring additional mitigation.
 - An amendment to the Closure Plan was filed with the Ontario Ministry of Mines in August, 2024.
 - 8 externally reportable incidents occurred in the first half of 2024, but none in the second half.
- Items to address in 2025:
 - Aquatics, fish tissue and population studies of the receiving environment to resume according to an updated Environmental Effects Monitoring Study (EEM Cycle 2), which incorporates a new weight-of-evidence approach (holistic, ecosystem-based assessment) to determine effluent effects and potential influence on the receiving environment.
 - Engagement with Fisheries and Oceans Canada (DFO) and Indigenous groups, potentially leading to Amendment to the Magino Fisheries Act Authorization (FAA) to address objectives and timelines for completion of fish habitat offsetting/compensation measures..
 - Review and updating, as applicable, various environment management plans following transition to Operations from Construction and following acquisition of the Project by Alamos, including potential updates to the follow-up programs.

SOMMAIRE / EXECUTIVE SUMMARY – FRANÇAIS

Alamos Gold Inc. (Alamos) exploite la mine Magino (le projet), située à environ 40 kilomètres (km) au nord-est de Wawa (Ontario), dans le canton de Finan, district d'Algoma. On accède au site par le chemin Goudreau depuis le canton de Dubreuilville. Le projet comprend la construction, l'exploitation et la fermeture d'une mine d'or à ciel ouvert, avec environ 150 millions de tonnes (Mt) de minerai et environ 430 Mt de roche minière, ainsi que l'infrastructure associée.

L'approbation fédérale de l'évaluation environnementale (EE) du projet a été obtenue par le biais de la déclaration de décision publiée le 24 janvier 2019, qui a ensuite été modifiée le 23 août 2023 et à nouveau le 26 juillet 2024. Le présent rapport annuel est soumis conformément à la condition 2.9 de la déclaration de décision relative à l'EE. Il détaille les activités entreprises pour se conformer à chacune des conditions de la déclaration de décision d'EE au cours de la période de déclaration allant de janvier à décembre 2024.

Sous la direction de Prodigy Gold, filiale d'Argonaut Gold Inc, la construction du projet a débuté le 19 février 2021 et la production commerciale a commencé le 1er novembre 2023. Le 12 juillet 2024, Alamos Gold a acquis Prodigy Gold et a poursuivi l'exploitation de la mine Magino dans le cadre de ses activités dans le district aurifère 'Island Gold'.

2024 représente la première année complète d'exploitation du projet. Les aspects notables de l'année, tels que décrits dans le présent rapport annuel, sont les suivants :

- Engagement et suivi continus :
 - Des réunions mensuelles et trimestrielles ont été organisées avec des groupes autochtones tout au long de l'année.
 - Échantillonnage et surveillance des eaux souterraines, des eaux de surface, des sédiments et de l'air pour les paramètres de valeur écologique et d'intérêt pour la santé humaine.
 - Suivi des observations de la faune, notamment des ours, des orignaux, des tortues serpentes, ainsi que des oiseaux migrateurs et de leur utilisation des plans d'eau.
- Succès en 2024 :
 - Maintien de bonnes relations avec les groupes autochtones, qui n'ont identifié aucun problème ni effet environnemental négatif.
 - Les résultats de l'échantillonnage et de la surveillance continuent d'indiquer qu'il n'y a pas d'effets environnementaux négatifs nécessitant des mesures d'atténuation supplémentaires.
 - Une modification du plan de fermeture a été déposée auprès du ministère des mines de l'Ontario en août 2024.
 - 8 incidents à signaler à l'externe se sont produits au cours du premier semestre de 2024, mais aucun au cours du deuxième semestre.
- Éléments à traiter en 2025 :
 - Reprise des études aquatiques, des études sur les tissus et les populations de poissons dans le milieu récepteur, conformément à une étude actualisée de suivi des effets sur l'environnement (cycle 2 de l'ESEE), qui intègre une nouvelle approche fondée sur le poids de la preuve (évaluation holistique fondée sur l'écosystème) pour déterminer les effets des effluents et l'influence potentielle sur le milieu récepteur.
 - Engagement avec Pêches et Océans Canada (MPO) et les groupes autochtones, pouvant mener à un amendement à l'autorisation de la Loi sur les pêches de Magino (FAA) afin d'aborder les objectifs et les calendriers pour l'achèvement des mesures de compensation de l'habitat du poisson.
 - Examen et mise à jour, le cas échéant, de divers plans de gestion de l'environnement après le passage de la construction à l'exploitation et après l'acquisition du projet par Alamos, y compris des mises à jour potentielles des programmes de suivi.

1. INTRODUCTION

Alamos Gold Inc. (Alamos) operates Magino Mine (the Project) located approximately 40 kilometers northeast of Wawa, Ontario, in Finan Township, Algoma District. The site is accessed via Goudreau Road from the Township of Dubreuilville. Figure 1 shows the location of the Project, in addition to Alamos' Island Gold Mine to the east. The Project includes the construction, operation and closure of an open pit gold mine, with approximately 150 million tonnes (Mt) of ore and approximately 430 Mt of mine rock and associated infrastructure.

Federal environmental assessment (EA) approval was received via the Decision Statement issued on January 24, 2019, which was subsequently amended August 23, 2023 and again July 26, 2024. The Statement of Completion (Category B) made under the Ontario Ministry of Natural Resources and Forestry's (MNR's) Class Environmental Assessment for Resource Stewardship and Facility Development Projects (or Class EA-RSFD) for the Project was issued on March 12, 2019.

Under Prodigy Gold Inc. (Prodigy), a subsidiary of Argonaut Gold Inc., the Project began construction on February 19, 2021, and commercial production began November 1, 2023. On July 12, 2024, Alamos Gold acquired Prodigy, and Magino Mine continued to operate under Prodigy through 2024. In 2025, Magino Mine under the ownership of 1001061522 Ontario Inc., a subsidiary of Alamos, continues to be operated by Alamos as part of the "Island Gold District" inclusive of Magino and the adjacent Island Gold Mine underground operation.. 2024 represents the first full year of operations at the Project.

This Annual Report is submitted in compliance with condition 2.9 of the EA Decision Statement. It details activities undertaken to comply with each of the conditions in the EA Decision Statement during the reporting period of January to December 2024. The report is organized so that each section heading addresses a set of conditions as they are laid out in the EA Decision Statement.

For clarity, this report refers to "Alamos" when discussing 2024 activities at the Project; however Prodigy remained the proponent through 2024 as a subsidiary of Alamos following its acquisition.

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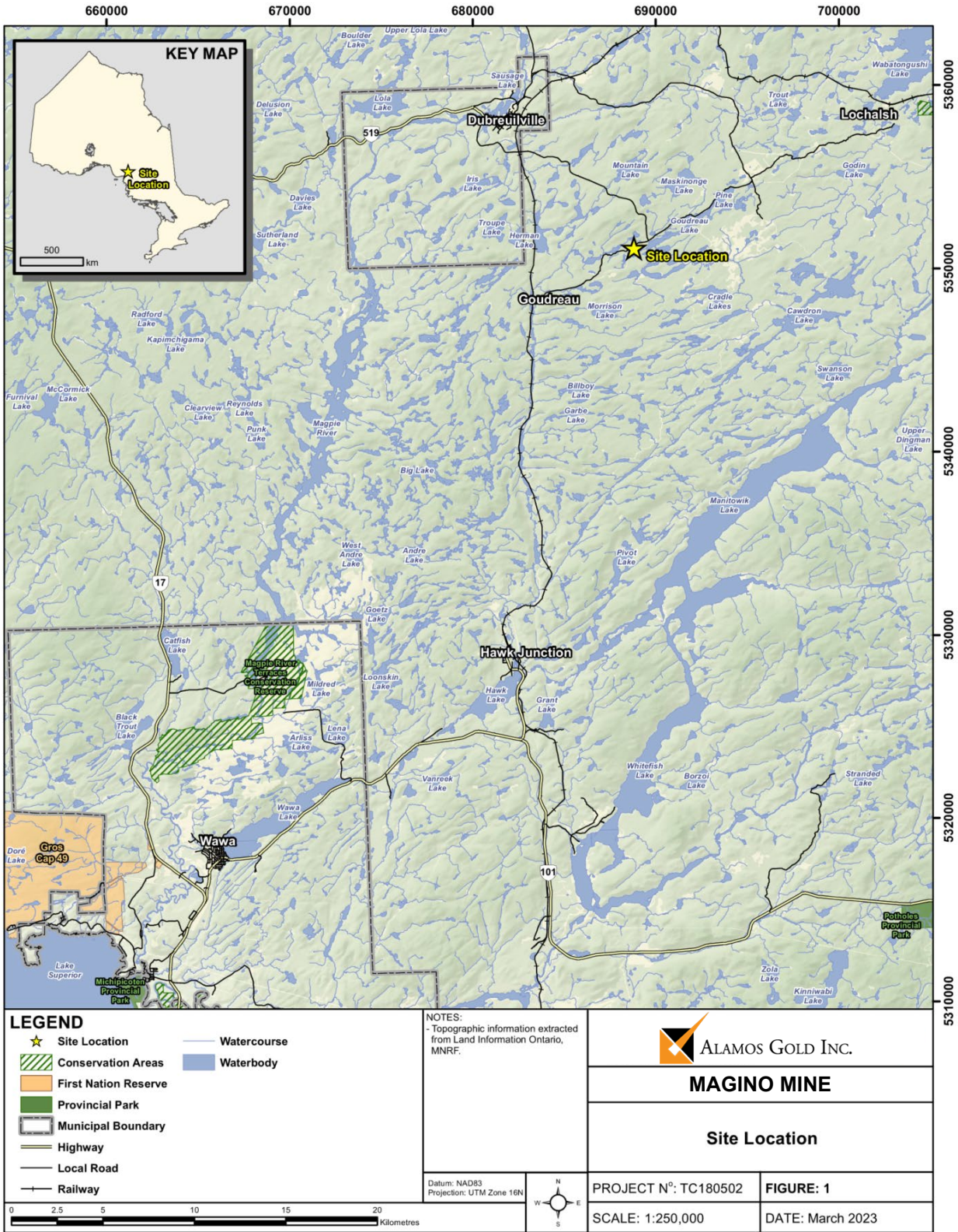


Figure 1: Magino Mine Project Location

2. CONDITIONS AND COMPLIANCE REPORTING

This section provides a description of the activities taken by Alamos in 2024 to comply with the conditions of the federal EA Decision Statement (original January 24, 2019, last amended July 2024).

A. General Conditions

A-1 Qualified Individuals / Best Practices

2.1 The Proponent shall ensure that its actions in meeting the conditions set out in this Decision Statement during all phases of the Designated Project are considered in a careful and precautionary manner, promote sustainable development, are informed by the best information and knowledge available at the time the Proponent takes action, including community and Indigenous traditional knowledge, are based on methods and models that are recognized by standard-setting bodies, are undertaken by qualified individuals, and have applied the best available economically and technically feasible technologies.

Response: Alamos continued to engage the services of several reputable consulting companies in 2024 to provide the qualified professionals (e.g., Professional Geoscientist (P. Geo.), Professional Engineer (P. Eng.), Certified Engineering Technologists (C.E.T.), and individuals holding a Master of Engineering Science (M.E.Sc.) or a Master of Science (M.Sc.)) to implement and/or supervise all activities according to requirements. Alamos also continued discussions with Indigenous groups, including Michipicoten First Nation (MFN), Missanabie Cree First Nation (MCFN), Métis Nation of Ontario (MNO), Batchewana First Nation (BFN), Red Sky Métis Independent Nation (RSMIN), and Garden River First Nation (GRFN) in 2024 (collectively referred to as “Indigenous groups” throughout this report), regarding the Project’s ongoing environmental performance.

A-2 Consultation

2.2 The Proponent shall, where consultation is a requirement of a condition set out in this Decision Statement:

2.2.1 provide a written notice of the opportunity for the party or parties being consulted to present their views and information on the subject of the consultation;

2.2.2 provide all information available and relevant on the scope and the subject matter of the consultation and a period of time taking into account the views of the party or parties being consulted, not to be less than 15 days, to prepare their views and information;

2.2.3 undertake an impartial consideration of all views and information presented by the party or parties being consulted on the subject matter of the consultation; and

2.2.4 advise in a timely manner the party or parties being consulted on how the views and information received have been considered by the Proponent.

2.3 The Proponent shall, where consultation with Indigenous groups is a requirement of a condition set out in this Decision Statement, communicate with each Indigenous group with respect to the manner to satisfy the consultation requirements referred to in condition 2.2, including methods of notification, the type of information and the period of time to be provided when seeking input, the process to be used by the Proponent to undertake impartial consideration of all views and information presented on the subject of the consultation, and the period of time and the means to advise Indigenous groups of how their views and information were considered by the Proponent.

Response: Prodigy conducted extensive consultations in 2020 with Indigenous groups and provincial and federal government departments to develop the follow-up programs, plans and measures required by the various EA conditions. All views and information presented during consultation meetings were considered and were either addressed in the meeting or by follow-up email. Finalized documents were provided to consulted parties in 2021.

While formal consultations were not required for the EA conditions or any other Project works in 2024, Alamos continued to meet quarterly to monthly with Indigenous groups to discuss the Project’s ongoing environmental

performance and the implementation of the individual Benefits Agreements. A SharePoint site is used by all parties to provide and update related documentation.

A-3 Follow-up and Adaptive Management

2.4 The Proponent shall, where a follow-up program is a requirement of a condition set out in this Decision Statement, determine, as part of the development of each follow-up program and in consultation with the party or parties being consulted during the development, the following information:

2.4.1 the methodology, location, frequency, timing and duration of monitoring associated with the follow-up program;

2.4.2 the scope, content and frequency of reporting of the results of the follow-up program;

2.4.3 the levels of environmental change relative to baseline conditions that would require the Proponent to implement modified or additional mitigation measure(s), including instances where the Proponent may require Designated Project activities to be stopped; and

2.4.4 the technically and economically feasible mitigation measures to be implemented by the Proponent if monitoring conducted as part of the follow-up program shows that the levels of environmental change referred to in condition 2.4.3 have been reached or exceeded and the timing for implementing the modified or additional mitigation measures.

2.5 The Proponent shall maintain the information referred to in condition 2.4 during the implementation of each follow-up program in consultation with the party or parties being consulted during the development of each follow-up program.

2.6 The Proponent shall provide the follow-up programs referred to in conditions 3.16, 3.17, 3.18, 3.19, 4.4, 4.5, 5.3, 5.4, 6.5, 6.6, 7.2 and 7.3 to the Agency and to the party or parties being consulted during the development of each follow-up program prior to the implementation of each follow-up program. The Proponent shall also provide any update(s) to the Agency and to the party or parties being consulted during the development of each follow-up program within 30 days of the follow-up program being updated.

Response: Prodigy developed, in consultation with Indigenous groups and relevant authorities, draft follow-up programs as part of various Project-specific environmental management plans, incorporating the requirements of EA condition 2.4. They were finalized in January 2021 and provided to consulted parties in January and March 2021, prior to their implementation.

The Surface Water Monitoring Plan and Groundwater Monitoring Plan were subsequently updated in March 2023 as part of the site's application to amend the provincial Environmental Compliance Approval for Industrial Sewage Works. There have been no further changes to the follow-up programs, nor to the broader environmental management plans, since their creation.

As the Project transitions from the Construction Environment Management Plan to an Operations Environment Management Plan, and as Alamos incorporates Magino Mine into its greater Island Gold District operations, these and other plans including the follow-up programs, will be reviewed and updated, as applicable, commencing in 2025. Alamos is committed to communicating and discussing these changes with Indigenous groups, the Agency and other relevant authorities, as well as providing draft versions of the management documents for comment prior to finalizing.

2.7 The Proponent shall, where a follow-up program is a requirement of a condition set out in this Decision Statement and in consultation with the party or parties being consulted during the development of the follow-up program:

2.7.1 conduct the follow-up program according to the information determined pursuant to condition 2.4;

2.7.2 undertake monitoring and analysis to verify the accuracy of the environmental assessment as it pertains to the particular condition and/or to determine the effectiveness of any mitigation measure(s);

2.7.3 determine whether modified or additional mitigation measures are required based on the monitoring and analysis undertaken pursuant to condition 2.7.2; and

2.7.4 if modified or additional mitigation measures are required pursuant to condition 2.7.3, develop and implement these mitigation measures in a timely manner and monitor them pursuant to condition 2.7.2.

Response: As described in subsequent sections in this report, Alamos implemented the follow-up programs required by EA conditions 3.16, 3.17, 3.18, 3.19, 4.4, 4.5, 5.3, 5.4, 6.5, 6.6, 7.2 and 7.3 throughout 2024 as required. The results of the follow-up programs did not indicate that additional measures or changes to the programs were required. Details of the follow-up programs are provided in subsequent sections of this Annual Report.

2.8 Where consultation with Indigenous groups is a requirement of a follow-up program, the Proponent shall discuss with each Indigenous group opportunities for their participation in the development and implementation of the follow-up program, including the analysis of the follow-up results and whether modified or additional mitigation measures are required, as set out in condition 2.7.

Response: Alamos meets quarterly to monthly with Indigenous groups to discuss the Project's ongoing environmental performance including the results of the follow-up programs required by the EA conditions. There were no related issues noted from the Indigenous groups in 2024.

A-4 Annual Reporting

2.9 The Proponent shall, commencing in the reporting year during which the Proponent begins the implementation of the conditions set out in this Decision Statement, prepare an annual report that sets out:

2.9.1 the activities undertaken by the Proponent in the reporting year to comply with each of the conditions set out in this Decision Statement;

2.9.2 how the Proponent complied with condition 2.1;

2.9.3 for conditions set out in this Decision Statement for which consultation is a requirement, how the Proponent considered any views and information that the Proponent received during or as a result of the consultation;

2.9.4 the information referred to in conditions 2.4 and 2.5 for each follow-up program;

2.9.5 the results of the follow-up program requirements identified in conditions 3.16, 3.17, 3.18, 3.19, 4.4, 4.5, 5.3, 5.4, 6.5, 6.6, 7.2 and 7.3;

2.9.6 any modified or additional mitigation measures implemented or proposed to be implemented by the Proponent, as determined under condition 2.7;

2.9.7 any change(s) to the Designated Project in the reporting year for which the Proponent determined that condition 2.14 did not apply.

2.10 The Proponent shall submit to the Agency the annual report referred to in condition 2.9, including a plain language executive summary in both official languages, no later than March 31 following the reporting year to which the annual report applies.

Response: This Annual Report is submitted in compliance with EA conditions 2.9 and 2.10 of the federal EA Decision Statement issued on January 24, 2019, last amended July 26, 2024.

A-5 Information Sharing

2.11 The Proponent shall publish on the Internet, or any medium which is publicly available, the annual reports and the executive summaries referred to in conditions 2.9 and 2.10, the offsetting plan(s) referred to in condition 3.14, the reports related to accidents and malfunctions referred to in conditions 8.4.2 and 8.4.3, the communication plans referred to in conditions 6.1 and 8.5, the schedules referred to in conditions 9.1, and 9.2, and any update(s) or revision(s) to the above documents, upon submission of these documents to the parties referenced in the respective conditions. The Proponent shall keep these documents publicly available for 25 years following the end of operation, or until the end of decommissioning of the Designated

Project, whichever comes first. The Proponent shall notify the Agency and Indigenous groups of the availability of these documents within 48 hours of their publication.

Response: Alamos makes all versions of the documentation required by EA condition 2.11 accessible to the public upon request at their offices in Dubreuilville and Toronto, Ontario:

Magino Mine Office
12 Goudreau Road
Dubreuilville, Ontario
POS 1B0

Island Gold District Office
21 Rue des Pins
P.O. Box 309
Dubreuilville, Ontario
POS 1B0

Toronto Office
181 Bay Street, Suite 3910
Toronto, Ontario
M5J 2T3

The public can also contact Alamos (info@alamosgold.com or 1-866-788-8801) to request the documentation.

The documentation is provided directly to the Agency and Indigenous groups either annually (annual reports, executive summaries and schedules), as/when they are updated (communication plan(s) and offsetting plan(s)), or within the reporting deadlines for incidents (accident and malfunction reports).

2.12 When the development of a plan is a requirement of a condition set out in this Decision Statement, the Proponent shall submit the plan to the Agency prior to construction, unless otherwise required through the condition.

Response: The offsetting plan referred to in EA condition 3.14 and draft communication plans referred to in EA conditions 6.1 and 8.5 were submitted to the Agency in 2020, prior to construction. The final communication plans were provided to the Agency in January 2021, prior to construction.

A-6 Change of Proponent

2.13 The Proponent shall notify the Agency and Indigenous groups in writing no later than 30 days after the day on which there is a transfer of ownership, care, control or management of the Designated Project in whole or in part.

Response: On July 12, 2024, Alamos Gold Inc. acquired Prodigy Gold Inc. as a subsidiary from Argonaut Gold Inc.. Alamos continued operations at Magino Mine with Prodigy as its wholly-owned subsidiary through 2024, as part of its greater Island Gold District operations. The Agency was notified August 9, 2024.

A-7 Change to the Designated Project

2.14 If the Proponent is proposing to carry out the Designated Project in a manner other than described in condition 1.7, the Proponent shall notify the Agency in writing in advance of carrying out the proposed activities. As part of the notification, the Proponent shall provide:

2.14.1 a description of the proposed change(s) to the Designated Project and the environmental effects that may result from the proposed change(s);

2.14.2 any modified or additional measure to mitigate any environmental effect that may result from the proposed change(s) and any modified or additional follow-up requirement; and

2.14.3 an explanation of how, taking into account any modified or additional mitigation measure referred to in condition 2.14.2, the environmental effects that may result from the proposed change(s) may differ from the environmental effects of the Designated Project identified during the environmental assessment.

2.15 The Proponent shall provide the Agency any additional information required by the Agency about the proposed change(s) referred to in condition 2.14, which may include the results of consultation with Indigenous groups and relevant authorities on the proposed change(s) and environmental effects referred to in condition 2.14.1 and the modified or additional mitigation measures and follow-up requirements referred to in condition 2.14.2.

Response: Changes to the Project in 2024 include:

- **New Haul Road:** In 2024, construction began on a new haul road between Magino Mine and Island Gold Mine, to facilitate the future transfer of ore from the Island Gold Mine to the Magino processing facilities. Most of the road is to be located on the Island Gold Mine property, and the portion that is on the Magino Mine property (<200 m length) did not require any tree clearing for its construction. There were no additional adverse environmental effects identified associated with this change relative to the original environmental assessment.

B. Fish and Fish Habitat

3.1 The Proponent shall develop, prior to construction, and implement, during all phases of the Designated Project, measures to control erosion and sedimentation within the project study area. The Proponent shall submit these measures to the Agency before implementing them. Among other measures, the Proponent shall:

3.1.1 Use ditches and diversion berms to maintain stream bank stability; and

3.1.2 Use physical barriers to reduce runoff from disturbed areas.

Response: In 2021, Prodigy developed the Sediment and Erosion Control Plan and submitted it to the Agency. Sediment and erosion control measures, including the use of ditches, diversion berms, sumps, and physical barriers such as sandbag barriers to enforce existing structures, were implemented in 2024.

3.2 The Proponent shall comply with the Metal and Diamond Mining Effluent Regulations and the pollution prevention provisions of the Fisheries Act.

Response: Alamos complied with the Metal and Diamond Mining Effluent Regulations (MDMER) throughout 2024, using the registered final discharge point at the Water Quality Control Pond which then deposits into Otto Lake. The Lovell Lake Treatment Pond and Waterbody 3 Treatment Pond remain permitted discharge points in case of emergency, however there were no emergency discharges in 2024. Water in Lovell Lake Treatment Pond and Waterbody 3 were managed within the water management system.

3.3 The Proponent shall collect, during construction and operation, contact water for reuse in Designated Project activities, and treat excess contact water that cannot be reused.

3.4 The Proponent shall control the flow at which excess water referred to in condition 3.3 is discharged to limit disturbance of lake bed material.

Response: Contact water is managed within the Project's overall water management system which directs contact water through a series of ponds and ditches towards the Water Quality Control Pond. There is a passive wetland treatment system upstream of the Water Quality Control Pond, and if there is no incoming water to the Water Quality Control Pond, the water is recirculated through the passive wetland treatment system to maximize its effectiveness.

Excess waters are discharged via the final discharge point at the Water Quality Control Pond, which then deposits into Otto Lake. To limit disturbance of lakebed material, three siphon lines from the Water Quality Control Pond discharging into Otto Lake provide for low pressure conveyance of the waters and the outlets have diffusers.

Water management at the Magino Mine maximizes the reuse and recycling of industrial water in the milling and tailings management facility circuit, under a closed-loop system that minimizes freshwater makeup requirements. In 2024, make-up water required for the processing facilities was provided primarily from the reuse of water taken for construction dewatering activities.

3.5 The Proponent shall install, prior to operation, and use a cyanide destruction circuit during operation to reduce cyanide concentrations in tailings before the tailings are directed to the tailings management facility.

Response: Since the startup of the processing plant in June 2023, a cyanide destruction circuit using sulphur dioxide gas has been used at the mill to reduce cyanide concentrations in tailings.

3.6 The Proponent shall, after the end of operation and until the open-pit lake is filled, collect and direct contact water to the open-pit lake.

Response: As the Project was in operations phase in 2024, there was no specific action for EA condition 3.6 in 2024.

3.7 The Proponent shall, prior to operation, implement seepage control measures at the tailings management facility and maintain these measures during operation and decommissioning.

Response: The design of the tailings management facility includes seepage control measures. Construction of the seepage control measures began in 2022 and were completed prior to the start of the operations phase in 2023. Since tailings deposition began in 2023, some seepage is occurring from the tailings management facility into adjacent contact water ponds and ditches of the mine water management system, which then report to the Water Quality Control Pond. To mitigate the impact this had on the effluent water quality in 2023, the seepage was actively pumped from the Waterbody 3 Treatment Pond back into the tailings management facility, and tailings deposition was, and continues to be, directed to reinforce the areas where seepage is suspected. As a result of these mitigations, the need to pump seepage back into the tailings management facility was reduced from 24 hours per day to once per month and the Water Quality Control Pond water quality improved significantly in 2024.

3.8 The proponent shall not connect the open-pit lake until such time as water in the open-pit lake complies with the pollution prevention provisions of the Fisheries Act.

Response: Connecting the open-pit lake will take place during the Project's closure phase. As the Project was in operations phase in 2024, there was no specific action for EA condition 3.8 in 2024.

3.9 The Proponent shall treat water taking into account the Canadian Council of Ministers of the Environment's Canadian Water Quality Guidelines for Protection of Aquatic Life.

Response: The CCME's Canadian Water Quality Guidelines for Protection of Aquatic Life (PAL) were taken into consideration in the development of the discharge criteria for the provincial Industrial Sewage Works ECA (2066-CQLN6X). Effluent is discharged via the final discharge point at the Water Quality Control Pond following the upstream passive wetland treatment system and a retention period in the Water Quality Control Pond itself. Active treatment (e.g. chemical dosing) will be considered if effluent water quality monitoring indicates there is a requirement.

3.10 The Proponent shall develop, prior to the start of blasting activities in or near water and in consultation with Indigenous groups, and implement, during blasting activities in or near water, mitigation measures to avoid or prevent adverse effects to fish and fish habitat from the use of explosives in a manner consistent with the Fisheries Act and its regulations. When developing these measures, the Proponent shall take into account Fisheries and Oceans Canada's Measures to avoid causing harm to fish and fish habitat including aquatic species to risk as it pertains to the use of explosives in or near water. The Proponent shall submit these measures to the Agency before implementing them.

Response: In 2020, Prodigy developed, in consultation with Indigenous groups, draft mitigation measures to avoid or prevent adverse effects to fish and fish habitat from the use of explosives. They were finalized and provided to the Agency in January 2021.

3.11 The Proponent shall conduct in-water construction activities during timing windows of least risk for the area, unless otherwise agreed to by relevant federal and provincial authorities. If in-water construction activities cannot be conducted during identified timing windows of least risk, the Proponent shall develop and implement additional mitigation measures, in consultation with Indigenous groups and Fisheries and Oceans Canada, to protect fish during sensitive life stages."

Response: In 2024, there were no in-water construction activities for the Project.

3.12 The Proponent shall salvage and relocate fish prior to conducting any Designated Project activity requiring removal of fish habitat in a manner consistent with any license issued under the Fisheries Act and its regulations. The Proponent shall salvage and relocate fish in consultation with Indigenous groups and to the satisfaction of Fisheries and Oceans Canada and other relevant authorities.

Response: Fish salvage activities were completed in 2022 under DFO Authorization 20-HCAA-02291 which was issued following consultations with Indigenous groups. No fish salvage activities have occurred since and no further fish salvage activities are planned for the Project.

3.13 The Proponent shall design, install and operate the water intake structures in Goudreau Lake in a manner which reduces the incidental capture of fish by entrainment and impingement through the use of an appropriately sized fish screen, taking into account Fisheries and Oceans Canada's Freshwater Intake End-of-Pipe Fish Screen Guideline and in a manner consistent with the Fisheries Act and its regulations.

Response: The design of the end-of-pipe fish screen for the Goudreau Lake water intake conformed to the DFO's Guideline, the Fisheries Act and its regulations, and the piping was installed in 2023. Since the current Permit to Take Water (0121-CCXHDL) does not allow water taking from Goudreau Lake, the Project has moved the pumphouse and much of the piping to the fish habitat sump south of Goudreau Lake. The intake pipe and end-of-pipe fish screen was left in Goudreau Lake for potential later use.

3.14 The Proponent shall develop, to the satisfaction of Fisheries and Oceans Canada and Environment and Climate Change Canada and in consultation with Indigenous groups, any offsetting plan(s) related to any residual serious harm to fish associated with the carrying out of the Designated Project. The Proponent shall implement the plan. The Proponent shall submit any approved offsetting plan(s) to the Agency prior to implementation."

3.15 The Proponent shall, for any fish habitat offsetting measure(s) proposed in any offsetting plan(s) referred to in condition 3.14 that may cause adverse environmental effects not considered in the environmental assessment, develop and implement, following consultation with Indigenous groups, Fisheries and Oceans Canada and Environment and Climate Change Canada, measures to mitigate those effects. The Proponent shall submit these measures to the Agency before implementing them.

Response: In 2019, Prodigy developed the Fish Habitat Compensation Plan/ Offset Plan. It was developed in coordination with the DFO, MNR, and ECCC, in consultation with Indigenous groups, and in compliance with the requirements for both the MDMER Schedule 2 Fish Habitat Compensation Plan and Fisheries Act Paragraph 35(2)(b) Authorization Offset Plan. Approval of the Schedule 2 authorization was received from the Governor in Council in 2020. The Plan was submitted as part of the Fisheries Act authorization application process in 2020. The Plan was provided to the Agency in November 2020.

The Plan describes measures to mitigate potential impacts arising from the implementation of the Plan, and authorization received under the Fisheries Act requires monitoring and reporting of the effectiveness of the implementation of the Plan. No additional adverse environmental effects not considered in the EA were identified for fish habitat offsetting measures.

Prodigy began implementing the plan in 2021, submitting annual monitoring reports to the DFO. In 2022 and 2023, Prodigy substantially completed the McVeigh Creek diversion and Spring Lake extension and commenced construction of the upland portion the Goudreau Lake basin fish habitat area. The construction of the downstream connection to Goudreau Lake had been planned to begin in 2024, however, as reported in the 2024 annual monitoring report (ERM, 2025), the work was not completed due to obstacles in achieving the required area, morphological characteristics and adequate flows. Shallow bedrock has impeded the ability to achieve the design volume, depth, and connectivity of the offset habitats. Further review of the completed works and engagement with the DFO will be required to determine the achieved extent of the offset habitat targets and establish an adapted strategy, plan and schedule.

As the Offset Plan is updated, as well as any associated updates to environmental management plans or follow-up programs, they will be communicated to the Agency, Indigenous Groups and relevant authorities prior to finalizing.

3.16 The Proponent shall develop, prior to the start of blasting activities in or near water and in consultation with Indigenous groups and relevant authorities, a follow-up program to determine the effectiveness of the mitigation measures as it pertains to the adverse environmental effects on fish and fish habitat, including spawning habitat, caused by blasting.

Response: In 2020, Prodigy developed, in consultation with Indigenous groups and relevant authorities, a draft follow-up program as part of the Fish and Fish Habitat Management Plan and Surface Water Monitoring Plan. They were finalized in January 2021 and provided to consulted parties in January and March 2021. The Surface Water Monitoring Plan was subsequently updated in March 2023.

3.16 (continued) The Proponent shall implement the follow-up program during blasting activities. As part of the implementation of the follow-up program, the Proponent shall:

3.16.1 Monitor instantaneous pressure and particle velocity during the first blasting event;

3.16.2 If results of the monitoring referred to in condition 3.16.1 indicate an instantaneous pressure change greater than 100 kiloPascals in the swimbladder of fish or that blasting produces a peak particle velocity greater than 13 millimetre per second in a spawning bed, develop, prior to the next blasting event and in consultation with relevant authorities, modified or additional mitigation measures pursuant to condition 2.7 in order to protect fish and fish habitat, including spawning habitat; and

3.16.3 Implement the modified or additional mitigation measures referred to in condition 3.16.2 during all subsequent blasting events. The Proponent shall submit these measures to the Agency before implementing them.

Response: Prodigy carried out monitoring during the first blasting event in the open pit on April 20, 2021. No pressure or particle velocity issues that could impact the health of fish were identified, such that modified/ additional mitigations were not developed or implemented for subsequent blasts in the open pit. Prodigy did not carry out blasting near fish or fish habitat in 2022. In February 2023, Prodigy conducted a blast associated with the fish habitat construction. Hydrophone measurements were less than 10kPa, indicating no impact to the health of fish. In 2024, Alamos did not conduct any new monitoring as conditions weren't significantly different from the monitored blast in 2021.

3.17 The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to determine the effectiveness of the mitigation measures for the salvage and relocation of fish and as it pertains to the incidental capture of fish by entrainment and impingement from the Designated Project. The Proponent shall implement the follow-up program during all phases of the Designated Project.

Response: In 2020, Prodigy developed, in consultation with Indigenous groups and relevant authorities, a draft follow-up program as part of the Fish and Fish Habitat Management Plan. It was finalized in January 2021 and provided to consulted parties in January and March 2021.

The water bodies where water-taking occurred in 2024 were deemed clear of fish (salvaged to regulatory standards) and so it was not necessary to implement the follow-up program.

3.18 The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to verify the accuracy of the environmental assessment and to determine the effectiveness of the mitigation measures as it pertains to adverse environmental effects on fish and fish habitat caused by changes in water and sediment quality in Otto Lake and Herman Lake.

Response: In 2020, Prodigy developed, in consultation with Indigenous groups and relevant authorities, a draft follow-up program as part of the Surface Water Monitoring Plan (Appendix 6-D of the Water Management Plan). It was finalized January 2021 and provided consulted parties in January and March 2021. It was subsequently updated in March 2023.

3.18 (continued) The Proponent shall implement the follow-up program during all phases of the Designated Project, including the environmental effects monitoring requirements set out in Schedule 5 of the Metal and Diamond Mining Effluent Regulations. As part of the implementation of the follow-up program, the Proponent shall:

3.18.1 Monitor, at least quarterly, concentrations of total phosphorus, mercury, copper, silver, sulphate and ammonia in water during operation;

Response: Unless prevented by unsafe conditions, Alamos conducts monthly surface water sampling in Otto Lake (the immediate receiving waterbody for Magino Mine’s effluent) and Herman Lake (the next downstream waterbody) according to the Surface Water Monitoring Plan (Appendix 6-D of the Water Management Plan) and as required by the provincial Industrial Sewage Works ECA (2066-CQLN6X). The following table presents the 2024 sampling results for the parameters specified in EA condition 3.18.1. Further information, including individual sample results, additional water quality parameters, and sampling for additional water bodies, is provided in the annual Surface Water Report generated as required by the provincial Industrial Sewage Works ECA (2066-CQLN6X).

As presented in the following table, 2024 metals and ammonia levels were consistent with 2021-2023 data, while sulphate levels were higher. In 2024, there was one instance of ammonia slightly above the federal guideline (0.0194 mg/L compared to 0.019 mg/L), however all other parameters met provincial and federal guidelines. Alamos will continue to monitor trends in the receiving bodies’ water quality as operations at the Project matures.

Water Quality		Number of Monthly Samples	Phosphorus	Mercury	Copper	Silver	Sulphate	Ammonia (un-ionized)
			mg/L	ng/L	mg/L	mg/L	mg/L	mg/L
Provincial Water Quality Objectives			0.02 (i)	200	0.005 (i)*	0.0001	n/a	0.02 (i)
CCME Water Quality Guidelines for Protection of Aquatic Life (Long term)			n/a	26	0.02	0.00025	n/a	0.019
2024 Samples - 75 th Percentile	OL-B	10	0.0121	0.910	0.00182	<0.00001	43.18	0.0017
	OL-F	8	0.0116	0.940	0.00179	<0.00001	47.50	0.0028
	HL-B	10	0.0092	0.838	0.00113	<0.00001	20.40	0.0005
	HL-B-In	10	0.009	0.765	0.00122	<0.00001	20.38	0.0005
	HL-REF	10	0.0085	0.775	0.00114	<0.00001	19.08	0.0005
	HL-REF-DUP	9	0.0085	0.780	0.00117	<0.00001	16.90	0.0005
	Instances above guideline		None	None	None	None	n/a	1 of CWQG
2023 Samples - 75 th Percentile (All OL and HL samples)		76	0.0086	1.185	0.00102	<0.00001	6.19	0.0005
2022 Sample - 75 th Percentile (All OL and HL samples)		90	0.0085	0.930	0.00075	0.000005	3.48	0.005**
2021 Samples - 75 th Percentile (All OL and HL samples)		87	0.0095	0.660	0.00148	0.000025	3.27	0.005**

CCME: Canadian Council of Ministers of the Environment

(i): interim objective

*: The objective for copper is 0.001mg/L if hardness is < 20mg/L; 0.005 if hardness is >20mg/L (which it was for every sample)

** A higher detection limit was used by the lab in 2021 and 2022 dataset, such that these values are not directly comparable (they are biased high).

3.18.2 Monitor, at least annually, concentrations of copper, arsenic, cadmium, manganese, mercury and total phosphorus in sediments during operation;

Response: Alamos has conducted annual sediment sampling in the receiving water body since 2021. As presented in the following table, the metal levels measured 2024 in the sediment samples collected in Otto Lake and Herman Lake (the receiving body for operations) were consistent with the metal levels in the 2023 sediment samples collected in Spring Lake (the receiving body during construction). There were multiple metal levels above the provincial and federal guidelines, but except for one sample each year for arsenic, all metal levels were below the federal PEL. The 2023 and 2024 sediment results were elevated compared to those collected in 2022 and 2021, however additional monitoring is required to effectively interpret sediment quality sampling with respect to mine

discharges. To address this, Alamos will be implementing Cycle 2 of their Environmental Effects Monitoring program in 2025, using a new weight-of-evidence approach (holistic, ecosystem-based assessment) to determine effluent effects and potential influence on the receiving environment.

Sediment Quality		Copper	Arsenic	Cadmium	Manganese	Mercury	Phosphorus
		mg/kg	mg/kg	mg/kg	mg/kg	mg/kg	mg/kg
Provincial Sediment Quality Guidelines	LEL	16	6	0.6	460	0.2	60
	SEL	110	33	10	1100	2	2000
CCME Sediment Quality Guidelines for Protection of Aquatic Life (freshwater)	ISQG	35.7	5.9	0.6	n/a	0.17	n/a
	PEL	197	17	3.5	n/a	0.486	n/a
2024 Samples	OL-B	38.4	6.58	1.02	320	0.126	1760
	OL-F	10.6	1.19	0.142	162	0.0276	373
	HL-B	55.6	2.44	0.425	192	0.0818	565
	HL-B-In	51.5	2.78	0.335	442	0.0617	433
	HL-REF	64	4.56	0.384	782	0.0686	416
	HL-DB	59.9	26.2	1.7	1720	0.222	1550
	Instances above guideline	5 of LEL 5 of ISQG	2 of LEL 2 of ISQG 1 of PEL	2 of LEL 2 of ISQG	2 of LEL 1 of SEL	1 of LEL 1 of ISQG	6 of LEL
2023 Samples - 75 th Percentile (SL-B samples, 5 in total)		34.0	14.9	0.788	987	0.134	717
2022 Samples - 75 th Percentile (SL-B samples, 5 in total)		11.7	5.57	0.255	462	0.0403	190
2021 Samples - 75 th Percentile (5 OL-B and 5 HL-B samples)		25.6	1.77	0.222	185.5	0.0485	450

CCME: Canadian Council of Ministers of the Environment

LEL: Lowest Effect Level indicating concentration in the sediment that can be tolerated by the majority of benthic organisms

SEL: Severe Effect Level indicating a concentration in the sediment at which pronounced disturbance of the sediment-dwelling community can be expected.

ISQG: Interim Sediment Quality Guidelines

PEL: Probable Effect Level indicating a concentration in the sediment above which adverse effects are expected to occur frequently

3.18.3 *Monitor fish health through fish tissue sampling and fish population studies. Monitoring shall include lower trophic level indicator species and shall include monitoring of fish abundance, fish population structure and other fish health metrics that shall be determined in consultation in Indigenous groups and relevant authorities. The Proponent shall conduct monitoring for one year prior to operation and at least twice a year for the first three years of operation and shall:*

3.18.3.1 *If the results of monitoring during the first three years of operation demonstrate that no adverse environmental effects to fish and fish habitat from Designated Project activities are occurring, continue monitoring every three years after the first three years for a duration that shall be determined in consultation with Indigenous groups and relevant authorities; or*

3.18.3.2 *If the results of monitoring during the first three years of operation demonstrate that adverse environmental effects to fish and fish habitat from Designated Project activities are occurring, determine, in consultation with Indigenous groups and relevant authorities, with what frequency and for what duration additional monitoring shall occur;*

Response: The aquatic sampling program is described in the Surface Water Monitoring Plan (Appendix 6-D of the Water Management Plan).

Fish tissue sampling and fish population studies were conducted in Project area waterbodies including Otto Lake and Herman Lake in 2021. The results showed that Otto Lake and Herman Lake, which are the receiving water bodies for the operations phase, had the greatest species richness observed among the sampled locations, and they had lower concentrations of mercury and methylmercury than peripheral waterbodies while total arsenic levels were often higher than in reference waterbodies. There were no instances among fish sampled from Otto Lake and Herman Lake where total mercury concentrations were above provincial and federal guidelines for safe levels for human consumption.

Fish tissue sampling and fish population studies were conducted in 2022 and 2023 in Spring Lake, the receiving waterbody for the construction phase, which ended in 2023. The 2022 sampling indicated that Spring Lake species had generally lower concentrations of total mercury than those in the reference waterbody, and that there were no instances where total mercury concentrations were above provincial and federal guidelines to ensure safe levels for human consumption. The 2023 sampling showed a statistically significant decrease in White Sucker arsenic, cobalt, and lead concentrations from 2022 to 2023; however, total mercury and methylmercury concentrations were significantly lower in 2022 compared to 2023. Fish sampled in 2023 were larger and older on average than those captured in 2022; correcting for total length in statistical models still showed significant differences in total mercury concentrations between years. Statistical comparison for small bodied species were not performed since different species were present in sufficient abundance to meet minimum laboratory requirements.

Fish tissue and population studies in Otto Lake and Herman Lake were not conducted in 2024 due primarily to the change in final effluent discharge location from Spring Lake to Otto Lake. This necessitated new baseline work including plume dispersion studies, to define how, when and where receiving body monitoring should be conducted. A federal Environmental Effects Monitoring pre-design study was conducted in Otto Lake in October 2024, the results from which will direct a subsequent study in 2025 (EEM Cycle 2) which will provide a new weight-of-evidence approach (holistic, ecosystem-based assessment) to determine effluent effects and potential influence on the receiving environment.

As the Project only began the operations phase in late 2023, there was no specific actions for EA condition 3.18.3.1 or 3.18.3.2 in 2024.

3.18.4 Monitor nutrient levels, algae abundance, and dissolved oxygen levels. In doing so the Proponent shall:

3.18.4.1 Conduct monitoring one year prior to operation;

3.18.4.2 Conduct monitoring at least twice a year for the first three years of operation and:

3.18.4.2.1 If the results of the monitoring referred to in condition 3.18.4.2 demonstrate a statistically significant change with the results of monitoring referred to in condition 3.18.4.1, conduct a fish habitat utilization survey to verify that these changes do not cause adverse environmental effects to fish and fish habitat. The Proponent shall determine the methodology, the frequency and the duration of this survey in consultation with Indigenous groups and relevant authorities.

Response: Unless prevented by unsafe conditions, Alamos conducts monthly surface water sampling in Otto Lake (the immediate receiving waterbody for Magino Mine’s effluent) and Herman Lake (the next downstream waterbody) according to the Surface Water Monitoring Plan (Appendix 6-D of the Water Management Plan) and as required by the provincial Industrial Sewage Works ECA (2066-CQLN6X). Nutrient levels and dissolved oxygen are analyzed for, however algal abundance was not completed in 2024. As part of a study of the receiving environment in 2025 (EEM Cycle 2) algal abundance sampling will be conducted and it is expected that the results of the study will help to determine appropriate sampling going forward, holistically considering effluent effects and potential influence on the receiving environment.. The following table presents the 2024 sampling results for parameters specified in EA condition 3.18.4. Further information, including individual sample results, additional water quality parameters, and sampling for additional water bodies, is provided in the annual Surface Water Report generated as required by the provincial Industrial Sewage Works ECA (2066-CQLN6X).

Note that as operations began in late 2023, the 2022 and 2023 data is to be considered for EA condition 3.18.4.1; and as the first year of full operations, 2024 data is to be considered for EA condition 3.18.4.2.

As presented in the following table, the nutrient levels measured in 2024 were consistent with those measured 2021-2023, although there was significant variation in nitrate levels in all years. Dissolved oxygen levels measured in 2024 are higher than those measured in 2021-2023.

Water Quality		Number of Monthly Samples	Nutrient Levels			Dissolved Oxygen
			Phosphorus	Ammonia (as N)	Nitrate (as N)	
			mg/L	mg/L	mg/L	
Provincial Water Quality Objectives			0.02(i)	n/a	n/a	n/a
CCME Water Quality Guidelines for Protection of Aquatic Life		Short term	n/a	n/a	3	n/a
		Long term	n/a	n/a	124	n/a
2024 Samples - 75 th Percentile	OL-B	10	0.0121	0.0429	1.208	16.08
	OL-F	8	0.0116	0.0676	1.048	10.61
	HL-B	10	0.0092	0.0201	0.287	14.17
	HL-B-In	10	0.0090	0.0312	0.321	13.69
	HL-REF	10	0.0085	0.0135	0.298	12.78
	HL-REF-DUP	9	0.0085	0.0140	0.306	12.78
	Instances above guideline		None	n/a	None	n/a
2023 Samples - 75 th Percentile (All OL and HL samples)		76	0.00863	0.0417	0.295	12.08
2022 Samples - 75 th Percentile (All OL and HL samples)		90	0.00845	0.0331	0.105	10.28
2021 Samples - 75 th Percentile (All OL and HL samples)		87	0.00945	0.0175	0.0605	10.62*

CCME: Canadian Council of Ministers of the Environment

(i): interim objective

* Dissolved oxygen data is available for 42 samples

Alamos will continue monitoring in 2025 and 2026 (three years of operations), and conduct the statistical analysis required by EA condition 3.18.4.2.1 to determine whether a fish habitat utilization study is required.

3.18.4.3 After the third year of operation, the Proponent shall:

3.18.4.3.1 Continue monitoring of nutrient levels, algae abundance and dissolved oxygen levels every three years for a duration that shall be determined in consultation with Indigenous groups and relevant authorities, if the results of monitoring referred to in condition 3.18.4.2 demonstrate that no adverse environmental effects to fish and fish habitat from Designated Project activities are occurring; or

3.18.4.3.2 Continue monitoring at a frequency and duration that shall be determined in consultation with Indigenous groups and relevant authorities, if the results of monitoring referred to in condition 3.18.4.2 demonstrate that adverse environmental effects to fish and fish habitat from Designated Project activities are occurring.

Response: As the Project began operations phase in late 2023, there was no specific action for EA condition 3.18.4.3 in 2024.

3.18.5 if results of the monitoring referred to in conditions 3.18.1, 3.18.2, 3.18.3 or 3.18.4 or the results of the fish habitat utilization survey referred to in condition 3.18.4.2.1 demonstrate that modified or additional mitigation measures are required to protect fish and fish habitat from changes to water and sediment quality, develop and implement modified or additional mitigation measures pursuant to condition 2.7, which shall include, at a minimum, the installation and use of an effluent treatment facility. The Proponent shall submit these measures to the Agency before implementing them.

Response: As described in the above sections, the monitoring referred to in conditions 3.18.1, 3.18.2, 3.18.3 and 3.18.4 thus far has not shown adverse environmental effects on fish and fish habitat caused by changes in water and sediment quality due to the Project.

Alamos is committed to continuing monitoring for surface water quality, sediment quality, fish populations and fish health (tissue). A federal Environmental Effects Monitoring pre-design study was conducted in Otto Lake in October 2024, the results from which will direct a subsequent study in 2025 (EEM Cycle 2) which will provide a new weight-of-evidence approach (holistic, ecosystem-based assessment) to determine effluent effects and potential influence on the receiving environment.

3.19 The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to verify the accuracy of the environmental assessment and to determine the effectiveness of the mitigation measures as it pertains to the adverse environmental effects on fish and fish habitat in Otto Lake, Herman Lake and Goudreau Lake from changes in groundwater quality caused by the Designated Project.

Response: In 2020, Prodigy developed, in consultation with Indigenous groups and relevant authorities, a draft follow-up program as part of the Groundwater Monitoring Plan (Appendix 6-F of the Water Management Plan). It was finalized in January 2021 and provided to consulted parties in January and March 2021. It was subsequently updated in December 2022.

3.19 (continued) The Proponent shall implement the follow-up program during all phases of the Designated Project in consultation with Indigenous groups. As part of the implementation of the follow-up program, the Proponent shall...

3.19.1 Monitor groundwater quality using as benchmarks the comparative standards for water quality identified by the Proponent in Table 7-54 of the Environmental Impact Statement; and

Response: The groundwater monitoring plan has been implemented since 2022, with 188 samples being collected in 2024. The following table present a summary of the 2024 sampling results for the parameters specified in Table 7-54 of the Environmental Impact Statement (EIS). Further information, including individual sample results, additional water quality parameters and well water levels, is provided in the annual Groundwater Water Report generated as required for the provincial Industrial Sewage Works ECA (2066-CQLN6X). As noted in the following table, 2024 data is generally in line with the baseline groundwater data, with the exception of phosphorus which is elevated in comparison to the baseline. There appear to be some trends developing in the data compared to 2022-2023 data, particularly with the non-metal parameters, however additional monitoring is required to effectively interpret groundwater quality with respect to the impact from the Project.

Parameter (mg/L)	Comparative Standards As presented in Table 7-54 of the EIS			2024 Data			Trending Compared to 2022 and 2023 Data
				75 th Percentile **	Number of Samples Above (or Below)		
	Baseline Groundwater*	ODWS	PWQO		Baseline GW	ODWS or PWQO	
Alkalinity	319			209.25	7	n/a	increase
Chloride	42			5.42	1	n/a	increase
Sulphate	5800	500		27.7	0	0	increase

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Parameter (mg/L)	Comparative Standards As presented in Table 7-54 of the EIS			2024 Data			Trending Compared to 2022 and 2023 Data
				75 th Percentile **	Number of Samples Above (or Below)		
	Baseline Groundwater*	ODWS	PWQO		Baseline GW	ODWS or PWQO	
pH [no units]	6.6 - 10.98	6.5 - 8.5	6.5 - 8.5	7.87	0 above 4 below	0 above 4 below	none
Phosphorus (T)	0.03 - 0.49		0.01 - 0.03	0.195	23 above 80 below	108 above 40 below	decrease
Ammonia N	9.3		0.0156	0.058	0	101	none
Nitrate - N	13.4	1		0.230	1	18	increase
Organic Carbon (D)	24.5	5		8.5	2	100	none
Total Dissolved Solids	630	500		269	2	5	increase
Cyanide (T)	7.28	0.2		0.001	0	0	none
Aluminum	41	0.1	0.08	0.015	0	13	none
Arsenic	0.02	0.025	0.005	0.001	0	0	none
Boron	0.193	5	0.2	0.023	0	0	none
Cadmium	0.00254	0.005	0.0005	0.00001	0	0	none
Calcium	631			71	0	n/a	increase
Chromium	0.122	0.05	0.0089	0.00025	0	0	none
Cobalt	0.0713		0.0009	0.0076	1	42	none
Copper	0.49	1	0.005	0.0021	0	0	none
Iron	85	0.3	0.3	0.559	0	58	none
Lead	0.0275	0.01	0.01	0.000025	0	0	none
Manganese	6.4	0.05		0.432	0	110	none
Mercury	0.001	0.001	0.0002	0.0000025	0	0	none
Molybdenum	0.112		0.04	0.0016	0	1	decrease
Nickel	0.136		0.025	0.0011	1	1	increase
Selenium	1.5	0.01	0.1	0.00021	0	0	none
Silver	0.008		0.0001	0.000005	0	0	none
Thallium	0.00093		0.0003	0.000005	0	0	none
Vanadium	0.217		0.006	0.00086	0	0	none
Zinc	0.262	5	0.02	0.0061	3	0	none

* Baseline Groundwater numbers include full range across Baseline Groundwater, TMF Water, MRMF Leachate and Pit Water as presented in Table 7-54 of the EIS

** The average is presented instead of the 75th percentile for pH and phosphorus

ODWS: Ontario Drinking Water Standards

PWQO: Provincial Water Quality Objectives

3.19.2 If the results of the monitoring referred to in condition 3.19.1 demonstrate that modified or additional mitigation measures are required to mitigate adverse environmental effects on fish and fish habitat of changes in groundwater quality caused by the Designated Project, develop and implement modified or additional mitigation measures pursuant to condition 2.7. The Proponent shall submit these measures to the Agency before implementing them.

Response: As described in the section above, the monitoring referred to in EA conditions 3.19.1 thus far has not varied significantly beyond the baseline groundwater quality and does not indicate that mitigations are required to mitigate adverse environmental effects on fish and fish habitat caused by changes in groundwater quality.

C. Migratory Birds

4.1 The Proponent shall carry out the Designated Project in a manner that protects migratory birds and avoids harming, killing or disturbing migratory birds or destroying, disturbing or taking their nests or eggs. In this regard, the Proponent shall take into account Environment and Climate Change Canada's Avoidance Guidelines and the risk of incidental take. The Proponent's actions when carrying out the Designated Project shall be in compliance with the Migratory Birds Convention Act, 1994, the Migratory Birds Regulations and with the Species at Risk Act.

Response: In 2024, less than 0.5 hectares was cleared at the Project. All tree clearing was conducted outside the migratory bird season of April 20 to August 29.

4.2 The Proponent shall control lighting required during all phases of the Designated Project, including direction, timing and intensity, to avoid adverse environmental effects on migratory birds, while meeting health and safety requirements.

Response: In 2024, Alamos continued to implement the procedures related to controlling light as provided in the Air/Atmospheric Environment Management Plan and Wildlife and Vegetation Management Plan. Halogen light stands are equipped with hoods, and LTE lights are directed downwards, to direct light away from potential offsite nesting areas.

4.3 The Proponent shall undertake, in consultation with Indigenous groups and relevant authorities, progressive reclamation of the project study area. The Proponent shall identify, prior to the start of progressive reclamation and in consultation with Indigenous groups and relevant authorities, plant species native to the area of the Designated Project to use for revegetation as part of the progressive reclamation, including species suitable to create habitat for migratory birds.

Response: In 2020, Prodigy developed, in consultation with Indigenous groups and relevant authorities, a draft Closure Plan and a draft Wildlife and Vegetation Management Plan. They were finalized in January 2021 and provided to consulted parties in January and March 2021. They included the identification of possible native species for revegetation. As there are limited disturbed areas that are not part of active operations, there has been limited progressive reclamation.

4.4 The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to verify the accuracy of the environmental assessment as it pertains to the use by migratory birds of surface water facilities in the project study area.

Response: In 2020, Prodigy developed, in consultation with Indigenous groups and relevant authorities, a draft follow-up program as part of the Wildlife and Vegetation Management Plan. It was finalized in January 2021 and provided to consulted parties in January and March 2021.

4.4 (continued) As part of the implementation of the follow-up program, the Proponent shall:

4.4.1 Monitor, at times migratory birds may be present in the project study area, the use by migratory birds of the tailings management facility and the Water Quality Control Pond during all phases of the Designated Project until such time that water quality in the tailings management facility and the Water Quality Control Pond meet legislative requirements and water quality objectives. The water quality objectives are to be

established using an ecological risk based approach, developed in consultation with Indigenous groups and relevant authorities;

Response: Alamos monitors the use of the tailings management facility and the Water Quality Control Pond by migratory birds through daily inspections. Migratory bird use of the tailings management facility and Water Quality Control Pond in 2024 was observed to be limited (11 sightings total of ravens, geese and ducks all in late winter early spring), likely due to industrial activity in the area, and the abundant availability of surrounding natural areas.

4.4.2 Monitor, at times migratory birds may be present in the project study area, the use by migratory birds of the open-pit lake during decommissioning. The Proponent shall determine, in consultation with indigenous groups and relevant authorities, the frequency and duration of the monitoring during decommissioning; and

Response: As the Project was in operations phase in 2024, there was no specific action for EA condition 4.4.2 in 2024.

4.4.3 If results of the monitoring referred to in conditions 4.4.1 or 4.4.2 indicate that migratory birds use the tailings management facility, the Water Quality Control Pond or the open-pit lake, develop, in consultation with Indigenous groups, and implement deterrence measures pursuant to condition 2.7. The Proponent shall submit these measures to the Agency before implementing them.

Response: In 2024, migratory bird use of the tailings management facility and Water Quality Control Pond was observed to be limited, likely due to industrial activity in the area. As a result, no deterrence measures were implemented near water in 2024. Meanwhile, falcon kites and predator effigies were installed on land to deter nesting in equipment or in areas that would be disturbed as a course of production.

4.5 The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to verify the accuracy of the environmental assessment and to determine the effectiveness of the mitigation measures to avoid harm to migratory birds, their eggs, and nests, including the mitigation measures used to comply with conditions 4.1 to 4.3. As part of the development of the follow-up program, the Proponent shall identify performance indicators that shall be used by the Proponent to evaluate the effectiveness of the progressive reclamation referred to in condition 4.3.

Response: In 2020, Prodigy developed, in consultation with Indigenous groups and relevant authorities, a draft follow-up program as part of the Wildlife and Vegetation Management Plan. It was finalized in January 2021 and provided to consulted parties in January and March 2021.

4.5 (continued) The Proponent shall implement the follow-up program during all phases of the Designated Project. As part of the implementation of the follow-up program, the Proponent shall:

4.5.1 Conduct migratory bird surveys annually for the first three years following completion of construction to assess changes in migratory bird populations caused by the Designated Project. The Proponent shall determine the methodology for the migratory bird surveys in consultation with Indigenous groups and relevant authorities. The Proponent shall determine, in consultation with Indigenous groups and relevant authorities and based on the results of the initial surveys, if additional surveys are required after the first three years following completion of construction and at what frequency and in which locations these additional surveys shall occur; and

Response: In 2024, Alamos conducted the first post-construction migratory bird survey of the Magino Mine property. Two dawn-breeding bird surveys were conducted from July 31 to August 15. 57 species were identified within the study area, of which 4 are of special concern: Canada Warbler, Barn Swallow, Evening Grosbeak and Olive-sided Flycatcher. Due to the late implementation of the field work, Indigenous groups were only notified after the study was completed. Alamos is committed to improving the 2025 and 2026 surveys by conducting the surveys during the breeding window of June 10 to July 10, including nocturnal and marsh bird surveys, and consulting with Indigenous groups prior to finalizing the study plan. In doing so, the results of the 2025 and 2026 surveys will be more comparable to the 2012-2016 baseline surveys.

4.5.2 Monitor the effectiveness of the progressive reclamation referred to in condition 4.3, including the establishment of native plant species to create habitat for migratory birds, annually during operation and during the first three years of decommissioning and every five years thereafter. The Proponent shall monitor the effectiveness of the progressive reclamation referred to in condition 4.3 until the Proponent has determined, in consultation with Indigenous groups and relevant authorities, that the performance indicators have been met.”

Response: As operations just began in late 2023, there has been limited progressive rehabilitation at the Project and there were no significant observations in 2024 related to migratory bird habitat due to the resulting establishment of native plant species. Alamos nonetheless implemented other portions of the follow-up program in 2024 for example:

- Employees were encouraged to report observations of birds and/or nests in active areas. In 2024, there were 11 sightings total of ravens, geese and ducks in the tailings management facility and Water Quality Control Pond area; 2 sightings of 20+ snow bunting in the McVeigh Creek area, and 4 miscellaneous bird sightings throughout the plant.
- In response to the discovery of bank swallows nesting in the upper overburden banks of the open pit in 2023, the bank swallow nest was removed from the open pit once the birds left for the season and in 2024 the exposed banks were sloped to discourage future nesting in the open pit.

There were no fatalities of migratory birds nor damage to migratory bird nests or eggs observed in 2024.

D. Health of Indigenous Peoples

5.1 The Proponent shall develop, prior to construction, measures to mitigate emissions of dust and fugitive particulate generated by the Designated Project, including dust associated with mine vehicles on roads located within the property boundary, that take into account the standards and criteria set out in the Canadian Council of Ministers of the Environment's Canadian Ambient Air Quality Standards and Ontario's Ambient Air Quality Criteria. The Proponent shall submit these measures to the Agency before implementing them. The Proponent shall implement these measures during construction, operation and the first three years of decommissioning.

Response: In 2020, Prodigy developed, in consultation with Indigenous groups and relevant authorities, measures consistent with the previously developed Fugitive Dust Best Management Practices Plan as part of the draft Air / Atmospheric Environment Management Plan. It was finalized in January 2021 and provided to consulted parties in January and March 2021. Alamos continued to implement the dust control measures in the Air / Atmospheric Environment Management Plan, such as road watering, throughout 2024 as required based on observations from daily inspections.

5.2 The Proponent shall undertake reagent handling and ore processing activities in an enclosed space equipped with a dust collection system.

Response: The crushers and the reagent areas are enclosed with dust collection systems, and Alamos continued to operate them as such in 2024.

5.3 The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to verify the accuracy of the environmental assessment and to determine the effectiveness of the mitigation measures as it pertains to the adverse environmental effects on the health of Indigenous Peoples caused by increased concentration of air contaminants, including total suspended particulates, particulate matter (PM10), fine particulate matter (PM2.5), sulphur dioxide, nitrogen dioxide and cadmium. As part of the follow-up program, the Proponent shall:

5.3.1 Identify, prior to construction, monitoring locations for air contaminants within areas used by Indigenous groups for traditional purposes for which maximum concentrations of air contaminants were predicted by the Proponent during the environmental assessment, as identified in Appendix N of the final response to Information Request 01 (Canadian Environmental Assessment Registry Reference Number 80044, Document Number 26);

Response: In 2020, Prodigy developed, in consultation with Indigenous groups and relevant authorities, a draft follow-up program as part of the Air/Atmospheric Environment Management Plan. It was finalized in January 2021 and provided to consulted parties in January and March 2021. The follow-up program identifies the locations of three air quality monitors:

- AM1 located on the Magino Mine property near its southern boundary;
- AM2 located on the boundary between the Magino Mine and Island Gold Mine, both operated by Alamos as part of the Island Gold District; and
- AM3 located on the Magino Mine property near its northern boundary;.

Prodigy began monitoring at AM2 station beginning August 2021, at AM3 station beginning September 2022 and at AM1 station beginning January 2023.

5.3.2 Monitor, during construction, operation and the first three years of decommissioning, air contaminants at the monitoring locations identified pursuant to condition 5.3.1, using as benchmarks the standards and criteria set out in the Canadian Council of Ministers of the Environment's Canadian Ambient Air Quality Standards and Ontario's Ambient Air Quality Criteria. The Proponent shall monitor fine particulate matter (PM_{2.5}) in real-time, particulate matter (PM₁₀) and cadmium at a minimum every 6 days and total suspended particulates, sulphur dioxide and nitrogen dioxide at a frequency that shall allow the Proponent to monitor adverse environmental effects on human health. The Proponent shall determine the frequency of monitoring for total suspended particulates, Sulphur dioxide and nitrogen dioxide in consultation with Indigenous groups and relevant authorities during the development of the follow-up program;

Response: The follow-up program describes the monitoring parameters and frequency for the air monitoring program at the Project. Ongoing challenges with operating the monitors and data collection have resulted in gaps in the air monitoring data since the stations were commissioned in 2021. Most significantly, Alamos has identified that the continuous particulate data collected at AM3 has been unavailable since 2023. Alamos recognizes these findings as non-compliances and is committed to addressing the gaps in the air monitoring program in 2025.

The following table presents a summary of the available monitoring data for 2024. While the 2024 data indicates higher concentrations of NO₂ and particulate matter than the 2021 and 2022 data collected prior to operations, the data is not substantially different from 2023, showing a slight reduction in magnitude and frequency of benchmark exceedances. There were several exceedances as outlined in the below summary table.

Air Quality		Passive Monitoring		Continuous Monitoring			Discrete Sampling Every 6 days	
		SO ₂	NO ₂	NO ₂	PM _{2.5}	PM ₁₀	TSP	Cadmium
		30 day	30 day	1-hr	24-hr RA	24-hr RA	24-hr	24-hr
		ppb	ppb	ppb	µg/m ³	µg/m ³	µg/m ³	µg/m ³
Follow-up Program Trigger		6	14	31	19	35	84	0.0175
OAAQC		-	-	200	30	50	120	0.025
CAAQC		-	-	42	27	-	-	-
2024 Samples - Maximum	AM1	0.2	3.3	118	36	106	216	0.00008
	AM2	0.1	3.0	9	10	36	116	<0.00042
	AM3	0.6	0.6	n/a	n/a	n/a	107	<0.00042
Exceedances		None	None	None	2 of AAQCs	11 of OAAQC	6 of OAAQC	None
2023 Samples - Maximum (All AM1, AM2 and AM3 data)		0.2	4.7	33	45	65	198	0.00050
2022 Samples - Maximum (All AM1, AM2 and AM3 data)		<0.1	2.7	n/a	20	32	87	<0.00042
2021 Samples - Maximum (All AM1, AM2 and AM3 data)		0.2	2.7	n/a	7	9	32	<0.00042

OAAQC: Ontario Ambient Air Quality Criteria
CAAQC: Canadian Ambient Air Quality Criteria
RA: Rolling Average
n/a: not available

5.3.3 Notify the Agency and Indigenous groups in writing within 24 hours of any exceedance(s) observed by the Proponent during monitoring referred to in condition 5.3.2 of 1-hour limits or 24-hour limits of the standards and criteria set out in the Canadian Council of Ministers of the Environment's Canadian Ambient Air Quality Standards and Ontario's Ambient Air Quality Criteria, except for fine particulate matter (PM2.5); and

Response: Alamos continued to experience challenges operating the air quality monitors in 2024, as well as data collection issues from AM3. For these reasons, 2024 monitoring data was not available until 2025, and notification within 24 hours of the exceedances were not made in 2024. Alamos is committed to improving the data collection and analysis of the air monitoring program in 2025.

5.3.4 Determine, in consultation with Indigenous groups and relevant authorities, the thresholds for concentration of fine particulate matter (PM2.5) above which the Proponent shall notify Indigenous groups.

Response: The follow-up program specifies the PM2.5 notification threshold as the CAAQC.

5.4 The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to verify the accuracy of the environmental assessment and to determine the effectiveness of mitigation measures as it pertains to the adverse environmental effects on health of Indigenous Peoples caused by contamination of water and fish. As part of the follow-up program, the Proponent shall:

5.4.1 Identify, prior to construction, fish species that shall be monitored, waterbodies where Indigenous use is expected and where contaminants shall be monitored;

Response: In 2020, Prodigy developed, in consultation with Indigenous groups and relevant authorities, a draft follow-up program as part of the Surface Water Monitoring Plan (Appendix 6-D of the Water Management Plan). The draft Surface Water Monitoring Plan identified fish species to be monitored, waterbodies where Indigenous use is expected and where contaminants will be monitored. It was finalized January 2021 and provided consulted parties in January and March 2021. It was subsequently updated in March 2023.

5.4.2 Monitor mercury, methylmercury, cobalt, lead and arsenic in surface water in Otto Lake and other downstream waterbodies identified pursuant to condition 5.4.1 during all phases of the Designated Project;

Response: Unless prevented by unsafe conditions, Alamos conducts monthly surface water sampling in Otto Lake (the immediate receiving waterbody for Magino Mine's effluent) and Herman Lake (the next downstream waterbody) according to the Surface Water Monitoring Plan (Appendix 6-D of the Water Management Plan) and as required by the provincial Industrial Sewage Works ECA (2066-CQLN6X). The following table presents the 2024 sampling results for the parameters specified in EA condition 5.4.2. Further information, including individual sample results, additional water quality parameters, and sampling for additional water bodies, is provided in the annual Surface Water Report generated as required for the provincial Industrial Sewage Works ECA (2066-CQLN6X).

There were no parameter concentrations above provincial or federal water quality guidelines in 2024.

Water Quality		Number of Monthly Samples	Mercury	Methyl Mercury	Cobalt	Lead	Arsenic
			ng/L	ng/L	mg/L	mg/L	mg/L
Provincial Water Quality Objectives			200	n/a	0.0009(i)	0.005 0.001(i)	0.1 0.005(i)
CCME Water Quality Guidelines for Protection of Aquatic Life (Long term)			26	4	n/a	0.001	0.005
2024 Samples - 75 th Percentile	OL-B	10	0.910	0.152	0.00061	<0.00005	0.00089
	OL-F	8	0.940	0.173	0.00063	0.000025	0.00083
	OL-DB-SUR	4		0.178			

Water Quality		Number of Monthly Samples	Mercury	Methyl Mercury	Cobalt	Lead	Arsenic
			ng/L	ng/L	mg/L	mg/L	mg/L
	OL-DB-BOT	4		0.194			
	HL-B	10	0.838	0.073	0.00029	<0.00005	0.00070
	HL-B-In	10	0.765	0.069	0.00030	<0.00005	0.00070
	HL-REF	10	0.775	0.055	0.00027	<0.00005	0.00069
	HL-REF-DUP	9	0.780	0.050	0.00028	0.000025	0.00068
	HL-DB-SUR	3		0.087			
	HL-DB-BOT	4		0.101			
	Instances above guideline		None	None	None	None	None
2023 Samples - 75 th Percentile (All OL and HL samples)		76 53 for MeHg	1.185	0.064	0.00005	0.000025	0.00060
2022 Samples - 75 th Percentile (All OL and HL samples)		90	0.930	0.049	<0.00005	0.000025	0.00065
2021 Samples - 75 th Percentile (All OL and HL samples)		87	0.660	0.044	0.00005	0.000025	0.00063

CCME: Canadian Council of Ministers of the Environment

(i): interim objective

5.4.3 Monitor mercury, methylmercury, cobalt, lead and arsenic in surface water in Goudreau Lake and other downstream waterbodies identified pursuant to condition 5.4.1 during decommissioning;

Response: As the Project was in operations phase in 2024, there was no specific action for EA condition 5.4.3 in 2024.

5.4.4 Monitor mercury, methylmercury, lead, arsenic and cobalt in fish tissue in Otto Lake and other downstream waterbodies identified pursuant to condition 5.4.1 every three years during all phases of the Designated Project, starting the first year of construction, and every five years after the end of decommissioning. The Proponent shall determine, in consultation with Indigenous groups and relevant authorities, if additional monitoring must be implemented after the end of decommissioning; and

Response: In 2021, the first year of construction, fish tissue sampling including mercury, methylmercury, lead, arsenic and cobalt analysis was conducted in Otto Lake (the immediate receiving waterbody for Magino Mine’s effluent) and Herman Lake (the next downstream waterbody), as well as peripheral water bodies as reference. The results showed that the fish in Otto Lake and Herman Lake had lower concentrations of mercury and methylmercury than fish in peripheral waterbodies, while total arsenic levels were often higher than in reference waterbodies. There were no instances among fish sampled from Otto Lake and Herman Lake where total mercury concentrations in fish were above provincial and federal guidelines to ensure safe levels for human consumption; however there were two instances in fish in the reference waterbody.

Additional fish tissue sampling and fish population studies were conducted in 2022 and 2023 in Spring Lake (the receiving waterbody for the construction phase). The 2022 sampling indicated that fish in Spring Lake had generally lower concentrations of total mercury than those in the reference waterbody, and that there were no instances where total mercury concentrations in fish were above provincial and federal guidelines to ensure safe levels for human consumption.

Fish tissue and population studies in Otto Lake and Herman Lake were not conducted in 2024 due primarily to the change in final effluent discharge location from Spring Lake to Otto Lake. This necessitated new baseline work including plume dispersion studies, to define how, when and where receiving body monitoring should be

conducted. A federal Environmental Effects Monitoring pre-design study was conducted in Otto Lake in October 2024), the results from which will direct a subsequent study in 2025 (EEM Cycle 2) which will provide a new weight-of-evidence approach (holistic, ecosystem-based assessment) to determine effluent effects and potential influence on the receiving environment.

5.4.5 monitor mercury, methylmercury, lead, arsenic and cobalt in fish tissue in Goudreau Lake and other downstream waterbodies identified pursuant to condition 5.4.1 every three years starting at the beginning of decommissioning and for a duration that shall be determined in consultation with Indigenous groups and relevant authorities.

Response: As the Project was in operations phase in 2024, there was no specific action for EA condition 5.4.5 in 2024.

E. Current Use of Lands and Resources for Traditional Purposes

6.1 The Proponent shall develop, prior to construction and in consultation with Indigenous groups, a communication plan to share information related to the Designated Project and the adverse environmental effects of the Designated Project with Indigenous groups. The Proponent shall implement and maintain the communication plan up-to-date during all phases of the Designated Project. The communication plan shall include procedures, including timing and methods, for sharing information on the following:

6.1.1 the location and timing of Designated Project activities that may affect quality of experience to Indigenous uses of lands for traditional purposes caused by changes in dust, noise or light within the property boundary and that may permanently or temporarily affect navigation within the project study area;

6.1.2 the results of the follow-up program referred to in conditions 3.16, 3.17, 3.18, 3.19, 4.4, 4.5, 5.3, 5.4, 6.5, 6.6, 7.2, and 7.3, including any potential health risks, in plain language, and the modified or additional mitigation measures developed and implemented by the Proponent pursuant to condition 2.7 for each follow-up program.

6.2 The Proponent shall develop, as part of the communication plan referred to in condition in 6.1, procedures for Indigenous groups to provide feedback to the Proponent about adverse environmental effects caused by the Designated Project related to access to and use of lands for traditional purposes, and procedures for the Proponent to document and respond in a timely manner to the feedback received and demonstrate how issues have been addressed, including through the implementation of additional or modified mitigation measures. The Proponent shall implement these procedures during all phases of the Designated Project.

Response: In 2020, Prodigy developed, in consultation with Indigenous groups, a draft communication plan as required in EA conditions 6.1 and 6.2 as part of the Indigenous Engagement Plan. Prodigy finalized the Plan in January 2021 and provided it to the parties consulted in January 2021. No changes were made to the communication plan since then.

Alamos continued to implement the communication plan throughout 2024 including quarterly to monthly meetings with the Indigenous groups where information regarding the follow-up programs, and environmental performance in general, is shared and documented in meeting minutes. A SharePoint site is used by all parties to provide and update related documentation.

6.3 The Proponent shall develop, prior to construction and in consultation with Indigenous groups, a Historic Resources Management Plan for structures, sites, or things of historical, archaeological, paleontological, or architectural significance. The Proponent shall implement the plan during all phases of the Designated Project. As part of the plan, for any previously unidentified structures, sites or things of historical, archaeological, paleontological or architectural significance discovered within the property boundary by the Proponent or brought to the attention of the Proponent by an Indigenous group or another party during any phase of the Designated project, the Proponent shall:

6.3.1 immediately halt work at the location of the discovery, except for actions required to be undertaken to protect the integrity of the discovery;

6.3.2 delineate an area with a radius of at least 30 metres around the discovery as a no-work zone and monitor any work conducted within 50 metres around the discovery;

6.3.3 conduct an assessment at the location of the discovery;

6.3.4 inform the Agency and Indigenous groups within 24 hours of the discovery, and allow Indigenous groups to monitor and participate in the archeological work; and

6.3.5 consult Indigenous groups and relevant authorities on the manner by which to comply with all applicable legislative or legal requirements and associated regulations and protocols respecting the discovery, recording, transferring and safekeeping of previously unidentified structures, sites or things of historical, archaeological, paleontological or architectural significance.

Response: In 2020, Prodigy developed, in consultation with Indigenous groups, a draft Historic Resources Management Plan. Prodigy finalized the Plan in January 2021 and provided it to consulted parties in January and March 2021.

Alamos continued to implement the Historic Resources Management Plan throughout 2024. No previously unidentified structures, sites, or things of historical, archaeological, paleontological or architectural significance were identified within the property boundary in 2024.

6.4 As part of the progressive reclamation referred to in condition 4.3, the Proponent shall:

6.4.1 identify, prior to the start of progressive reclamation and in consultation with Indigenous groups and relevant authorities, species of interest to Indigenous peoples to use for revegetation as part of the progressive reclamation; and

Response: In 2020, Prodigy developed, in consultation with Indigenous groups and relevant authorities, a draft Closure Plan and a draft Wildlife and Vegetation Management Plan. They were finalized in January 2021 and provided to consulted parties in January and March 2021. They included the identification of possible native species for revegetation.

6.4.2 develop, prior to the start of progressive reclamation and in consultation with Indigenous groups and relevant authorities, and implement, during all phases of the Designated Project, measures to manage the spread of invasive species. The Proponent shall submit these measures to the Agency before implementing them.

Response: In 2020, Prodigy developed, in consultation with Indigenous groups and relevant authorities, a draft Invasive Species Management Plan and protection measures to mitigate environmental harms associated with terrestrial vegetation (e.g., for revegetation/rehabilitation activities) as part of the draft Wildlife and Vegetation Management Plan. Prodigy finalized the Plans in January 2021 and provided them to consulted parties in January and March 2021.

Alamos continued to implement the measures in the Invasive Species Management Plan throughout 2024, including equipment inspections for foreign material, to manage the spread of invasive species.

*6.5 The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, and implement, during all phases of the Designated Project, a follow-up program to verify the accuracy of the environmental assessment as it pertains to the adverse environmental effects of the Designated Project on the current use of lands and resources for traditional purposes caused by changes in the use of the project study area by mammals, including black bear (*Ursus americanus*) and moose (*Alces alces*). As part of the development of the follow-up program, the Proponent shall identify, in consultation with Indigenous groups and relevant authorities, species of mammals, in addition to black bear (*Ursus americanus*) and moose (*Alces alces*), that shall be monitored. If the results of the monitoring indicate that these mammal species use the property, the Proponent shall implement modified or additional mitigation measures pursuant to condition 2.7 to prevent the identified species of mammals from accessing Designated Project components.*

Response: In 2020, Prodigy developed, in consultation with Indigenous groups and relevant authorities, a draft follow-up program as part of the Wildlife and Vegetation Management Plan. It was finalized in January 2021 and provided to consulted parties in January and March 2021.

Alamos continued to implement the program throughout 2024 and personnel are encouraged to report wildlife sightings through multiple channels (e.g., drop box, radio, forms).

The seasonal frequency and magnitude of bear sightings have been consistent since 2021. While the number of moose sightings has decreased from 2021, they were consistent in 2022-2024. There were notably more wolf and coyote sightings throughout 2023 and 2024 than in 2021 and 2022. This is believed to be a result of population growth, the population becoming more accustomed to activity, and employees becoming more diligent in reporting.

Alamos continued to implement measures to prevent wildlife from accessing the Project components throughout 2024. These measures included the use of bear-proof food waste bins to avoid attracting wildlife, using lights to deter, delivering training to all employees on working around wildlife, developing and implementing a Wildlife Interaction Standard Operating Procedure, and trapping to prevent re-occurrence of coyotes and wolves. Additional analysis of the effectiveness of these measures will occur when sufficient data is available.

6.6 The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, and implement during all phases of the Designated Project, a follow-up program to verify the accuracy of the environmental assessment and determine the effectiveness of mitigation measures, including the mitigation measures referred to in conditions 6.1 to 6.4, as it pertains to the adverse environmental effects of the Designated Project on the current use of lands and resources for traditional purposes. The Proponent shall implement the follow-up program during all phases of the Designated Project.

Response: In 2020, Prodigy developed, in consultation with Indigenous groups and relevant authorities, a draft follow-up program as part of the Traditional Use of Lands and Resources Management Plan. It was finalized in January 2021 and provided to consulted parties in January and March 2021.

Alamos continued to implement the follow-up program throughout 2024, engaging with Indigenous groups through quarterly to monthly meetings where information regarding the follow-up program, and environmental performance in general, is shared and documented in meeting minutes. A SharePoint site is used by all parties to provide and update related documentation.

There were no activities at the Project with the potential to affect the quality of experience of Indigenous uses of lands for traditional purposes were identified in 2024.

F. Wetlands

7.1 The Proponent shall restore a minimum of 40 hectares of wetland within the property boundary. The Proponent shall determine, in consultation with Environment and Climate Change Canada, methods for restoration that are technically and economically feasible and that are appropriate for the project study area.

Response: Restoration of the wetland area will be done as part of the closure phase, such that specific planning or action related to this EA condition will be initiated toward the end of the operations phase.

7.2 The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to determine the effectiveness of restoration referred to in condition 7.1. As part of the development of the follow-up program, the Proponent shall identify performance indicators that shall be used by the Proponent to evaluate the effectiveness of the restoration. The Proponent shall monitor the effectiveness of the restoration from the start of the restoration until performance indicators are met.

Response: In 2020, Prodigy developed, in consultation with Indigenous groups and relevant authorities, a draft follow-up program as part of the Wildlife and Vegetation Management Plan. It was finalized in January 2021 and provided to consulted parties in January and March 2021.

As restoration of the wetland area will be carried out during the closure phase, specific planning or action related to this EA condition will be initiated toward the end of the operations phase.

*7.3 The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to verify the accuracy of the environmental assessment as it pertains to the presence of snapping turtle (*Chelydra serpentina*) or snapping turtle eggs within the project study area. The Proponent shall implement the follow-up program during construction and operation. If the Proponent observes snapping turtle or snapping turtle eggs, the Proponent shall develop, in consultation with Indigenous groups and relevant authorities, modified or additional mitigation measures pursuant to condition 2.7, which shall include, at a minimum, the installation of exclusion fences around snapping turtle habitat, if technically feasible, or the relocation of snapping turtles outside of the project study area. The Proponent shall submit these measures to the Agency before implementing them.*

Response: In 2020, Prodigy developed, in consultation with Indigenous groups and relevant authorities, a draft follow-up program as part of the Wildlife and Vegetation Management Plan. It was finalized in January 2021 and provided to consulted parties in January and March 2021.

Alamos continued to implement the follow-up program in 2024. No snapping turtles or snapping turtle eggs were observed in 2024.

G. Accidents and Malfunctions

8.1 The Proponent shall take all reasonable measures to prevent accidents and malfunctions that may result in adverse environmental effects.

8.2 The Proponent shall, prior to construction, consult with Indigenous groups and relevant authorities on the measures to be implemented to prevent accidents and malfunctions.

8.3 The Proponent shall, prior to construction and in consultation with Indigenous groups and relevant authorities, develop an accident and malfunction response plan in relation to the Designated Project. The accident and malfunction plan shall include:

8.3.1 the types of accidents and malfunctions that may cause adverse environmental effects;

8.3.2 the measures to be implemented in response to each type of accident and malfunction referred to in condition 8.3.1 to mitigate any adverse environmental effect(s) caused by the accident or malfunction; and

8.3.3 the role of Indigenous groups in the implementation of the accident and malfunction plan.

Response: In 2020, Prodigy developed a draft Accident and Malfunction Response Plan in consultation with Indigenous groups and relevant authorities, which includes measures to prevent accidents and malfunctions as well as measures to respond to them. Prodigy finalized the Plan in January 2021 and provided the final program to consulted parties in January and March 2021.

8.4 In the event of an accident or malfunction with the potential to cause adverse environmental effects, the Proponent shall immediately implement the measures appropriate to the accident or malfunction as described in the accident and malfunction response plan referred to in condition 8.3.2 and shall:

8.4.1 Notify, as soon as possible, Indigenous groups and relevant authorities of the accident or malfunction, and notify the Agency in writing no later than 24 hours following the accident or malfunction. For the notification to Indigenous groups and the Agency, the Proponent shall specify:

8.4.1.1 the date the accident or malfunction occurred;

8.4.1.2 a description of the accident or malfunction;

8.4.1.3 a list of any substances potentially released in the environment as a result of the accident or malfunction.

8.4.2 Submit a written report to the Agency no later than 30 days after the day on which the accident or malfunction occurred. The written report shall include:

8.4.2.1 a detailed description of the accident or malfunction and of its adverse environmental effects and any associated potential health risks;

8.4.2.2 a description of the measures that were taken by the Proponent to mitigate the adverse environmental effects caused by the accident or malfunction;

8.4.2.3 any view(s) from Indigenous groups and advice from relevant authorities received with respect to the accident or malfunction, its adverse environmental effects, the associated potential health risks and the measures taken by the Proponent to mitigate these adverse environmental effects;

8.4.2.4 a description of any residual adverse environmental effects and any modified or additional measures required by the Proponent to mitigate residual adverse environmental effects; and

8.4.2.5 details concerning the implementation of the accident or malfunction response plan referred to in condition 8.3.

8.4.3 Submit a written report to the Agency no later than 90 days after the day on which the accident or malfunction occurred that includes a description of changes made to avoid a subsequent occurrence of the accident or malfunction and of the modified or additional measure(s) implemented by the Proponent to mitigate and monitor residual adverse environmental effects and to carry out any required progressive reclamation, taking into account the information submitted in the written report pursuant to condition 8.4.2. The report shall include all additional views from Indigenous groups and advice from relevant authorities received by the Proponent since the views and advice referred to in condition 9.4.2.3 were received by the Proponent.”

Response: In 2024, there were eight incidents that were externally reportable by the criteria specified in the Accident and Malfunction Response Plan. The following provides the dates on which relevant authorities and Indigenous groups were first notified, and when the 30-day and 90-day reports were submitted to the Agency. Two events from 2023 are included as some of their reporting was submitted in 2024.

- October 6, 2023 diesel spill (Event Reference No. 1-3WVOPL)
 - Notification to relevant authorities: October 7, 2023
 - Submission of 30-day report: November 5, 2023
 - Submission of 90-day report: January 4, 2024
- December 7, 2023 antifreeze/coolant spill (Event Reference No. 1-4H6MIR)
 - Notification to relevant authorities: December 7, 2023
 - Submission of 30-day report: January 7, 2024
 - Submission of 90-day report: March 22, 2024
- February 11, 2024 hydraulic fuel spill (Event Reference No. 1256)
 - Notification to relevant authorities: February 11, 2024
 - Submission of 30-day report: March 12, 2024
 - Submission of 90-day report: Not generated/submitted (no change from 30-day report)
- February 23, 2024 T04+ all-season oil spill (Event Reference No. 1279)
 - Notification to relevant authorities: February 24, 2024
 - Submission of 30-day report: March 24, 2024
 - Submission of 90-day report: Not generated/submitted (no change from 30-day report)
- February 25, 2024 coolant spill (Event Reference No. 1284)
 - Notification to relevant authorities: February 26, 2024
 - Submission of 30-day report: March 24, 2024
 - Submission of 90-day report: Not generated/submitted (no change from 30-day report)
- March 9, 2024 coolant, compressor oil and hydraulic oil spill (Event Reference No. 1301)

- Notification to relevant authorities: March 19, 2024 (delayed due to investigation into quantity)
- Submission of 30-day report: April 8, 2024
- Submission of 90-day report: Not generated/submitted (no change from 30-day report)
- April 26, 2024 hydraulic oil spill (Event Reference No. 1361)
 - Notification to relevant authorities: April 27, 2024
 - Submission of 30-day report: May 26, 2024
 - Submission of 90-day report: Not generated/submitted (no change from 30-day report)
- June 9, 2024 coolant and engine oil spill (Event Reference No. 1407)
 - Notification to relevant authorities: June 9, 2024
 - Submission of 30-day report: Missed
 - Submission of 90-day report: Missed
- June 13, 2024 hydraulic oil spill (Event Reference No. 1415)
 - Notification to relevant authorities: June 14, 2024
 - Submission of 30-day report: August 9, 2024
 - Submission of 90-day report: September 12, 2024
- June 28, 2024 hydraulic oil spill (Event Reference No. 1425)
 - Notification to relevant authorities: June 30, 2024 (delayed due to power outage)
 - Submission of 30-day report: August 11, 2024
 - Submission of 90-day report: September 26, 2024

Where the information described in EA condition 8.4.2.1 through 8.4.2.4 did not apply to the incident (e.g., there were no potential health risks as a result of the incident, no residual effects were expected), these topics were omitted from the 30-day report. Each 30-day report described the steps taken to implement the Accident and Malfunction Response Plan to address the incident, as required under EA condition 8.4.2.5. There were no comments received from Indigenous groups or relevant authorities requiring response and so they were omitted from the 30-day reports. The only comment from an Indigenous group was to provide a map tracking all reportable and non-reportable spills, which Alamos subsequently provided.

Where the information described in EA condition 8.4.3 did not apply to the incident (e.g., spills were cleaned up immediately and no further reclamation was required), these topics were omitted from the 90-day report. There were no comments received from Indigenous groups or relevant authorities requiring response and so they were omitted from the 90-day reports.

As noted above, the 30-day and 90-day reports for the June 13, 2024 hydraulic oil spill were missed. It should be noted clean-up of the spill and area had been completed. Alamos recognizes the importance of reporting and is committed to reporting as required moving forward.

8.5 The Proponent shall develop a communication plan in consultation with Indigenous groups. The Proponent shall develop the communication plan prior to construction and shall implement and keep it up to date during all phases of the Designated Project. The plan shall include:

8.5.1 the types of accident and malfunction requiring the Proponent to notify the respective Indigenous groups;

8.5.2 the manner by which Indigenous groups shall be notified by the Proponent of an accident or malfunction and of any opportunities for the Indigenous groups to assist in the response to the accident or malfunction; and

8.5.3 the contact information of the representatives of the Proponent that the Indigenous groups may contact and of the representatives of the respective Indigenous groups to which the Proponent provides notification.

Response: In 2020, Prodigy developed a draft Accident and Malfunction Response Plan which included a communication plan in consultation with Indigenous groups and relevant authorities. Prodigy finalized the Plan in January 2021 and provided the final Plan to consulted parties in January and March 2021. There were no revisions or updates to the plan in 2024.

H. Schedules

9.1 The Proponent shall submit to the Agency a schedule for all conditions set out in this Decision Statement no later than 60 days prior to the start of construction. This schedule shall detail all activities planned to fulfill each condition set out in this Decision Statement and the commencement and estimated completion month(s) and year(s) for each of these activities.

9.2 The Proponent shall submit to the Agency a schedule outlining all activities required to carry out all phases of the Designated Project no later than 60 days prior to the start of construction. The schedule shall indicate the commencement and estimated completion month(s) and year(s) and duration of each of these activities.

Response: In 2020, prior to construction, Prodigy submitted the initial versions of the Schedule of EA Decision Statement Conditions per EA condition 9.1 and the Schedule of All Activities per EA condition 9.2 to the Agency.

9.3 The Proponent shall submit to the Agency in writing an update to schedules referred to in conditions 9.1 and 9.2 every year no later than March 31, until completion of all activities referred to in each schedule.

9.4 The Proponent shall provide to the Agency revised schedules if any change is made to the initial schedules referred to in conditions 9.1 and 9.2 or to any subsequent update(s) referred to in condition 9.3, upon revision of the schedules.

9.5 The Proponent shall provide Indigenous groups with the schedules referred to in conditions 9.1 and 9.2 and the updates or revisions to the initial schedules pursuant to condition 9.3 and 9.4 at the same time the Proponent provides these documents to the Agency.

Response: Updates to the two schedules referenced in EA conditions 9.1 and 9.2 are provided to the Agency and Indigenous groups with the Annual Report submissions as required. Alamos is submitting updated schedules as part of this 2024 Annual Report in Appendices B and C.

I. Record Keeping

10.1 The Proponent shall maintain all records relevant to the implementation of the conditions set out in this Decision Statement. The Proponent shall retain the records and make them available to the Agency throughout construction and operation and for 25 years following the end of operation or until the end of decommissioning of the Designated Project, whichever comes first. The Proponent shall provide the aforementioned records to the Agency upon demand within a timeframe specified by the Agency.

10.2 The Proponent shall retain all records referred to in condition 10.1 at a facility in Canada and shall provide the address of the facility to the Agency. The Proponent shall notify the Agency at least 30 days prior to any change to the physical location of the facility where the records are retained, and shall provide to the Agency the address of the new location.

Response: Alamos maintains all records relevant to the implementation of the conditions set out in the January 24, 2019 EA Decision Statement, last amended July 26, 2024. Most records are digital and can be accessed at the Project site or at Alamos offices in Dubreuilville and Toronto, Ontario:

Magino Mine Office
12 Goudreau Road
Dubreuilville, Ontario
P0S 1B0

Island Gold District Office
21 Rue des Pins
Dubreuilville, Ontario
P0S 1B0

Toronto Office
181 Bay Street, Suite 3910
Toronto, Ontario
M5J 2T3

Other records are paper and are maintained at the Project site until such a time where they can be transferred to the Dubreuilville office and/or stored/ entered digitally.

10.3 The Proponent shall notify the Agency of any change to the contact information of the Proponent included in this Decision Statement.

Response: On July 12, 2024, Alamos Gold acquired Prodigy Gold as its subsidiary, and continued operations at Magino Mine as part of its greater Island Gold District operations. The Agency was notified August 9, 2024 about Alamos acquiring Magino Mine, as well as the change in proponent contact information to Colin Webster (as provided in the Introduction).

J. Greenhouse Gas Management Plan

The original EA Decision Statement issued January 24, 2019 was amended August 23, 2023 and included a new condition, EA condition 11, related to the creation and implementation of a Greenhouse Gas Management Plan. Alamos completed and submitted a Greenhouse Gas Management Plan to ECCC in May 2024. The EA Decision Statement was subsequently amended July 26, 2024 and removed EA condition 11 pursuant to subsection 308(1) of the Budget Implementation Act, 2024, because the condition was “solely related to transboundary atmospheric effects, and as such, could not have been included in a decision statement issued under the amended IAA” (ECCC letter correspondence to Prodigy, July 2024).

Nonetheless, Alamos is committed to managing greenhouse gas emissions from the Project and is working towards reducing its dependence on its LNG Plant for energy by establishing the infrastructure required to use electrical energy from the grid.

APPENDIX A: CONCORDANCE TABLE – AMENDED EA CONDITIONS (JULY 2024) vs ANNUAL REPORT SECTIONS

July 26, 2024 Amended EA Conditions		Annual Report Section
Applicable Sections	EA Condition #	
General Conditions		
Qualified Individuals / Best Practices	2.1	Section 2.A-1
Consultation	2.2-2.3	Section 2.A-2
Follow-up and Adaptive Management	2.4-2.8	Section 2.A-3
Annual Reporting	2.9-2.10	Section 2.A-4
Information Sharing	2.11-2.12	Section 2.A-5
Change of Proponent	2.13	Section 2.A-6
Change to the Designated Project	2.14-2.15	Section 2.A-7
Fish and Fish Habitat	3.1-3.19	Section 2.B
Migratory Birds	4.1-4.5	Section 2.C
Health of Indigenous Peoples	5.1-5.4	Section 2.D
Current Use of Lands and Resources for Traditional Purposes	6.1-6.6	Section 2.E
Wetlands	7.1-7.3	Section 2.F
Accidents and Malfunctions	8.1-8.5	Section 2.G
Schedules	9.1-9.5	Section 2.H
Record Keeping	10.1-10.3	Section 2.I
Greenhouse Gas Management Plan	11 (revoked)	Section 2.J

APPENDIX B: SCHEDULE OF EA DECISION STATEMENT CONDITIONS (AS PER EA CONDITION 9.1)

Table 1: Schedule of Key Project Milestones

Project Phase	Years	Estimated Duration
Construction	2 years	February 2021 to May 2023
Operation	15 years	Commissioning: May 2023 to November 2023 Commercial Production: November 2023 to December 2038
Decommissioning (Active Closure)	3 years	January 2039 to December 2041
Abandonment (Post-Closure)	Approximately 50 years; includes 7 years of Active Monitoring until closure objectives are satisfied (in addition to Active Monitoring undertaken during Decommissioning) followed by Passive Abandonment	Active Monitoring: January 2042 to December 2048 Full Abandonment including Passive Abandonment: January 2042 to December 2091

Table 2: Schedule of Decision Statement Conditions (per EA Decision Statement Condition 9.1)

Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
General Conditions				
Qualified Individuals / Best Practices				
2.1	<p>“The Proponent shall ensure that its actions in meeting the conditions set out in this Decision Statement during all phases of the Designated Project are considered in a careful and precautionary manner, promote sustainable development, are informed by the best information and knowledge available at the time the Proponent takes action, including community and Indigenous traditional knowledge, are based on methods and models that are recognized by standard-setting bodies, are undertaken by qualified individuals, and have applied the best available economically and technically feasible technologies.”</p>	January 2019	End of all Project phases (on or about December 2091)	
Consultation				
2.2	<p>“The Proponent shall, where consultation is a requirement of a condition set out in this Decision Statement:</p> <p>2.2.1 provide a written notice of the opportunity for the party or parties being consulted to present their views and information on the subject of the consultation;</p> <p>2.2.2 provide all information available and relevant on the scope and the subject matter of the consultation and a period of time taking into account the views of the party or parties being consulted, not to be less than 15 days, to prepare their views and information;</p> <p>2.2.3 undertake an impartial consideration of all views and information presented by the party or parties being consulted on the subject matter of the consultation; and</p> <p>2.2.4 advise in a timely manner the party or parties being consulted on how the views and information received have been considered by the Proponent.”</p>	January 2019	End of all Project phases (on or about December 2091)	Alamos continues to consult with stakeholders and Indigenous groups on EA conditions and related topics.

Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
2.3	<p>“The Proponent shall, where consultation with Indigenous groups is a requirement of a condition set out in this Decision Statement, communicate with each Indigenous group with respect to the manner to satisfy the consultation requirements referred to in condition 2.2, including methods of notification, the type of information and the period of time to .be provided when seeking input, the process to be used by the Proponent to undertake impartial consideration of all views and information presented on the subject of the consultation, and the period of time and the means to advise Indigenous groups of how their views and information were considered by the Proponent.”</p>	January 2019	End of all Project phases (on or about December 2091)	
Follow-up and Adaptive Management				
2.4	<p>“The Proponent shall, where a follow-up program is a requirement of a condition set out in this Decision Statement, determine, as part of the development of each follow-up program and in consultation with the party or parties being consulted during the development, the following information:</p> <p>2.4.1 the methodology, location, frequency, timing and duration of monitoring associated with the follow-up program;</p> <p>2.4.2 the scope, content and frequency of reporting of the results of the follow-up program;</p> <p>2.4.3 the levels of environmental change relative to baseline conditions that would require the Proponent to implement modified or additional mitigation measure(s), including instances where the Proponent may require Designated Project activities to be stopped; and</p> <p>2.4.4 the technically and economically feasible mitigation measures to be implemented by the Proponent if monitoring conducted as part of the follow-up program shows that the levels of environmental change referred to in condition 2.4.3 have been reached or exceeded and the timing for implementing the modified or additional mitigation measures.”</p>	October 2020	January 2021	

Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
2.5	“The Proponent shall maintain the information referred to in condition 2.4 during the implementation of each follow-up program in consultation with the party or parties being consulted during the development of each follow-up program.”	January 2021	End of all Project phases (on or about December 2091)	
2.6	“The Proponent shall provide the follow-up programs referred to in conditions 3.16, 3.17, 3.18, 3.19, 4.4, 4.5, 5.3, 5.4, 6.5, 6.6, 7.2 and 7.3 to the Agency and to the party or parties being consulted during the development of each follow-up program prior to the implementation of each follow-up program. The Proponent shall also provide any update(s) to the Agency and to the party or parties being consulted during the development of each follow-up program within 30 days of the follow-up program being updated.”	January 2021	On or about December 2048	Updates to be provided if/when necessary.

Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
2.7	<p>“The Proponent shall, where a follow-up program is a requirement of a condition set out in this Decision Statement and in consultation with the party or parties being consulted during the development of the follow- up program:</p> <p>2.7.1 conduct the follow-up program according to the information determined pursuant to condition 2.4;</p> <p>2.7.2 undertake monitoring and analysis to verify the accuracy of the environmental assessment as it pertains to the particular condition and/or to determine the effectiveness of any mitigation measure(s);</p> <p>2.7.3 determine whether modified or additional mitigation measures are required based on the monitoring and analysis undertaken pursuant to condition 2.7.2; and</p> <p>2.7.4 if modified or additional mitigation measures are required pursuant to condition 2.7.3, develop and implement these mitigation measures in a timely manner and monitor them pursuant to condition 2.7.2.”</p>	February 2021 at the earliest	On or about December 2048	<p>Follow-up programs have been developed and outline the requirements for monitoring and implementation of mitigations.</p> <p>Follow-up programs allow for adaptive management to ensure mitigations where required are changed or amended to manage the identified impact.</p> <p>Project follow-up programs verify the accuracy of the EA and describe the process for mitigating any additional effects identified during monitoring.</p>
2.8	<p>“Where consultation with Indigenous groups is a requirement of a follow-up program, the Proponent shall discuss with each Indigenous group opportunities for their participation in the development and implementation of the follow-up program, including the analysis of the follow- up results and whether modified or additional mitigation measures are required, as set out in condition 2.7”</p>	October 2020	End of all Project phases (on or about December 2091)	

Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
Annual Reporting				
2.9	<p>“The Proponent shall, commencing in the reporting year during which the Proponent begins the implementation of the conditions set out in this Decision Statement, prepare an annual report that sets out:</p> <p>2.9.1 the activities undertaken by the Proponent in the reporting year to comply with each of the conditions set out in this Decision Statement;</p> <p>2.9.2 how the Proponent complied with condition 2.1;</p> <p>2.9.3 for conditions set out in this Decision Statement for which consultation is a requirement, how the Proponent considered any views and information that the Proponent received during or as a result of the consultation;</p> <p>2.9.4 the information referred to in conditions 2.4 and 2.5 for each follow-up program;</p> <p>2.9.5 the results of the follow-up program requirements identified in conditions 3.16, 3.17, 3.18,3.19, 4.4, 4.5, 5.3, 5.4, 6.5, 6.6, 7.2 and 7.3;</p> <p>2.9.6 any modified or additional mitigation measures implemented or proposed to be implemented by the Proponent, as determined under condition 2.7;</p> <p>2.9.7 any change(s) to the Designated Project in the reporting year for which the Proponent determined that condition 2.14 did not apply.”</p>	January 2019	On or about December 2041	
2.10	<p>“The Proponent shall submit to the Agency the annual report referred to in condition 2.9, including a plain language executive summary in both official languages, no later than March 31 following the reporting year to which the annual report applies.”</p>	March 2020 (2019 Annual Report)	On or about December 2041	Annual reports have been submitted every year since the 2019 Annual Report.
Information Sharing				

Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
2.1 1	“The Proponent shall publish on the Internet, or any medium which is publicly available, the annual reports and the executive summaries referred to in conditions 2.9 and 2.10, the offsetting plan(s) referred to in condition 3.14, the reports related to accidents and malfunctions referred to in conditions 8.4.2 and 8.4.3, the communication plans referred to in conditions 6.1 and 8.5, the schedules referred to in conditions 9.1, and 9.2, and any update(s) or revision(s) to the above documents, upon submission of these documents to the parties referenced in the respective conditions. The Proponent shall keep these documents publicly available for 25 years following the end of operation, or until the end of decommissioning of the Designated Project, whichever comes first. The Proponent shall notify the Agency and Indigenous groups of the availability of these documents within 48 hours of their publication.”	April 2020 (2019 Annual Report)	On or about December 2063	Alamos makes all versions of the documentation accessible to the public upon request at their offices in Dubreuilville and Toronto, Ontario, or upon request at info@alamosgold.com or 1-866-788-8801.
2.1 2	“When the development of a plan is a requirement of a condition set out in this Decision Statement, the Proponent shall submit the plan to the Agency prior to construction, unless otherwise required through the condition.”	October 2020	January 2021	
Change of Proponent				
2.1 3	“The Proponent shall notify the Agency and Indigenous groups in writing no later than 30 days after the day on which there is a transfer of ownership, care, control or management of the Designated Project in whole or in part.”	As required	End of all Project phases (on or about December 2091)	On July 12, 2024, Alamos Gold Inc, acquired Prodigy Gold Inc. as its subsidiary from Argonaut Gold Inc. The Agency was notified August 9, 2024.
Change to the Designated Project				

Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
2.1 4	<p>"If the Proponent is proposing to carry out the Designated Project in a manner other than described in condition 1.7, the Proponent shall notify the Agency in writing in advance of carrying out the proposed activities. As part of the notification, the Proponent shall provide:</p> <p>2.14.1 a description of the proposed change(s) to the Designated Project and the environmental effects that may result from the proposed change(s);</p> <p>2.14.2 any modified or additional measure to mitigate any environmental effect that may results from the proposed change(s) and any modified or additional follow-up requirement; and</p> <p>2.14.3 an explanation of how, taking into account any modified or additional mitigation measure referred to in condition 2.14.2, the environmental effects that may result from the proposed change(s) may differ from the environmental effects of the Designated Project identified during the environmental assessment."</p>	As required	End of all Project phases (on or about December 2091)	<p>No changes to the Designated Project that may result in adverse environmental effects have been proposed/initiated to date.</p> <p>Some notable changes include:</p> <p>Addition of the LNG Plant in 2023; Commencement of haul road construction between Island Gold Mine and the Magino mill in 2024.</p>
2.1 5	<p>"The Proponent shall provide the Agency any additional information required by the Agency about the proposed change(s) referred to in condition 2.14, which may include the results of consultation with Indigenous groups and relevant authorities on the proposed change(s) and environmental effects referred to in condition 2.14.1 and the modified or additional mitigation measures and follow-up requirements referred to in condition 2.14.2."</p>	As required	End of all Project phases (on or about December 2091)	
Fish and Fish Habitat				
3.1	<p>"The Proponent shall develop, prior to construction, and implement, during all phases of the Designated Project, measures to control erosion and sedimentation within the project study area. The Proponent shall submit these measures to the Agency before implementing them. Among other measures, the Proponent shall:</p>	October 2020	On or about December 2041	

Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
	3.1.1 use ditches and diversion berms to maintain stream bank stability; and	February 2021		
	3.1.2 use physical barriers to reduce runoff from disturbed areas.”	February 2021		
3.2	“The Proponent shall comply with the Metal and Diamond Mining Effluent Regulations and the pollution prevention provisions of the <i>Fisheries Act</i> .”	February 2021	End of all Project phases (on or about December 2091)	
3.3	“The Proponent shall collect, during construction and operation, contact water for reuse in Designated Project activities, and treat excess contact water that cannot be reused.”	May 2021	On or about December 2038	
3.4	“The Proponent shall control the flow at which excess water referred to in condition 3.3 is discharged to limit disturbance of lake bed material.”	May 2021	On or about December 2038	
3.5	“The Proponent shall install, prior to operation, and use a cyanide destruction circuit during operation to reduce cyanide concentrations in tailings before the tailings are directed to the tailings management facility.”	June 2023	On or about December 2038	
3.6	“The Proponent shall, after the end of operation and until the open-pit lake is filled, collect and direct contact water to the open-pit lake.”	On or about January 2039	On or about December 2080	
3.7	“The Proponent shall, prior to operation, implement seepage control measures at the tailings management facility and maintain these measures during operation and decommissioning.”	October 2022	On or about December 2041	

Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
3.8	“The proponent shall not connect the open-pit lake until such time as water in the open-pit lake complies with the pollution prevention provisions of the <i>Fisheries Act</i> .”	June 2039	June 2082	Corresponds to 43 years of pit filling, commencing at the end of operations phase. May start up to 3 years earlier, if mining stops and only ore stockpile processing is happening at end of life.
3.9	“The Proponent shall treat water taking into account the Canadian Council of Ministers of the Environment's <i>Canadian Water Quality Guidelines for Protection of Aquatic Life</i> .”	May 2021	On or about December 2038	
3.10	“The Proponent shall develop, prior to the start of blasting activities in or near water and in consultation with Indigenous groups, and implement, during blasting activities in or near water, mitigation measures to avoid or prevent adverse effects to fish and fish habitat from the use of explosives in a manner consistent with the <i>Fisheries Act</i> and its regulations. When developing these measures, the Proponent shall take into account Fisheries and Oceans Canada's Measures to avoid causing harm to fish and fish habitat including aquatic species at risk as it pertains to the use of explosives in or near water. The Proponent shall submit these measures to the Agency before implementing them.”	October 2020	On or about December 2038	
3.11	“The Proponent shall conduct in-water construction activities during timing windows of least risk for the area, unless otherwise agreed to by relevant federal and provincial authorities. If in-water construction activities cannot be conducted during identified timing windows of least risk, the Proponent shall develop and implement additional mitigation measures, in consultation with Indigenous groups and Fisheries and Oceans Canada, to protect fish during sensitive life stages.”	November 2021	December 2025	

Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
3.1 2	“The Proponent shall salvage and relocate fish prior to conducting any Designated Project activity requiring removal of fish habitat in a manner consistent with any license issued under the Fisheries Act and its regulations. The Proponent shall salvage and relocate fish in consultation with Indigenous groups and to the satisfaction of Fisheries and Oceans Canada and other relevant authorities.”	October 2020	December 2025	Fish Salvage began October 2020, the initial construction salvaging was completed in October 2021. Additional fish salvage was performed in sections of McVeigh Creek in 2022. No more fish salvage activities are currently planned.
3.1 3	“The Proponent shall design, install and operate the water intake structures in Goudreau Lake in a manner which reduces the incidental capture of fish by entrainment and impingement through the use of an appropriately sized fish screen, taking into account Fisheries and Oceans Canada's Freshwater Intake End-of-Pipe Fish Screen Guideline and in a manner consistent with the Fisheries Act and its regulations.”	February 2021	On or about March 2041	Currently not taking water from Goudreau Lake as it is not permitted.

Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
3.1 4	<p>“The Proponent shall develop, to the satisfaction of Fisheries and Oceans Canada and Environment and Climate Change Canada and in consultation with Indigenous groups, any offsetting plan(s) related to any residual serious harm to fish associated with the carrying out of the Designated Project. The Proponent shall implement the plan. The Proponent shall submit any approved offsetting plan(s) to the Agency prior to implementation.”</p>	January 2019	On or about January 2035	Contingency measures to be implemented and additional monitoring to be undertaken if monitoring at the end of 10 years following construction indicates that compensation/offset measures are not completed as specified in the plans, and/or are not functioning as predicted.
3.1 5	<p>“The Proponent shall, for any fish habitat offsetting measure(s) proposed in any offsetting plan(s) referred to in condition 3.14 that may cause adverse environmental effects not considered in the environmental assessment, develop and implement, following consultation with Indigenous groups, Fisheries and Oceans Canada and Environment and Climate Change Canada, measures to mitigate those effects. The Proponent shall submit these measures to the Agency before implementing them.”</p>	N/A	N/A	<p>No measures are proposed in plan(s) referred to in EA condition 3.14 that may cause adverse environmental effects not considered in the EA.</p> <p>The Fisheries Act Authorization and fish habitat plan will potentially be updated in 2025 following engagement with DFO.</p>

<p>3.1 6</p>	<p>“The Proponent shall develop, prior to the start of blasting activities in or near water and in consultation with Indigenous groups and relevant authorities, a follow-up program to determine the effectiveness of the mitigation measures as it pertains to the adverse environmental effects on fish and fish habitat, including spawning habitat, caused by blasting. The Proponent shall implement the follow-up program during blasting activities. As part of the implementation of the follow-up program, the Proponent shall:</p> <p>3.16.1 monitor instantaneous pressure and particle velocity during the first blasting event;</p> <p>3.16.2 if results of the monitoring referred to in condition 3.16.1 indicate an instantaneous pressure change greater than 100 kilo Pascals in the swim bladder of fish or that blasting produces a peak particle velocity greater than 13 millimetre per second in a spawning bed, develop, prior to the next blasting event and in consultation with relevant authorities, modified or additional mitigation measures pursuant to condition 2.7 in order to protect fish and fish habitat, including spawning habitat; and</p> <p>3.16.3 implement the modified or additional mitigation measures referred to in condition 3.16.2 during all subsequent blasting events. The Proponent shall submit these measures to the Agency before implementing them.”</p>	<p>October 2020</p>	<p>December 2025</p>	<p>Prodigy has consulted on the development and implementation of all required plans, follow-up programs and measures, and is committed to ongoing engagement on implementation. Plans outline requirements for monitoring and implementation of mitigations to manage environmental effects. Project follow-up programs verify the accuracy of the EA and describe the process for mitigating additional effects identified during the monitoring. Contingency measures to be implemented and additional monitoring to be undertaken if monitoring at the end of 10 years following construction indicates that compensation/offset measures are not completed as specified in the plans, and/or are not functioning as predicted.</p>
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<p>3.1 7</p>	<p>“The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to determine the effectiveness of the mitigation measures for the salvage and relocation of fish and as it pertains to the incidental capture of fish by entrainment and impingement from the Designated Project. The Proponent shall implement the follow-up program during all phases of the Designated Project.”</p>	<p>October 2020</p>	<p>On or about December 2038</p>	<p>Prodigy has consulted on the development and implementation of all required plans, follow-up programs and measures, and is committed to ongoing engagement on implementation. Plans outline requirements for monitoring and implementation of mitigations to manage environmental effects. Project follow-up programs verify the accuracy of the EA and describe the process for mitigating additional effects identified during the monitoring. Contingency measures to be implemented and additional monitoring to be undertaken if monitoring at the end of 10 years following construction indicates that compensation/offset measures are not completed as specified in the plans, and/or are not functioning as predicted</p>
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Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
3.1 8	“The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to verify the accuracy of the environmental assessment and to determine the effectiveness of the mitigation measures as it pertains to adverse environmental effects on fish and fish habitat caused by changes in water and sediment quality in Otto Lake and Herman Lake. The Proponent shall implement the follow-up program during all phases of the Designated Project, including the environmental effects monitoring requirements set out in Schedule 5 of the <i>Metal and Diamond Mining Effluent Regulations</i> . As part of the implementation of the follow-up program, the Proponent shall:	October 2020	On or about December 2041	Prodigy has consulted on the development and implementation of all required plans, follow-up programs and measures, and is committed to ongoing engagement on implementation. Plans outline requirements for monitoring and implementation of mitigations to manage environmental effects. Project follow-up programs verify the accuracy of the EA and describe the process for mitigating additional effects identified during the monitoring.
	3.18.1 monitor, at least quarterly, concentrations of total phosphorus, mercury, copper, silver, sulphate and ammonia in water during operation;	May 2023	On or about December 2038	
	3.18.2 monitor, at least annually, concentrations of copper, arsenic, cadmium, manganese, mercury and total phosphorus in sediments during operation;	May 2023	On or about December 2038	
	3.18.3 monitor fish health through fish tissue sampling and fish population studies. Monitoring shall include lower trophic level indicator species and shall include monitoring of fish abundance, fish population structure and other fish health metrics that shall be determined in consultation with Indigenous groups and relevant authorities. The Proponent shall conduct monitoring for one year prior to operation and at least twice a year for the first three years of operation and shall:	October 2021	December 2025	
	3.18.3.1 if the results of monitoring during the first three years of operation demonstrate that no adverse environmental effects to fish and fish habitat from Designated Project activities are occurring, continue monitoring every three years after the first three years for a duration that shall be determined in consultation with Indigenous groups and relevant authorities; or	October 2022	To be determined in consultation with Indigenous groups and relevant authorities	

Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
	3.18.3.2 if the results of monitoring during the first three years of operation demonstrate that adverse environmental effects to fish and fish habitat from Designated Project activities are occurring, determine, in consultation with Indigenous groups and relevant authorities, with what frequency and for what duration additional monitoring shall occur;	October 2022	To be determined in consultation with Indigenous groups and relevant authorities	
	3.18.4 monitor nutrient levels, algae abundance, and dissolved oxygen levels. In doing so the Proponent shall: 3.18.4.1 conduct monitoring one year prior to operation;	September 2021	On or about April 2023	
	3.18.4.2 conduct monitoring at least twice a year for the first three years of operation and:	October 2022	On or about December 2025	
	3.18.4.2.1 if the results of the monitoring referred to in condition 3.18.4.2 demonstrate a statistically significant change with the results of monitoring referred to in condition 3.18.4.1, conduct a fish habitat utilization survey to verify that these changes do not cause adverse environmental effects to fish and fish habitat. The Proponent shall determine the methodology, the frequency and the duration of this survey in consultation with Indigenous groups and relevant authorities.	October 2022	After December 2025 (survey duration to be determined in consultation with Indigenous groups and relevant authorities)	
	3.18.4.3 after the third year of operation, the Proponent shall: 3.18.4.3.1 continue monitoring of nutrient levels, algae abundance and dissolved oxygen levels every three years for a duration that shall be determined in consultation with Indigenous groups and relevant authorities, if the results of monitoring referred to in condition 3.18.4.2 demonstrate that no adverse environmental effects to fish and fish habitat from Designated Project activities are occurring; or	After December 2025	To be determined in consultation with Indigenous groups and relevant authorities	

Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
	3.18.4.3.2 continue monitoring at a frequency and duration that shall be determined in consultation with Indigenous groups and relevant authorities, if the results of monitoring referred to in condition 3.18.4.2 demonstrate that adverse environmental effects to fish and fish habitat from Designated Project activities are occurring.	After December 2025	To be determined in consultation with Indigenous groups and relevant authorities	
	3.18.5 if results of the monitoring referred to in conditions 3.18.1, 3.18.2, 3.18.3 or 3.18.4 or the results of the fish habitat utilization survey referred to in condition 3.18.4.2.1 demonstrate that modified or additional mitigation measures are required to protect fish and fish habitat from changes to water and sediment quality, develop and implement modified or additional mitigation measures pursuant to condition 2.7, which shall include, at a minimum, the installation and use of an effluent treatment facility. The Proponent shall submit these measures to the Agency before implementing them.”	On or about September 2021	To be determined in consultation with Indigenous groups and relevant authorities	

Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
3.19	<p>“The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to verify the accuracy of the environmental assessment and to determine the effectiveness of the mitigation measures as it pertains to the adverse environmental effects on fish and fish habitat in Otto Lake, Herman Lake and Goudreau Lake from changes in groundwater quality caused by the Designated Project. The Proponent shall implement the follow-up program during all phases of the Designated Project in consultation with Indigenous groups. As part of the implementation of the follow-up program, the Proponent shall:</p>	October 2020	On or about December 2045 (at a minimum, monitoring program will be re-assessed to determine groundwater monitoring requirements, and to be determined based on the length of time needed to develop and implement the modified or additional mitigation measures)	Prodigy has consulted on the development and implementation of all required plans, follow-up programs and measures, and is committed to ongoing engagement on implementation. Plans outline requirements for monitoring and implementation of mitigations to manage environmental effects. Project follow-up programs verify the accuracy of the EA and describe the process for mitigating additional effects identified during the monitoring.

Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
	3.19.1 monitor groundwater quality using as benchmarks the comparative standards for water quality identified by the Proponent in Table 7-54 of the Environmental Impact Statement; and	April 2021	On or about December 2045 (at a minimum, monitoring program will be re-assessed to determine groundwater monitoring requirements, and to be determined based on the length of time needed to develop and implement the modified or additional mitigation measures)	

Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
	3.19.2 if the results of the monitoring referred to in condition 3.19.1 demonstrate that modified or additional mitigation measures are required to mitigate adverse environmental effects on fish and fish habitat of changes in groundwater quality caused by the Designated Project, develop and implement modified or additional mitigation measures pursuant to condition 2.7. The Proponent shall submit these measures to the Agency before implementing them.”	Spring 2022	On or about December 2045 (at a minimum, monitoring program will be re-assessed to determine groundwater monitoring requirements, and to be determined based on the length of time needed to develop and implement the modified or additional mitigation measures)	
Migratory Birds				
4.1	“The Proponent shall carry out the Designated Project in a manner that protects migratory birds and avoids harming, killing or disturbing migratory birds or destroying, disturbing or taking their nests or eggs. In this regard, the Proponent shall take into account Environment and Climate Change Canada's <i>Avoidance Guidelines</i> and the risk of incidental take. The Proponent's actions when carrying out the Designated Project shall be in compliance with the <i>Migratory Birds Convention Act, 1994</i> , the <i>Migratory Birds Regulations</i> and with the <i>Species at Risk Act</i> .”	February 2021	On or about December 2048	

Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
4.2	“The Proponent shall control lighting required during all phases of the Designated Project, including direction, timing and intensity, to avoid adverse environmental effects on migratory birds, while meeting health and safety requirements.”	February 2021	On or about December 2048	
4.3	“The Proponent shall undertake, in consultation with Indigenous groups and relevant authorities, progressive reclamation of the project study area. The Proponent shall identify, prior to the start of progressive reclamation and in consultation with Indigenous groups and relevant authorities, plant species native to the area of the Designated Project to use for revegetation as part of the progressive reclamation, including species suitable to create habitat for migratory birds.”	June 2020	On or about December 2038	
4.4	“The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to verify the accuracy of the environmental assessment as it pertains to the use by migratory birds of surface water facilities in the project study area. As part of the implementation of the follow-up program, the Proponent shall:	October 2020	January 2021	Prodigy has consulted on the development and implementation of all required plans, follow-up programs and measures, and is committed to ongoing engagement on implementation. Plans outline requirements for monitoring and implementation of mitigations to manage
	4.4.1 monitor, at times migratory birds may be present in the project study area, the use by migratory birds of the tailings management facility and the Water Quality Control Pond during all phases of the Designated Project until such time that water quality in the tailings management facility and the Water Quality Control Pond meet legislative requirements and water quality objectives. The water quality objectives are to be established using an ecological risk based approach, developed in consultation with Indigenous groups and relevant authorities;	April 2023	December 2041	

Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
	4.4.2 monitor, at times migratory birds may be present in the project study area, the use by migratory birds of the open-pit lake during decommissioning. The Proponent shall determine, in consultation with indigenous groups and relevant authorities, the frequency and duration of the monitoring during decommissioning; and	On or about January 2039	On or about December 2041	environmental effects. Project follow-up programs verify the accuracy of the EA and describe the process for mitigating additional effects identified during the monitoring.
	4.4.3 if results of the monitoring referred to in conditions 4.4.1 or 4.4.2 indicate that migratory birds use the tailings management facility, the Water Quality Control Pond or the open-pit lake, develop, in consultation with Indigenous groups, and implement deterrence measures pursuant to condition 2.7. The Proponent shall submit these measures to the Agency before implementing them”	April 2023	December 2041	
4.5	“The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to verify the accuracy of the environmental assessment and to determine the effectiveness of the mitigation measures to avoid harm to migratory birds, their eggs, and nests, including the mitigation measures used to comply with conditions 4.1 to 4.3. As part of the development of the follow-up program, the Proponent shall identify performance indicators that shall be used by the Proponent to evaluate the effectiveness of the progressive reclamation referred to in condition 4.3. The Proponent shall implement the follow-up program during all phases of the Designated Project. As part of the implementation of the follow-up program, the Proponent shall:	October 2020	On or about December 2045	Prodigy has consulted on the development and implementation of all required plans, follow-up programs and measures, and is committed to ongoing engagement on implementation. Plans outline requirements for

Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
	4.5.1 conduct migratory bird surveys annually for the first three years following completion of construction to assess changes in migratory bird populations caused by the Designated Project. The Proponent shall determine the methodology for the migratory bird surveys in consultation with Indigenous groups and relevant authorities. The Proponent shall determine, in consultation with Indigenous groups and relevant authorities and based on the results of the initial surveys, if additional surveys are required after the first three years following completion of construction and at what frequency and in which locations these additional surveys shall occur; and	November 2023	To be determined in consultation with Indigenous groups and relevant authorities	monitoring and implementation of mitigations to manage environmental effects. Project follow-up programs verify the accuracy of the EA and describe the process for mitigating additional effects identified during the monitoring.
	4.5.2 monitor the effectiveness of the progressive reclamation referred to in condition 4.3, including the establishment of native plant species to create habitat for migratory birds, annually during operation and during the first three years of decommissioning and every five years thereafter. The Proponent shall monitor the effectiveness of the progressive reclamation referred to in condition 4.3 until the Proponent has determined, in consultation with Indigenous groups and relevant authorities, that the performance indicators have been met.”	November 2023	To be determined in consultation with Indigenous groups and relevant authorities	
Health of Indigenous Peoples				
5.1	“The Proponent shall develop, prior to construction, measures to mitigate emissions of dust and fugitive particulate generated by the Designated Project, including dust associated with mine vehicles on roads located within the property boundary, that take into account the standards and criteria set out in the Canadian Council of Ministers of the Environment's <i>Canadian Ambient Air Quality Standards</i> and Ontario's <i>Ambient Air Quality Criteria</i> . The Proponent shall submit these measures to the Agency before implementing them. The Proponent shall implement these measures during construction, operation and the first three years of decommissioning. “	October 2020	On or about December 2041	

Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
5.2	“The Proponent shall undertake reagent handling and ore processing activities in an enclosed space equipped with a dust collection system. “	June 2023	On or about March 2039	
5.3	“The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to verify the accuracy of the environmental assessment and to determine the effectiveness of the mitigation measures as it pertains to the adverse environmental effects on the health of Indigenous Peoples caused by increased concentration of air contaminants, including total suspended particulates, particulate matter (PM ₁₀), fine particulate matter (PM _{2.5}), sulphur dioxide, nitrogen dioxide and cadmium. As part of the follow-up program, the Proponent shall:	October 2020	January 2021	Prodigy has consulted on the development and implementation of all required plans, follow-up programs and measures, and is committed to ongoing engagement on implementation. Plans outline requirements for monitoring and implementation of mitigations to manage environmental effects. Project follow-up programs verify the accuracy of the EA and describe the process for mitigating additional effects identified during the monitoring.
	5.3.1 identify, prior to construction, monitoring locations for air contaminants within areas used by Indigenous groups for traditional purposes for which maximum concentrations of air contaminants were predicted by the Proponent during the environmental assessment, as identified in Appendix N of the final response to Information Request 01 (Canadian Environmental Assessment Registry Reference Number 80044, Document Number 26);	January 2021	December 2022	
	5.3.2 monitor, during construction, operation and the first three years of decommissioning, air contaminants at the monitoring locations identified pursuant to condition 5.3.1, using as benchmarks the standards and criteria set out in the Canadian Council of Ministers of the Environment's <i>Canadian Ambient Air Quality Standards</i> and Ontario's <i>Ambient Air Quality Criteria</i> . The Proponent shall monitor fine particulate matter (PM _{2.5}) in real-time, particulate matter (PM ₁₀) and cadmium at a minimum every 6 days and total suspended particulates, sulphur dioxide and nitrogen dioxide at a frequency that shall allow the Proponent to monitor adverse environmental effects on human health. The Proponent shall determine the frequency of monitoring for total suspended particulates, sulphur dioxide and nitrogen dioxide in consultation with Indigenous groups and relevant authorities during the development of the follow-up program;	August 2021	On or about December 2041	

Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
	5.3.3 notify the Agency and Indigenous groups in writing within 24 hours of any exceedance(s) observed by the Proponent during monitoring referred to in condition 5.3.2 of 1-hour limits or 24-hour limits of the standards and criteria set out in the Canadian Council of Ministers of the Environment's Canadian Ambient Air Quality Standards and Ontario's Ambient Air Quality, except for fine particulate matter (PM 2.5); and	August 2021	On or about December 2041	
	5.3.4 determine, in consultation with Indigenous groups and relevant authorities, the thresholds for concentration of fine particulate matter (PM 2.5) above which the Proponent shall notify Indigenous groups. “	October 2020	January 2021	
5.4	“The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to verify the accuracy of the environmental assessment and to determine the effectiveness of mitigation measures as it pertains to the adverse environmental effects on health of Indigenous Peoples caused by contamination of water and fish. As part of the follow-up program, the Proponent shall:	October 2020	January 2021	Prodigy has consulted on the development and implementation of all required plans, follow-up programs and measures, and is committed to ongoing engagement on implementation. Plans outline
	5.4.1 identify, prior to construction, fish species that shall be monitored, waterbodies where Indigenous use is expected and where contaminants shall be monitored;	October 2020	January 2021	

Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
	5.4.2 monitor mercury, methylmercury, cobalt, lead and arsenic in surface water in Otto Lake and other downstream waterbodies identified pursuant to condition 5.4.1 during all phases of the Designated Project;	On or about February 2021	On or about December 2041 (monitoring for background and receiver monitoring locations will be re-assessed after the 10-year sampling period)	requirements for monitoring and implementation of mitigations to manage environmental effects. Project follow-up programs verify the accuracy of the EA and describe the process for mitigating additional effects identified during the monitoring.
	5.4.3 monitor mercury, methylmercury, cobalt, lead and arsenic in surface water in Goudreau Lake and other downstream waterbodies identified pursuant to condition 5.4.1 during decommissioning;	On or about December 2038	On or about December 2041	
	5.4.4 monitor mercury, methylmercury, lead, arsenic and cobalt in fish tissue in Otto Lake and other downstream waterbodies identified pursuant to condition 5.4.1 every three years during all phases of the Designated Project, starting the first year of construction, and every five years after the end of decommissioning. The Proponent shall determine, in consultation with Indigenous groups and relevant authorities, if additional monitoring must be implemented after the end of decommissioning; and	October (Fall) 2021	To be determined in consultation with Indigenous groups and relevant authorities	

Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
	5.4.5 monitor mercury, methylmercury, lead, arsenic and cobalt in fish tissue in Goudreau Lake and other downstream waterbodies identified pursuant to condition 5.4.1 every three years starting at the beginning of decommissioning and for a duration that shall be determined in consultation with Indigenous groups and relevant authorities. “	On or about January 2039	On or about December 2041 (at a minimum, duration to be determined in consultation with Indigenous groups and relevant authorities)	
Current Use of Lands and Resources for Traditional Purposes				
6.1	<p>“The Proponent shall develop, prior to construction and in consultation with Indigenous groups, a communication plan to share information related to the Designated Project and the adverse environmental effects of the Designated Project with Indigenous groups. The Proponent shall implement and maintain the communication plan up-to-date during all phases of the Designated Project. The communication plan shall include procedures, including timing and methods, for sharing information on the following:</p> <p>6.1.1 the location and timing of Designated Project activities that may affect quality of experience to Indigenous uses of lands for traditional purposes caused by changes in dust, noise or light within the property boundary and that may permanently or temporarily affect navigation within the project study area;</p> <p>6.1.2 the results of the follow-up program referred to in conditions 3.16, 3.17, 3.18, 3.19, 4.4, 4.5, 5.3, 5.4, 6.5, 6.6, 7.2, and 7.3, including any potential health risks, in plain language, and the modified or additional mitigation measures developed and implemented by the Proponent pursuant to condition 2.7 for each follow-up program.”</p>	October 2020	End of all Project phases (on or about December 2091)	Monitoring will be re-assessed following the period of Active Monitoring to determine if further action is needed as described in the <i>Closure Plan</i> .

Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
6.2	<p>“The Proponent shall develop, as part of the communication plan referred to in condition in 6.1, procedures for Indigenous groups to provide feedback to the Proponent about adverse environmental effects caused by the Designated Project related to access to and use of lands for traditional purposes, and procedures for the Proponent to document and respond in a timely manner to the feedback received and demonstrate how issues have been addressed, including through the implementation of additional or modified mitigation measures. The Proponent shall implement these procedures during all phases of the Designated Project.”</p>	October 2020	End of all Project phases (on or about December 2091)	

Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
6.3	<p>“The Proponent shall develop, prior to construction and in consultation with Indigenous groups, a Historic Resources Management Plan for structures, sites, or things of historical, archaeological, paleontological, or architectural significance. The Proponent shall implement the plan during all phases of the Designated Project. As part of the plan, for any previously unidentified structures, sites or things of historical, archaeological, paleontological or architectural significance discovered within the property boundary by the Proponent or brought to the attention of the Proponent by an Indigenous group or another party during any phase of the Designated project, the Proponent shall:</p> <p>6.3.1 immediately halt work at the location of the discovery, except for actions required to be undertaken to protect the integrity of the discovery;</p> <p>6.3.2 delineate an area with a radius of at least 30 metres around the discovery as a no-work zone and monitor any work conducted within 50 metres around the discovery;</p> <p>6.3.3 conduct an assessment at the location of the discovery;</p> <p>6.3.4 inform the Agency and Indigenous groups within 24 hours of the discovery, and allow Indigenous groups to monitor and participate in the archeological work; and</p> <p>6.3.5 consult Indigenous groups and relevant authorities on the manner by which to comply with all applicable legislative or legal requirements and associated regulations and protocols respecting the discovery, recording, transferring and safekeeping of previously unidentified structures, sites or things of historical, archaeological, paleontological or architectural significance. “</p>	September 2019	End of all Project phases (on or about December 2091)	

Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
6.4	<p>“As part of the progressive reclamation referred to in condition 4.3, the Proponent shall:</p> <p>6.4.1 identify, prior to the start of progressive reclamation and in consultation with Indigenous groups and relevant authorities, species of interest to Indigenous peoples to use for revegetation as part of the progressive reclamation; and</p> <p>6.4.2 develop, prior to the start of progressive reclamation and in consultation with Indigenous groups and relevant authorities, and implement, during all phases of the Designated Project, measures to manage the spread of invasive species. The Proponent shall submit these measures to the Agency before implementing them.”</p>	June 2020	End of all Project phases (on or about December 2091)	

Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
6.5	<p>“The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, and implement, during all phases of the Designated Project, a follow-up program to verify the accuracy of the environmental assessment as it pertains to the adverse environmental effects of the Designated Project on the current use of lands and resources for traditional purposes caused by changes in the use of the project study area by mammals, including black bear (<i>Ursus americanus</i>) and moose (<i>Alces alces</i>). As part of the development of the follow-up program, the Proponent shall identify, in consultation with Indigenous groups and relevant authorities, species of mammals, in addition to black bear (<i>Ursus americanus</i>) and moose (<i>Alces alces</i>), that shall be monitored. If the results of the monitoring indicate that these mammal species use the property, the Proponent shall implement modified or additional mitigation measures pursuant to condition 2.7 to prevent the identified species of mammals from accessing Designated Project components.”</p>		End of all Project phases	<p>Prodigy has consulted on the development and implementation of all required plans, follow-up programs and measures, and is committed to ongoing engagement on implementation. Plans outline requirements for monitoring and implementation of mitigations to manage environmental effects. Project follow-up programs verify the accuracy of the EA and describe the process for mitigating additional effects identified during the monitoring.</p>

Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
6.6	<p>“The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, and implement during all phases of the Designated Project, a follow-up program to verify the accuracy of the environmental assessment and determine the effectiveness of mitigation measures, including the mitigation measures referred to in conditions 6.1 to 6.4, as it pertains to the adverse environmental effects of the Designated Project on the current use of lands and resources for traditional purposes. The Proponent shall implement the follow-up program during all phases of the Designated Project.”</p>	October 2020	End of all Project phases (on or about December 2091)	<p>Prodigy has consulted on the development and implementation of all required plans, follow-up programs and measures, and is committed to ongoing engagement on implementation. Plans outline requirements for monitoring and implementation of mitigations to manage environmental effects. Project follow-up programs verify the accuracy of the EA and describe the process for mitigating additional effects identified during the monitoring.</p>
Wetlands				

Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
7.1	<p>“The Proponent shall restore a minimum of 40 hectares of wetland within the property boundary. The Proponent shall determine, in consultation with Environment and Climate Change Canada, methods for restoration that are technically and economically feasible and that are appropriate for the project study area.”</p>	<p>To be confirmed (toward the end of the operations phase)</p>	<p>December 2041</p>	<p>As restoration of the wetland area will be done as part of the reclamation of the tailings management facility at closure, specific planning or action related to this EA condition will be initiated toward the end of the operations phase.</p>

Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
7.2	<p>“The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to determine the effectiveness of restoration referred to in condition 7.1. As part of the development of the follow-up program, the Proponent shall identify performance indicators that shall be used by the Proponent to evaluate the effectiveness of the restoration. The Proponent shall monitor the effectiveness of the restoration from the start of the restoration until performance indicators are met.”</p>	October 2020	Until performance indicators are met.	<p>Prodigy has consulted on the development and implementation of all required plans, follow-up programs and measures, and is committed to ongoing engagement on implementation. Plans outline requirements for monitoring and implementation of mitigations to manage environmental effects. Project follow-up programs verify the accuracy of the EA and describe the process for mitigating additional effects identified during the monitoring.</p>

Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
7.3	<p>“The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, a follow-up program to verify the accuracy of the environmental assessment as it pertains to the presence of snapping turtle (<i>Chelydra serpentina</i>) or snapping turtle eggs within the project study area. The Proponent shall implement the follow-up program during construction and operation. If the Proponent observes snapping turtle or snapping turtle eggs, the Proponent shall develop, in consultation with Indigenous groups and relevant authorities, modified or additional mitigation measures pursuant to condition 2.7, which shall include, at a minimum, the installation of exclusion fences around snapping turtle habitat, if technically feasible, or the relocation of snapping turtles outside of the project study area. The Proponent shall submit these measures to the Agency before implementing them.”</p>	October 2020	On or about December 2038	<p>Prodigy has consulted on the development and implementation of all required plans, follow-up programs and measures, and is committed to ongoing engagement on implementation. Plans outline requirements for monitoring and implementation of mitigations to manage environmental effects. Project follow-up programs verify the accuracy of the EA and describe the process for mitigating additional effects identified during the monitoring.</p>
Accidents and Malfunctions				
8.1	<p>“The Proponent shall take all reasonable measures to prevent accidents and malfunctions that may result in adverse environmental effects.”</p>	February 2021	End of all Project phases (on or about December 2091)	

Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
8.2	“The Proponent shall, prior to construction, consult with Indigenous groups and relevant authorities on the measures to be implemented to prevent accidents and malfunctions.”	October 2020	On or before January 2021	
8.3	<p>“The Proponent shall, prior to construction and in consultation with Indigenous groups and relevant authorities, develop an accident and malfunction response plan in relation to the Designated Project. The accident and malfunction plan shall include:</p> <p>8.3.1 the types of accidents and malfunctions that may cause adverse environmental effects;</p> <p>8.3.2 the measures to be implemented in response to each type of accident and malfunction referred to in condition 8.3.1 to mitigate any adverse environmental effect(s) caused by the accident or malfunction; and</p> <p>8.3.3 the role of Indigenous groups in the implementation of the accident and malfunction plan.”</p>	October 2020	January 2021	Prodigy has consulted on the development and implementation of all required plans, follow-up programs and measures, and is committed to ongoing engagement on implementation.

8.4	<p>“In the event of an accident or malfunction with the potential to cause adverse environmental effects, the Proponent shall immediately implement the measures appropriate to the accident or malfunction as described in the accident and malfunction response plan referred to in condition 8.3.2 and shall:</p> <p>8.4.1 notify, as soon as possible, Indigenous groups and relevant authorities of the accident or malfunction, and notify the Agency in writing no later than 24 hours following the accident or malfunction. For the notification to Indigenous groups and the Agency, the Proponent shall specify:</p> <p>8.4.1.1 the date the accident or malfunction occurred;</p> <p>8.4.1.2 a description of the accident or malfunction;</p> <p>8.4.1.3 a list of any substances potentially released in the environment as a result of the accident or malfunction.</p> <p>8.4.2 submit a written report to the Agency no later than 30 days after the day on which the accident or malfunction occurred. The written report shall include:</p> <p>8.4.2.1 a detailed description of the accident or malfunction and of its adverse environmental effects and any associated potential health risks;</p> <p>8.4.2.2 a description of the measures that were taken by the Proponent to mitigate the adverse environmental effects caused by the accident or malfunction;</p> <p>8.4.2.3 any view(s) from Indigenous groups and advice from relevant authorities received with respect to the accident or malfunction, its adverse environmental effects, the associated potential health risks and the measures taken by the Proponent to mitigate these adverse environmental effects;</p> <p>8.4.2.4 a description of any residual adverse environmental effects and any modified or additional measures required by the Proponent to mitigate residual adverse environmental effects; and</p> <p>8.4.2.5 details concerning the implementation of the accident or malfunction response plan referred to in condition 8.3</p> <p>8.4.3 submit a written report to the Agency no later than 90 days after the day on which the accident or malfunction occurred that includes a description of changes made to avoid a subsequent occurrence of the accident or malfunction and of the modified or additional measure(s) implemented by the Proponent to mitigate and monitor residual adverse environmental effects and to carry out any required progressive reclamation, taking into account the information submitted in the written report pursuant to condition 8.4.2. The report shall include all additional views from Indigenous groups and advice from relevant authorities received by the Proponent since the views and advice referred to in condition 9.4.2.3 were received by the Proponent.” [It is understood that the reference to 9.4.2.3 should</p>	February 2021 (to be implemented as required)	End of all Project phases (on or about December 2091)	This EA condition will be implemented if/when accidents or malfunctions occur.
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Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
	be 8.4.2.3; this is an error in the original and amended Decision Statements. There is no condition 9.4.2.3.]			

Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
8.5	<p>“The Proponent shall develop a communication plan in consultation with Indigenous groups. The Proponent shall develop the communication plan prior to construction and shall implement and keep it up to date during all phases of the Designated Project. The plan shall include:</p> <p>8.5.1 the types of accident and malfunction requiring the Proponent to notify the respective Indigenous groups;</p> <p>8.5.2 the manner by which Indigenous groups shall be notified by the Proponent of an accident or malfunction and of any opportunities for the Indigenous groups to assist in the response to the accident or malfunction; and</p> <p>8.5.3 the contact information of the representatives of the Proponent that the Indigenous groups may contact and of the representatives of the respective Indigenous groups to which the Proponent provides notification.”</p>	October 2020	January 2021	
Schedules				
9.1	<p>“The Proponent shall submit to the Agency a schedule for all conditions set out in this Decision Statement no later than 60 days prior to the start of construction. This schedule shall detail all activities planned to fulfill each condition set out in this Decision Statement and the commencement and estimated completion month(s) and year(s) for each of these activities.”</p>	October 2020	October 2020	The initial version of this schedule was submitted in October 2020. This document is the annual update.
9.2	<p>“The Proponent shall submit to the Agency a schedule outlining all activities required to carry out all phases of the Designated Project no later than 60 days prior to the start of construction. The schedule shall indicate the commencement and estimated completion month(s) and year(s) and duration of each of these activities.”</p>	October 2020	October 2020	

Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
9.3	“The Proponent shall submit to the Agency in writing an update to schedules referred to in conditions 9.1 and 9.2 every year no later than March 31, until completion of all activities referred to in each schedule.”	March 2021	On or about December 2048	An initial version of the two schedules was submitted in October 2020. Subsequent versions of both schedules will continue to be incorporated into the annual IAAC Reports.
9.4	“The Proponent shall provide to the Agency revised schedules if any change is made to the initial schedules referred to in conditions 9.1 and 9.2 or to any subsequent update(s) referred to in condition 9.3, upon revision of the schedules.”	As required	On or about December 2048	
9.5	“The Proponent shall provide Indigenous groups with the schedules referred to in conditions 9.1 and 9.2 and the updates or revisions to the initial schedules pursuant to condition 9.3 and 9.4 at the same time the Proponent provides these documents to the Agency.”	October 2020	On or about December 2048	
Record Keeping				
10.1	“The Proponent shall maintain all records relevant to the implementation of the conditions set out in this Decision Statement. The Proponent shall retain the records and make them available to the Agency throughout construction and operation and for 25 years following the end of operation or until the end of decommissioning of the Designated Project, whichever comes first. The Proponent shall provide the aforementioned records to the Agency upon demand within a timeframe specified by the Agency.”	January 2019	On or about December 2063	

Condition		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Relevant Notes
#	Description			
10.2	“The Proponent shall retain all records referred to in condition 10.1 at a facility in Canada and shall provide the address of the facility to the Agency. The Proponent shall notify the Agency at least 30 days prior to any change to the physical location of the facility where the records are retained, and shall provide to the Agency the address of the new location.”	January 2019	On or about December 2063	
10.3	“The Proponent shall notify the Agency of any change to the contact information of the Proponent included in this Decision Statement.”	As required	End of all Project phases (on or about December 2091)	
Greenhouse Gas Management Plan				
11	Revoked in the amended EA Decision Statement, July 2024			

APPENDIX C: SCHEDULE OF ALL ACTIVITIES (AS PER EA CONDITION 9.2)

Table 3: Schedule of All Activities (per EA Decision Statement Condition 9.2)

Activity		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Estimated Duration	Relevant Notes
#	Description				
Construction (2 years - February 2021 to May 2023)					
1	Clearing, grubbing and site grading required for the construction of the following project components:	February 2021	February 2024	3 years	No clearing during May 15 - August 31 Additional clearing, grubbing and site grading may be required for future development during operations, such as TMF lifts and MRMF expansion.
2	the open pit;	February 2021	July 2021	7 months	Substantially complete
3	the tailings and mine rock management facilities and associated water management systems;	February 2021	February 2024	3 years	Construction phase TMF Stage 1A complete. During operations phase: - TMF Stage 1B complete Summer 2024 - TMF Stage 2 will be complete Summer 2026 - TMF Stage 3 will be complete Winter 2028 - TMF Stage 4 will be complete Winter 2032 - MRMF Clearing/Grubbing Q1, 2024
4	the ore stockpile areas;	February 2021	May 2021	4 months	Complete
5	processing plant area, including the ore stockpile, conveyor and all associated infrastructure, including reagent storage area and truck shop;	February 2021	May 2021	4 months	Complete

Activity		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Estimated Duration	Relevant Notes
#	Description				
6	the explosives storage area; and	February 2021	August 2022	18 months	Complete
7	worker accommodation area.	February 2021	May 2021	4 months	Complete
8	Building the public bypass road would be built with aggregate and overburden sourced from on-site material, and with side ditches and culverts at creek crossings. The public bypass road would be built to the grade of a primary forest road in accordance with Ontario Ministry of Natural Resources and Forestry guidance and be subject to provincial approval under the <i>Provincial Lands Act</i> .	April 2021	TBD	TBD	Proposed bypass route was not approved by MNR. Alternative routing considerations ongoing but in the meantime Alamos is escorting public through the site as required.
9	Constructing of a drainage channel north of Water Body 10 to enhance flow and drainage. Construction of flood control berm at WB10.	April 2021	TBD	TBD	SLR completed test pitting to support work on design of a flood control berm at WB10. Originally the flood control berm was to be completed in 2023, but the mining schedule has delayed the requirement for the work until further notice.
10	Constructing of a channel to connect the outflow of Spring Lake to the lower reach of McVeigh Creek, south of the bypass road.	April 2021	May 2022	2 years	Constructed May 2022, monitoring planned to determine potential modifications to support functionality.

Activity		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Estimated Duration	Relevant Notes
#	Description				
11	Decommissioning historical mine components (buildings, non-mine waste landfill, existing tailings management facility).	February 2021	December 2025	4 years	Decommissioning Historical Tailings Facility is planned to facilitate open pit mining. Completion date has not been finalized. Waste Landfill excavated and relocated Q4 2023. Other infrastructure removed – June 2023.
12	Draining waterbodies to be overprinted by the project footprint, including Lovell Lake, Webb Lake, part of McVeigh Creek and tributaries, waterbodies 1, 2, 3, 4, 5 and 10.	September 2021	TBD	TBD	Lovell Lake Treatment Pond and Waterbody 3 Treatment Pond to be overprinted in further stages of the project with TMF and MRMF development. Completion date has not been finalized. Drainage of Webb Lake complete in 2024. The portions of McVeigh Creek cutoff were dewatered as of summer 2023. Waterbodies 1 and 2 were dewatered in Summer 2023. Waterbodies 4 and 5 are now encapsulated inside of the TMF and are overprinted by tailings deposition. Waterbody 10 planned to partially become part of Goudreau Fish Habitat area; completion date has not been finalized..
13	LNG power plant	January 2022	June 2023	2 years	Commissioned in 2023.
Operation (15 years - November 2023 to December 2038)					
14	Extracting ore from the open pit.	January 2023	December 2038	16 years	Includes pre-stripping (during construction phase)

Activity		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Estimated Duration	Relevant Notes
#	Description				
15	Drilling and blasting zones of rock.	April 2021	December 2038	18 years	Activity commenced during construction and continues in operations phase.
16	Removing the material and hauling it in trucks to the processing plant, stockpile areas and mine rock management facility.	January 2023	March 2038	15 years	Activity commenced during construction and continues in operations phase.
17	Dewatering the open pit.	May 2021	December 2038	17 years	Activity commenced during construction and continues in operations phase.
18	Stockpiling of overburden, low-grade ore, and waste rock.	April 2021	December 2038	17 years	Activity commenced during construction and continues in operations phase.
19	Storing and using of explosives.	March 2021	December 2038	17 years	Activity commenced during construction and continues in operations phase.
20	Processing ore: Raw ore material extracted from the open pit or transferred from the ore stockpile will be processed through a crusher and a grinding circuit. A leaching and refining process would finely grind the ore and extract gold using cyanide and other reagents. Smelting to produce gold doré would then occur following the use of an electro-winning circuit.	May 2023	March 2039	16 years	Commercial production commenced 1 November, 2023.
21	Water-taking from Goudreau Lake to supply potable and process water.	May 2023	March 2040	17 Years	No activity thus far

Activity		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Estimated Duration	Relevant Notes
#	Description				
22	Managing mine water (effluent, runoff, and seepage) and sewage.	March 2021	March 2040	19 years	Surface water management plan is in effect. Provincial Environmental Compliance Approval for Industrial Sewage Works during operations approved in May 2023.
23	Operating roads including mine haul and service roads, potable and process water infrastructure, sewage treatment system, on-site back-up power system, and accommodation facilities.	March 2021	March 2040	19 years	Activities developed from start of construction and continue in operations phase.
24	Rehabilitating the site progressively.	May 2023	December 2038	15 Years	Limited activity during the construction and early operations phase through 2024.
Decommissioning (i.e., Active Closure, 3 years January 2039 to December 2041)					
25	Removing project components that support ore extraction, processing, and transport.	February 2039	December 2041	3 years	
26	Draining of tailings water to the open pit.	January 2041	December 2083	43 years	
27	Removing of discharge and piping systems in the tailings management facility.	January 2039	December 2041	3 years	
28	Grading of surfaces and placement of overburden and soil on portions of the tailings and mine rock management facilities, followed by selective seeding to initiate revegetation.	May 2039	October 2041	2 years	

Activity		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Estimated Duration	Relevant Notes
#	Description				
29	Constructing wildlife access ramps on the tailings and mine rock management facilities.	May 2039	December 2041	2 years	
30	Revegetating the project footprint.	May 2039	October 2041	2 years	
Abandonment (50 years, including 7 years of Active Monitoring (in addition to Active Monitoring undertaken during Decommissioning) followed by Passive Abandonment January 2042 to December 2091)					
31	Monitoring of environmental conditions (e.g., water quality in Water Quality Control Pond, seepage collection ponds and open pit) to determine when direct release to the surrounding environment would be acceptable.	April 2023	December 2083	61 years	These are expected to occur throughout operations and pit flooding. WQCP and Open Pit monitoring began prior to release authorization.
32	Monitoring of success of site rehabilitation plan.	May 2036	December 2080 [for monitoring of pit filling]	45 years	Same – some monitoring of progressive reclamation through operations as well
33	Maintaining of the Water Quality Control Pond to receive drainage from the tailings and mine rock management facilities in perpetuity.	April 2023	N/A	N/A	To be maintained in perpetuity with operations and closure

Activity		Estimated Commencement Date (Month, Year)	Estimated Completion Date (Month, Year)	Estimated Duration	Relevant Notes
#	Description				
34	Filling the open pit through natural runoff and groundwater flows. Natural filling would be supplemented with pumped water from Goudreau Lake at the same rate as freshwater taking during operations (1,680 cubic metres per day). This would take approximately 43 years.	January 2037	December 2079	43 years	
35	Connecting of the open pit lake with Goudreau Lake, upon demonstration that open pit lake water quality monitoring is suitable for discharge.	June 2080	June 2081	1 year	