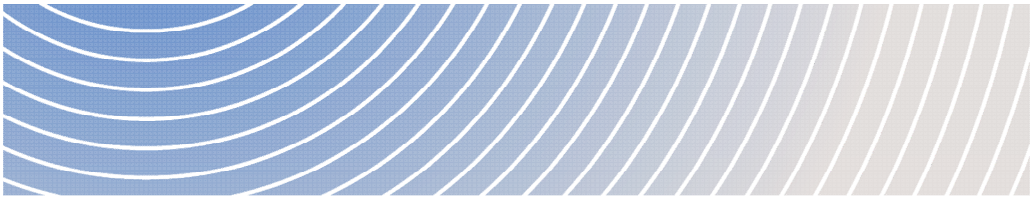
Impact Assessment Agency of Canada | Agence d'évaluation d'impact du Canada

Analysis of Alamos Gold Inc.'s proposed changes to the Lynn Lake Gold Mine Project – MacLellan Site



FINAL REPORT

FEBRUARY 2026

Canada

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1. Introduction

The Lynn Lake Gold Project (the Project), as proposed by Alamos Gold Inc. (the Proponent) involves the construction, operation, decommissioning, and reclamation of an open pit gold mine and new metal mill located approximately 1,000 kilometres north of Winnipeg, near the Town of Lynn Lake, Manitoba. The Project involves the redevelopment of two historical gold mines (the Gordon site and MacLellan site) and has an ore input capacity of 8,250 tonnes per day over a 13-year period. Components of the Project include new mine infrastructure, a new distribution line, open pits, access roads, an ore milling and processing plant, ore and overburden stockpiles, mine rock storage areas, and a tailings management facility.

IAAC conducted an environmental assessment under the *Canadian Environmental Assessment Act, 2012* (CEAA 2012). On March 5, 2023, the Minister of Environment and Climate Change issued a Decision Statement for the Project that contains legally binding conditions, which include mitigation measures and follow-up program requirements that the Proponent must comply with throughout the life of the Project. The Decision Statement was first amended on July 26, 2024, to align with the transition provisions set out in the *Budget Implementation Act, 2024*, and again on August 6, 2025, to update the mine pit dewatering discharge point at the Gordon site (CIAR Reference number 80140, documents 127 & 143). Based on information provided by the Proponent, construction of the Project began in February 2025.

On June, 2025, the Proponent notified the Impact Assessment Agency of Canada (IAAC) of proposed changes to the Project, in accordance with condition 2.16 of the Decision Statement. This report summarizes the proposed changes and provides an analysis of whether they constitute a new or different designated project under the *Physical Activities Regulations*. It also assesses whether the changes could result in increased adverse environmental effects within federal jurisdiction compared to those identified in the 2023 environmental assessment. In addition, the report considers whether any modifications to the conditions in the Decision Statement, such as additions or removals, may be necessary to address the proposed changes. The analysis is based on information provided by the Proponent, feedback received from federal authorities and from Indigenous groups.

2. Proposed Project changes

The Proponent's submission details proposed changes to the planned infrastructure for the Lynn Lake Gold Project, specifically the MacLellan Mine site. The proposed changes include adjustments to the Project development area (PDA) and footprints of several components, the addition of a satellite pit, increased total ore production over the life of the mine, and the extension of the mine life.

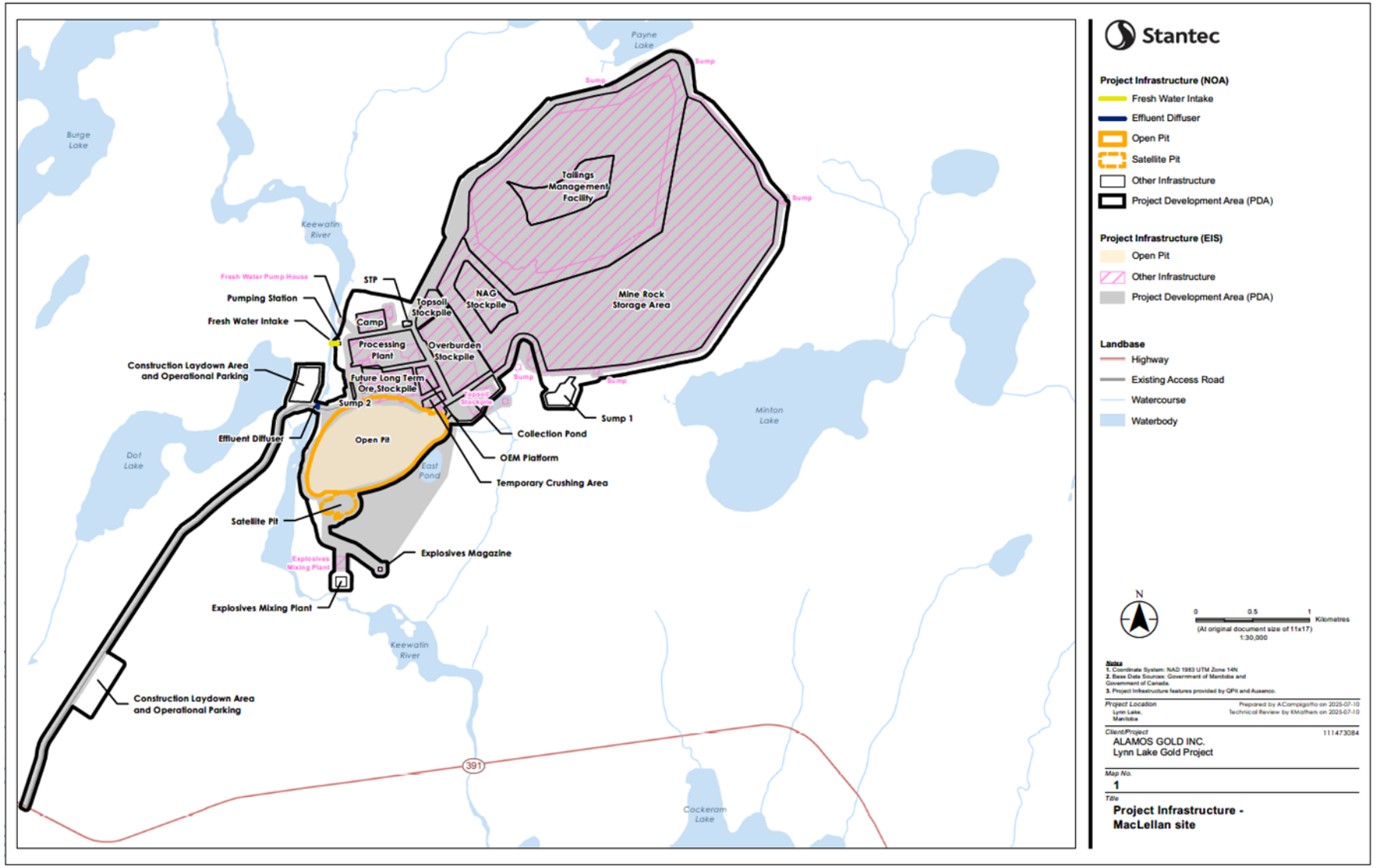
A map of the proposed PDA adjustments is shown in Figure 1. The changes to the PDA would decrease the total area by 2.5%, from 937 hectares to approximately 914 hectares.

The Proponent is also proposing to decrease the ore cutoff grade for processing and to enlarge the original open pit. The combination of the new satellite pit, a decrease in the ore cutoff grade, and a larger open pit

would result in an approximate 48% increase in total ore production at the MacLellan site from 26.8 to 39.7 megatonnes (Mt) and an approximate 37% increase for the whole project, from 34.8 to 47.7 Mt. Despite this increase in mine tonnage, the daily ore input capacity of the processing plant will increase slightly from 7,500 tonnes per day to approximately 8,000 tonnes per day.

The mine life (operation phase) would also increase from 13 years to approximately 17 years to accommodate the increase in total ore production resulting in a processing plant operation window that would extend 6 years beyond ore extraction activities. Post-closure is expected to take at least 40 years instead of 21 due to the time it will take for the larger open pit to fill with water according to updated water quantity modelling results.

Figure 1. Map comparing the project footprint of the proposed changes with the initial project footprint for the MacLellan site.



2.1 Analysis under the *Physical Activity Regulations*

The *Physical Activities Regulations* identify the activities that constitute designated projects that may require an impact assessment. Section 19(c) and 19(d) of the Physical Activities Regulations read as follows:

> ***19 The expansion of an existing mine, mill, quarry or sand or gravel pit in one of the following circumstances:***
>
> ***(c) in the case of an existing metal mine, other than a rare earth element mine, placer mine or uranium mine, if the expansion would result in an increase in the area of mining operations of 50% or more and the total ore production capacity would be 5 000 t/day or more after the expansion;***
>
> ***(d) in the case of an existing metal mill, other than a uranium mill, if the expansion would result in an increase in the area of mining operations of 50% or more and the total ore input capacity would be 5 000 t/day or more after the expansion;***

The *Physical Activities Regulations* defines the "area of mining operations" as "the area at ground level occupied by any open-pit or underground workings, mill complex or storage area for overburden, waste rock, tailings or ore." To meet either Section 19(c) or 19(d) of the *Physical Activities Regulations*, the Project would need to result in an increase in this area of 50% or more, regardless of ore production or input capacity.

According to the Proponent's analysis, the combined footprint of the open pits, processing plant, and relevant storage areas at the MacLellan site was 686.07 ha in the Environmental Impact Statement (EIS) and would be 674.07 ha with the proposed changes. This is a 12-ha decrease in the MacLellan site footprint, and therefore also represents a decrease in the total footprint across both sites of the project.

As the proposed changes would not result in an increase in the area of mining operations of 50% or more, they do not meet the definition of a designated project as defined in sections 19(c) nor 19(d). Therefore, IAAC is of the view that the proposed changes do not constitute a new or different designated project.

3. Consultation and engagement

3.1 Proponent engagement with Indigenous groups

In its Notice of Change to IAAC, the Proponent indicated that it engaged with the 13 Indigenous groups named in the Decision Statement through the Project's Environmental Advisory Committee (EAC). Indigenous groups were informed of the proposed changes either directly during EAC meetings held between October 2023 and May 2025, or through the distribution of meeting minutes.

The Proponent provided Indigenous groups with an opportunity to review the project Notice of Change. IAAC is aware that regional wildfires in 2025 affected the capacity of some Indigenous groups to engage with the Proponent during their initial review period. IAAC provided additional time to accommodate these circumstances, and discussions between the Proponent and affected groups resumed once conditions allowed.

3.2 IAAC consultation with federal authorities, Indigenous groups, and the public

IAAC sought the expertise of Environment and Climate Change Canada (ECCC), Fisheries and Oceans Canada (DFO), Natural Resources Canada (NRCan) and Health Canada (HC) to inform the assessment of potential adverse environmental effects related to proposed changes to the Project, as presented below in section 4.

IAAC engaged with the 13 Indigenous groups listed in the Decision Statement (Barren Lands First Nation, Chemawawin Cree Nation, Hatchet Lake First Nation, Manitoba Métis Federation, Marcel Colomb First Nation, Mathias Colomb Cree Nation, Métis Nation – Saskatchewan Eastern Region 1, Métis Nation – Saskatchewan Northern Region 1, Nisichawayasihk Cree Nation, Northlands Denesuline First Nation, O-Pipon-Na-Piwin Cree Nation, Peter Ballantyne Cree Nation, and Sayisi Dene First Nation) to seek their comments on IAAC's analysis report and proposed amendments to the decision statement.

IAAC sought comments from federal authorities, Indigenous groups, and the public on the proposed changes to the Project during the public comment period held from October 16 to November 15, 2025. IAAC received submissions from ECCC, the Manitoba Métis Federation (MMF), Marcel Colomb First Nation (MCFN), and members of the public. ECCC provided comments related to adding Dot Lake to the monitoring locations and correcting the list of contaminants to be monitored. Three public comments were received; however, these did not address the proposed changes and expressed general views on mining activities. The MMF agreed with IAAC's proposed amendments but raised concerns about the Proponent's engagement. MCFN similarly raised concerns about the Proponent's engagement, as noted above, and requested additional requirements to address effects on fish and fish habitat, as presented below.

4. Assessment of potential adverse environmental effects

4.1 Fish and fish habitat

4.1.1 Proponent's assessment

The Proponent indicated that adjustments to the mine rock storage area (MRSA), tailings management facility (TMF), overburden stockpile, topsoil stockpile, and process plant, as well as the addition of a satellite pit, construction laydown areas, and detailed freshwater intake lines and effluent locations may interact with surface water, and could therefore affect fish and fish habitat. As part of the analysis, the Proponent indicated that new groundwater quantity and surface water balance models were used to predict the potential impacts of the updated Project design. The Proponent noted that these models were more conservative than the previous models used during the original environmental assessment.

The Proponent's analysis identified potential impacts to fish and fish habitat, related to changes in surface water quantity and quality. However, the Proponent indicated that these impacts can be effectively mitigated through habitat offsetting and adaptive management, as needed.

Water quantity

The Proponent indicated a decrease in flows in Minton Lake and Dot Lake outlets and water levels in Minton Lake during all phases, and an increase in flows in the unnamed tributary to the Keewatin River (KEE3-B1) during post-closure relative to the predictions made during the environmental assessment. Additionally, the Proponent indicated groundwater table drawdown of more than 1 metre is expected to occur over a much larger area than predicted in the environmental assessment, including under wetlands of unknown fish-bearing status and unknown connectivity to groundwater.

The Proponent explained that the impacts described above are unlikely to impact fish and fish habitat. Specifically, the Proponent notes that changes in water quantity in Minton Lake and its outlet on fish and fish habitat would be mitigated by the existing vegetation and dominance of beaver dams which control hydraulic conditions. The Proponent also notes that predicted flow reductions in the Minton and Dot Lake outlet fall within the thresholds identified in Fisheries and Oceans Canada's *Framework for Assessing the Ecological Flow Requirements to Support Fisheries in Canada*.

The Proponent explained that the predicted increased flows to the unnamed tributary of the Keewatin River and potential drying out of fish bearing wetlands due to groundwater drawdown would be mitigated by habitat offsetting required as part of the Project's *Fisheries Act* authorization. Due to the magnitude of impacts previously predicted as part of the original environmental assessment, the Proponent explained that

the unnamed tributary of the Keewatin River is already accounted for in their draft offsetting plan. For wetlands of unknown fish-bearing status and unknown connectivity to groundwater, the Proponent stated that it is undertaking sampling to determine whether these wetlands provide habitat for fish and has stated that, should these wetlands bear fish, this habitat will be incorporated into the habitat offsetting plan.

Water quality

The Proponent predicted potential effects to water quality in the unnamed tributary of the Keewatin River (KEE3-B1), the Payne Lake outlet (KEE3-PAY1) and Minton Lake beyond what was assessed during the environmental assessment.

The Proponent noted the following exceedances of water quality guidelines:

- KEE3-B1: total arsenic during operations and post-closure, and total cobalt, total copper, fluoride and phosphorus during post-closure once the pit refills and overflows into this tributary.
- KEE3-PAY1: dissolved copper during operation, closure and post-closure, and total cobalt concentrations during operation.
- Minton Lake: dissolved copper and total cobalt during operation, closure and post-closure.

The Proponent noted that the majority of these exceedances, including those for arsenic, were not likely to impact fish health, growth or survival due to the conservative nature of the guidelines and the attenuating effects of other water chemistry parameters. However, the Proponent did note that dissolved copper and total cobalt increased the magnitude of residual effects to fish health growth and survival from negligible to high. These exceedances, according to the Proponent, were driven by the application of the more stringent *Federal Environmental Quality Guidelines* for these parameters relative to the *Canadian Water Quality Guidelines for Protection of Freshwater Aquatic Life* and the *Manitoba Water Quality Standards, Objectives, and Guidelines for Protection of Freshwater Aquatic Life* that were applied in the environmental assessment.

The Proponent explained that the modelling results presented did not take into account any planned or adaptive mitigation measures or expected attenuation process that would occur within the groundwater environment. The Proponent indicated that updated design features at the TMF and MRSA, including increasing the depth of seepage collection ditches, and the installation of seepage collect wells and grout curtains as well as the implementation of adaptive measures to adjust the depth of grouting, and install pump back wells based on monitoring results, would effectively mitigate these residual effects to fish health growth and survival.

4.1.2 Views expressed

Water quantity

DFO, ECCC and NRCan all expressed concerns about the predicted change in the extent of water table drawdown and noted that the potential impacts on fish bearing wetlands were not clear. NRCan and DFO recommended that the Proponent add groundwater quantity and wetland water level monitoring sites within the forecasted extent of groundwater drawdown to effectively verify the predictions in the updated models and NRCan recommended two additional monitoring sites. DFO acknowledged that adequate updated

surface water monitoring sites would be required as part of the *Fisheries Act* Authorization application and noted that it did not foresee technical or biological barriers that would prevent the Proponent from offsetting these impacts in its offsetting plan for the Project, even if all wetlands are fish-bearing and completely dry by the end of operation.

DFO noted uncertainty in the Proponent's explanations that predicted decreased water levels in Minton Lake and decreased flows in Minton and Dot Lake outlets would be sufficiently moderated by site-specific conditions and emphasized the importance of additional monitoring measures to validate the predictions. DFO acknowledged that adequate updated surface water monitoring sites would be required as part of the *Fisheries Act* Authorization application requirements.

Water quality

ECCC highlighted that exceedances are predicted to occur earlier than predicted during the environmental assessment, including during operation and that two parameters of potential concern, total cobalt and total phosphorus, were not identified in the environmental assessment as contaminants of concern. ECCC recommended that these parameters be reflected in conditions 3.14.2 and 3.14.3, respectively. ECCC also recommended adding total and dissolved copper to conditions 3.14.2 and 3.14.4, as predicted exceedances, previously unidentified contaminants of concern, and modelling uncertainties increase the potential risk to water quality. Monitoring these parameters would provide critical data to verify predictions related to effects on fish and fish habitat. Additionally, ECCC noted that it was unclear in the Notice of Change whether existing and additional measures would be sufficient to be protective of aquatic life. They also indicated that the Proponent's approach to applying arsenic source terms during modelling increases the uncertainty of the predicted effects on water quality associated with the Project change.

NRCan noted the much shorter travel times for seepage from mine facilities to their surface water discharge points and recommended closer monitoring to adaptively manage potential impacts.

DFO expressed concern over the potential mobilization of sediment into the Keewatin River from the unnamed tributary of the Keewatin River during post-closure when the Pit Lake is connected to the tributary. DFO also noted that it did not support the Proponent's assertion that the risk would be effectively mitigated by the tributary's morphology and numerous beaver dams. However, DFO noted that this issue can be addressed through the *Fisheries Act* permitting process through additional modelling and subsequent development of mitigation or monitoring measures as required.

MCFN expressed concerns regarding potential long-term water quality effects associated with seepage from the tailings management facility and mine rock storage areas at the MacLellan site. MCFN noted that monitoring and reporting of contaminant concentrations alone may be insufficient to understand the full extent of potential effects and emphasized the importance of assessing total contaminant loads released from the Project. MCFN also identified uncertainty in seepage predictions, including uncertainty related to hydrological conditions, waste rock heterogeneity, and the long-term performance of seepage containment measures such as grout curtains in a cold and permafrost-influenced environment. MCFN indicated that enhanced Indigenous oversight and more timely sharing of seepage monitoring results would be important to support adaptive management and ensure protection of downstream aquatic environments.

4.1.3 IAAC's analysis and conclusions

IAAC notes that many measures that would mitigate the effects of the Project change were already considered during the original environmental assessment and are described in the existing Decision Statement, including the requirement to offset for residual effects to fish and fish habitat (3.1), collect and treat contact water and seepage (3.7), manage acid-generating and metal leaching materials (3.10), implement sedimentation and erosion measures (3.13) and monitor and adaptively manage through follow-up programs for water quality (3.14, 3.17) and water quantity (3.15), and fish and fish habitat (3.16). IAAC is recommending changes to federal conditions within the Decision Statement (see Table 1) to update the definition of the Designated Project (1.7) and Project development areas (1.35) so that these existing conditions apply to the Project change and its adverse federal effects.

IAAC also notes that the proponent identified challenges with obtaining reliable flow measurements at the Minton Lake and Dot Lake outlets due to site conditions, and recommended shifting monitoring downstream where established rating curves exist. IAAC has reflected this recommendation in the proposed updates to condition 3.15.1.

IAAC also recommends modifications to the follow-up programs for water quality (3.14), water quantity (3.15) and fish and fish habitat (3.16) to incorporate additional details of the Project change (see Table 1). These adjustments include:

- adding cobalt to the list of contaminants to be monitored under condition 3.14.2;
- adding total and dissolved copper to the list of contaminants to be monitored at the MacLellan site under conditions 3.14.2 and 3.14.4;
- adding Payne Lake outlet as a monitoring location in conditions 3.14.2 and 3.14.4;
- updating condition 3.14.6 to reference the updated water modelling results reported in the Notice of Change;
- adding downstream to the Minton Lake outlet and Dot Lake to the monitoring locations in condition 3.15.1, adding groundwater quantity monitoring sites within the predicted zone of groundwater drawdown to condition 3.15.2, and updating these conditions to reference the updated water modelling results reported in the Notice of Change; and
- adding Payne Lake Outlet to fish and fish habitat monitoring in conditions 3.16.2 and 3.16.4 and downstream to the Minton Lake Outlet to condition 3.16.4.
- adding hydraulic barriers to condition 3.17.1.

In order to support the mitigation of potential adverse environmental effects on fish and fish habitat, and the associated effects on Indigenous peoples' current use of lands and resources that may result from seepage-related water quality changes, IAAC recommends:

- adding condition 3.11 to require the Proponent to design the seepage containment structures and hydraulic barriers for the tailings management facility in consultation with Indigenous groups;
- adding condition 3.12 to require the Proponent to provide opportunities for Indigenous groups to access the Project development areas, when safety permits, to observe construction activities related to seepage-control components;

- adding condition 3.14.6 to require reporting of contaminant mass loadings for surface water and groundwater as part of the water quality follow-up program; and
- adding condition 3.14.7 to require that seepage monitoring results be shared with Indigenous groups as soon as feasible after results become available.

Overall, IAAC is of the view that the proposed project changes would not change the significance of the project's effects on fish and fish habitat, if the Decision Statement is amended to reflect the changes recommended above.

4.2 Health of Indigenous Peoples

4.2.1 Proponent's assessment

The Proponent evaluated impacts on the health of Indigenous Peoples through the changes to drinking water quality of surface water, fish tissue contamination, air quality. The Proponent indicated that there were no predicted impacts to Indigenous health via impacts to drinking water or the consumption of contaminated fish, noting that surface water quality remained well below the drinking water quality guidelines and impacts to water quality and fish would be mitigated as described in section 4.1.

The Proponent identified changes in air quality as a potential pathway of effects on the health of Indigenous peoples. In its analysis, the Proponent noted that it considered the following Project changes in its analysis of impacts on air quality:

- increases in total amount of ore produced, crushing and process capacity of the facilities, and blasting;
- shifts in the timing of peak ore production (year 7 to year 5) and peak transport of ore from the Gordon site to the mill at the MacClellan site (year 2 to year 4); and
- changes to the types and numbers of mining equipment.

The Proponent indicated that predicted air quality results, were marginally higher than were assessed as part of the environmental assessment, but there were noted exceedances of the World Health Organization's Global Air Quality Guidelines' exposure limits values at the Indigenous receptor site (i.e. trapping area 12) for maximum concentrations of 1-hour nitrogen dioxide (NO_2) and 24-hour particulate matter 10 microns or less in size (PM_{10}).

The Proponent explained however, that the frequency of exceedances for NO_2 remained low making it less likely to cause health impacts. The Proponent also explained that existing monitoring and adaptive management measures for air quality parameters, including NO_2 and PM_{10}, will remain in place to verify the accuracy of the model predictions and implement modified or additional measures as needed.

4.2.2 Views expressed

Environment and Climate Change Canada and Health Canada noted the increased NO_2 concentrations predicted in proximity to areas of Indigenous use as a result of the Project change and flagged the importance of monitoring for NO_2 to verify the effects predictions and adaptively manage effects. ECCC also noted the shift in timing of peak NO_2 emissions corresponding with the shift in peak transport of ore from the Gordon site to the MacClellan site in year 4 instead of year 2 and recommended making this change in the air quality follow-up program in condition 6.3.5. Environment and Climate Change Canada also noted the importance of conducting the two months of monitoring in late autumn/early winter, when concentrations are expected to peak due to seasonal atmospheric conditions.

Health Canada indicated that they support the Proponent's proposed location and timing of continuous NO_2 monitoring and ECCC's recommendation to update condition 6.3.5 accordingly.

4.2.3 IAAC's analysis and conclusions

IAAC finds that the key effect pathways of the project change on Indigenous health is through predicted changes to air quality. The key measures to mitigate effects to Indigenous health via changes in air quality, including NO_2 and PM_{10} are already captured in the existing Decision Statement including through condition 6.1 which requires the Proponent to implement measures to mitigate dust and fugitive particulates from the Project. IAAC also notes that additional monitoring and adaptive management for air contaminants including NO_2 and PM_{10} are included under condition 6.3. To ensure the monitoring and follow-up program required by condition 6.3 remains effective in mitigating impacts to the health of Indigenous Peoples, IAAC recommends changing the NO_2 monitoring requirement from year 2 to year 4 to maintain the timing relative to peak ore transport to the MacClellan site, and to add language, clarifying this intent, in case project timelines change. IAAC further recommends clarifying the seasonal timing of NO_2 monitoring, as committed to by the Proponent, to ensure the monitoring and follow-up program remains effective in mitigating impacts to the health of Indigenous Peoples. IAAC also recommends adjusting the timing in condition 6.3.5 to require additional monitoring "each year until the end of mining activity" instead of "during all phases of the project", to better reflect the timing of potential risks to Indigenous health.

IAAC is of the view that the proposed changes to the Project would not change the significance of the project's effects on the health of Indigenous Peoples, if the Decision Statement is amended to reflect the changes recommended above.

5. Conclusion

Based on the information provided by the Proponent and the parties consulted, IAAC is of the view that the proposed changes to the Project are not likely to cause significant adverse environmental effects beyond those described in the 2023 environmental assessment. This conclusion takes into account the mitigation measures and follow-up programs included in the conditions of the Decision Statement, as well as the proposed amendments in Table 1.

In addition, IAAC recommends adding definitions of both the February 2024 and the June 2025 Notice of Change to section 1 of the Decision Statement and replacing references to the February 2024 Notice of Change in conditions 3.6, 3.14.8, 3.15.1, 3.15.2, 6.3.5 and 6.3.7 in order to simplify references to multiple notices of change in the conditions. IAAC also recommends that conditions 2.16 and 2.17 be amended to align with recent decision statements, ensuring consistency in how project changes are reported by Proponents and how IAAC considers this information.

Table 1. Amendments to the Decision Statement recommended by IAAC

Content in Decision Statement issued August 2025	Recommended content in amended Decision Statement
Description of the Designated Project: Alamos Gold Inc. is proposing the construction, operation, decommissioning, and reclamation of an open pit gold mine and new metal mill located approximately 1000 kilometres north of Winnipeg, near the Town of Lynn Lake, Manitoba. The Designated Project would involve the redevelopment of two historical gold mines (the Gordon site and MacLellan site) and have an ore input capacity of 8,250 tonnes per day over a 13-year period. Components of the project would include new mine infrastructure, a new distribution line, open pits, access roads, an ore milling and processing plant, ore and overburden stockpiles, mine rock storage areas, and a tailings management facility.	**Updated Description of the Designated Project:** Alamos Gold Inc. is proposing the construction, operation, decommissioning, and reclamation of an open pit gold mine and new metal mill located approximately 1000 kilometres north of Winnipeg, near the Town of Lynn Lake, Manitoba. The Designated Project would involve the redevelopment of two historical gold mines (the Gordon site and MacLellan site) and have an ore input capacity of 8,250 tonnes per day over **approximately** ~~13~~**17**-year~~**s**~~**period**. Components of the project would include new mine infrastructure, a new distribution line, open pits, access roads, an ore milling and processing plant, ore and overburden stockpiles, mine rock storage areas, and a tailings management facility.
Condition 1.7: *Designated Project* means the Lynn Lake Gold Project as described in Chapter 2 of the Environmental Assessment Report prepared by the Impact Assessment Agency of Canada (Canadian Environmental Assessment Registry Reference Number 80140, document 124) as well as the changes to the pit dewatering discharge location as described in IAAC's Analysis of Proposed Changes to the Lynn Lake Gold Project- Pit Dewatering (Canadian Impact Assessment Registry Reference number 80140, document 142).	**Updated condition 1.7:** *Designated Project* means the Lynn Lake Gold Project as described in Chapter 2 of the Environmental Assessment Report ~~**prepared by the Impact Assessment Agency of Canada (Canadian Environmental Assessment Registry Reference Number 80140, document 124)**~~ as well as the changes to the pit dewatering discharge location as described in IAAC's Analysis of Proposed Changes to the Lynn Lake Gold Project- Pit Dewatering (Canadian Impact Assessment Registry Reference number 80140, document 142) **and changes to the MacLellan site as described in section 2 of IAAC's Analysis of Proposed Changes to the Lynn Lake Gold Project- MacLellan site (Canadian Impact Assessment Registry Reference number 80140, document 149)**.
N/A – new condition	**New condition 1.14:** ***February 2024 Notice of Change* means the February 2024 document entitled *Lynn Lake Gold Project: Gordon Mine Pit Dewatering Notice of Alteration / Notice of Change* (Canadian**

Content in Decision Statement issued August 2025	Recommended content in amended Decision Statement
	Impact Assessment Registry Reference Number 80140, document 131).
N/A – new condition	**New condition 1.22:** ***June 2025 Notice of Change* means the June 2025 document entitled *Lynn Lake Gold Project: MacLellan Mine Plan Amendment Notice of Alteration / Notice of Change* (Canadian Impact Assessment Registry Reference Number 80140, document 145).**
Condition 1.35: *Project development areas* means the geographic areas occupied by the Designated Project, including the Gordon Site and the MacLellan Site, as described in Figures 2 and 3 of the Environmental Assessment Report *(*Canadian Impact Assessment Registry Reference Number 80140*)*	**Updated condition 1.35:** Project development areas means the geographic areas occupied by the Designated Project, including the Gordon Site as described in Figure~~s~~ 2 ~~and 3~~ of the Environmental Assessment Report **and the MacLellan Site as described in Figure 1 of IAAC's Analysis of Proposed Changes to the Lynn Lake Gold Project- MacLellan site** (Canadian Impact Assessment Registry Reference Number 80140 document number **142 and XX**).
N/A – new condition	**New condition 2.16.4:** **results of consultation with Indigenous groups on the proposed change(s), if the proposed change(s) may adversely affect Indigenous groups or their rights, including any views on the environmental effects referred to in condition 2.16.1 and on the modified or additional mitigation measures and follow-up requirements referred to in condition 2.16.2.**
Condition 2.17: The Proponent shall submit to the Agency any additional information required by the Agency about the proposed change(s) referred to in condition 2.16, 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 2.16.1 and the modified or additional mitigation measures and follow-up requirements referred to in condition 2.16.2.	**Updated condition 2.17:** The Proponent shall submit to the Agency any additional information required by the Agency about the proposed change(s) referred to in condition 2.16, 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 2.16.1 and the modified or additional mitigation measures and follow-up requirements referred to in condition 2.16.2

Content in Decision Statement issued August 2025	Recommended content in amended Decision Statement
Condition 3.6: The Proponent shall adjust the rate of release of water into the Hughes River from dewatering the East and Wendy pit lakes, and into Farley and Gordon Lakes from groundwater intercepted pursuant to condition 3.4 in order to maintain water levels in these receiving systems within range of natural variability predicted in the Lynn Lake Gold Project: Gordon Mine Pit Dewatering Notice of Alteration / Notice of Change, dated February 9, 2024 (Canadian Impact Assessment Registry Reference Number 80140, document 131) and Volume 2 Chapter 10 of the Environmental Impact Statement (Canadian Impact Assessment Registry Reference Number 80140, document 54).	**Updated condition 3.6:** The Proponent shall adjust the rate of release of water into the Hughes River from dewatering the East and Wendy pit lakes, and into Farley and Gordon Lakes from groundwater intercepted pursuant to condition 3.4 in order to maintain water levels in these receiving systems within range of natural variability predicted in **the February 2024 Notice of Change** ~~***Lynn Lake Gold Project: Gordon Mine Pit Dewatering Notice of Alteration / Notice of Change, dated February 9, 2024***~~ (Canadian Impact Assessment Registry Reference Number 80140, document 131) and Volume 2 Chapter 10 of the Environmental Impact Statement (Canadian Impact Assessment Registry Reference Number 80140, document 54).
N/A – new condition	**New condition 3.11:** **The Proponent shall design the seepage containment structures and hydraulic barriers for the tailings management facility, to mitigate potential adverse environmental effects on fish and fish habitat, and shall consult Indigenous groups on the final design prior to construction.**
N/A – new condition	**New condition 3.12:** **The Proponent shall provide opportunities for Indigenous groups to access the Project development areas during the construction of seepage containment components associated with the tailings management facility and mine rock storage areas, including liners, hydraulic barriers and grout curtains, while meeting health and safety requirements, for the purpose of observing construction activities related to seepage control.**
Condition 3.14.2: monitor water quality in the newly formed pit lakes, tailings management facility, mine rock storage areas, contact water collection ponds, and receiving water bodies and watercourses upstream and downstream of the Project development areas,	**Updated condition 3.14.2:** monitor water quality in the newly formed pit lakes, tailings management facility, mine rock storage areas, contact water collection ponds, and receiving water bodies and watercourses upstream and

Content in Decision Statement issued August 2025	Recommended content in amended Decision Statement
including at the edge and downstream of the edge of mixing zones identified pursuant to condition 3.12.1, Arbor Lake, Burge Lake, Cockeram Lake, Ellystan Lake, Farley Creek, Farley Lake, Gordon Lake, the Hughes River, the Keewatin River, the unnamed tributary of the Keewatin River, Minton Lake, Payne Lake, Susan Lake and Swede Lake, for all contaminants that may have adverse effects on fish and fish habitat, including aluminum, antimony, arsenic, calcium, copper, cyanide, fluoride, hexavalent chromium, iron, magnesium, methylmercury, phosphorus, selenium, and total and dissolved cadmium. Monitoring shall be conducted as follows: […]	downstream of the Project development areas, including at the edge and downstream of the edge of mixing zones identified pursuant to condition 3.12.1, Arbor Lake, Burge Lake, Cockeram Lake, Ellystan Lake, Farley Creek, Farley Lake, Gordon Lake, the Hughes River, the Keewatin River, the unnamed tributary of the Keewatin River, Minton Lake, Payne Lake, **Payne Lake outlet**, Susan Lake and Swede Lake, for all contaminants that may have adverse effects on fish and fish habitat, including aluminum, antimony, arsenic, calcium, **cobalt, total and dissolved** copper, cyanide, fluoride, hexavalent chromium, iron, magnesium, methylmercury, phosphorus, selenium, and total and dissolved cadmium. Monitoring shall be conducted as follows: […]
Condition 3.14.4: monitor, beginning during construction, water quality in groundwater near the open pits, Farley Lake, Gordon Lake, the Keewatin River, the unnamed tributary of the Keewatin River, Minton Lake, the unnamed lakes northeast of Minton Lake, Payne Lake, Pump Lake and Susan Lake, up and down gradient from the tailings management facility, mine rock storage areas, ore and overburden stockpiles, and seepage collection systems. Monitoring shall be conducted for all contaminants that may have adverse effects on fish and fish habitat, including antimony, arsenic, iron, sodium, sulphate, and uranium at the Gordon site and aluminum, antimony, arsenic, cobalt, total and dissolved copper, total cyanide, iron, lead, nitrate, nitrite, sodium, and sulphate at the MacLellan site;	**Updated condition 3.14.4:** monitor, beginning during construction, water quality in groundwater near the open pits, Farley Lake, Gordon Lake, the Keewatin River, the unnamed tributary of the Keewatin River, Minton Lake, the unnamed lakes northeast of Minton Lake, Payne Lake**, Payne Lake outlet**, Pump Lake and Susan Lake, up and down gradient from the tailings management facility, mine rock storage areas, ore and overburden stockpiles, and seepage collection systems. Monitoring shall be conducted for all contaminants that may have adverse effects on fish and fish habitat, including antimony, arsenic, iron, sodium, sulphate, and uranium at the Gordon site and aluminum, antimony, arsenic, cobalt, **total and dissolved copper,** total cyanide, iron, lead, nitrate, nitrite, sodium, and sulphate at the MacLellan site;
N/A – new condition	**New condition 3.14.6:** **calculate, based on the results of monitoring conducted pursuant to conditions 3.14.2 to 3.14.5, and report the mass loadings of contaminants that may have adverse effects on fish and fish habitat for each surface water and groundwater monitoring location where contact water or seepage is conveyed or has the potential to be conveyed from the Project development areas;**

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N/A – new condition	**New condition 3.14.7:** **provide to Indigenous groups, as soon as feasible after results become available, the results of monitoring conducted pursuant to conditions 3.14.2 to 3.14.5, including any confirmed exceedances of predicted concentrations identified in the Environmental Impact Statement and in the June 2025 Notice of Change, or of the water quality guidelines referenced in condition 3.14.8; and**
Condition 3.14.8: develop, in consultation with relevant authorities, and implement modified or additional mitigation measures, if the results of monitoring conducted pursuant to condition 3.12.2, 3.12.3, 3.12.4 and 3.12.5 demonstrate any unanticipated effects attributable to the Designated Project, taking into account the Canadian Council of Ministers of the Environment's Canadian Water Quality Guidelines of the Protection for Aquatic Life or Manitoba's Water Quality Standards, Objectives, and Guidelines, whichever is most protective of fish and fish habitat, and predicted concentrations identified in Volume 1 Chapter 9 of the Environmental Impact Statement.	**Updated condition 3.14.8:** develop, in consultation with relevant authorities, and implement modified or additional mitigation measures, if the results of monitoring conducted pursuant to condition 3.14.2, 3.14.3, 3.14.4 and 3.14.5 demonstrate any unanticipated effects attributable to the Designated Project, taking into account the Canadian Council of Ministers of the Environment's Canadian Water Quality Guidelines of the Protection for Aquatic Life, ***the Federal Environmental Quality Guidelines*** or Manitoba's Water Quality Standards, Objectives, and Guidelines, whichever is most protective of fish and fish habitat, and predicted concentrations identified in Volume 1 Chapter 9 of the Environmental Impact Statement **and in the June 2025 Notice of Change**.
Condition 3.15.1: monitor, during all phases of the Designated Project, surface water instantaneous flows, lake levels and pH levels within Arbor Lake, Burge Lake, Cockeram Lake, Ellystan Lake, Farley Creek, Farley Lake, Gordon Lake, the Keewatin River, the unnamed tributary of the Keewatin River, Minton Lake, Payne Lake, Susan Lake, Swede Lake, fish-bearing wetlands within the local assessment areas, newly formed pit lakes, the tailings management facility, and contact water collection ponds, and prior to and during the construction phase and during the first year of the operation phase, the East and Wendy pit lakes and the Hughes River, to verify the environmental assessment predictions identified in Volume 2 Chapter 10 of the Environmental Impact Statementand Lynn Lake Gold Project: Gordon Mine Pit	**Updated condition 3.15.1:** monitor, during all phases of the Designated Project, surface water instantaneous flows, lake levels and pH levels within Arbor Lake, Burge Lake, Cockeram Lake, **Dot Lake,** Ellystan Lake, Farley Creek, Farley Lake, Gordon Lake, the Keewatin River, the unnamed tributary of the Keewatin River, Minton Lake, the **unnamed lake outlet downstream of the Minton Lake outlet,** Payne Lake, Susan Lake, Swede Lake, fish-bearing wetlands within the local assessment areas, newly formed pit lakes, the tailings management facility, and contact water collection ponds, and prior to and during the construction phase and during the first year of the operation phase, the East and Wendy pit lakes and the Hughes River, to verify the environmental assessment predictions identified in Volume 2 Chapter 10 of the Environmental Impact Statement**, the February 2024 Notice of Change, and the June 2025**

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Dewatering Notice of Alteration / Notice of Change, dated February 9, 2024 (Canadian Impact Assessment Registry Reference Number 80140, document 131);	**Notice of Change** ~~**Lynn Lake Gold Project: *Gordon Mine Pit Dewatering Notice of Alteration / Notice of Change*, dated February 9, 2024 (Canadian Impact Assessment Registry Reference Number 80140, document 131)**~~*;*
Condition 3.15.2: monitor, during all phases of the Designated Project, groundwater levels, gradients and hydraulic conductivity of all hydrogeological units, as identified in the groundwater model in Volume 5 Appendix F and G of the Environmental Impact Statement, with well depths ranging from near surface to a minimum of 115 meters below ground to characterize contaminant transport via groundwater at the depth of the groundwater model for the Designated Project. Monitoring wells shall be installed near the open pits, the tailings management facility, mine rock storage areas, ore and overburden stockpiles, and fish-bearing wetlands within the local assessment areas that intersect with the Project development areas; and	**Updated condition 3.15.2:** monitor, during all phases of the Designated Project, groundwater levels, gradients and hydraulic conductivity of all hydrogeological units, as identified in the groundwater model in Volume 5 Appendix F and G of the Environmental Impact Statement **and in the June 2025 Notice of Change**, with well depths ranging from near surface to a minimum of 115 meters below ground to characterize contaminant transport via groundwater at the depth of the groundwater model for the Designated Project. Monitoring wells shall be installed near the open pits, the tailings management facility, mine rock storage areas, ore and overburden stockpiles, and fish-bearing wetlands within the local assessment areas that intersect with the Project development areas **and within the updated forecast extent of drawdown related to operation of the pit**;
Condition 3.16.2: monitor total invertebrate density, taxon richness, Simpson's Evenness Index, Bray-Curtis Index, and chlorophyll a to characterize benthic invertebrate, plankton and periphyton communities in Farley Creek, Farley Lake, Gordon Lake, the Hughes River, the Keewatin River, Minton Lake, the new diversion channel, and any additional locations identified in consultation with Indigenous groups and relevant authorities, for the detection of project-related changes in nutrient and contaminant levels, taking into account predictions in Volume 2 Chapter 10 of the Environmental Impact Statement;	**Updated condition 3.16.2:** monitor total invertebrate density, taxon richness, Simpson's Evenness Index, Bray-Curtis Index, and chlorophyll a to characterize benthic invertebrate, plankton and periphyton communities in Farley Creek, Farley Lake, Gordon Lake, the Hughes River, the Keewatin River, Minton Lake, **the Payne Lake outlet,** the new diversion channel, and any additional locations identified in consultation with Indigenous groups and relevant authorities, for the detection of project-related changes in nutrient and contaminant levels, taking into account predictions in Volume 2 Chapter 10 of the Environmental Impact Statement;
Condition 3.16.4: monitor, starting prior to construction and during all phases of the Designated Project, fish habitat quality and quantity end points for all species identified pursuant to condition 3.14.3, in Farley Creek,	**Updated condition 3.16.4:** monitor, starting prior to construction and during all phases of the Designated Project, fish habitat quality and quantity end points for all species identified pursuant to condition 3.14.3, in Farley Creek, Farley Lake, Gordon Lake, the Keewatin River, Minton Lake, **the Minton Lake**

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Farley Lake, Gordon Lake, the Keewatin River, Minton Lake, the new diversion channel, fish-bearing wetlands within and downstream of the Project development areas, and any additional locations identified in consultation with Indigenous groups and relevant authorities, as well as in the Hughes River prior to and during the Construction phase and during the first year of the operation phase.	**outlet, the Payne Lake outlet,** the new diversion channel, fish-bearing wetlands within and downstream of the Project development areas, and any additional locations identified in consultation with Indigenous groups and relevant authorities, as well as in the Hughes River prior to and during the Construction phase and during the first year of the operation phase.
Condition 3.17.1: verify that the covers installed at the mine rock storage areas and tailings management facility pursuant to condition 3.10.5 perform and continue to perform as predicted in Volume 1 Chapter 5 of the Environmental Impact Statement during all phases of the Designated Project, including post-closure.	**Updated condition 3.17.1:** verify that the covers **and hydraulic barriers** installed at the mine rock storage areas and tailings management facility pursuant to condition 3.10.5 perform and continue to perform as predicted in Volume 1 Chapter 5 of the Environmental Impact Statement during all phases of the Designated Project, including post-closure.
Condition 6.3.5: monitor ambient air concentrations of nitrogen dioxide (NO_2) at locations identified in consultation with Indigenous groups and relevant authorities, for at least two consecutive months during year 2 of operation, and continue to monitor during all phases of the Designated Project if the monitoring results exceed predicted levels in the atmospheric dispersion model in Volume 1 Chapter 6 of the Environmental Impact Statement;	**Updated condition 6.3.5:** monitor ambient air concentrations of nitrogen dioxide (NO_2) at locations identified in consultation with Indigenous groups and relevant authorities, for at least two consecutive months **between November and January** during year ~~**2**~~**4** of operation **or whichever year the highest truck traffic volume for ore haulage from the Gordon Site to the ore milling and processing plant at the MacLellan site will occur**, and continue to monitor **each year until the end of ore extraction and transport** ~~**during all phases of the Designated Project**~~ if the monitoring results exceed predicted levels in the atmospheric dispersion model in ~~**Volume 1 Chapter 6 of the Environmental Impact Statement**~~ **the June 2025 Notice of Change or if ore production rates exceed those that occur during the NO_2 monitoring period**;
Condition 6.3.7: if the monitoring results referred to in conditions 6.3.2 to 6.3.5 exceed predicted levels in the atmospheric dispersion model in Volume 1 Chapter 6 of the Environmental Impact Statement, taking into account the results of monitoring meteorological conditions pursuant to condition 6.3.6, the human health and ecological risk assessment	**Updated condition 6.3.7:** if the monitoring results referred to in conditions 6.3.2 to 6.3.5 exceed predicted levels in the atmospheric dispersion model in ~~**Volume 1 Chapter 6 of the Environmental Impact Statement**~~ **the June 2025 Notice of Change**, taking into account the results of monitoring meteorological conditions pursuant to condition 6.3.6, the human health

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in Volume 5 of the Environmental Impact Statement, or thresholds of the Canadian Council of Ministers of the Environment's Canadian Ambient Air Quality Standards, modify or implement additional mitigation measures pursuant to condition 2.8, and update the human health and ecological risk assessment in Volume 5 of the Environmental Impact Statement. The Proponent shall submit any updates to the human health and ecological risk assessment to the Agency and relevant authorities.	and ecological risk assessment in Volume 5 of the Environmental Impact Statement, **and** ~~**or**~~ thresholds of the Canadian Council of Ministers of the Environment's Canadian Ambient Air Quality Standards, modify or implement additional mitigation measures pursuant to condition 2.8, and update the human health and ecological risk assessment in Volume 5 of the Environmental Impact Statement. The Proponent shall submit any updates to the human health and ecological risk assessment to the Agency and relevant authorities.