



**Lynn Lake Gold Project:
Heritage and Cultural Resources
Protection Plan**

Version 0

January 30, 2025

**LYNN LAKE GOLD PROJECT:
HERITAGE AND CULTURAL RESOURCES PROTECTION PLAN**

Document History

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Revision History

Effective Date:	Date of Last Revision:
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Revision #	Date	Summary of Changes	Author

Approvals

This document requires the following approvals:

Name	Company Title	Date	Signature

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Acronyms and Abbreviations

Alamos	Alamos Gold Inc.
BP	years before present
CEAA 2012	<i>Canadian Environmental Assessment Act, 2012</i>
EAC	Environmental Advisory Committee
EIS	Environmental Impact Statement
GPS	Global Positioning System
HCRPP	Heritage and Cultural Resources Protection Plan
HRB	Historic Resources Branch
HRIA	Heritage Resources Impact Assessment
HSE	Health, Safety, and Environment
IAAC	Impact Assessment Agency of Canada
LAA	Local Assessment Area
m	metre
MECC	Manitoba Environment and Climate Change (formerly Manitoba Environment, Climate and Parks, formerly Manitoba Conservation and Climate)
MRSA	Mine Rock Storage Area
PDA	Project Development Area
QA/QC	Quality Assurance/Quality Control
RCMP	Royal Canadian Mounted Police
RGMPs	Responsible Gold Mining Principles
the Project	Lynn Lake Gold Project
TLRU	Traditional Land and Resource Use
TMF	Tailings Management Facility

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Glossary

Adaptive Management	The process of using the findings from ongoing monitoring to continually improve mitigation strategies and procedures to further lessen effects on selected valued components
Artifact	Any object manufactures, used, moved, or modified by human beings
Caches	Rock features in which supplies were stored
Chance Find	A heritage resource (including human remains) that is unearthed or discovered during the construction and operating phases of a project
Diagnostic	Any artifact that provides information as to cultural affiliation or age
Exhumation	The act of removing a buried, or once buried, human body from the grave or found location
Feature	A non-portable object or alteration to the landscape that has cultural significance.
Funerary Object	Artifacts that have been buried with an individual
Hearth	The physical remains of a firepit
Heritage Resource	The physical remains of past cultural groups
Heritage and Cultural Resources Protection Plan	The managing document plan detailing the methods and procedures of heritage and cultural resource protection for the project
Heritage Site	The specific location in which a cluster of heritage resources in a direct temporal and spatial relationship are documented
Human remains	The remains of human bodies, often recovered in skeletal form
<i>in situ</i>	In place
Matrix	The consistency and quality of the soil
Mitigation	A planned activity or process that reduces the severity of a potential effect on a selected valued component
Monitoring	A planned activity used to evaluate the progress or effectiveness of mitigation measures and verify environmental assessment predictions

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Morphology	The form, structure, and method by which an object is created
Ochre	An earthy clay colored by iron oxide – usually red, but can be yellow
Petroform	Stones that have been placed in a shape or design and may be an effigy of an animal or thunderbird nest
Post-contact	The time after the arrival of Europeans
Pottery	Storage vessels fashioned from fired clay
Precontact Period	The period of time in Canadian human history before the arrival of Europeans. In Manitoba this is generally considered to range from 13,000 years before present to the late 17 th century
Project Development Area	The immediate area in which Project activities and components may occur
Stone Alignment	Features constructed of cobbles and boulders in a meaningful way
Stratum	A layer of soil that is distinct and separate from that above and below it
Trade Goods	Items of European manufacture traded to Indigenous peoples for furs and supplies e.g., metal objects, weapons, and glass beads
Way-markers	A sign or feature that marks a portage or trail or announces a change in direction

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1.0 INTRODUCTION

The following presents the Heritage and Cultural Resource Protection Plan ('HCRPP' or 'the Plan'), which considers the construction, operation, and decommissioning/closure phases of the Lynn Lake Gold Project ('LLGP' or 'the Project') and has been developed to facilitate the identification, protection, and management of heritage or cultural resources that could potentially be affected by the Project, as well as the appropriate communication, documentation, protection, and commemoration of such resources, where necessary.

1.1 PURPOSE

The purpose of the HCRPP is to specify the monitoring activities (follow-up) required to facilitate the identification, protection, and management of heritage or cultural resources that could potentially be affected by the Project while construction, operation, and decommissioning/closure are underway and describe appropriate communication, documentation, protection, or commemoration regarding these in accordance with guidelines established by the Historic Resources Branch of Manitoba Sport, Culture, and Heritage (HRB).

1.2 OBJECTIVES

The objectives of the HCRPP are to:

- Support the implementation of chance discovery protocols for undocumented/unknown heritage and cultural resources.
- Support compliance with applicable regulatory and permit obligations regarding chance discoveries.
- Facilitate the communication of chance discoveries of heritage and cultural resources through Alamos Gold Inc.'s (Alamos') on-going Indigenous engagement program.

The objectives of the HCRPP will be met using management and monitoring commitments from the Environmental Impact Statement (EIS) for the Project (Stantec 2020), and additional input from provincial regulators, Indigenous Nations, and stakeholders. The management and monitoring criteria reflect measurable and meaningful parameters to verify key EIS predictions and to evaluate the effectiveness of mitigation measures.

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1.3 RELATIONSHIP TO OTHER MANAGEMENT PLANS

The HCRPP is intended as a general guide to protect heritage and cultural resources during the lifetime of the Project. Other plans that are applicable to the management of ground disturbances, such as the Soil Management and Rehabilitation Plan, Vegetation and Weed Management Plan, Erosion and Sediment Control Plan, Wildlife Monitoring and Management Plan, and Surface Water Monitoring and Management Plan work in concert with this plan, with measures associated with heritage and cultural resources management and mitigation.

1.4 REGULATORY CONTEXT

The EIS was submitted to the Impact Assessment Agency of Canada (IAAC) (formerly the Canadian Environmental Assessment Agency) pursuant to the *Canadian Environmental Assessment Act, 2012* (CEAA), and to Manitoba Environment and Climate Change (MECC; formerly Manitoba Environment, Climate and Parks and formerly Manitoba Conservation and Climate) as an Environment Act Proposal pursuant to *The Environment Act* of Manitoba. The relevant federal and provincial regulatory requirements related to heritage and cultural resources management are outlined below.

1.4.1 Federal Regulatory Requirements

Cultural and heritage resources require consideration relative to the Project under CEAA 2012. As noted in Section 5(1)(c) of CEAA 2012, “*the environmental effects that are to be taken into account in relation to an act or thing, a physical activity, a designated project or a project area, with respect to aboriginal peoples, an effect occurring in Canada of any change that may be caused to the environment on ... any structure, site or thing that is of historical, archaeological, paleontological, or architectural significance*”. IAAC has also published technical guidance for assessing project effects on physical and cultural heritage (CEA Agency 2015).

1.4.2 Provincial Regulatory Requirements

Guidance for developing Heritage Resource Protection Plans (HRPPs) is provided in a brief guideline document (HRB n.d.). The HCRPP has been developed to comply with Manitoba’s regulatory requirements outlined in Section 12(2) of *The Heritage Resources Act*. *The Heritage Resources Act* stipulates that if the Minister of Manitoba Sport, Culture, and Heritage has reason to believe that heritage resources or human remains that are upon, within, or beneath a site are likely to be damaged or destroyed by reason of any work, a heritage resource impact assessment (HRIA) of the Project may be required. Potential impacts to paleontological resources are also addressed in *The Heritage Resources Act*.

An HRIA is a written evaluation of the effect that a proposed development may have on heritage resources that are known or thought likely to be present at a development site. The goal of an HRIA is to facilitate investigation prior to project construction. Alamos proactively completed an HRIA of the Project in 2015 (McLeod 2016). The HRIA is separate and distinct from an environmental assessment, but the information collected during the HRIA assists in making informed decisions regarding potential residual effects and

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mitigation measures to address these effects. It also provides data required for monitoring and mitigation, such as the potential for undiscovered heritage resources in the Project area and assists with developing contingency plans and field measures that would be required if heritage resources were discovered during construction. An HRIA requirement may be issued by the HRB in the chance discovery of heritage or cultural resources.

The Province of Manitoba also enforces *The Policy Respecting the Reporting, Exhumation, and Reburial of Found Human Remains* (1987) that is administered by the HRB (HRB 2014). This policy outlines the protocols if human remains, or objects thought to be human remains, are found and provisions of the HCRPP that comply with this policy are presented in Sections 3.3 and 4.5.

1.4.3 Corporate or Other Policies

As a member of the World Gold Council, Alamos is a proud supporter of the Responsible Gold Mining Principles (the RGMPs). The ten RGMPs provide a framework that sets expectations for consumers, investors, and the downstream gold supply chain as to what constitutes responsible gold mining, addressing key environmental, social and governance issues for the gold mining sector. They are designed to provide confidence to governments, investors, employees and contractors, communities, supply chain partners and civil society that gold has been produced responsibly. Following the release of the RGMPs in September 2019, Alamos has implemented and aligned to the framework, and obtained external assurance to provide further confidence that the gold produced by Alamos is responsibly mined. In 2023, Alamos communicated its progress on implementing the RGMPs through Alamos' 2022 RGMP Progress Report which received independent audit/assurance from EEM EHS Management Inc. (Alamos 2023). The 2022 RGMP Progress Report reflects Alamos' third year reporting under the RGMP. Alamos will continue to implement the RGMPs through 2024 and beyond. Exploration sites and projects under development, such as the Lynn Lake Gold Project, are excluded from the RGMP implementation process. The RGMPs are only applicable to operating mines. The Lynn Lake Gold Project will be incorporated as it transitions through construction into operation.

Working with its members, the World Gold Council has set out RGMPs to address key environmental, social and governance issues for the gold mining sector. One of the key principles is Water, Energy and Climate Change.

Alamos also has a Sustainability Policy. For Alamos, sustainability encompasses excellence in health and safety, environmental management, community engagement, security, and human rights. The Policy outlines Alamos' commitment to build, operate and close mines in a manner that supports our sustainability vision and promotes the Alamos core values of Safety, Teamwork, Environmental Sustainability, Integrity, and Commitment. The Policy is a key element of the Alamos Sustainability Framework and is supported by Corporate Sustainability Standards that guide site procedures and practices.

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Alamos has a series of guiding corporate sustainability standards, including:

- Community
- Environmental Monitoring
- Hazard Identification & Risk Management
- Incident Classification, Investigation & Reporting

Those corporate sustainability standards that may be applicable specifically to the HCRPP include Biodiversity & Land Use (Table 1-1). Alamos’ standards are regularly updated to reflect the latest developments. For the most current and up-to-date standards, please refer to the online version.

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Table 1-1 Corporate Sustainability Standards

Corporate Standard	Requirement
Community (CSS-COM-10.1)	<p>Sites shall complete a cultural heritage screening exercise for known and potential heritage resources. The screening shall identify potential risks and verify provisions of the legal framework relevant for cultural heritage.</p> <p>The exercise should be guided by competent professionals with expertise on cultural heritage to identify the study area, take stock of all known and potential heritage resources.</p> <p>Cultural heritage screening shall involve cultural heritage authorities (i.e., relevant groups and communities [Indigenous and non-Indigenous], concerned government authorities, relevant civil society organizations, local experts, and traditional knowledge holders) to document the presence or verify the probability of the existence of cultural heritage resources.</p> <p>All stakeholder engagement should be documented and serve as a key input to developing acceptable mitigation measures.</p> <p>Where appropriate, a cultural heritage mapping exercise or other field-based survey shall be conducted to evaluate the cultural heritage resources.</p>
Community (CSS-COM-10.2)	<p>The cultural heritage screening exercise shall draw on leading international frameworks and standards including:</p> <ul style="list-style-type: none"> • IFC’s Performance Standard 8: Cultural Heritage • EBRD’s Performance Requirement 8: Cultural Heritage • UNESCO’s Convention Concerning the Protection of the World Cultural and Natural Heritage
Community (CSS-COM-10.3)	<p>All sites shall develop provisions for managing chance finds through a Chance Find Procedure (see Appendix A) which will be applied in the event that cultural heritage is subsequently discovered.</p> <p>Training shall be provided on the site’s Chance Find Procedure for all exploration and construction employees / contractors that may be involved in new site surficial disturbance.</p>

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Corporate Standard	Requirement
Community (CSS-COM-10.4)	Avoiding impacts to cultural resources is Alamos' preferred option for risk management. If impacts are unavoidable, sites shall identify and assess the feasibility of alternative locations or of alternative project designs. An assessment must be undertaken upfront and prior to any work that might impact the identified cultural resources, to ensure all reasonable steps have been taken to avoid negative impacts.
Community (CSS-COM-10.5)	If it is not possible to minimize impacts to cultural heritage resources, in situ restoration measures should be considered with the relevant communities, stakeholders, and government agencies.
Community (CSS-COM-10.6)	Relocation may be a viable option for movable cultural heritage resources if done after engaging with the relevant communities, stakeholders, and government agencies. Relocation should only be considered if strategies for avoiding and minimizing impacts have proven not to be viable.
Community (CSS-COM-10.7)	For projects that may restrict access to cultural heritage resources, risk management efforts shall focus on avoiding the need for access restrictions. For cultural heritage resources with strong cultural significance for certain groups, specific provisions shall be made to provide these groups access to the site.
Community (CSS-COM-10.8)	If cultural resources are legally protected or have been internationally recognized (such as UNESCO World Heritage Properties), Alamos shall comply with the provisions associated with the protection status and will implement additional activities, whenever possible and applicable, to enhance the conservation and management of these protected properties.
Environmental Monitoring (CSS-ENV-10.1)	Sites shall develop and implement an environmental monitoring program. The site's environmental monitoring program will be documented as to: list of points monitored, coordinates of points monitored, description of points (including the reason for monitoring (e.g., regulatory compliance, baseline, trend analysis, etc.), frequency of monitoring, anticipated duration of monitoring (e.g., the life of the mine), and parameters monitored. The monitoring program will be of sufficient scope to allow for the timely identification of potential environmental impacts prior to their migration offsite. Sites will regularly review their monitoring programs and update for and changes at the mine site as required. At a minimum, the program will meet all environmental regulatory requirements.
Environmental Monitoring (CSS-ENV-10.2)	Compliance monitoring data will be subject to Quality Assurance/Quality Control (QA/QC) verification. Sample results that do not meet QA/QC guidelines will be disregarded and sample collection repeated. Sites must use reliable and accredited labs.
Environmental Monitoring (CSS-ENV-10.3)	Monitoring data will be stored in an electronic database.
Environmental Monitoring (CSS-ENV-10.4)	When compliance monitoring results indicate exceedances from permit or regulatory requirements, or significant deviation from previous results, the results will be reconfirmed with the person or company that did the analysis, and a confirmatory monitoring or sample will be taken immediately if the result is reconfirmed. Sites will also follow any permit-specific or jurisdictional requirements.
Environmental Monitoring (CSS-ENV-10.5)	Monitoring data will be reviewed at least quarterly by the responsible manager to identify trends that may indicate potential for future exceedances from permit conditions or applicable standards, and potential risk. The site General Manager will be formally notified of any exceedances and emerging compliance issues. Refer to CSS-GOV-08 Incident Reporting Standard for any moderate, major, or catastrophic incidents.

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Corporate Standard	Requirement
Environmental Monitoring (CSS-ENV-10.6)	Sites will assess the need for a monitoring program involving external stakeholders.
Hazard Identification & Risk Management (CSS-GOV-2.1)	All Alamos locations shall maintain systems to identify, prevent and/or manage sustainability risks that face its operations and those which its activities may pose to others. This includes but is not limited to hazards and risks related to the: <ul style="list-style-type: none"> • Health and Safety of our workforce and communities, • Environmental impacts of our activities (local and downstream), • Societal and community impacts, and • Security and protection of people and property.
Hazard Identification & Risk Management (CSS-GOV-2.2)	Site Managers are responsible to ensure that appropriate resources, both internal and external, are available to identify, quantify, manage, and report sustainability hazards and risks. Assessments shall consider all site activities including: <ul style="list-style-type: none"> • Contractor works, • Regulatory requirements • Permit or license requirements, • Alamos Sustainability Standards requirements, and • Other site-specific requirements.
Hazard Identification & Risk Management (CSS-GOV-2.3)	Sites shall maintain a risk registry of all site risks. The risk registry will be updated at least quarterly or when major changes/incidents occur. Clear responsibility and authority for implementing, managing, reporting, and coordinating updates to the risk registry shall be designated to a specific employee(s).
Hazard Identification & Risk Management (CSS-GOV-2.4)	All corporate, site and task-level risks shall be assessed against the Alamos Risk Matrix, including likelihood and consequence assessments.
Hazard Identification & Risk Management (CSS-GOV-2.5)	Sites shall apply the hierarchy of controls considering (in order of priority): <ol style="list-style-type: none"> 1. Elimination – Remove the hazard 2. Substitution – Replace the hazard 3. Engineering control – physically control or isolate the hazard (e.g., dikes, guarding, interlocks) 4. Administrative control – control response/avoidance of hazard (e.g., training, procedures, reducing employee exposure to hazards, signage) 5. PPE or Mitigation – Protect people (personal protective equipment) or the environment (spill kits) from the hazard. This is the last line of defense. <p>Extreme and high risks that exist after controls have been applied should go through a formal review with the Site Manager.</p>
Hazard Identification & Risk Management (CSS-GOV-2.6)	Sites shall ensure effective communication of risks and controls to the workforce based on the nature of the activity and related risk. The nature of communication may change based on the risk frequency and consequence. For example, communication may include induction training, refresher training, policies, procedures and/or signage.
Hazard Identification & Risk Management (CSS-GOV-2.7)	For each identified risk, management shall assess and manage the risk appropriately with consideration to the risk rating. In considering risk mitigation, management must evaluate the cost of controls versus the benefit derived and ensure the resultant control framework is effective.

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Corporate Standard	Requirement
Hazard Identification & Risk Management (CSS-GOV-2.9)	The Alamos Executive and Internal Audit Director shall review and verify enterprise risks on a quarterly basis.
Incident Classification, Investigation & Reporting (CSS-GOV-8.3)	The Corporate Sustainability Team shall maintain an Incident Alert email group user list comprised of, at a minimum: <ul style="list-style-type: none"> • Alamos Executive and Management, • Country Managers, • General Managers; and • Project Managers.
Incident Classification, Investigation & Reporting (CSS-GOV-8.6)	The Corporate Sustainability Team shall provide a report on significant incidents on a quarterly basis to senior management and the Technical & Sustainability Committee of the Board.
Incident Classification, Investigation & Reporting (CSS-GOV-8.7)	Corporate Sustainability and Risk Management teams shall annually review and revise the Alamos Risk Assessment Consequence Table to ensure thresholds are consistent with the Alamos Enterprise Risk Management system.
Biodiversity & Land Use (CSS-ENV-7.2)	Prior to any surface disturbance, sites will evaluate risks of potential impacts to sensitive resources, including: <ul style="list-style-type: none"> • Cultural resources • Traditional knowledge or historical community use • Territorial lands • Historical or archeological features • Threatened or endangered wildlife and vegetation species • Sensitive areas • Sensitive habitats • Wetlands <p>If risks are identified, a Biodiversity and Land Use Management Plan will be developed, implemented and maintained in order to avoid, minimize, mitigate or offset disturbance.</p>
Biodiversity & Land Use (CSS-ENV-7.3)	Sensitive resources discovered during site activities will be reported to site management and the proper authorities. Impacts to these sensitive resources and any unauthorized collection is prohibited during project construction, operation, and closure.

Alamos respects the collective and customary rights, culture, and connection to the land of Indigenous peoples, and works closely with local Indigenous Nations and communities to be a good neighbour and partner of choice. We also collaborate with and obtain input from Indigenous Nations around our mines to help when making business decisions that may affect Indigenous-related matters. The Project is within the traditional territory of Indigenous peoples as described in Section 3 of the EIS (Alamos 2020). Alamos has an Exploration Agreement and an Impact-Benefit Agreement with Marcel Colomb First Nation and is in frequent communication with other potentially affected Indigenous Nations.

1.4.4 Approval Related Requirements

The conditions relating to heritage and cultural resources laid out in the federal Decision Statement issued under CEAA, 2012, provincial Environment Act Licence No. 3390 (Gordon), and provincial Environment Act Licence No. 3391 (MacLellan) are outlined in Table 1-2.

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Table 1-2 Approval-Related Requirements

Licence	Condition	Corresponding HCRPP Section
CEAA, 2012	7.1 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, an archaeological and heritage resource management plan for any structures, sites or things of historical, archaeological, paleontological or architectural significance discovered within the Project development areas. As part of the archaeological and heritage resource management plan, the Proponent shall:	All
CEAA, 2012	7.1.1 immediately halt work at the location of the discovery, except for actions required to be undertaken to protect the integrity of the discovery; 7.1.2 delineate an area of at least 50 metres around the discovery as a no-work zone; 7.1.3 inform the Agency and Indigenous groups in writing within 24 hours of the discovery, and allow Indigenous groups to monitor and participate in archaeological works; 7.1.4 have a qualified individual, whose expertise pertains to the requirements of Manitoba's Heritage Resources Act, conduct an assessment at the location of the discovery, including sampling and construction monitoring on landforms of similar historic potential to the discovery site(s) within the Project development areas that are planned for development, prior to development in these areas; and 7.1.5 consult with Indigenous groups and relevant authorities on the manner by which to comply with all applicable legislative or legal requirements and protocols respecting the discovery, recording, transferring and safekeeping of previously unidentified structures, sites or things of historical, archaeological, paleontological or architectural significance.	4.4 Table 3-1
CEAA, 2012	7.2 The Proponent shall develop, prior to construction and in consultation with Indigenous groups, nation-specific measures to address the effects described in the Environmental Assessment Report caused by the Designated Project on cultural heritage, including tangible and intangible losses to culture. The Proponent shall implement the measures during all phases of the Designated Project and submit these measures to the Agency prior to implementing them, while ensuring that confidential information is protected. The Proponent shall report its discussions with Indigenous groups as part of the annual report referred to in condition 2.10, including the level of satisfaction of Indigenous groups with the implementation of the measures. As part of the measures, the Proponent shall: 7.2.1 develop and/or contribute to Indigenous-led program(s) and/or initiative(s) to preserve and enhance cultural heritage, including the transfer of intergenerational knowledge	2.2 3.1
Environment Act Licence No. 3390 (Gordon)	17. The licensee shall prepare, implement and continuously maintain in current status, the following plans for the development in a manner acceptable to the director: g) Heritage and Cultural Resources Protection Plan;	All

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Licence	Condition	Corresponding HCRPP Section
Environment Act Licence No. 3390 (Gordon)	33. The licensee shall, in an effort to eliminate or mitigate potential impacts to heritage or cultural resources, provide training and guidance, acceptable to the Director of the Historic Resources Branch, on recognizing cultural and/or sensitive sites to all employees and contractors working at the development.	3.0 3.4
Environment Act License No. 3391 (MacLellan)	17. The licensee shall prepare, implement and continuously maintain in current status, the following plans for the development in a manner acceptable to the director: g) Heritage and Cultural Resources Protection Plan;	All
Environment Act License No. 3391 (MacLellan)	35. The licensee shall, in an effort to eliminate or mitigate potential impacts to heritage or cultural resources, provide training and guidance, acceptable to the Director of the Historic Resources Branch, on recognizing cultural and/or sensitive sites to all employees and contractors working at the development.	3.0 3.4

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2.0 ENVIRONMENTAL SETTING

The Project is located in northern Manitoba, near the Town of Lynn Lake. The landscape is dominated by vegetation communities typical of the boreal forest. Within and immediately surrounding the Project are forested areas, wetlands, and lakes. Existing land uses around the Project include residential, traditional, and recreational uses. Residential uses are concentrated in the communities of Lynn Lake and Marcel Colomb First Nation's Black Sturgeon Reserve lands. The lands surrounding these communities are used for traditional land uses and recreational activities.

The regional landscape was influenced by the most recent glaciation as well as by post-glacial processes.

The Project is located within the Churchill River Upland Ecoregion of the Boreal Shield Ecozone (Smith et al. 1998). The terrain ranges from level to moderately sloping. The surface topography in the region is influenced in part by the underlying bedrock structure and in part by glacial and postglacial history. Surface topography surrounding the Project is flat to gently undulating.

The dominant surficial material consists of till (Stantec 2020). The till deposits are generally thin, range from 1 to 3 m in thickness, and are generally found overlying bedrock. Thicker till deposits are also present and commonly occur as fluted landforms. Across the area, soils include Brunisolic, Cryosolic, and Organic soil orders. Non-soil areas include exposed bedrock, previously developed lands, and open water.

2.1 HUMAN ENVIRONMENT

Archaeological data, archival records, and Indigenous oral tradition agree that there is a long history of Indigenous occupation of northern Manitoba, extending back thousands of years (Map 1, Appendix A). Archaeological time in northern Manitoba includes the Early Precontact Period [from approximately 9,500 to 6,500 years before present (BP)]; the Middle Precontact Period (approximately 6,500 to 2,500 BP); and the Late Precontact Period (2,500 BP to time of contact with Europeans about 325 BP).

The Project is located within Treaty 5 which was initially signed in 1875, with adhesions in 1908 and 1909, and covers northern Manitoba and small portions of Saskatchewan and Ontario. Two Indigenous Nations in the Project area, Mathias Colomb Cree Nation and Marcel Colomb First Nation, are signatories to Treaty 6 Adhesion of 1898. Marcel Colomb Indigenous Nation's reserve lands, the Black Sturgeon Reserve lands, is the Indigenous Nation nearest to the Gordon and MacLellan sites. Current use of lands and resources for traditional purposes by Indigenous peoples continues throughout the region.

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2.2 HERITAGE RESOURCES

As regulated in Manitoba, heritage resources include objects and properties that are of importance for their architectural, historical, cultural, environmental, archaeological, palaeontological, aesthetic, or scientific value. Heritage resources are the tangible remains of past land use activities, are non-renewable, and are susceptible to loss or damage because of Project activities. Legislation that commonly applies to management of cultural and heritage resources includes: *The Heritage Resources Act* (Government of Manitoba 1986) and *The Policy Respecting the Reporting, Exhumation, and Reburial of Found Human Remains* (1987) defines “Heritage Resource” as: a) a heritage site; b) a heritage object; and c) any work or assembly of works of nature or of human endeavor that is of value for its archaeological, palaeontological, pre-historic, historic, cultural, natural, scientific, or aesthetic features, and may be in the form of sites or objects or a combination thereof (Section 1). Deliberate destruction or disturbance of heritage resources is an offence under *The Heritage Resources Act*.

There are two types of heritage resources: artifacts and features. Heritage objects (artifacts) can be as small as a single stone flake (a product from stone tool production) or as large as a cast iron stove. Other types of artifacts can include butchered animal bones, pottery, and materials such as nails, bottle glass, and beads. Features are in-place objects or changes to the landscape that are non-portable, meaning that they cannot be removed from their original location. Examples of features include petroforms. Groupings or clusters of stones were also used as waymarkers and could indicate a food cache or burial location. These physical remains can provide evidence of specific activities such as campsites, workstations, quarries, kill sites, and post-contact settlement, industry, and events.

Heritage resource sites are fragile and the product of unique processes and conditions of preservation. The vertical and horizontal positions of artifacts provide valuable context and insights, from both a time and space perspective. Thus, removing or mixing artifacts and soils, without scientific recording, results in the loss of important information about the activities that occurred at a heritage site.

No archaeological sites have been recorded at the Gordon site. Eleven archaeological sites have been recorded at the MacLellan site (Stantec 2015). These are summarized in Table 2-1 and shown on the mapping provided in Appendix A. An HRIA for the environmental assessment was conducted at the Gordon and MacLellan sites in August 2015. None of the Project components interact with known heritage resources at the MacLellan site apart from HfMf-7, which is a shed related to historical mining activities, that has been mitigated with as-found recording (measurement, photography, and presentation in the permit report). HfMf-10 is a portion of a trail within the Project Development Area (PDA). The record made of the trail during the HRIA was considered adequate mitigation by HRB. No further action is required on either of these sites. Table 2-1 lists previously recorded heritage resources recorded within the MacLellan site PDA and Local Assessment Area (LAA).

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Table 2-1 Summary of Previously Recorded Heritage Resource Sites in the Project PDA (All within the MacLellan Site PDA/LAA)

Site Type	Number	Regulatory Requirements
PDA: Camp site (HfMf-8)	1	No further concern
LAA: Camp site (HfMf-9, HfMf-11)	2	Not in conflict
PDA: Uninterpreted (HfMf-3, HfMf-4, and HfMf-6)	3	No further concern
LAA: Uninterpreted (HfMf-1, HfMf-2, HfMf-5)	3	Not in conflict
PDA: Structural (HfMf-7)	1	No further concern
PDA: Trail (HfMf-10)	1	No further concern
TOTAL	11	

2.3 HUMAN REMAINS

Human remains include the soft tissue and bones of a deceased person at any stage of decomposition. The *Heritage Resources Act* (1986), Section 43 (1) defines human remains as: “*remains of human bodies that in the opinion of the minister have heritage significance and that are situated or discovered outside a recognized cemetery or burial ground in respect of which there is some manner of identifying the persons buried therein.*”

Any bones discovered during construction, operation, and decommissioning periods of the Project, will be assumed to be human and represent a human burial site, and will be afforded protection until determined to be otherwise. While a human skull is often readily recognizable, other bones may need to be identified by an expert. Since skulls and long bones can be crushed and shattered by frost heaves or soil subsidence, it may not be possible to recognize even these more obvious human remains without expert assistance. It is common to find cultural heritage objects, or “artifacts”, associated with human remains, or as parts of grave furniture (i.e., coffins). These heritage objects, termed “funerary objects”, should be considered part of the burial, treated with the same respect, and must accompany the human remains at all times.

2.4 CULTURAL RESOURCES

The concept of cultural landscapes is used to describe any geographical area that has been modified, influenced, or given special cultural meaning by people (CEA Agency 2015). This includes sites that contain evidence that an Indigenous peoples have historically utilized an area. These resources include, but are not limited to, burial sites/graves, camp sites, sites of spiritual significance, and archaeological sites, along with Indigenous artifacts.

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Cultural value and importance are associated with physical and cultural heritage. These values may be tangible, i.e., biophysical resources, or intangible i.e., values relating to beliefs, perceptions, values, and qualitative experience. Cultural resources in the context of the HCRPP are tangible objects, features, and areas including, but not limited to:

- Trails and travelways, including navigation (Map 2, Appendix A Stantec 2018)
- Habitation areas (e.g., cabins, campsites, temporary shelters)
- Cultural and spiritual sites and areas (e.g., ceremonial sites).

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3.0 MITIGATION AND MANAGEMENT PROCEDURES

No archaeological monitors will be present on site during any of the Project phases as both the MacLellan and Gordon sites have completed an HRB-approved HRIA. Therefore, Alamos requires that persons working under its management, including employees and contractors, have the knowledge, understanding, skills, and abilities to complete work in a manner that protects the environment. Mitigation measures will include education and training for Project workers (developed in collaboration with relevant Indigenous Nations) about cultural and heritage resources and associated protocols so that the HCRPP can be effectively implemented if there is a chance find of heritage and/or cultural resources during construction, operation, and decommissioning/closure. The mitigation and management procedures outlined in the HCRPP are identical across all Project phases and locations.

Mitigation measures will be further developed during detailed Project design. Mitigation and management measures have been prepared in accordance with federal and provincial legislation and guidelines, and Alamos' corporate policies and procedures for the protection of human health and the environment.

The mitigation measures listed below were developed as part of the EIS. Additional mitigation measures identified as part of the Project approval and permitting will be incorporated into these sections in subsequent updates, as required.

3.1 CONSTRUCTION

Primary construction activities are generally expected to consist of:

- Site preparation
- Physical construction and equipment installation
- Commissioning.

There is the potential for the Project to interact with known or presently unknown heritage and cultural resources during the construction phase. All known heritage resources within the PDA have been mitigated to the satisfaction of the HRB. Known heritage resources outside the PDA are only a concern if design change alters the PDA boundary to overlap with their locations. A change in heritage resources may result in the loss of information about or alteration to site contents or context. During construction, inadvertent discoveries of heritage cultural resources will trigger the HCRPP protocols described in Sections 3.4 and 3.5.

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In-design Project mitigations to reduce chance encounters of heritage and cultural include:

- Siting facilities to avoid sensitive areas such as watercourses, areas of high archaeological potential, previously recorded archaeological resources (as per Table 2-1), and areas of importance identified by Indigenous Nations.
- Ongoing Indigenous engagement (incl. Environmental Advisory Committee [EAC]) program throughout Project planning and continuing through the permitting phase as well as construction, operation, and decommissioning/closure addressing chance encounters with heritage or cultural resources. The identification of culturally sensitive areas throughout all phases will be discussed through the EAC and may require protection measures implemented.

The potential for effects on heritage resources primarily occurs during construction, including loss or disturbance to site contents and site contexts through brush or topsoil removal, compaction, vehicle traffic, and grading.

Potential construction activities associated with the Project that could interact with heritage and cultural resources are as follows:

- Site Preparation at the Gordon and MacLellan sites ('Both Sites') (removal of existing buildings; removal of contaminated materials; vegetation clearing and earthworks; development of a temporary construction camp at the MacLellan site).
- Mine Components at Both Sites (construction of ore pads; ore, overburden and mine rock storage areas (MRSAs); mill feed storage area and crushing plant; ore milling and processing plant; and Tailings Management Facility (TMF) at the MacLellan site; water management facilities [e.g., sumps, ponds, and ditches]).
- Utilities, Infrastructure, and Other Facilities at Both Sites (construction of buildings and yards; access roads [i.e., upgrades at the Gordon and MacLellan sites] and internal mine roads; site lighting and security; power supply and distribution system; potable water treatment plant at the MacLellan site; on-site pipelines at the MacLellan site; fuel storage and distribution systems; sewage treatment facilities; domestic solid waste handling facilities).

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Specific mitigation measures for cultural resources during construction include the following proposed methods to mitigate Project adverse residual effects for current use of lands and resources for traditional purposes:

- Construction and operation activities will be restricted to the PDAs, as much as possible, to reduce disturbances to adjacent forest land.
- Site clearing and disturbance will be limited to the Project footprint and associated access routes.
- Existing access roads and trails will be used to the extent possible; access routes will be refurbished in compliance with provisions of *The Crown Lands Act* and *The Mines and Minerals Act*.
- Apart from a portion of a trail (HfMf-10), which does not require further mitigation, no known cultural and spiritual sites or areas are in the PDA. Alamos' ongoing Indigenous engagement program will facilitate development of mitigation measures if additional cultural and spiritual sites are reported or discovered during construction and operation phases.

Identification of borrow sources is ongoing. Detailed Project planning to identify the location and scope of borrow pit operation will be undertaken in consideration of environmental constraints to avoid or reduce interactions with sensitive features such as archaeological resources, watercourses, and wetlands, or known areas of habitat for rare species. It is assumed that quarries and other borrow sources owned and operated by third parties will be operated in accordance with permit requirements and best practices stipulated by the applicable regulatory authorities. Borrow sources will require a review by the HRB, which will determine whether a pre-construction HRIA is required at any of the locations, and specify the actions recommended.

3.1.1 Gordon Site

Construction and operation at the Gordon site will not interact with known heritage resources because none have been previously recorded in the PDA/LAA and there is a low potential for such resources to be present based on predictive modelling. The Traditional Land and Resource Use (TLRU) studies completed for the Project (see Section 2.3) report no culturally important spaces in the PDA/LAA (Map 2).

The ore and overburden stockpile locations at the Gordon site were not considered to have high heritage resource potential based on predictive modelling and the extent of previous disturbance. No archaeological sites have been previously recorded at the Gordon site. Field assessments at this location did not record heritage resources.

Direct and indirect potential effects from the Project on potential unknown heritage resources at the Gordon site include:

- Direct effects may occur during construction and include loss or disturbance to site contents and site contexts through brush or topsoil removal, compaction, vehicle traffic, grading for access roads and infrastructure, and mine infrastructure construction.
- Indirect effects may include unauthorized collection of heritage resources if the Project creates new human access opportunities or exposes artifacts.

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Mitigation measures recommended for the Gordon site include:

- Implementation of the HCRPP when heritage or cultural resources, or objects thought to be heritage or cultural objects, are exposed.
- Evaluation by a professional archaeologist of changes to the PDA/LAA or the addition of development components.
- Education of construction contractors for the appropriate protocols if heritage or cultural resources, or objects thought to be heritage or cultural resources, are discovered.

3.1.2 MacLellan Site

Development within the MacLellan site is primarily located in areas that would have experienced limited human activity given the nature of the terrain and lack of navigable and potable water. Locations along the Keewatin River would have been more conducive for human occupation and resource harvesting. The lone exception is the upland area where exposed quartz veins may have been quarried for stone tool manufacture. The TLRU studies completed in relation to the Project (see Section 2.3) report no culturally important spaces in the PDA/LAA.

The potential effect pathways during construction at the MacLellan site include:

- Soil removal required for the storage, stockpile, infrastructure areas, water treatment plant, water pipeline, and the work camp could disturb surface or shallowly buried heritage resources by removing artifacts from their horizontal and/or vertical context.

Most of the Project development at the MacLellan site is proposed in locations that have a low to moderate potential for heritage resources. None of the proposed Project components interact with known heritage resources at the MacLellan site, with the exception of HfMf-7, a shed related to historical mining activities, that was mitigated with as-found recording (photography, measurement, and presentation in the permit report). Trail HfMf-10 was mitigated by mapping during the HRIA. The east and west banks of the Keewatin River are areas considered to have a high heritage resource potential but are outside the PDA/LAA.

Mitigation measures recommended for the MacLellan site include:

- Implementation of the HCRPP when heritage or cultural resources, or objects thought to be heritage or cultural objects, are exposed.
- Evaluation by a professional archaeologist of changes to the PDA/LAA or the addition of development components as reviewed by the HRB, which will detail any actions required.
- Education of construction contractors for the appropriate protocol if heritage or cultural resources, or objects thought to be heritage or cultural resources, are discovered.
- As-found recording of site HfMf-7, a shed related to historical mining activity. The HRB has reviewed recommendations and mitigation measures outlined in heritage permit reports and concurred with the proposed mitigation measures, that were carried out in advance during the 2015 HRIA so that a return trip to the site was unnecessary (HRB 2017 pers. comm.).

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Mitigation measures recommended for the MacLellan site include:

- Implementation of the HCRPP when heritage or cultural resources, or objects thought to be heritage or cultural objects, are exposed.
- Evaluation by a professional archaeologist of changes to the PDA/LAA or the addition of development components.
- Education of construction contractors for the appropriate protocols if heritage or cultural resources, or objects thought to be heritage or cultural resources, are discovered.

3.2 OPERATION

Although no known cultural resources or areas are in the PDA, Alamos' ongoing Indigenous engagement program will facilitate the development of mitigation measures if these are reported or discovered during the operation phase.

The potential effect pathways during operation at the Gordon and MacLellan sites include:

- Brushing activities to expand Project components could disturb surface or shallowly buried heritage resources by dislodging artifacts within or just below tree roots.
- Subsoil removal or regrading in areas that were not developed during construction could result in disturbance to heritage resources by disturbing the horizontal and/or vertical context of artifacts.
- Spill remediation (if required) where subsurface excavation results in a disturbance to heritage resources by disturbing the horizontal and/or vertical context of artifacts.

Mitigation measures recommended for the MacLellan site include:

- Implementation of the HCRPP when heritage or cultural resources, or objects thought to be heritage or cultural objects, are exposed.
- Evaluation by a professional archaeologist of changes to the PDA/LAA or the addition of development components.
- Education of construction contractors for the appropriate protocols if heritage or cultural resources, or objects thought to be heritage or cultural resources, are discovered.

3.3 DECOMMISSIONING/CLOSURE

A Closure Plan has been developed and will be implemented in accordance with the Mine Closure Regulation under *The Mines and Minerals Act* of Manitoba and associated General Closure Plan Guidelines (Government of Manitoba 2023), to remove redundant facilities and rehabilitate the Gordon and MacLellan sites following the completion of mining activities. The primary objective of closure activities will be to establish physical, chemical, and biological stability at the sites, and to meet desired end land functions and uses. The Closure Plan will be updated throughout the Project lifetime as necessary to reflect the environmental requirements in place at the time of closure. At the end of operation, the main components

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will include the open pits, mill processing facilities, offices, storage areas, TMF, and MRSAs. Active closure activities will take place once mining has been completed (Year 6 at the Gordon site and Year 17 at the MacLellan site). Permanent closure will occur when the site is stable, and monitoring is no longer required. For heritage resources, this will occur when there are no further ground-disturbing activities at portions of the PDA previously undisturbed during construction or operation. The duration and conditions for post-closure monitoring and permanent closure will be detailed in subsequent submissions of the Closure Plan to regulatory agencies as Project design and execution progresses.

Alamos will be responsible for monitoring and maintaining the integrity of the remaining structures as outlined in the Closure Plan. Alamos will surrender the leases and the sites will be transferred back to the provincial Crown at Permanent Closure once all fees, rents, royalties, and other liabilities applicable are paid. Both sites are expected to remain open indefinitely following permanent closure for recreational activities such as hunting and trapping.

The main elements of decommissioning/closure are:

- Removal of buildings, equipment, and facilities (i.e., permanent structures) from the Gordon and MacLellan sites, together with aboveground concrete structures.
- Reclamation of mine access roads not needed for post-mining land access, with contouring to restore natural drainages and roadways revegetated.
- Recontouring disturbed areas to blend in with surrounding topography and to re-establish natural drainage patterns.
- Removal of water management features that are no longer required, such as water treatment systems, ponds, and ditches. This will include: recontouring/spreading of pond berms; backfilling of ponds and ditches; and re-establishing natural drainage patterns.
- Management of site runoff from developed areas, including from the ore milling and processing plant site, MRSAs, TMF, and open pits, to meet federal and provincial regulatory requirements for downstream water quality.
- Implementation of public safety measures around the pits (e.g., re-sloping, fencing or rock berms).
- Allowing the open pits to fill with water to form pit lakes and directing the overflows to established drainages.
- Reclamation of MRSAs with suitable covers as needed, revegetation, and establishment of stable drainage conditions.
- Installation of a suitable cover and revegetation of the TMF and establishment of drainage to provide long-term erosion control.
- Revegetation of disturbed areas with plant species that are suitable for reclamation and the end land uses of the area. The goals of reclamation vegetation will be to: avoid erosion and sedimentation to protect aquatic resources; avoid invasive plant establishment; and re-establish a land use that is of value for wildlife and/or humans and mitigates the residual environmental effects of the Project on the environment.

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Changes to heritage and cultural resources are not anticipated from activities during decommissioning/closure; however, some indirect effects to cultural sites might be experienced due to emissions, such as noise and light in the LAA. Project related transportation or wastes and emissions during decommissioning/closure are not expected to affect access to cultural sites and areas because neither of these activities had interactions during construction or operation, and decommissioning/closure will represent a reduction in the amount of traffic or emissions experienced in the LAA. Should unanticipated heritage and cultural resources be identified, the following mitigation measures are recommended for the Gordon and MacLellan sites:

- Implementation of the HCRPP when heritage or cultural resources, or objects thought to be heritage or cultural objects, are exposed.
- Evaluation by a professional archaeologist of changes to the PDA/LAA or the addition of development components.
- Education of construction contractors for the appropriate protocols if heritage or cultural resources, or objects thought to be heritage or cultural resources, are discovered.

3.4 PROCEDURES IF CULTURAL AND HERITAGE RESOURCES ARE FOUND: KEY STEPS IN REPORTING HERITAGE OBJECTS

The salvage and preservation of any artifacts discovered during the construction, operation, decommissioning/closure periods of the Project will be in accordance with requirements of *The Heritage Resources Act* and HRPP Guidelines (HRB n.d.). In the event of a 'chance find', archaeological resources that require removal from the place where they are discovered will be transferred to a public institution selected through consultation with local Indigenous Nations along with the HRB. Activities relating to heritage and cultural resources that occur during the Project must be documented by a qualified professional archaeologist holding a valid heritage permit issued by the HRB. Appendix B provides examples of surface or sub-surface heritage objects or features that may be encountered in the field that have the potential to be of archaeological interest or cultural significance.

Alamos and its construction contractors will abide by requirements issued by the HRB for site avoidance, excavation, or heritage resource monitoring. If cultural and heritage resources are found, Alamos and its contractors will leave all artifacts *in situ* and inform the Health, Safety, and Environment (HSE) Manager immediately. Work will be immediately halted at the location of the discovery, and there will be no activities within a 50-metre (m) radius buffer of any cultural or heritage resources found until the Qualified Archaeologist has completed an archaeological investigation. Reporting the accidental discovery of heritage resources allows HRB to assess their significance, which helps advance knowledge of human history. Discoveries will also be reported to IAAC and relevant Indigenous Nations within 24 hours, and Indigenous Nations will be permitted to participate in archaeological response. Table 3-1 identifies the protocols to follow if cultural and heritage resources are found.

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Table 3-1 Chance Find Protocol

Steps	Site Supervisor (204-356-2647)	Alamos HSE Manager (204-356-2646)	Alamos Indigenous Engagement Manager (204-356-2646)	Qualified Archaeologist (Stantec Consulting 204-799-6159)	HRB 204-945-2118 <u>Emergency:</u> 204-792-5730 1-800-282-8069 ext. 2118
Step One	STOP WORK IMMEDIATELY	-	-	-	-
Step Two	Mark location with flagging tape and cordon with temporary fencing (minimum buffer 50 m from centre point of discovery), photograph the object or feature discovered and mark a waypoint of the find with a GPS receiver	-	-	-	-
Step Three	Contact HSE Manager	Contact Qualified Archaeologist and Indigenous Engagement Manager	Contact Indigenous Nation representative(s) in accordance with community communication protocols.	Determine the nature and significance of the find and inform HRB. Apply for a heritage permit from HRB.	Issue heritage permit
Step Four	-	-	-	Direct investigation to determine nature, extent, and significance of heritage resources	-
Step Five	-	-	If discovery includes sacred or ceremonial objects, Indigenous Nations' Representative(s) may arrange and facilitate appropriate ceremony	-	-

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Steps	Site Supervisor (204-356-2647)	Alamos HSE Manager (204-356-2646)	Alamos Indigenous Engagement Manager (204-356-2646)	Qualified Archaeologist (Stantec Consulting 204-799-6159)	HRB 204-945-2118 <u>Emergency:</u> 204-792-5730 1-800-282-8069 ext. 2118
Step Six	-	-	-	Complete scientific assessment of location through controlled surface collection and/or test pit excavation	-
Step Seven	-	-	-	Report findings and recommendations to HRB	Evaluate heritage resources site and findings presented to determine if further mitigative action is necessary before construction can continue
Step Eight	-	Construction activities in vicinity of site that will not disturb artifacts, or related archaeological activities may proceed	-	If site cannot be avoided based on progress of construction, direct site's removal by scientific and most appropriate methods	-
Step Nine	-	-	-	Contact HRB to advise status of site's removal, summary of findings, and recommendations	No construction activities will take place at site until HRB issues clearance
Step Ten	-	Remove barriers and continue construction at location	-	-	-

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3.5 PROCEDURES IF HUMAN REMAINS ARE FOUND

In 1987, the Province of Manitoba approved *The Policy Respecting the Reporting, Exhumation and Reburial of Found Human Remains* (1987). *The Burials Policy* establishes what is to be done upon discovery of found human remains in accordance with *The Heritage Resources Act* (1986). A copy of the Burials Policy will be provided upon request to the HRB. The essentials of *The Burials Policy* constitute the best practice following discovery of human remains:

1. Unless unavoidable and necessary human remains are not to be removed from their original resting place.
2. When human remains are discovered a) all work ceases, and the HRB is notified immediately; b) no further disturbance of the remains occurs until the arrival of personnel designated by the HRB.
3. Indigenous Nations are consulted before exhumation or removal of human remains or associated grave goods.
4. Personnel designated by the HRB shall carry out the exhumation, and as much as possible, out of the public eye.
5. Identification procedures will be undertaken only by personnel designated by the HRB.
6. Reburial of human remains when an Indigenous Nation(s) is involved is arranged by the Aboriginal Liaison Officer of the HRB in conjunction with the Indigenous Nation. Reburial in all other cases will be handled only by personnel designated by the HRB.

If a 'chance find' is determined to be human remains, the HSE Manager will immediately notify the local RCMP (204-356-2494) to rule out foul play. The Alamos HSE Manager will concurrently notify HRB (per requirements under Section 46 of *The Heritage Resources Act* [1986]). The HSE Manager will also notify the Project Manager. HRB and the RCMP will work collaboratively to conduct a death investigation. If the remains are found to be forensic in nature, then the RCMP will retain custody of the scene. If the remains are found to be non-forensic (i.e., historic), then HRB burial policy takes effect. Further details are provided in Appendix C. Human remains discovered during the Project will at all times be treated with dignity and respect. Indigenous Nations will be kept informed and involved throughout the process should human remains be found. The Indigenous Engagement Manager (or their designate) will communicate with appropriate Indigenous Nations regarding unanticipated discoveries. Table 3-2 illustrates the protocol for the chance discovery of human remains during all Project phases and in all Project locations.

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Table 3-2 Human Remains Protocol

Steps	Site Supervisor (204-356-2647)	Alamos HSE Manager (204-356-2646)	Alamos Indigenous Engagement Manager (204-356-2646)	Qualified Archaeologist (Stantec Consulting 204-799-6159)	HRB 204-945-2118 Emergency: 204-792-5730 1-800-282-8069 ext. 2118	RCMP (204-356-2494)
Step One	STOP WORK IMMEDIATELY	-	-	-	-	-
Step Two	With minimal intrusive work, mark location with flash tape and cordon with temporary fencing	-	-	-	-	-
Step Three	Contact Alamos HSE Manager	Contact RCMP and HRB and Project Manager. Contact Qualified Archaeologist, and Indigenous Engagement Manager.	Contact Indigenous Nation representative(s) in accordance with community communication protocols	-	Investigation	Investigation
Step Four	-	-	Representative(s) from Indigenous Nation(s) may arrange for and facilitate an appropriate ceremony	-	If remains are non-forensic and their removal is required to protect remains, lead exhumation and reburial of non-forensic human remains	If remains are forensic in nature or cannot be immediately determined whether remains are forensic, RCMP has jurisdiction over area of find and human remains

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Steps	Site Supervisor (204-356-2647)	Alamos HSE Manager (204-356-2646)	Alamos Indigenous Engagement Manager (204-356-2646)	Qualified Archaeologist (Stantec Consulting 204-799-6159)	HRB 204-945-2118 <u>Emergency:</u> 204-792-5730 1-800-282-8069 ext. 2118	RCMP (204-356-2494)
Step Five	-	-	-	Document human remains with GPS, record relevant data, and submit with report to HRB	-	-
Step Six	Construction activities in vicinity of site that will not disturb artifacts, or related archaeological activities may proceed	-	Discuss with Indigenous Nations regarding what type of analysis would be done on remains	Work with Indigenous Nations to decide whether and what type of analysis would be done on remains	If remains are non-forensic, the HRB will take direction from Indigenous Nations regarding their proper disposition	-

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3.5.1 Potential Penalties

Under the *Manitoba Heritage Resources Act* 69(1), any person who contravenes or fails to observe a provision of this Act or a regulation, order, by-law, direction or requirement made or imposed thereunder is guilty of an offence and liable on summary conviction, where the person is an individual, to a fine of not more than \$5,000 for each day that the offence continues and, where the person is a corporation, to a fine of not more than \$50,000 for each day that the offence continues.

Under Section 33(2) of the *Environment Act*, any corporation found guilty of an offence under this Act may be fined up to \$500,000 for the first offence, and up to \$1,000,000 for each subsequent offence.

Heritage resources are not to be sold.

Heritage resources may not be moved out of the Province of Manitoba without the consent of the HRB.

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Follow-Up and Monitoring Activities
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4.0 FOLLOW-UP AND MONITORING ACTIVITIES

Monitoring (follow-up) is the continuation of observation, measurement, or assessment of environmental conditions at and surrounding the Project, its components, or activities.

For heritage and cultural resources, no follow-up or monitoring activities are anticipated. As previously noted, the risk for disturbance of heritage resources ends when there are no further ground disturbing activities within portions of the PDA previously undisturbed during construction or operation.

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Adaptive Management
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5.0 ADAPTIVE MANAGEMENT

Adaptive management is a planned process for responding to uncertainty or to an unanticipated or underestimated project effect. Information learned from monitoring actual project effects is applied and compared to predicted effects. Where a variance between the actual and predicted effects occurs, a determination is made as to whether modifications or other actions are necessary to revise the existing mitigation measures. As part of this commitment, we will implement technically and economically feasible mitigation measures if monitoring indicates that specified levels of environmental change have been reached or exceeded. Feasibility and implementation decisions will be made based on the circumstances and considerations at the time.

Triggers for adaptive management with respect to the protection of heritage and cultural resources include, but are not limited to:

- New information from Indigenous Nations identified through the engagement process.
- Discovery of significant, as defined by the HRIA and HRPP Guidelines (HRB n.d.), cultural and archaeological resources including but not limited to multi-component sites, burials, and sites of a special nature as determined by the HRB or specifically identified (geographic location and content) by Indigenous Nations.

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Reporting
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6.0 REPORTING

Reports of chance finds will be submitted to regulatory authorities as required under provincial legislation and shared with interested Indigenous Nations and stakeholders.

The form and frequency of follow-up reporting will be determined as the Project progresses through the approvals process; however, it is anticipated that those elements relevant to this HCRPP will be assembled into a formal summary report and provided to interested parties on an annual basis during construction and operation and during closure in years when monitoring is carried out. The reporting will be used to inform adaptive management reviews. Receiving, documenting, and responding to communication from external interested parties, including complaints, will also form part of reporting under this Plan.

Activities relating to heritage and cultural resources that occur during the Project must be documented by a Qualified Archaeologist holding a valid heritage permit issued by the HRB. Section 3.4 of this HCRPP describes the procedures to be implemented during construction and operation of the Project to allow Alamos to safeguard cultural and heritage resources discovered or disturbed during the construction and operation of the Project. No reports related to any such find or its analysis will be published, other than such reports provided to the HRB or other agencies, as may be required by law, and information shared with affected Indigenous Nations as appropriate.

Reporting follows the standards and requirements established by the heritage resources permit held by the Qualified Archaeologist.

**LYNN LAKE GOLD PROJECT:
HERITAGE AND CULTURAL RESOURCES PROTECTION PLAN**

References
January 30, 2025

7.0 REFERENCES

7.1 LITERATURE CITED

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- Smith, R.E., H. Veldhuis, G.F. Mills, R.G. Eilers, W.R. Fraser and G.W. Lelyk. 1998. Terrestrial Ecozones, Ecoregions and Ecodistricts of Manitoba. An Ecological Stratification of Manitoba's Landscapes. Land Resource Unit. Brandon Research Centre, Research Branch. Agriculture and Agri-Food Canada. Technical Bulletin 1998-9E.
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- Stantec. 2018. A Traditional Land and Resource Use Study for Marcel Colomb First Nation, Manitoba: EA/EIS Version. Prepared for Marcel Colomb First Nation. January 11, 2018.
- Stantec, 2020. Lynn Lake Gold Project Environmental Impact Statement. Prepared for Alamos Gold Inc. May 25, 2020. Winnipeg, MB.

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HERITAGE AND CULTURAL RESOURCES PROTECTION PLAN**

References
January 30, 2025

7.2 PERSONAL COMMUNICATIONS

HRB. 2017. Telephone conversation between David McLeod and HRB regarding disposition of HfMf-7

**LYNN LAKE GOLD PROJECT:
HERITAGE AND CULTURAL RESOURCES PROTECTION PLAN**

Appendix A Maps

Project Infrastructure

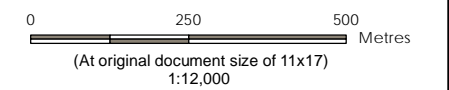
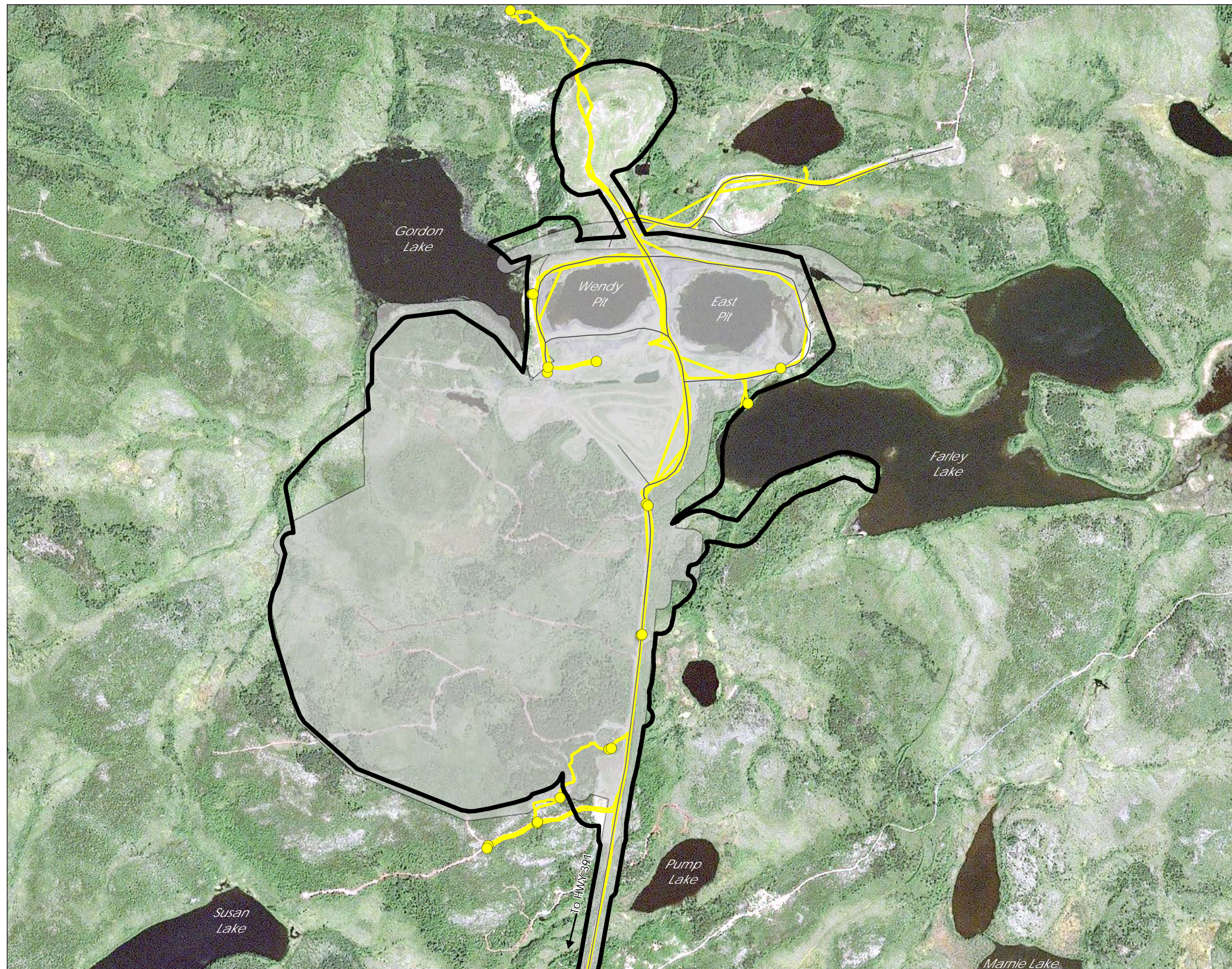
- Revised Project Footprint
- Original Project Footprint

Survey Locations

- Archaeological Test Excavation
- Surveyed Area

Landbase

- Existing Access Road



- Notes**
1. Coordinate System: NAD 1983 UTM Zone 14N
 2. Base Data Sources: Government of Manitoba and Government of Canada.
 3. Imagery source: SPOT-7 imagery, BlackBridge Gemoatics Corp. July 2015.

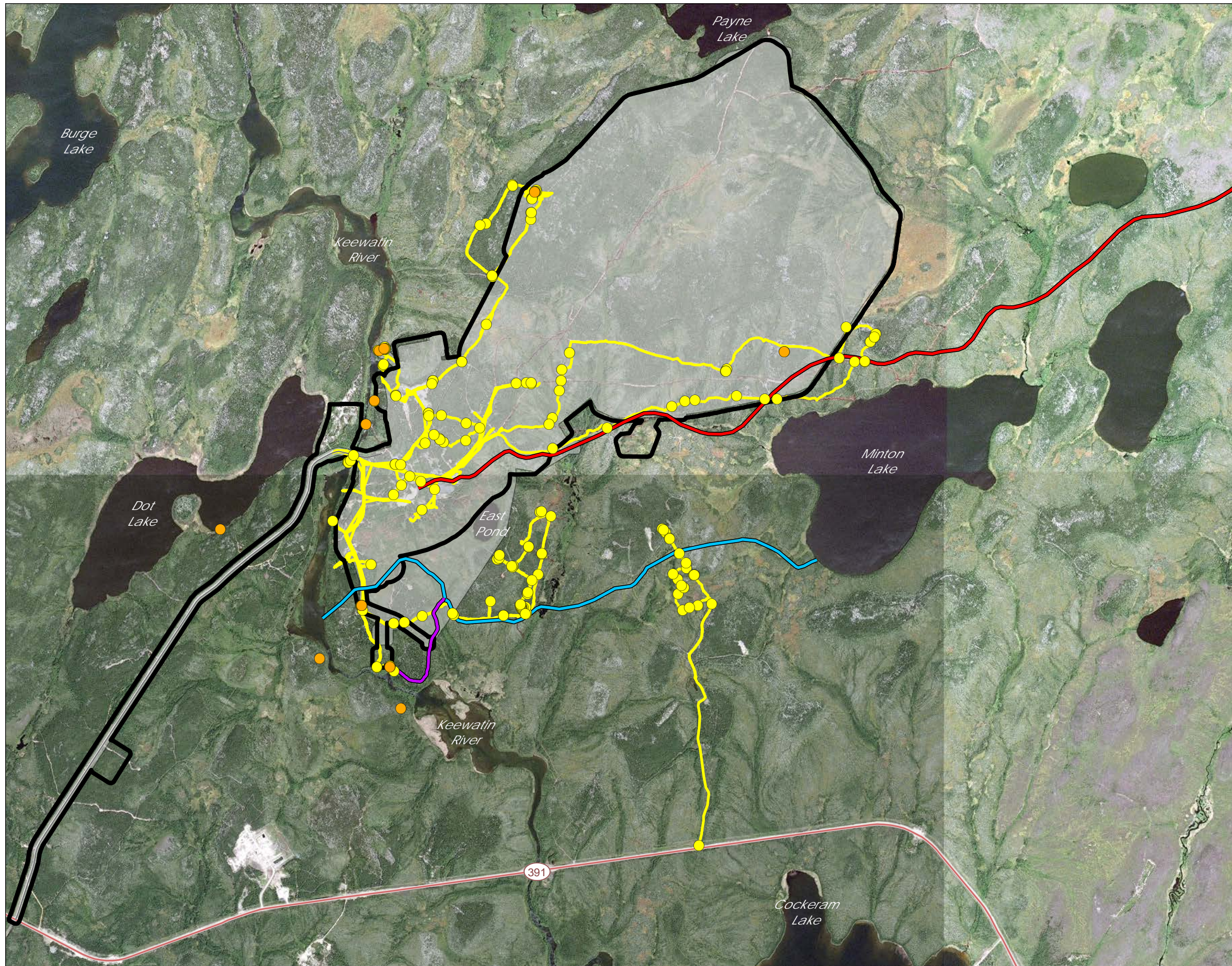
Project Location Lynn Lake, Manitoba
Prepared by ACampigotto on 2023-09-21
 Technical Review by KMathers on 2023-09-21

Client/Project ALAMOS GOLD INC.
 Lynn Lake Gold Project
111473054

Map No.
1

Title
Areas Assessed for Heritage Resources - Gordon site

G:_GIS_Projects\Folder\111473058_ILGP_EA\RA\HRA\HRA_MacLellan_NOA_PDA_20230921.mxd Revised: 2023-09-21 By: ACampigotto



Project Infrastructure

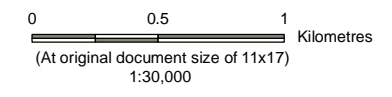
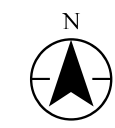
- Revised Project Footprint
- Original Project Footprint

Survey Locations

- Archaeological Sites
- Archaeological Test Excavation
- Surveyed Area
- Minton Lake Portage
- Portage
- Trail

Landbase

- Highway
- Existing Access Road



- Notes**
1. Coordinate System: NAD 1983 UTM Zone 14N
 2. Base Data Sources: Government of Manitoba and Government of Canada.
 3. Imagery source: SPOT-7 imagery, BlackBridge Gemoatics Corp. July 2015.

Project Location Lynn Lake, Manitoba
 Prepared by ACampigotto on 2023-09-21
 Technical Review by KMathers on 2023-09-21

Client/Project ALAMOS GOLD INC.
 Lynn Lake Gold Project
 111473054

Map No.
2

Title
Areas Assessed for Heritage Resources - MacLellan site

Appendix B Resources Identification Guide

LYNN LAKE GOLD PROJECT: HERITAGE AND CULTURAL RESOURCES PROTECTION PLAN

Appendix B Resources Identification Guide
January 30, 2025

The following are some examples of surface or sub-surface heritage objects or features that may be encountered in the field that have the potential to be of archaeological interest or cultural significance. These descriptions are provided for information only. When the features described in these examples are encountered in the field, or when it is otherwise believed that a site potentially may be of archaeological interest, the HSE Manager and Project Manager must be notified.

Artifacts

Projectile points, pottery, trade goods, and other artifact types have been recovered across Manitoba. The artifact will be photographed, and the surrounding vegetation and soil matrix described in detail before collection. If a diagnostic artifact is found during a controlled surface collection, the recovery of the artifact will not take place until mapping is complete. Any recognizable soil stratum associated with the artifact will be described. Often metal objects are found abandoned along old portage routes, former trails, and at abandoned cabin and homestead sites. Metal tin cans can be dated using method of manufacture. Similarly, glass fragments can also be identified to a certain time period based on morphology, manufacturing method and, occasionally, color.



**LYNN LAKE GOLD PROJECT:
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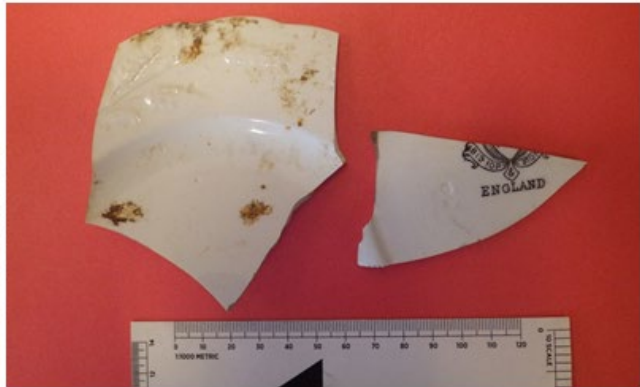
Appendix B Resources Identification Guide
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Manufacture methods help date bottles



In situ ceramic plate



Decorative patterns and manufacturer's marks on ceramic plates are diagnostic

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Soil Staining

Discolorations in the soil may indicate an archaeological site. The following examples are common colours associated with artifacts and features that have been found within the Province. Red or yellow Ochre or rust stains can be found in the soil. They can be the result of oxidized metal fragments or nails; red or yellow ochre nodules may indicate a burial or ceremonial activity. Soil staining can also be found in the form of charcoal flecks and white ash from a hearth or fire pit. Black soil stains may indicate human activity and organic materials or a living floor. Cultural strata can vary in depths depending on the length of occupation at the site. The presence of burned bone, fire-cracked rock, stone chips, pottery, and other objects may be found in association with soil discoloration and would confirm the soil staining is a cultural layer.



Soil staining can indicate cultural activity

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Animal Bone

Animal Bone (mammal, bird, fish) at a site can indicate the kinds of resources that were being used as food as well as indicate seasonality of occupation. Bone was also an important material for tool manufacturing. Common bone tools include fleshers and beamers fashioned from large mammal long bones, barbed spear points and harpoons, awls, and needles. Bones at a site can indicate the kinds of animals that were being used as food. The ulna of swans, eagles and other large birds were used for bird whistles. Key features to look for on bones to determine if they have been deposited by humans include signs of cut-marks or burning or staining which may indicate human modification by various butchering or processing techniques.

Butchered bone found on site surface



Bear bones

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In-situ Articulated Caribou Thorax

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Culturally Modified Trees

Occasionally evidence of cultural practices is found in the form of modified trees such as the birch trees noted in this photograph. Birch bark was used for many purposes such as storage baskets, canoes and more recently, birch-bark biting crafts. Cut wood has been used to construct an animal trap, as a material for building or for firewood and indicates that humans have been in the area.



Prayer cloths (prayer trees) are spiritual items which take the form of coloured cloths which have been tied around the trunks of trees. It is highly inappropriate to disturb or to photograph these spiritual items, therefore no photographic example will be included here. Sweat lodge frames (low domed frames of bent willows with a pit of fire broken stones in the middle and a large fire hearth outside) or the remnants of former lodges should not be disturbed or photographed but mapped and reported.

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Stone Features

There are many different kinds of stone alignments and/or markings that have been constructed by humans: Way-markers, caches, ceremonial sites, building foundations, tipi rings (common on the prairie but not in the forest), burials and pictographs are the major rock features that are found during archaeological investigations. These can be on or above the ground surface or buried features.



Stone mound possible way-marker



Stone feature: pictograph

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Ground or Structural Features

It is especially important to note unusual ground features. Depressions or mounds that are out-of-place from the surrounding landscape may indicate an underlying structure or possible burial. The manner in which structural features are constructed can be dated.



Wood stains can indicate former buildings

Cellar



House foundation

Appendix C Provisions Regarding Found Human Remains Fact sheet (HRB)

Provisions Regarding Found Human Remains

The discovery and recovery of human remains is a sensitive issue, but one that is governed by provincial laws and process. Therefore, it is the responsibility of any individual encountering human remains to ensure that, upon discovery, actions are undertaken consistent with provincial legislation and policy. Failure to comply may result in legal action being taken.

This information is being provided to all persons conducting fieldwork under a Manitoba Heritage Permit. It outlines the Province of Manitoba's requirements and procedures consistent with *The Heritage Resources Act* (1986) and Manitoba's "*Policy Respecting the Reporting, Exhumation and Reburial of Found Human Remains*" (1987) to be followed in the event that human remains are discovered.

References herein to *The Heritage Resources Act* (1986) are not meant to supplant the *Act*, a copy of which may be obtained online or from:

Queen's Printer, Statutory Publications
Lower level, 200 Vaughan Street, Winnipeg, MB R3C 1T5
In Winnipeg: (204) 945-3101 Toll free in MB: 1-800-321-1203
Email: statpub@gov.mb.ca

Responsibility Rests with the Historic Resources Branch

The Historic Resources Branch is responsible for the administration of *The Heritage Resources Act* (1986) and to oversee the disposition of found human remains of an archaeological nature from the moment of discovery. Accordingly, the protection, preservation and disposition of found human remains and associated heritage objects will be overseen by personnel designated by the Historic Resources Branch (*Burials Policy: Legal Provision G*).

Any human remains occurring outside recognized cemeteries may potentially be forensic in nature, that is, remains associated with past behaviors, actions or events which are a concern of other legal agencies (for example, missing persons). For this reason it is always advisable to notify the nearest police or RCMP detachment in addition to the Historic Resources Branch upon the discovery of human remains.

Definition of Human Remains

The Heritage Resources Act (1986), Section 43 (1) states that "human remains" means:

"remains of human bodies that in the opinion of the minister have heritage significance and that are situated or discovered outside a recognized cemetery or burial ground in respect of which there is some manner of identifying the persons buried therein."

Heritage Permits

Heritage Permits issued by the Historic Resources Branch are subject to prescribed terms and conditions, and unless specifically stated, do not permit the handling or disturbance or possession of human remains upon discovery:

The Heritage Resources Act (1986), Sections 53; 45; and 46 state:

- 53 No person shall search or excavate for heritage objects or human remains except pursuant to a heritage permit and in accordance with such terms and conditions as may be prescribed by the minister and set out in or attached to the heritage permit.
- 45 The property in, and the title and right of possession to, any human remains found by any person after May 3, 1967, is and vests with the Crown.
- 46 Every person who finds an object that is or that the person believes to be a heritage object, or remains that are or that the person believes to be human remains, shall forthwith report the find to the minister and shall not handle, disturb or do anything to the object or the remains except in accordance with such requirements as the minister may prescribe.

Manitoba's Burials Policy

In 1987, the Province of Manitoba approved the *Policy Respecting the Reporting, Exhumation and Reburial of Found Human Remains* (otherwise known as: Manitoba's "Burials Policy"). The *Burials Policy* establishes what is to be done upon discovery of found human remains in accordance with *The Heritage Resources Act* (1986). A copy of the *Burials Policy* will be provided upon request to the Historic Resources Branch.

The essentials of the *Burials Policy* constitute the best practice following discovery of human remains:

1. Unless unavoidable and necessary human remains are not to be removed from their original resting place.
2. When human remains are discovered a) all work ceases and the Historic Resources Branch is notified immediately; b) no further disturbance of the remains occurs until the arrival of personnel designated by the Historic Resources Branch.
3. Community consultation takes place before exhumation or removal of human remains or associated grave goods.
4. Personnel designated by the Historic Resources Branch shall carry out the exhumation, and as much as possible, out of the public eye.
5. Identification procedures will be undertaken only by personnel designated by the Historic Resources Branch.
6. Reburial of human remains when a First Nation is involved is arranged by the Aboriginal Liaison Officer of the Historic Resources Branch in conjunction with the community. Reburial in all other cases will be handled only by personnel designated by the Historic Resources Branch.

Manitoba Sport, Culture, and Heritage
Historic Resources Branch
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Website: www.manitoba.ca/heritage

