



**Lynn Lake Gold Project:  
Emergency Response and  
Spill Prevention and  
Contingency Plan**

Version 0

January 30, 2025

**LYNN LAKE GOLD PROJECT:  
EMERGENCY RESPONSE AND SPILL PREVENTION AND CONTINGENCY PLAN**

## Document History

### Document Location

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### Revision History

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### Approvals

This document requires the following approvals:

Name	Company Title	Date	Signature

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## **Acronyms and Abbreviations**

Alamos	Alamos Gold Inc.
ANFO	Ammonium Nitrate/Fuel Oil
ARD	Acid Rock Drainage
CCME	Canadian Council of Ministers of the Environment
CDA	Canadian Dam Association
CEAA 2012	<i>Canadian Environmental Assessment Act, 2012</i>
EECP	Environmental Emergency Communication Plan
EIS	Environmental Impact Statement
EMMP	Environmental Management and Monitoring Program
EMO	Emergency Measures Organization
EMP	Explosives Management Plan
EMS	Emergency Medical Services
EPCM	Engineering, Procurement, and Construction Management
ERC	Emergency Response Coordinator
ERSPCP	Emergency Response and Spill Prevention and Contingency Plan
ERSPT	Emergency Response and Spill Prevention Team
H&S	Health and Safety
HSE	Health, Safety, and Environment
HCN	Hydrogen Cyanide
LLFD	Lynn Lake Fire Department
MECC	Manitoba Environment and Climate Change (formerly Manitoba Environment, Climate and Parks and formerly Manitoba Conservation and Climate)
MDMER	<i>Metal and Diamond Mining Effluent Regulations</i>

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ML	Metal Leaching
MMF	Manitoba Metis Federation
MRSA	Mine Rock and Storage Area
PDA	Project Development Area
RGMP	Responsible Gold Mining Principles
TARP	Triggered Action Response Plan
TDG	Transportation of Dangerous Goods
TMF	Tailings Management Facility
WCB	Workers Compensation Board
WHMIS	Workplace Hazardous Materials Information System

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## **Glossary**

Assessment	The evaluation and interpretation of available information to provide a basis for decision-making.
Buffer Zone	This zone is intended to separate the public and other facilities from the consequences of an incident involving hazards and/or hazardous materials.
Communications	Advisories, directives, information, and messages that are transmitted.
Emergency	A situation or an impending situation that constitutes a danger of major proportions that could result in serious harm to persons or substantial damage to property and that is caused by the forces of nature, a disease or other health risk, an accident, or an act.
Emergency Management	Organized activities undertaken to prevent, mitigate, prepare for, respond to, and recover from actual or potential emergencies.
Emergency Response and Spill Prevention and Contingency Plan	A plan developed and maintained to direct an organization's external response to an emergency, spill, or contingency event.
Hazard	A phenomenon, substance, human activity, or condition that may cause the loss of life, injury or other health impacts, property damage, loss of livelihoods and services, social and economic disruption, or environmental damage. These may include natural, technological, or human-caused incidents or a combination of these.
Hazardous Material	A substance (gas, liquid, or solid) capable of causing harm to people, property, and/or the environment, the economy and/or services (for example, a toxic, flammable, or explosive substance).
Impact	The negative effect of a hazardous incident on people, property, the environment, the economy and/or services.
Incident	An occurrence or event that requires an emergency response to protect people, property, the environment, the economy and/or services.
Mitigation	Actions taken to reduce the adverse impacts or an emergency or disaster. Such actions may include diversion or containment measures to lessen impacts of a flood or spill.

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Natural Hazard	A naturally occurring event such as a forest fire, flood and/or severe weather that has the potential to harm people, property, the environment, the economy and/or services.
Preparedness	Actions taken prior to an emergency or disaster to ensure an effective response. These actions include formulation of emergency response plans, business continuity/continuity of operation plans, training, exercises, and public awareness and education.
Prevention	Actions taken to stop an emergency or disaster from occurring. Such actions may include legislative controls, zoning restrictions, improved operating standards/procedures, or critical infrastructure management.
Resources	These are personnel and major items of equipment, supplies, and facilities available or potentially available for assignment to incident operations and for which status is maintained. Resources are described by kind and type and may be used in operational or support capacities.
Response	The provision of emergency services and public assistance or intervention during or immediately after an incident to protect people, property, the environment, the economy and/or services. This may include the provision of resources such as personnel, services, and/or equipment.
Risk	The product of the probability of occurrence of a hazard and its consequences.
Risk Assessment	A methodology to determine the nature and extent of risk by analyzing potential hazards and the evaluation of vulnerabilities and consequences.
Site	The geographical location of an incident.
Standard	Common criteria used to measure performance.
Vulnerability	The susceptibility of a community, system, or asset to the damaging effects of a hazard.

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## 1.0 INTRODUCTION

The following presents the Emergency Response and Spill Prevention and Contingency Plan ('ERSPCP' or 'the Plan'), which considers the construction, operation, and decommissioning/closure phases of the Lynn Lake Gold Project ('LLGP' or 'the Project'). It is one component of the overall Environmental Management and Monitoring Plan (EMMP) for the Project. Emergency in this Plan is defined as a situation or an impending situation that constitutes a danger of major proportions that could result in serious harm to persons or substantial damage to property and that is caused by the forces of nature, a disease or other health risk, an accident, or an act. Accident and malfunction are events that have significant adverse impacts and require regulatory reporting as defined by Acts, regulations, or guidelines.

For clarity, the term "follow-up programs" as stated in the federal Decision Statement refers to "management and monitoring programs" as outlined in the provincial Licences. Both terms are used interchangeably but refer to the same monitoring activities that extend over the life of mine through all phases.

### 1.1 PURPOSE

The purpose of the ERSPCP is to reduce the likelihood of potential emergencies, compliance issues, and spills throughout the life of the Project, and to facilitate prompt, effective, and safe response actions (follow-up) if an emergency, compliance issue, or spill incident does occur. The three priorities of the ERSPCP are:

- Protection of life, including the occupational health and safety of Project personnel.
- Protection of the environment, including environmentally sensitive sites (Map 1 and Map 2; Appendix A).
- Protection of property, including Project equipment and infrastructure.

### 1.2 OBJECTIVES

As part of Alamos Gold Inc.'s (Alamos') approach to environmental management, the company sets, implements, and maintains documented environmental objectives that consider the Project's environmental risks and compliance obligations. These obligations are aligned with the Project's Environmental Policy and are communicated to employees, contractors, and interested parties, regularly monitored, and updated as appropriate.

Alamos' overarching environmental objective is to avoid adverse effects, where technologically and economically feasible, and mitigate adverse effects that are unavoidable. In support of this environmental objective, the ERSPCP focuses on prevention and response measures for accidents and malfunction scenarios, including emergencies and spills, in unplanned situations, and includes mechanisms for corrective or maintenance actions for less severe events. The overarching objective of the ERSPCP is to provide for emergency preparation and response, spill prevention, and contingency planning in accordance

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with federal and provincial legislation and guidelines, and corporate policies and procedures for the protection of human health and the environment.

The specific objectives of the ERSPCP are to:

- Identify the organization, responsibilities, and reporting procedures of the Emergency Response and Spill Prevention Team (ERSPT).
- Define appropriate communication protocols, including procedures to contact relevant regulatory agencies and Indigenous Nations related to an accident or to malfunction events and follow-up actions that will be taken.
- Provide site information on the facilities and contingencies in place should an emergency, spill or release of a hazardous substance, or compliance issue occur.
- Provide support and information on available resources, facilities, and trained personnel if an emergency (i.e., accident, explosion, fire) or spill event occurs.

Implementation of the ERSPCP is intended to provide Project personnel with the necessary framework and tools to:

- Clearly communicate the nature of an emergency or spill incident through appropriate established channels.
- Prevent the inadvertent release of materials which may have a deleterious effect on the terrestrial and aquatic environments.
- Organize an appropriate response to emergencies in an efficient manner.
- Respond with appropriate measures to an inadvertent release in a timely manner.
- Report emergencies and/or spill incidents to key Project personnel (i.e., senior management, response officials, staff), regulatory bodies, local authorities, Indigenous Nations, stakeholders, and the public in a timely and appropriate manner.

## **1.3 RELATIONSHIP TO OTHER MANAGEMENT PLANS**

The ERSPCP will work in concert with the procedures outlined in various plans to ensure a comprehensive and cohesive response to emergencies. In the event of a spill or other emergency, coordination will be facilitated through established communication channels with the teams responsible for the following plans:

- Soil Management and Rehabilitation Plan
- Acid Rock Drainage and Metal Leaching (ARD/ML) Management and Monitoring Plan
- Groundwater Monitoring and Management Plan
- Surface Water Management and Monitoring Plan
- Waste Management Plan
- Erosion and Sediment Control Plan

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- Explosives Management Plan.
- EMMP (see Section 1.4.2).

A decision/communications tree for environmental incidents is appended to this document and will be updated regularly (i.e., the Environmental Emergency Communication Plan [EECP]).

## **1.4 TRAINING**

### **1.4.1 All Employees**

All employees will be trained in relation to the ERSPCP at initial site induction. This training will provide for a rapid response to an emergency or spill situation consistent with company policies and procedures for facility personnel. The Procedure will be reviewed at least yearly with each employee through safety talks.

Training and orientation will also be provided in general emergency response and reporting, spill recognition and assessment, spill hazards and reporting, clean-up procedures and communications.

### **1.4.2 Company Emergency Response Personnel**

Company Emergency Response Personnel are referenced in the Introductory Chapter to the EMMP. It is of the utmost importance that each member understands and is comfortable with their role(s) and responsibilities, and have the required skill set both mentally and physically to function in emergency situations. The skills are typically acquired by repeated practice through incident simulation. Training provided will include knowledge and use of response equipment, hazards from chemicals that may be encountered, and applicable spill response procedures for that position.

Emergency Response personnel will undergo annual spill response drills/exercises to acquire and hone skills essential for emergency/spill response. Both a paper exercise and physical test of the operation will be conducted. A live exercise will be conducted once every two years where spill response is practiced, and every operation is physically tested. Desktop exercises (i.e., paper exercises) will be conducted in the alternate year to ensure annual training. Telephone contact lists will be tested quarterly.

### **1.4.3 Hazardous Materials Training and Inventory**

Each work area will maintain a current inventory of hazardous materials used and stored in the workplace. Copies of the hazardous material inventory will be provided to the Security Supervisor for emergency response purposes and all employees working in areas where hazardous materials are being used and stored will receive additional training specific to these materials.

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This training will include annual Workplace Hazardous Materials Information System (WHMIS) and Transportation of Dangerous Goods (TDG) training to complement a skills training program addressing the following topics:

- Inspection of workplace and workplace conditions, particularly areas where there is greater potential for spills and leaks.
- Conducting pre-operational checks of physical layout, equipment and process components and communication and reporting requirements.
- Transferring chemical substances as per company procedures for each substance used including communication and reporting requirements.
- Mixing and/or blending including operational checks and logging/reporting procedures.
- Normal and emergency shutdown of chemical handling, blending, and mixing systems.
- Spill containment, communication, and reporting procedures.
- Clean-up, collection, disposal, and restoration procedures to follow in the event of an accidental release of material.

Training will include review of standard operating procedures with a trainer and/or supervisor/department head(s) to demonstrate competency of those employees required to use, handle, mix, blend, store, transport, etc. hazardous materials covered under the ERSPCP to maintain a safe and efficient operation in compliance with applicable acts, regulations, company standards and procedures, and manufacturer specifications.

Information on hazardous materials present at the worksite will be kept up-to-date and be readily available. Sources of information include Safety Data Sheets, signs, container labels, posters, and reference books. The Site Supervisor and the Health, Safety, and Environment (HSE) Manager are responsible for ensuring this information is readily available to worksite personnel.

In addition, regular inspection of PPE, eye wash stations and emergency showers will take place to ensure proper functionality.

### **1.5 REGULATORY CONTEXT**

The Project Environmental Impact Statement (EIS) was submitted to the Impact Assessment Agency of Canada (formerly the Canadian Environmental Assessment Agency) pursuant to CEAA 2012, 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. Within the EIS, and with Project approval, federal and provincial regulatory requirements were identified. The relevant federal and provincial regulatory requirements related to emergency response and spill prevention and contingency planning are outlined below.

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## 1.5.1 Federal Regulatory Requirements

Federal regulatory requirements related to this ERSPCP are outlined in the following:

- Metal and Diamond Mining Effluent Regulations (MDMER) – related to the potential for deposition of mine rock or mine tailings into watercourses or waterbodies frequented by fish and an environmental effects monitoring program for discharge of mine effluent.
- *Canadian Environmental Assessment Act* – related to the construction, operation, decommissioning, and abandonment of a new metal mill or gold mine above certain ore input capacity and ore production thresholds (CEA Agency 2012).
- *Canadian Environmental Protection Act, 1999* – related to the conveyance in transit of hazardous waste or hazardous recyclable material or prescribed non-hazardous waste for final disposal.
- *Transportation of Dangerous Goods Act, 1992* – related to the development and approval of an Emergency Response Assistance Plan before the transport of certain dangerous goods.
- *Fisheries Act* – related to the potential for the harmful alteration, disruption, or destruction of fish habitat that could result from Project activities and potential for deposition of mine rock or mine tailings into watercourses or waterbodies frequented by fish.
- *Migratory Birds Convention Act, 1994* - The *Migratory Birds Convention Act* and its regulations make it an offence to deposit oil, oily waste, or other substances harmful to migratory birds into water inhabited by migratory birds. This Act is administered by the Canadian Wildlife Service of Environment Canada.

Additional federal requirements for consideration include:

- Environmental Emergency Regulations, 2019 under the *Canadian Environmental Protection Act* (CEPA), 1999 regarding the preparation and contents of an Environmental Emergency Plan:
  - CEPA, 1999 provides the authority to address the prevention of, preparedness for, response to and recovery from environmental emergencies caused by uncontrolled, unplanned or accidental releases.
  - Reduce any foreseeable likelihood of releases of toxic or other hazardous substances listed in Schedule 1 of the Environmental Emergency Regulations, 2019.
    - o Where a hazardous substance listed in Schedule 1 is located within a facility, a responsible person is required to prepare an Environmental Emergency Plan with respect to the substance, under the following circumstances:
      - if some or all of the substance is not in a container system having reported a maximum expected quantity set out under Schedule 2 that is equal or greater than the quantity set out in column 4 of Part 1 of Schedule 1 for the substance; or
      - if the substance is in a container system, having reported under Schedule 2, a maximum expected quantity set out in column 4 of Part 1 or 2 of Schedule 1 for that substance; and under Schedule 2, a maximum capacity that is equal or greater than the quantity set out in column 4 of Part 1 or 2 of Schedule 1 for that substance.

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- o Within six months after the day that an Environmental Emergency Plan is required to be prepared, a responsible person must inform the Minister that they have prepared the plan by submitting a notice as per the information outlined in Schedule 3 of the Regulations.
- o Within 12 months after the day that an Environmental Emergency Plan is required to be prepared, a responsible person must bring the plan into effect and submit a notice to the Minister that contains the information referred to in Schedule 4 of the Regulations.
- o If a notice has been submitted in respect of a substance located at a facility, a responsible person must submit a notice to the Minister if:
  - the total quantity of the substance located at the facility is, for a period of one year, less than the quantity set out in column 4 of Part 1 or 2 of Schedule 1 for that substance; or
  - a quantity of the substance is, for a period of one year, no longer found in a container system at the facility that has a maximum capacity that is equal to or greater than the quantity set out in column 4 of Part 1 or 2 of Schedule 1 for that substance.
- WHMIS, 2015 (Health Canada) regarding a national hazard communication standard for hazardous materials (i.e., hazard classification, cautionary labelling of containers, provision of [material] safety data sheets and worker education and training programs).

### 1.5.2 Provincial Regulatory Requirements

In Manitoba, the primary legislative instrument for emergencies and emergency response is *The Emergency Measures Act*, C.C.S.M. c. E80, 1988 (as amended 2020). Under this Act, public sector agencies, municipalities and others are required to develop and maintain emergency preparedness programs or emergency plans. The requirements for this are set out in the Local Authorities Emergency Planning and Preparedness Regulation MR 159/2016. The government has also established the Emergency Measures Organization with the responsibility for leading the numerous provincial programs and policies aimed at improving provincial preparedness for major emergencies and disasters. Although the Act and regulation applies to provincial agencies and municipalities, emergency response plans adopted by private entities should follow similar guiding principles.

The Project is also subject to *The Workplace Safety and Health Act*. Pursuant to this Act, under the *Operation of Mines Regulation*, MR 212/2011 provisions are made for the operation of a mine, including emergency preparedness and fire protection and care and use of explosives. The *Workplace Safety and Health Regulation* MR 217/2006 outlines requirements for first aid kits as to the type, size, and number.

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The Project is subject to *The Dangerous Goods Handling and Transportation Act* and the associated Storage and Handling of Petroleum Products and Allied Products Regulation, MR 188/2001 and the Environmental Accident Reporting Regulation and Schedule under *The Dangerous Goods Handling and Transportation Act* (of Manitoba). The regulation applies only to environmental accidents involving contaminants which:

- (a) Are listed in Column II of the Schedule
- (b) Have a primary or subsidiary classification set out in Column I as that classification is or can be determined under the Classification Criteria for Products, Substances and Organisms Regulation, MR 282/87; and
- (c) Are in a quantity or at a level set out in Column III of the Schedule.

Further to these regulatory requirements, Manitoba *Environment Act* Licences include a condition for preparing an Emergency Response Plan. The Proponent is to maintain an Emergency Response Plan in accordance with the Canadian Centre for Occupational Health and Safety Emergency Response Planning Guide or other document found to be acceptable to the Director of the Environmental Approvals Branch. The Emergency Response Plan is to outline procedures to be used in the event of a leak, spill, fire, flood, or other hazardous condition at the facility, or if waste management functions are disrupted.

### 1.5.3 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. 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.

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Alamos has a series of guiding corporate sustainability standards (Table 1-1), including:

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

Those corporate policies that may be applicable specifically to the ERSPCP include:

- Hazard Identification & Risk Management
- Incident Classification, Investigation & Reporting
- Tailings Management

Alamos' standards are regularly updated to reflect the latest developments. For the most current and up-to-date standards, please refer to the online (internal) version.

**Table 1-1 Corporate Sustainability Standards**

<b>Corporate Standard</b>	<b>Requirement</b>
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.
Environmental Monitoring (CSS-ENV-10.6)	Sites will assess the need for a monitoring program involving external stakeholders.

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Corporate Standard	Requirement
Hazard Identification & Risk Management (CSS-GOV-2.1)	<p>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:</p> <ul style="list-style-type: none"> <li>• Health and Safety of our workforce and communities,</li> <li>• Environmental impacts of our activities (local and downstream),</li> <li>• Societal and community impacts, and</li> <li>• Security and protection of people and property.</li> </ul>
Hazard Identification & Risk Management (CSS-GOV-2.2)	<p>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.</p> <p>Assessments shall consider all site activities including:</p> <ul style="list-style-type: none"> <li>• Contractor works,</li> <li>• Regulatory requirements</li> <li>• Permit or licence requirements,</li> <li>• Alamos Sustainability Standards requirements, and</li> <li>• Other site-specific requirements.</li> </ul>
Hazard Identification & Risk Management (CSS-GOV-2.3)	<p>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.</p> <p>Clear responsibility and authority for implementing, managing, reporting, and coordinating updates to the risk registry shall be designated to a specific employee(s).</p>
Hazard Identification & Risk Management (CSS-GOV-2.4)	<p>All corporate, site and task-level risks shall be assessed against the Alamos Risk Matrix, including likelihood and consequence assessments.</p>
Hazard Identification & Risk Management (CSS-GOV-2.5)	<p>Sites shall apply the hierarchy of controls considering (in order of priority):</p> <ol style="list-style-type: none"> <li>1. Elimination – Remove the hazard</li> <li>2. Substitution – Replace the hazard</li> <li>3. Engineering control – physically control or isolate the hazard (e.g., dikes, guarding, interlocks)</li> <li>4. Administrative control – control response/avoidance of hazard (e.g., training, procedures, reducing employee exposure to hazards, signage)</li> <li>5. PPE or Mitigation – Protect people (personal protective equipment) or the environment (spill kits) from the hazard. This is the last line of defense.</li> </ol> <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)	<p>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.</p>
Hazard Identification & Risk Management (CSS-GOV-2.7)	<p>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.</p>

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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"> <li>• Alamos Executive and Management,</li> <li>• Country Managers,</li> <li>• General Managers; and</li> <li>• Project Managers.</li> </ul>
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.
Hazard Identification & Risk Management (CSS-GOV-2.8)	Emergency Preparedness and Response Plans (EPRPs) shall identify, evaluate, and communicate potential emergency scenarios based on the site risk assessment. EPRPs and scenarios will be reviewed on a regular basis no less frequently than annually, as described in the Emergency Preparedness and Response Standard.
Incident Classification, Investigation & Reporting (CSS-GOV-8.1)	All sites shall maintain an Incident Register to manage and monitor all sustainability incidents, from Insignificant (level 1) to Catastrophic (level 5). Incident classifications are described in detail within the Alamos Risk Assessment Consequence Table. The Corporate Sustainability Team shall maintain an Incident Register to monitor significant and high-potential incidents i.e., Moderate (level 3), Major (level 4) and Catastrophic (level 5).
Incident Classification, Investigation & Reporting (CSS-GOV-8.2)	General and Project Directors/Managers (or designate) shall complete an Incident Alert form immediately following any: <ul style="list-style-type: none"> <li>• Moderate incident (level 3),</li> <li>• Major incident (level 4),</li> <li>• Catastrophic incident (level 5), or</li> <li>• High-potential near miss that could, in other circumstances, have resulted in a Moderate, Major, or Catastrophic incident. Incident alerts must be e-mailed within 24 to 48 hours to IncidentAlert@alamosgold.com.</li> </ul>
Incident Classification, Investigation & Reporting (CSS-GOV-8.4)	In addition to site requirements, final investigation reports for incidents that meet Moderate (level 3), Major (level 4) and Catastrophic (level 5) classifications shall be shared and distributed via the Incident Alert e-mail group ( <a href="mailto:IncidentAlert@alamosgold.com">IncidentAlert@alamosgold.com</a> ).  Incident investigations shall at a minimum: <ul style="list-style-type: none"> <li>• validate the reported incident;</li> <li>• analyze root cause;</li> <li>• evaluate gaps to existing management systems, controls or procedures;</li> <li>• develop corrective and preventive action plans;</li> <li>• establish responsibilities and timelines for implementation; and</li> <li>• report on lessons learned.</li> </ul>

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Corporate Standard	Requirement
	Root cause and trend analysis will be performed by site and reviewed by the General and Project Directors/Managers to facilitate continuous improvement. Where applicable, training shall be provided to persons involved in investigations on root cause analysis.
Incident Classification, Investigation & Reporting (CSS-GOV-8.5)	All General and Project Directors/Managers shall nominate a Competent Person to review Investigation Reports, preventive action plans, corrective measures and disseminate the information at their respective location, as applicable.
Tailings Management (CSS-ENV-3.11)	All tailings impounded areas shall have emergency plans in which the internal emergency response plans (ERP) and external emergency preparedness plans (EPP) are developed. The emergency plans must be defined in consideration of the inundation risk, annually updated, and annually tested. The ERP should be augmented with crisis management and communication planning.

**1.5.4 Guideline and Reference Documents**

Additional best management practices, standards, or guidelines applicable to the Project include:

- Canadian Centre for Occupational Health and Safety: Emergency Response Planning Guide, Second Edition.
- Canadian Standards Association (CSA) of Canada Z1220-17 (R2021): First aid kits for the workplace. Published by CSA Group, 2017 (Reaffirmed in 2021).
- Environmental Code of Practice for Metal Mines 2009 (Environment Canada) in support of the MDMER.
- Environmental Code of Practice for Aboveground and Underground Storage Tank Systems Containing Petroleum and Allied Petroleum Products, 2003 (Canadian Council of Ministers of the Environment [CCME]).

The following guideline and reference documents are noted as part of IAAC approval and Licences under *The Environment Act* (Manitoba):

- WHMIS regulations and protocols
- Canadian Centre for Occupational Health and Safety “Emergency Response Planning Guide”
- Canadian Dam Association’s Dam Safety Guidelines
- Manitoba’s Storage and Handling of Petroleum Products and Allied Products Regulation
- The *Dangerous Goods and Handling and Transportation Act*, and associated regulations
- The Mining Association of Canada’s Guide to the Management of Tailings Facilities.

**1.5.5 Approval Related Requirements**

The conditions related to the ERSPCP laid out in the federal Decision Statement issued under the *Canadian Environmental Assessment Act, 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**

<b>Licence</b>	<b>Condition</b>	<b>Corresponding ERSPCP Section</b>
CEAA, 2012	12.1 The Proponent shall take all reasonable measures to prevent accidents and malfunctions that may result in adverse environmental effects, including dam breaches, and mitigate them. In doing so, the Proponent shall:	All
CEAA, 2012	12.1.1 Design, construct and operate the tailings management facility containment structures taking into account the Canadian Dam Association's Dam Safety Guidelines and the Mining Association of Canada's Guide to the Management of Tailings Facilities, and by restricting the use of the emergency spillway to extreme precipitation events.	3.1.1, 3.3.2
CEAA, 2012	12.1.2 Design, prior to construction and in consultation with Indigenous Groups, Environment and Climate Change Canada, and any other relevant authorities, the Designated Project taking into account projections of climate change-related changes in frequency and severity of extreme precipitation events, and available Indigenous knowledge of historic flooding in the local assessment areas.	2.3, 3.1.1, 3.1.8
CEAA, 2012	12.2 The Proponent shall develop, in consultation with Indigenous groups and relevant authorities, and implement, a follow-up program related to the effects of changing permafrost on the Designated Project and how these changes may adversely affect the current use of lands by Indigenous groups. As part of the follow-up program, the Proponent shall identify the type, degree and extent of residual permafrost remaining within the Project development areas following construction to be incorporated into the design of the Designated Project.	3.1.8
CEAA, 2012	12.3 The Proponent shall consult, prior to construction, Indigenous groups and relevant authorities on the measures to be implemented to prevent accidents and malfunctions, including the likelihood, modes of failure and consequences of a dam breach.	3.3.2
CEAA, 2012	12.4 The Proponent shall develop, prior to construction and in consultation with Indigenous groups and relevant authorities, an accidents and malfunctions response plan in relation to each phase of the Designated Project. The accident and malfunction plan for each phase shall include:	All
CEAA, 2012	12.4.1 a description of the types of accidents and malfunctions that may cause adverse environmental effects during that phase;	3.2, 3.3, 3.4
CEAA, 2012	12.4.2 the measures to be implemented in response to each type of accident and malfunction referred to in condition 12.4.1 to mitigate any adverse environmental effect caused by the accident or malfunction; and	3.2, 3.3, 3.4, 3.5
CEAA, 2012	12.4.3 for each type of accident and malfunction referred to in condition 12.4.1, the roles and responsibilities of the Proponent and each relevant authority in implementing the measures referred to in condition 12.4.2 and for mobilizing emergency response equipment.	Introductory Chapter EMMP

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<b>Licence</b>	<b>Condition</b>	<b>Corresponding ERSPCP Section</b>
CEAA, 2012	12.5 The Proponent shall ensure the accidents and malfunctions response plan referred to above is kept up to date during the phase to which it pertains. The Proponent shall submit any updated accident and malfunction response plan to the Agency, Indigenous groups and the relevant authorities involved in its implementation within 30 days of the plan being updated.	6.0
CEAA, 2012	12.6 In the event of an accident or malfunction with the potential to cause adverse environmental effects, including an accident or a malfunction referred to in condition 12.4.1, the Proponent shall immediately implement the measures appropriate to remedy the accident or malfunction, including any measure referred to in condition 12.4.2, and shall:	3.2 to 3.5
CEAA, 2012	12.6.1 implement the communication plan referred to in condition 12.7 as it relates to accidents and malfunctions;	6.1
CEAA, 2012	12.6.2 notify relevant authorities with responsibilities related to emergency response, including environmental emergencies, in accordance with applicable regulatory and legislative requirements;	6.0, 6.1
CEAA, 2012	12.6.3 notify, as soon as possible and pursuant to the communication plan referred to in condition 12.7, Indigenous groups of the accident or malfunction, and notify the Agency in writing no later than 24 hours following the accident or malfunction. When notifying Indigenous groups and the Agency, the Proponent shall specify:	6.1
CEAA, 2012	12.6.3.1 the date and time when and location where the accident or malfunction occurred;	6.1
CEAA, 2012	12.6.3.2 a summary description of the accident or malfunction;	6.0, 6.1
CEAA, 2012	12.6.3.3 a list of any substance potentially released into the environment as a result of the accident or malfunction; and	6.0, 6.1
CEAA, 2012	12.6.3.4 a description of the notified relevant authorities, as referred to in condition 12.6.2.	6.0, 6.1
CEAA, 2012	12.6.4 submit a written report to the Agency no later than 30 days after the day on which the accident or malfunction occurred. The written report shall include.	6.0
CEAA, 2012	12.6.4.1 a detailed description of the accident or malfunction and of its adverse environmental effects;	6.0, 5.0
CEAA, 2012	12.6.4.2 a description of the measures that were taken by the Proponent to mitigate the adverse environmental effects caused by the accident or malfunction;	6.0, 5.0
CEAA, 2012	12.6.4.3 any view from Indigenous groups and advice from relevant authorities received with respect to the accident or malfunction, its adverse environmental effects and the measures taken by the Proponent to mitigate these adverse environmental effects;	6.0, 5.0

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CEAA, 2012	12.6.4.4 a description of any residual adverse environmental effect and any modified or additional measure required by the Proponent to mitigate residual adverse environmental effects; and	6.0, 5.0
CEAA, 2012	12.6.4.5 details concerning the implementation of the accidents and malfunctions response plan referred to in the above.	6.0, 5.0
CEAA, 2012	12.6.5 submit a written report to the Agency no later than 90 days after the day on which the accident or malfunction occurred, taking into account the information submitted in the written report pursuant to preceding condition, that includes:	All
CEAA, 2012	12.6.5.1 a description of the changes made to avoid a subsequent occurrence of the accident or malfunction;	6.0, 5.0
CEAA, 2012	12.6.5.2 a description of the modified or additional measure(s) implemented by the Proponent to mitigate and monitor residual adverse environmental effects and to carry out any required progressive reclamation; and	5.0
CEAA, 2012	12.6.5.3 all additional views from Indigenous groups and advice from relevant authorities received by the Proponent since the views and advice referred to in the above were received by the Proponent.	6.0
CEAA, 2012	12.7 The Proponent shall develop, in consultation with Indigenous groups, a communication plan for accidents and malfunctions occurring in relation to the Designated Project. The Proponent shall develop the communication plan prior to construction and shall implement and keep it up to date during all phases of the Designated Project. The plan shall include:	6.1, Appendix E
CEAA, 2012	12.7.1 the types of accidents and malfunctions requiring the Proponent to notify the Indigenous groups;	6.1, Appendix E
CEAA, 2012	12.7.2 the manner by which Indigenous groups shall be notified by the Proponent of an accident or malfunction and of any opportunity for the Indigenous groups to assist in the response to the accident or malfunction; and	6.1, Appendix E
CEAA, 2012	12.7.3 the names and contact information of the Proponent and Indigenous group representatives for the purposes of notifying pursuant to the condition above and communicating about accidents and malfunctions.	Appendix E
Environment Act Licence No. 3390 (Gordon)	4 The licensee shall, in the case of physical or mechanical equipment breakdown or process upset where such a breakdown or process upset results or may result in the release of a pollutant in an amount or concentration, or at a level or rate of release, that causes or may cause a significant adverse effect, immediately report the event by calling the 24-hour environmental accident reporting line at 204-944-4888 (toll free 1-855-944-4888). The report shall indicate the nature of the event, the time and estimated duration of the event and the reason for the event.	3.1.3, 3.5.3, Appendix E
Environment Act Licence No. 3390 (Gordon)	5 The licensee shall, following the reporting of an event pursuant to the above,	All

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<b>Licence</b>	<b>Condition</b>	<b>Corresponding ERSPCP Section</b>
Environment Act Licence No. 3390 (Gordon)	a) identify the repairs required to the mechanical equipment;	6.0, 6.1
Environment Act Licence No. 3390 (Gordon)	b) undertake all repairs to minimize unauthorized discharges of a pollutant;	6.0, 6.1
Environment Act Licence No. 3390 (Gordon)	c) complete the repairs in accordance with any written instructions of the director; and	6.0, 6.1
Environment Act Licence No. 3390 (Gordon)	d) submit a report to the director about the causes of breakdown and measures taken, within one week of the repairs being done.	6.0, 6.1
Environment Act Licence No. 3390 (Gordon)	6 The licensee shall continually maintain an up-to-date inventory of any process and cleaning chemicals used and/or stored on-site that would be captured by any applicable federal/provincial WHMIS regulations and protocols and make this information and applicable SDS sheets available to an environment officer upon request.	1.4.3
Environment Act Licence No. 3390 (Gordon)	7 The licensee shall prepare, within 60 days prior to construction, and maintain an emergency response contingency plan in accordance with the Canadian Centre for Occupational Health and Safety "Emergency Response Planning Guide" or other emergency planning guidelines acceptable to the director.	All
Environment Act Licence No. 3390 (Gordon)	8 The licensee shall implement and continually maintain in current status, and Environmental Management System (EMS) for the development which is acceptable to the director.	All
Environment Act Licence No. 3390 (Gordon)	9 The licensee, in the event of a fire which continues in excess of thirty (30) minutes or requires fire suppression assistance from personnel outside of the facility (example: fire department):	All
Environment Act Licence No. 3390 (Gordon)	a) Call the fire department; and	3.1.4, 3.1.6, 6.1
Environment Act Licence No. 3390 (Gordon)	b) Report the fire by calling the Environmental Emergency Report Line (204-944-4888 or toll free 1-855-944-4888), identifying the type of materials involved and the location of the fire.	3.1.4, 3.1.6, 6.1

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<b>Licence</b>	<b>Condition</b>	<b>Corresponding ERSPCP Section</b>
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 manner acceptable to the director:	All
Environment Act Licence No. 3390 (Gordon)	d) Emergency Response and Spill Prevention and Contingency Plan	All
Environment Act Licence No. 3390 (Gordon)	23 The licensee shall, during construction of the development, operate, maintain and store all materials and equipment in a manner that prevents any deleterious substances (fuel, oil, grease, hydraulic fluids, coolant, paint, uncured concrete and concrete wash water, etc.) from entering watercourses, and have an emergency spill kit for in-water use available on-site during construction.	3.1.3, 3.5.3
Environment Act Licence No. 3390 (Gordon)	24 The licensee shall not locate any petroleum storage tank within 100 metres of the shoreline of any waterway or water body.	3.1.3
Environment Act Licence No. 3390 (Gordon)	34 The licensee shall provide containment for all vessels containing chemicals in each area of the development where the chemicals are stored, loaded, transferred, used or otherwise handled, in compliance with the National Fire Code of Canada (2020), or any future amendment thereof, such that any product leakage or spillage and any contaminated liquid generated is contained within the development and contamination of groundwater and surface water is prevented.	3.1.3, 3.5.1, 3.5.2
Environment Act Licence No. 3390 (Gordon)	35 The licensee shall install and maintain spill recovery equipment at the development at all times.	3.1.3, Appendix B
Environment Act Licence No. 3390 (Gordon)	38 The licensee shall not release dangerous goods or hazardous wastes into the wastewater collection system.	3.1.4
Environment Act Licence No. 3390 (Gordon)	39 The licensee shall comply with all the applicable requirements of:	All
Environment Act Licence No. 3390 (Gordon)	a) Manitoba's Storage and Handling of Petroleum Products and Allied Products Regulation or any future amendment thereof;	3.1.3, 3.1.4, 3.5.3

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<b>Licence</b>	<b>Condition</b>	<b>Corresponding ERSPCP Section</b>
Environment Act Licence No. 3390 (Gordon)	b) The Dangerous Goods and Handling and Transportation Act, and regulations issued thereunder, respecting the handling, transport, storage and disposal of any dangerous goods brought onto or generated at the development; and	3.1.3, 3.1.4, 3.3.3, 3.5.3
Environment Act Licence No. 3390 (Gordon)	c) The Office of the Fire Commissioner – Province of Manitoba	3.1.3, 3.1.4, 3.5.3
Environment Act Licence No. 3390 (Gordon)	40 The licensee shall collect, transport and store used oil or hydraulic fluids removed from on-site machinery in secure, properly labelled, non-leaking containers and shall regularly send them to a recycling or disposal facility approved to accept hazardous wastes.	3.1.3
Environment Act Licence No. 3391 (MacLellan)	4 The licensee shall, in the case of physical or mechanical equipment breakdown or process upset where such a breakdown or process upset results or may result in the release of a pollutant in an amount or concentration, or at a level or rate of release, that causes or may cause a significant adverse effect, immediately report the event by calling the 24-hour environmental accident reporting line at 204-944-4888 (toll free 1-855-944-4888). The report shall indicate the nature of the event, the time and estimated duration of the event and the reason for the event.	3.1.3, 3.5.3
Environment Act Licence No. 3391 (MacLellan)	5 The licensee shall, following the reporting of an event pursuant to the above,	All
Environment Act Licence No. 3391 (MacLellan)	a) identify the repairs required to the mechanical equipment;	6.0, 6.1
Environment Act Licence No. 3391 (MacLellan)	b) undertake all repairs to minimize unauthorized discharges of a pollutant;	6.0, 6.1
Environment Act Licence No. 3391 (MacLellan)	c) complete the repairs in accordance with any written instructions of the director; and	6.0, 6.1
Environment Act Licence No. 3391 (MacLellan)	d) submit a report to the director about the causes of breakdown and measures taken, within one week of the repairs being done.	6.0, 6.1

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<b>Licence</b>	<b>Condition</b>	<b>Corresponding ERSPCP Section</b>
Environment Act Licence No. 3391 (MacLellan)	6 The licensee shall continually maintain an up-to-date inventory of any process and cleaning chemicals used and/or stored on-site that would be captured by any applicable federal/provincial WHMIS regulations and protocols and make this information and applicable SDS sheets available to an environment officer upon request.	1.4.3
Environment Act Licence No. 3391 (MacLellan)	7 The licensee shall prepare, within 60 days prior to construction, and maintain an emergency response contingency plan in accordance with the Canadian Centre for Occupational Health and Safety "Emergency Response Planning Guide" or other emergency planning guidelines acceptable to the director.	All
Environment Act Licence No. 3391 (MacLellan)	8 The licensee shall implement and continually maintain in current status, and Environmental Management System (EMS) for the development which is acceptable to the director.	All
Environment Act Licence No. 3391 (MacLellan)	9 The licensee, in the event of a fire which continues in excess of thirty (30) minutes or requires fire suppression assistance from personnel outside of the facility (example: fire department):	All
Environment Act Licence No. 3391 (MacLellan)	a) Call the fire department; and	3.1.4, 3.1.6, 6.1
Environment Act Licence No. 3391 (MacLellan)	b) Report the fire by calling the Environmental Emergency Report Line (204-944-4888 or toll free 1-855-944-4888), identifying the type of materials involved and the location of the fire.	3.1.4, 3.1.6, 6.1
Environment Act Licence No. 3391 (MacLellan)	17 The licensee shall prepare, implement and continuously maintain in current status, the following plans for the development in manner acceptable to the director:	All
Environment Act Licence No. 3391 (MacLellan)	d) Emergency Response and Spill Prevention and Contingency Plan	All
Environment Act Licence No. 3391 (MacLellan)	24 The licensee shall, during construction of the development, operate, maintain and store all materials and equipment in a manner that prevents any deleterious substances (fuel, oil, grease, hydraulic fluids, coolant, paint, uncured concrete and concrete wash water, etc.) from entering watercourses, and have an emergency spill kit for in-water use available on-site during construction.	3.1.3, 3.5.3
Environment Act Licence No. 3391 (MacLellan)	25 The licensee shall not locate any petroleum storage tank within 100 metres of the shoreline of any waterway or water body.	3.1.3

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<b>Licence</b>	<b>Condition</b>	<b>Corresponding ERSPCP Section</b>
Environment Act Licence No. 3391 (MacLellan)	36 The licensee shall provide containment for all vessels containing chemicals in each area of the development where the chemicals are stored, loaded, transferred, used or otherwise handled, in compliance with the National Fire Code of Canada (2020), or any future amendment thereof, such that any product leakage or spillage and any contaminated liquid generated is contained within the development and contamination of groundwater and surface water is prevented.	3.1.3, 3.5.1, 3.5.2
Environment Act Licence No. 3391 (MacLellan)	37 The licensee shall install and maintain spill recovery equipment at the development at all times.	4.1.2, Appendix B
Environment Act Licence No. 3391 (MacLellan)	40 The licensee shall not release dangerous goods or hazardous wastes into the wastewater collection system.	3.1.3
Environment Act Licence No. 3391 (MacLellan)	41 The licensee shall comply with all the applicable requirements of:	All
Environment Act Licence No. 3391 (MacLellan)	a) Manitoba's Storage and Handling of Petroleum Products and Allied Products Regulation or any future amendment thereof;	3.1.3, 3.1.4, 3.5.3
Environment Act Licence No. 3391 (MacLellan)	b) The Dangerous Goods and Handling and Transportation Act, and regulations issued thereunder, respecting the handling, transport, storage and disposal of any dangerous goods brought onto or generated at the development; and	3.1.3, 3.1.4, 3.3.3, 3.5.3
Environment Act Licence No. 3391 (MacLellan)	c) The Office of the Fire Commissioner – Province of Manitoba	3.1.3, 3.1.4, 3.5.3
Environment Act Licence No. 3391 (MacLellan)	42 The licensee shall collect, transport and store used oil or hydraulic fluids removed from on-site machinery in secure, properly labelled, non-leaking containers and shall regularly send them to a recycling or disposal facility approved to accept hazardous wastes.	3.1.3

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## **2.0 ENVIRONMENTAL SETTING**

### **2.1 REGIONAL AREA**

The Project is in a remote, sparsely populated, and rugged region of the Boreal Shield Ecozone. The area supports peat-covered hummocky glacial deposits underlain by an expanse of Precambrian bedrock. Glaciolacustrine deposits comprise nearshore sand and gravel as well as massive to laminated sand, silt and clay that accumulated in the deeper areas of glacial Lake Agassiz. Soils in the region are comprised of mineral soils, which are dominant on sandy, acidic till, with organic soils typical in bogs and peat plateaus, and widespread discontinuous permafrost (Smith et al. 1998). At the Gordon site, the most extensive soils within terrestrial areas belong to the Fay Lake soil units which represents 42% of the site. Soils within the Fay Lake soil units commonly have a loamy sand surface texture, occur on very gently sloping to moderately sloping areas of the landscape (i.e., slope gradients of >2-9%), are well drained and classified as Eluviated Dystric Brunisols. At the MacLellan site, the most extensive soils within terrestrial areas belong to the Hat Lake and Wuskwatim soil units, which represent 34% and 32% of this area, respectively. Soils of the Hat Lake soil units have a loamy sand surface texture, occur on nearly level to very gently sloping areas of the landscape (i.e., slope gradients of >0.5-9%), and are imperfectly drained and classified as Gleyed Eluviated Dystric Brunisols. Soils of the Wuskwatim soil units have a fibric surface texture, occur on level to depressional portions of the landscape, and are very poorly drained and classified as Terric Fibric Organic Cryosols and Fibric Organic Cryosols.

Contiguous tracts of boreal forest span the area with jack pine (*Pinus banksiana*) common in well-drained areas, and black spruce (*Picea mariana*) and tamarack (*Larix laricina*) species abundant in wetter areas. The area is home to diverse wildlife species such as moose (*Alces alces*), black bear (*Ursus americanus*), American marten (*Martes americana*), beaver (*Castor canadensis*), and a variety of migratory bird species. Surface water around the Gordon site drains southward into the Hughes River, via Farley, Swede and Ellystan lakes, which in turn discharge into the Barrington River. Around the MacLellan site, water flows south into the Keewatin River and southeast through Cockeram Lake and Sickle Lake before discharging into Granville Lake. Fish inhabiting the area include northern pike (*Esox lucius*), walleye (*Sander vitreus*), lake whitefish (*Coregonus clupeaformis*), brook stickleback (*Culaea inconstans*), and the provincially stocked Rainbow Trout (*Oncorhynchus mykiss*) and Brook Trout (*Salvelinus fontinalis*).

The Lynn Lake Hospital is the only hospital in the Local Assessment Area. It is a 19-bed (including eight long-term care beds [as of 2024 long-term care is not available]) facility with a 24-hour emergency room, a lab and X-ray. The Lynn Lake Fire Department (LLFD) is a volunteer service that serves the Town of Lynn Lake and assists Marcel Colomb First Nation (Black Sturgeon Reserve lands). Much of the Fire Department's equipment is dated beyond its recommended service life. Lynn Lake has 24-hour emergency medical service with one ambulance in the community. Services provide patient transport to the Thompson General and other regional hospitals. Ambulance services in Lynn Lake are contracted to affiliate agencies, which employ paramedics who rotate in from Thompson and Winnipeg. Construction of a new emergency medical services (EMS) building next to the hospital in Lynn Lake was completed in 2019. Medical transport

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services for Marcel Colomb First Nation's members in the Town of Lynn Lake and Marcel Colomb First Nation (Black Sturgeon Reserve lands) are provided by the Nation. STARS air ambulance Service is available to the community Lynn Lake with flight time out of Winnipeg being a minimum of two hours. Emergency management support is available from relevant provincial government departments, including Manitoba Environment and Climate, out of a Regional Office in Thompson and a District Office in Lynn Lake.

Water in the Town of Lynn Lake comes from West Lynn Lake. The water treatment plant (Level 3) and distribution network (Level 1) are operated by the Town. Water and wastewater services are generally exclusive to the community. The water distribution and wastewater collection infrastructure were built more than 50 years ago and both systems require substantial investment. Both systems were put in place to serve a much larger population, approximately four to six times the current population. To meet local demand, the Town topped up the volume of potable water produced with chlorinated unfiltered lake water. Between 2012 and 2023, a Boil Water Advisory was effect in the town of Lynn Lake. The installation of a new water treatment plant resulted in lifting this advisory in fall of 2023. Marcel Colomb First Nation operates its own water treatment plant and sewage lagoon on the Nation's Black Sturgeon Reserve lands. Both were built recently and are in good condition.

## **2.2 PROJECT SITES**

The Gordon site was formerly operated as a two-pit open pit gold mine between 1996 and 1999. After closure, the site underwent a reclamation process and currently consists of a 15-kilometre (km) gravel access road, a bridge across the Hughes River, two mine rock storage areas and two overburden storage areas that have been capped, and two water-filled open pits. All buildings and infrastructure have been removed. The site access road remains with access restricted via a locked gate at the Hughes River bridge.

The MacLellan site was formerly operated as an underground gold and silver mine between 1986 and 1989; closed because of high operating costs and falling gold prices. Ore was trucked to a mill facility in Lynn Lake for processing. The site has been in a 'care and maintenance' phase since closure with very little reclamation completed. The site currently consists of a 4.6-km gravel access road, power distribution line (abandoned pole line), infrastructure from the former underground mine, maintenance and other storage buildings, and former mine water settling ponds. Access to the site is restricted via a locked gate across the access road near PR391.

During construction, first aid facilities will be supplied by the Engineering, Procurement, and Construction Management (EPCM) contractor. First-aid personnel will provide transport to Lynn Lake hospital when required. During operation, first aid facilities will be supplied by a dedicated first aid/mine rescue office in each of the site administration offices. Site security personnel will be trained as EMS first responders, and when required, provide transfer to Lynn Lake hospital. First response firefighting activities will be conducted by the Mine Rescue Team using on-site water trucks and emergency medical services equipment. Alamos will provide emergency response services sufficient in size and capability to respond to emergency situations at the mine.

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Power, water, and wastewater treatment will be provided by Alamos and will not rely on resources within the Town of Lynn Lake. Since power, water, and wastewater systems for the Project will be independent of the Town of Lynn Lake, there will be no additional related demands on that infrastructure within the Town.

### 2.2.1 Environmentally Sensitive Features

Environmental features have been identified with respect to Project infrastructure and/or activities that are deemed as sensitive (e.g., wetlands and watercourses) to potential accident and malfunction scenarios (Appendix A).

For the Gordon site, environmentally sensitive aquatic features consist of Gordon and Farley Lake, Susan Lake, Pump Lake, Marnie Lake, Simpson Lake, Swede Lake, Hughes River, Hill Lake, and Westdal Lake. Watercourse features consist of stream crossings along the existing access road and unnamed tributaries to Gordon and Farley lakes, a tributary between Gordon and Farley lakes, a tributary between Pump Lake and Simpson Lake, tributaries to Swede Lake and Simpson Lake, an ephemeral tributary to Swede Lake, and several unnamed tributaries and small lakes connecting to the Hughes River. Hunting areas encapsulate the Gordon site, including Gordon and Farley lakes, Hughes Lake and Westdal Lake. The entire site and existing access road fall within a trapping area. Fishing areas encompass Simpson and Swede lakes, including a road crossing between the two, and along the Hughes River (which is also identified as an area for hunting and plant gathering [food]). A habitation area is identified at Swede Lake and at Hughes Lake (see Appendix A). An active osprey nest has been identified approximately 800 metres (m) from the existing access road. The recommended development setback distance of 1,000 m for medium to high disturbance (i.e., truck traffic; road construction) should be adhered to. However, depending on the level of activity required for upgrading the road, construction could be considered a medium disturbance level and subject to a 500 m setback and spatial and temporal restrictions would no longer apply. The most critical aspect related to nesting is to complete vegetation clearing outside of the restricted activity period (May 4 to August 20). Additional information can be found in the Avian Mitigation Plan, which is presented in Section 4.2.1 of the Wildlife Management and Monitoring Plan.

Environmentally sensitive features at the MacLellan site consists of aquatic features such as the Keewatin River, Payne Lake, Dot Lake, Minton Lake, and East Pond. Tributaries consists of unnamed tributaries between Payne Lake and the Keewatin River and an unnamed tributary to East Pond. Water crossings along the existing access road include a tributary to Dot Lake and the Keewatin River. A hunting/trapping area encompasses part of the MacLellan site and existing access road to PR 391. Woodland caribou (*Rangifer tarandus caribou*) are known to occasionally enter the Regional Assessment Area (RAA) west of the MacLellan site. Woodland caribou critical habitat including calving areas are considered sensitive features. Currently, there are no calving areas defined within the RAA. Should woodland caribou be defined within the RAA, the sensitivity map will be updated. To avoid potential adverse impacts, vegetation clearing during the calving and calf-rearing period (May 1 to June 30) will require authorization by relevant authorities. An inactive bald eagle nest was identified at the MacLellan site that encompasses part of the Keewatin River and Project Development Area (PDA) south of East Pond, east of the existing access road (see Appendix A). Should the nest become occupied prior to access road upgrades being completed, then a setback distance of approximately 500 m (for medium disturbance) to 1,000 m (for high disturbance)

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could be applied. The variable setback distance would depend on the level of activity required for upgrading the road. An active raven's nest which became occupied by a nesting bald eagle discovered near the mine (i.e., 230 m) has been unoccupied for some time now. Should the nest become occupied by nesting bald eagles prior to PDA clearing, then the recommended development setback and restricted activity period for the species should be applied. As with Gordon, the most critical aspect is to complete vegetation clearing outside of the restricted activity period prior to birds returning to nest in early spring.

### **2.3 EXTREME WEATHER EVENTS**

Flooding is a regular occurrence in the province and has resulted in substantial investment in flood mitigation and planning throughout Manitoba (GMB 2019). Extreme precipitation and mild spring weather can result in rapid snow melt, ice jams, and flooding. The ore milling and processing plant (MacLellan site) is in an area that has not known to have flooded in previous floods. In recent history, the most severe flooding events in Manitoba have occurred in the southern part of the province in 1950, 1997, and 2011.

Flooding within the region can be triggered by extreme precipitation, rapid snow melt, ice jams, and beaver activity, with peak flows generally occurring during freshet in the spring. Catchments within the area surrounding the Project are generally small and therefore have low flood severity. Larger catchments such as the Keewatin River are populated by large lakes which mitigate peak flows. An assessment of peak flows on the Keewatin River found that in the reach of the river adjacent to the Project, river stage (water surface elevation) is less sensitive to flood magnitudes due to the large channel capacity than other catchments in the area (Stantec 2016). A flood assessment on Farley Lake also found that there are only small changes in water surface elevation associated with substantial changes to lake inflows. Per Alamos' 2023 Climate Change Risk Assessment, (which analyzed the likelihood and consequence of various physical risks associated with multiple climate change scenarios and time horizons), floods and heavy precipitation pose a low/insignificant risk to the Project in even the most extreme climate change scenario.

### **2.4 GEOLOGICAL HAZARDS**

#### **2.4.1 Seismic Activity**

Seismic activity is characterized by the local geography of an area and the movement and/or fracture of rocks within the Earth's surface (e.g., the movement of tectonic plates). These movements release seismic waves that radiate and cause vibration of the ground (known as earthquakes; Natural Resources Canada 2019).

Manitoba is the province least likely to experience earthquakes in Canada; the entire province is classified as "low" for seismic hazard (Natural Resources Canada 2015). Over time, a few earthquakes have occurred on the border of the province and off the coast of northern Manitoba. Earthquakes are not listed as a regional environmental hazard for the province of Manitoba by the federal government (Government of Canada 2019).

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**2.4.2 Subsidence**

Subsidence, the settling/sinking of land, can be caused by removing groundwater, compaction of soil, underground mining, or the thawing of permafrost (CGA 2013). Irregular topography related to thaw subsidence was identified at the Project site during desktop mapping exercises and field investigations (Stantec 2020). Subsidence related to thermokarst (landforms resulting from the thawing of ice-rich permafrost) was noted at several locations during geotechnical studies. Approximately half of the land surveyed during baseline studies contains permafrost.

There are areas of discontinuous permafrost within the Local Assessment Area, which may thaw because of dewatering. As water flow changes in the landscape, flow channels that are created may saturate areas of permafrost, which will result in thaw.

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### **3.0 MITIGATION AND MANAGEMENT MEASURES**

Accidents or malfunctions are events that occur outside the normal planned function or activity of the Project. Through planning and design and the adoption of safety measures, the risks of accidents or malfunctions can be reduced or controlled. This ERSPCP will help to mitigate the effects of accidents or malfunctions should they occur.

Emergency response measures and capacities will be further developed during detailed Project design. Emergency response measures have been prepared in accordance with federal and provincial legislation and guidelines, and corporate policies and procedures for the protection of human health and the environment (including species at risk). Measures are prescribed for the provision of emergency response planning, training, responsibilities, cleanup equipment, and materials, and contact and reporting procedures.

The mitigation measures and management procedures listed below include mitigation measures that were developed as part of the EIS, as well as established best management practices and standard operating procedures.

#### **3.1 GENERAL**

The following subsections outline general Project design, planning, and management measures to reduce the likelihood of potential accidents, malfunctions, and emergencies, as well as prevention, response, and contingency measures pertaining to vehicle accidents; spill prevention and contingency; fire/explosions; injury or fatal medical emergencies; and natural hazards. These measures, which are broadly applicable to potential accidents, malfunctions, and emergencies that could occur during all phases of the Project, will be implemented at both the Gordon site and the MacLellan site as necessary throughout the life of the Project.

##### **3.1.1 Project Design, Planning, and Management**

Project planning and management strategies, including in-design mitigation measures and environmental protection measures, will reduce the likelihood of accidents and emergency situations, as reasonably practical. These include:

- Engineering design that complies with codes and standards for incorporating factors of safety to protect Project infrastructure and personnel. As example:
  - Designing TMF perimeter dams to accommodate the 1 in 2,475 year “High” classification earthquake event.
  - Inclusion of an emergency spillway to allow for the safe routing of flows from precipitation to prevent dam overtopping. The design flooding event for the operation of the Project was selected as 1/3 between the 1 in 1000-year and the probable maximum flood, according to the Canadian Dam

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Association (CDA) *Dam Safety Guidelines* and the Mining Association of Canada's *Guide to the Management of Tailings Facilities*. The design flooding event for the closure phase of the Project was selected as 2/3 between the 1 in 1000-year and the probable maximum flood. Use of the emergency spillway will be restricted to extreme precipitation events.

- Application of National Building Code of Canada and other guidelines to reduce effects of the environment on the Project and reduce the level of urgency in emergency events.
  - Project design will consider normal and extreme weather conditions that may arise and will include measures for climate adaptation. For example, power equipment, including distribution lines, wires, and conductors, would be designed, and rated for climatic conditions that can reasonably be expected over the life of the Project.
  - The potential effects of extreme weather, including storms, precipitation, flooding/ice jams, and drought will be considered in Project design and operation, including the selection of materials and equipment.
  - Fire prevention and suppression systems maintained on-site, including water supplies, sprinklers, fire extinguishers, and other firefighting equipment. Flammable materials will be carefully managed on-site.
- Implementing adaptive management strategies (e.g., modified scheduling to account for weather events, progressive rehabilitation to stabilize slopes and exposed ground surfaces).
  - Environmental protection and emergency response planning.

Alamos will provide emergency response services sufficient in capacity and capability to respond to emergency situations at the Gordon and MacLellan sites. This will include first aid equipment (including ambulatory services), and trained medical staff, emergency response vehicles and equipment (e.g., water trucks, excavators, earthmovers), pipe lead detection systems, silt/fence curtains, spill kits and spill containment equipment, materials and supplies at fuel storage areas and equipped on vehicles. Emergency response equipment for fire and/or explosion will include a fire water tank with a capacity of 500 cubic metres (m<sup>3</sup>) (equivalent to two hours of fire water supply), a network of fire hydrants, and automated fire detection and protection system.

### 3.1.2 Vehicle Accidents

On and off-site vehicle accidents associated with the Project could result in emergencies including:

- Spills from a vehicle collision – A vehicle collision involving transports or haul trucks may result in the release of hazardous materials such as mill reagents, fuel, or other non-hazardous materials such as construction materials or collected sewage (refer to Section 3.1.2).
- Fire or explosion associated with a vehicle collision (refer to Section 3.1.6).
- Injuries resulting from a vehicle collision – A vehicle collision involving personnel, transports, and haul trucks may result in injuries to personnel or members of the public (refer to Section 3.1.7).

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Alamos will work with external responders as needed/requested to aid (personnel and equipment as required) for off-site emergencies. On and off-site vehicle accidents will be reported to Alamos Senior Management and outside regulatory agencies and other local officials such as the local Lynn Lake detachment of the Royal Canadian Mounted Police. If a vehicle accident results in injury, immediate response is required. If required, off-site medical aid will be the responsibility of the Medical First Responder to organize (i.e., making the decision to transport, choice of method, and accompany the patient, if necessary). The applicable Site Supervisor is responsible for arranging the required transportation for the injured worker. If the transport is to be by aircraft or ambulance, the Site Supervisor will contact the appropriate support services.

Several traffic safety measures will be implemented to reduce the potential for vehicle-related malfunctions or accidents as a result of the Project. These include, but are not limited to, the following:

- Project vehicles will be driven by trained and competent drivers who will use approved routes.
- Highway laws will be obeyed, including seasonal weight restrictions, speed limits, traffic signage and requirements for permit for oversized loads.
- Project vehicles will be manually inspected daily to confirm they are in proper working condition.
- Mine roads will be well constructed and maintained.
- Internal speed checks will be carried out by mine security.
- Merging lines will be painted and maintained on highway turnoffs to mine sites, in coordination with Manitoba Transportation and Infrastructure.
- Mine vehicles will be required to have beacon lights, flagging, first aid kits, fire extinguishers, and spill kits.
- Roads on MacLellan and Gordon sites will be radio controlled.
- Access to the mine sites will not be permitted by public vehicles and additional mitigations will be put in place, including the rerouting of trails and addition of signage at portages, to safeguard local resource users.
- Implement road safety measures such as speed limits and signage and use multi-passenger vehicles to reduce the chance for wildlife collisions both on-site and between sites.

Alamos will provide emergency response services sufficient in capacity and capability to respond to emergency situations at the Project sites during all Phases of the Project. Alamos will cooperate with local officials in the incident investigation process and conduct an internal incident investigation. Remedial action will be taken by Alamos in accordance with the results of the investigations.

Section 4.1.1 lists elements of the monitoring program that are applicable with respect to vehicle accidents.

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### 3.1.3 Spill Prevention and Contingency

The preferred method to deal with spills is by avoidance through appropriate storage, handling, and transportation measures. This will be achieved through the following:

- Facility design that incorporates best management practices for spill containment, including:
  - Locating a petroleum storage tank over 100 metres from the shoreline of any waterway or waterbody.
  - No fueling of any equipment within 100 metres from the shoreline of any waterway without controls in place to mitigate any overflow or loss of hydrocarbons
  - Double-walled above ground storage tanks for hazardous substances; construction of fuel storage and distribution infrastructure based on current engineering standards in accordance with federal and provincial requirements.
  - A concrete pad around vehicle fueling and transfer areas with a drain to an oil/water separator; tanker trucks to deliver diesel fuel, gasoline, propane to the site on an as-needed basis; fueling of mobile vehicles within designated fuel handling areas with stationary mine equipment fueled via a fuel-dispensing truck.
  - Collection, transport and storage of used oil or hydraulic fluids are to be removed from on-site machinery in secure, properly labelled, non-leaking containers to approved recycling or disposal facilities that accept such hazardous wastes.
  - Installation of warning signs and protective barriers where there is potential for impact from vehicles.
  - Secondary containment with capacity to accommodate 110% of the largest storage tank/vessel in the area and keeping the area free of water or snow (which can reduce capacity).
  - Individual container shut-off valves where more than one container share a distribution network.
  - Separate storage areas and sump systems for incompatible products.
  - Various sized spill kits and spill containment supplies provided at key locations and equipped on vehicles (details on different spill kits is provided in Appendix B).
- Facility design that incorporates best management practices for spill/leak prevention and detection for TMF discharge/reclaim.
- Spill containment requirements for field maintenance and field repairs.
- Drip pan requirements for stationary equipment beyond 24 hours.
- Regular inspection and maintenance of seepage contact water collection systems with respect to capacity and proper system functioning.

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- Delivery of reagents (i.e., sodium cyanide) in accordance with the Transportation of Dangerous Goods Regulations. Storage will be in secure locations on-site with appropriate secondary containment capacity. Reagent delivery will be either in bulk, super bags, tote bins, or drums. The reagent storage area will include concrete containment. Alamos' Global Standards for delivery of reagent and storage location as stipulated in "Chemical & Reagent Management" standard must be followed.
- Storage and management of sodium cyanide in accordance with the International Cyanide Management Code for the manufacture, transport, storage, and use of cyanide in gold production. Alamos will align with the recommendations and principles of the Code. Alamos' Global Standards for delivery of sodium cyanide and storage location as stipulated in "Chemical & Reagent Management" standard must be followed.
- Operational procedures will be documented for fuel handling, process reagent handling, explosives reagents handling, and waste management.
- Certification of vehicles and drivers for transportation of hazardous goods.
- Certification of vehicles and drivers for transportation of non-hazardous products, including sewage.
- Vehicle cargos adequately contained and secured.
- Preventative maintenance of (but not limited to) vehicles, equipment, and storage containers.
- Regular housekeeping and environmental audits of facilities.
- Regular record keeping of tank fuel levels and deliveries versus dispensed product.
- Regular measurement of compressed gas pressure for propane storage tanks and record keeping of deliveries versus dispensed product.
- Fuel delivery in compliance with appropriate regulations, standards, and best management practices (e.g., Transportation of Dangerous Goods Regulations).
- Fuel transfer utilizing best management practices/procedures to limit potential for overtopping of tanks or spillage; inventories tracked regularly to check for possible losses.
- Documented inspection schedules and procedures for dangerous goods and hazardous materials storage on-site.
- An adaptive management program to manage improvements.
- Implementation of the standard operating procedures listed in Section 3.5 for cyanide management, ammonium nitrate management, and fuel management.

Appendix C provides information on the quantity of spilled materials that would be considered an emergency for different hazardous materials (by category). These amounts are for guidance only.

Spills of certain volumes (Appendix C) will be reported in the Initial Environmental Incident Report, which will include details of the incident, person notifying, regulator notification for external reporting, and other comments including follow-up actions required (Appendix D). Section 4.1.2 describes follow-up and monitoring requirements that are applicable with respect to spill prevention and contingency.

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### **3.1.4 Fuel or Hazardous Materials Management**

Waste oils, fuels, and hazardous wastes will be safely stored, handled and transported as recommended by the suppliers and/or manufacturers and in compliance with applicable federal, provincial, or municipal regulations (e.g., the Hazardous Waste Regulation under the *Dangerous Goods Handling and Transportation Act* of Manitoba, *Canadian Environmental Protection Act* and associated regulations, and the *Transportation of Dangerous Goods Act* and associated regulations). All hazardous waste produced on site is to be labelled and stored in the designated facility prior to shipping off-site. All hazardous waste is tracked by a designated person. Dangerous goods or hazardous wastes will not be released into the wastewater collection system.

Alamos will provide emergency response services sufficient in capacity and capability to respond to emergency situations at the mines. Alamos will cooperate with local officials in the incident investigation process and conduct an internal incident investigation. Remedial action will be taken by Alamos in accordance with the results of the investigations.

Spilled contaminants will be stored on site temporarily until proper disposal can be arranged. Proper waste management practices are outlined in the Soil Management and Rehabilitation Plan and the Waste Management Plan.

All leaking gas cylinders are an emergency if the leak cannot be stopped by closing the cylinder valve. Leaks of propane, oxygen, flammable gas, or toxic gas are dangerous. If a leak is suspected, perform a leak test with a commercial leak detection solution or non-reactive, detergent solution. If a leak is detected, and the leak cannot be stopped by closing the valve, and it is an inert atmospheric gas (e.g., nitrogen, carbon dioxide, etc.) clear the affected area and/or floor. If the leak involves a flammable, toxic, or corrosive gas and is outside of a ventilated enclosure that is designed to contain the gas, immediately activate the building alarm system, and evacuate the building. If not already done so, contact the Security Supervisor, meet emergency responders, and provide information on the nature, extent, and exact location of the leak.

### **3.1.5 Spill in or Near Water and Spill to Ground**

A decision/communications tree for environmental incidents (i.e., EECF), is appended to this document and will be updated regularly. In the event of a fuel, oil, or chemical spill near or onto water, the following general response steps/actions will be taken:

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***Spill in or Near Water***

- Safety of employees, site personnel and the public will be priority.
- Spill material source will be identified.
- Necessary equipment and crews to stop, contain and clean-up the spill and remediate the site will be mobilized.
- If safe to do so:
  - Take measures to stop the flow from the source.
  - Construct barriers with available materials (e.g., earth berm, trench, or absorbent pads) to prevent the spread of material, to stop the spill from entering a watercourse.
  - Block culverts with plywood, poly, and/or sandbags.
  - Deploy hydrophobic absorbent pads, socks or booms on water surface for a small spill; deploy larger absorbent socks, buoyant curtain, or barriers on larger spills to limit dispersal (weather and water flow conditions permitting) using a pump or hydrophobic absorbent pads to remove the spilled material from inside the boomed area.
- If the spill occurs on ice or snow, undertake the following (in addition to the above):
  - Construct barriers with available materials (e.g., snow or absorbent pads) to prevent the spread of material, to stop the spill from entering a watercourse.
  - Pump, shovel and/or use absorbent pads to collect spilled material if pooling; scrape ice and contain contaminated snow/ice in appropriate sealed containers with lids, or in drums; label and secure in a designated area with secondary containment.

***Spill to Ground***

If the spill occurs on ground, the following general response steps/actions will be taken:

- Safety of employees, site personnel and the public will be the priority.
- Spill material source will be identified.
- Construct a soil berm downslope of the spill; if appropriate, use synthetic, impervious sheeting to act as a barrier.
- Immediately contain and clean-up the spill using on-site spill kits and appropriate absorbent materials.
- Recover spilled and contaminated material, including soil and vegetation.
- Soils in the vicinity of a spill will be tested for hydrocarbons and excavated as required.

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### ***Solid Chemical Spill***

In the event of a solid chemical spill (e.g., acids, alkali and base, oxidizer, highly toxic chemicals, low hazard materials [sodium chloride, calcium chloride], air and water reactive spills) the following general response steps/actions will be taken:

- Necessary equipment and crews to stop, contain and clean-up the spill and remediate the site will be mobilized.
- Isolate and evacuate the spill area.
- In the case of spilling a volatile chemical within a building, shut down the ventilation to prevent the spread of vapours.
- In the case of solid reactive material, immediately smother the spilled material if it is safe to do so with an inert spill absorbent (e.g., dry sand, kitty litter). A Class D fire extinguisher can be used for reactive metals.
- If not already done so, contact the Security Supervisor, meet emergency responders, and provide information on the nature, extent, and exact location of the spill.
- Don the appropriate personal protective equipment for the material spilled.
- Dike around the spill using spill absorbent pads and cover the spill area with spill absorbent. Ideally, use spill absorbent that contains a mild neutralizing agent such as sodium carbonate (soda ash).
  - If necessary, slightly moisten the solid to limit dust production. Use water, or if the material is reactive, another inert liquid (e.g., ethylene glycol).
- Sweep up the residue using spark-proof tools and place the residue into labeled, plastic waste container (i.e., plastic pail with lid or double heavy duty plastic bags).
- Neutralize remaining solid acid residue with a dilute solution of sodium bicarbonate (baking soda), or in the case of alkali and base, 5% citric acid. Oxidizer residue can be neutralized with a dilute 5% sodium thiosulfate solution. Use spill absorbent to absorb the neutralized residue.
- Remove any remaining highly toxic chemical residue using limited detergent and water. Absorb the wash water using spill absorbent and dispose of as hazardous waste.
- Mop the affected area using detergent and water and dispose of this water properly as hazardous waste (e.g., appropriate container).
- Remove and bag personal protective equipment for cleaning or disposal.
- Restart the ventilation system if shut down.

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### ***Liquid Spill***

In the event of wastewater (i.e., sewage) spill during transport from the Gordon mine or transfer to the sewage treatment plant at MacLellan, the following general response steps/actions will be taken:

- Utilize proper protective equipment (i.e., rubber gloves, boots, eye protection).
- Remove any excessive water with a pump.
- Shovel and bag solids in the spill area and dispose of them properly.
- Soak the remaining liquid with absorbent materials and dispose of them properly.
- Apply garden lime over the affected area, wait 24 hours, then shovel and bag the lime for proper disposal.
- Wash the area with a water hose or a disinfectant solution.
- If within a building, set up drying equipment such as fans or dehumidifiers.
- Removed any damaged items or materials for proper disposal.
- Treat the impacted soil or ground surface with lime or bleach if needed.

### **3.1.6 Fire/Explosions**

The ERSPCP includes provisions related to fire prevention and management, which will reduce the likelihood of accidents and potential fires to as low a level as is reasonably practical. As part of this Plan, fire prevention and suppression systems will be located at the Gordon and MacLellan sites, including water supplies, sprinklers, fire extinguishers and other firefighting equipment. This will include a fire water tank with a capacity of 500 m<sup>3</sup> equivalent to two hours of fire water supply, a network of fire hydrants, and an automated fire detection and protection system. These facilities will use raw water from local sources. Supplemental hand-held fire extinguishers, suitable for each area of the mines, will be mounted throughout the buildings, control rooms, transformer areas, and fuel storage locations.

A cleared buffer will be maintained around critical mine infrastructure to impede the spread of fire from a facility fire to the surrounding woodlands and to protect the facilities from a wildfire. Alamos will adhere to the National Fire Code of Canada and *The Fires Prevention and Emergency Response Act* (Manitoba). Regular maintenance and safety inspections will be conducted on Project infrastructure and equipment.

First response firefighting activities will be conducted by the Mine Rescue Team utilizing on-site water trucks and emergency response equipment. Alamos will provide emergency response services sufficient in size and capability to respond to emergency situations at the mines. Primary firefighting activities will be handled by the local fire authority of the Town of Lynn Lake.

Employees will be trained in fuel handling, equipment maintenance, and fire prevention and response measures and fire prevention and suppression systems will be maintained on-site. Furthermore, emergency response procedures will be in place to provide timely and effective response to fires, and containment within the PDA. Protocols for communication with local authorities will also be included in these emergency response procedures.

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Liquid fuels, lubricants, waste oils and gaseous materials must be handled to meet the requirements of *The Dangerous Goods Handling and Transportation Act* and must be contained in labelled, dedicated tanks with associated containment and oil/water separators. External fuel and oil tanks will have containment berms or a double wall capable of holding 110% of a complete spill of the largest tank. Provisions will be in place for the proper disposal of spilled fuel or oils. Pressure tank storage and handling (e.g., for propane tanks) will be in accordance with the Office of the Fire Commissioner – Inspection & Technical Services Manitoba for registration of a Propane Storage Tank Location. Standard operating procedures for cyanide management, ammonium nitrate management, and fuel management will be implemented as described in Section 3.5.

In the event of accidental explosions/fires, the Emergency Response Coordinator (ERC) will be notified immediately (e.g., by the Project First Responder or the applicable Site Supervisor) and will inform and mobilize the ERSPT. The following steps are expected to be followed:

- Cease all work activities in the area.
- Nearby personnel are to make their way to designated muster points and remain there until authorized to leave the area.
- Any personnel injured will be subject to appropriate medical emergency response procedures (see Section 3.1.7).
- Personnel are to be aware of the potential for secondary explosions, structural collapse, or other potential hazards before entering the area to assist injured persons.
- All explosion/fire incidents will be reported to Senior Management at Alamos and outside regulatory agencies.
- Fuel and chemical storage areas should be monitored on a monthly basis, year-round.

### **3.1.7 Injury or Fatal Medical Emergencies**

Medical emergencies may arise from a variety of situations as noted in this Plan. Injuries can be dealt with in many situations through the timely intervention of on-site first aid. Other more urgent incidents could result in fatalities. Injuries require immediate response. On-site first aid kits must be well-stocked and readily accessible (i.e., as to type, size, and number) and must meet the requirements as set out in CSA Z1220-17 "*First aid kits for the workplace*" as referenced in the Workplace Safety and Health Regulation MR 217/2006. Personnel with first aid/CPR training must be available to provide aid until emergency response arrives on the scene. Any worker that sustains an injury or illness that is, or may be work-related, is to report for treatment as soon as practical.

Automated external defibrillators (AEDs) are not required at workplaces in Manitoba but will be available at selected locations. Where AEDs are installed, signs will be posted, the units will be regularly (monthly) inspected/tested and maintained when required. AED training during first aid /CPR training will be encouraged.

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During construction, first aid facilities will be supplied by the EPCM contractor. First aid personnel will provide transport to Lynn Lake Hospital when required. During operations, first aid facilities will be supplied by a dedicated first aid/mine rescue office in each of the site administration offices. Site security personnel will be trained as EMS first responders, and when required, provide transfer to Lynn Lake Hospital.

Typical first aid scenarios can include: bleeding from cuts and abrasions; slip, trips, and falls (e.g., strains, sprains, fractures, concussion); burns; and allergic reactions.

### ***Procedures for Handling Medical Emergencies***

The following procedures will be followed by the first responder for a medical emergency, whether minor or life threatening:

- Stop work in the area.
- The first responder will cordon off the area to assess the site for hazards to avoid entering a potentially unsafe condition.
- Provide immediate first aid, direct someone to call 911 Emergency Channel.
- Provide the dispatcher with required contact, locational information.
- Post spotter to direct emergency response to the scene.
- The first responder will stay at the scene and maintain contact with the dispatcher.
- Continue to render first aid until relieved by Medical First Responder, assist if required, and pass on patient assessment information.

If the injury requires off-site medical aid, it will be the responsibility of the Medical First Responder to do the referral (i.e., making decision to transport, choice of method, and accompany the patient, if necessary). The applicable Site Supervisor is responsible for arranging the required transportation for the injured worker. If the transport is to be by helicopter or ambulance, the Security Supervisor will contact the appropriate support services.

The Medical First Responder will complete the necessary forms and submit them to the proper authorities, the applicable Site Supervisor, the HSE Manager, and the Project Manager (who may forward them to Human Resources and Corporate head office, if necessary). Records will be kept in an Accident Record Book maintained by the H&S Coordinator and Environmental Monitor. Each record must be signed and dated. First aid statistics will be reviewed on a regular basis at safety talks. Trends will be determined, and action taken to recommend corrective action(s). The Workers Compensation Board (WCB) may require an employer or person to provide reports in respect of an injury in a form and manner required by the Board as per *The Workers Compensation Act*. A Return-to-Work Program, to be developed and implemented in cooperation with the WCB, will facilitate helping injured workers return to safe and suitable employment as health permits following a workplace injury (Workers Compensation Board of Manitoba 2022).

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### ***Fatalities***

Injuries that result in fatalities are subject to local law and conditions. Remains of injured parties determined to be deceased by qualified medical personnel, are not to be moved until authorization is provided by the RCMP (if a criminal incident) or the Medical Examiner. Due to the severity, emphasis will be placed on conducting an internal investigation of the incident to determine the causes and necessary response steps to avoid recurrence. Added responsibilities, in the event of a fatality, are placed on the Security Supervisor, ERC, H&S Coordinator, applicable Site Supervisor, HSE Manager, and Project Manager related to securing the site, preserving the incident scene, controlling access, communicating and preliminary reporting the incident, notifying next of kin/family, and documenting collection of evidence, initiating legal reporting and follow-up with agencies having authority.

### **3.1.8 Natural Hazards**

Natural hazards include a range of events that can result in accidents, malfunctions, or other emergencies. Natural events include extreme weather (storms), geologic hazards (e.g., seismic activity, landslides, subsidence), and wildfire. Alamos will record natural hazard events as input into the annual review of the ERSPCP.

Extreme, or severe, weather events can endanger personnel at the Project sites, due to whiteouts, low visibility conditions (e.g., wildfire and associated respiratory concerns), extreme cold, washed-out roads or power outages, which could impede emergency evacuation and response to other emergencies. During severe weather events, work activities may be reduced to essential site services only. The following actions will be taken in the event of a severe weather incident:

- Upon notice of road access to the Project site being curtailed due to a storm event, that person will immediately notify the Security Supervisor who will advise the Project Manager.
- The details and extent of road closure(s) will be confirmed through the Project Manager (or designate) with the RCMP.
- Workers at the site will be notified if road closure(s) is to extend through a shift change and determine whether the oncoming shift should be cancelled.
- The operability of non-essential services will be evaluated by the Project Manager if the severe weather persists.

The Project is in an area of low seismic activity. In the event of seismic event, Alamos will implement measures comparable to that for fires/explosions, including reporting.

Unintended fires can result from various accidents or malfunctions or through wildfires in the vicinity of the Project. The Project structures will be constructed primarily of concrete and steel and equipped with appropriate fire suppression and alarm systems. The buildings and majority of materials handled (i.e., ore, mine rock) are not flammable. Employees will be trained in fuel handling and equipment maintenance. Emergency response procedures (described below) will be in place to provide timely and effective response to fires and containment within Project sites. Protocols for communication with local authorities will be

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included in emergency response procedures. Where feasible, a cleared buffer will be maintained around critical Project infrastructure, which would reduce the potential for a wildfire affecting structures. A surrounding buffer zone will further decrease the likelihood of a wildfire incident spreading and causing major damage to the Project.

The ERC will take direct charge of firefighting and rescue operations. All orders given during such an incident will be issued through the HSE Manager, who will be able to modify the various operations, as necessary. The HSE Manager will also coordinate with the municipal fire chief when the municipal fire department is involved. In situations of wildfire affecting Project components, constant contact will be maintained with the local Natural Resources District Office in Lynn Lake to coordinate the deployment of wildfire response attack crews.

It is the responsibility of the Project Manager (with support from the HSE Manager and Site Supervisor[s]) to ensure that personnel are acquainted with, and informed about those procedures that affect them, and that they understand the proper course of action in the event of a fire incident or warning. Site Supervisors are to read and explain fire procedures to their personnel on a regular basis and confirm that new personnel fully understand what to do in the case of fire. Personnel are to be informed without delay of changes in the fire procedure. A report of these regular fire safety talks must be made to the H&S Coordinator and Environmental Monitor. Site Supervisors are responsible for the monthly inspection of their supervised areas for fire hazards and for verifying that firefighting equipment is in good operating condition. A report of these inspections must be filed with the H&S Coordinator and the Environmental Monitor. Contractors, vendors, and suppliers must comply with this procedure.

Personnel and contractors will be aware of, and assemble in, posted muster points in the case of the need for an evacuation.

Subsidence, the settling/sinking of land caused by removing groundwater, compaction of soil, underground mining, or the thawing of permafrost (CGA 2013), could cause damage to Project infrastructure or equipment, by weakening buildings and potentially causing building collapse or power outage, and by twisting/damaging roads and underground infrastructure such as pipes. Interaction between geologic hazards (i.e., subsidence) and the Project will be managed through use of the following mitigation measures:

- The Project will be designed and constructed to meet applicable engineering codes, standards, and best management practices. These include applicable building safety, industry codes, and standards for geologic hazards, including the *National Building Code of Canada*, which provides standards of safety to account for seismic activity, and subsidence, and will form the basis of design and construction of the Project.
- The tailings management facility and dams will be founded on bedrock.
- The tailings management facility dams are designed to withstand a 1 in 2,475-year seismic event during operation, and ½ between a 1 in 2,475-year and a 1 in 10,000-year event for passive closure, according to the CDA Dam Safety Guidelines.
- Regular maintenance and safety inspections will be conducted on Project infrastructure and equipment.

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- The proponent will monitor observed effects of the environment on the Project, and will act as required to maintain, repair and upgrade infrastructure/equipment as required.
- An investigation of the nature, degree and extent of permafrost will be conducted to support the final infrastructure siting and design.

### **3.2 CONSTRUCTION**

Section 3.1 outlines general prevention, response, and contingency measures that are broadly applicable to potential accidents, malfunctions, and emergencies that could occur during all phases of the Project, including the construction phase. These measures will be implemented at both the Gordon site and the MacLellan site as necessary during Project construction. No potential accidents, malfunctions, or emergencies have been identified that would require the implementation of additional prevention, response, or contingency measures specific to Project construction.

During construction, temporary solutions may be required, including the provision of site based medical support, first responders and fire fighters. Initially, there may be a greater reliance on the town of Lynn Lake until all elements are established for operations.

### **3.3 OPERATION**

Subsections 3.3.1 and 3.3.2 below contain information about site-specific emergency response, spill prevention and contingency measures to be implemented at the Gordon site and the MacLellan site, respectively, during operation to address the following: diesel generator set failure (Gordon site); sewage pipeline or tank failure (Gordon site); tailings management facility failure (MacLellan site); ore milling and processing plant malfunction (MacLellan site); standby diesel generator failure (MacLellan site); and sewage treatment plant malfunction (MacLellan site).

Subsection 3.3.3 below contains information about emergency response, spill prevention and contingency measures to be implemented during Project operation to address the following: release of untreated contact water; open pit slope failure; ore, overburden, and mine rock storage area slope failure; and over-blasting. These measures are not site-specific and will therefore be implemented at both the Gordon site and the MacLellan site.

Section 3.1 outlines general measures that are broadly applicable to potential accidents, malfunctions, and emergencies that could occur during all phases of the Project, including the operation phase. These measures will also be implemented at both the Gordon site and the MacLellan site as necessary during Project operation.

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**3.3.1 Gordon Site**

***Diesel Generator Set Failure***

In the event of a diesel generator leak or spill, diesel fuel could be released to the environment. To respond to a diesel generator failure, Alamos will:

- Spill containment is to be provided in the form of spill containment basins or drive-through berms; small containment basins are designed to collect small spills or leaks under vehicles, hose valves and tank connections; drive-through berms (or containment berms or spill berms) are used to collect runoff or contain spills from vehicles and equipment.
- If a leak is discovered, the decision/communications tree for environmental incidents (Appendix E) will be followed and MECC may be notified immediately, in accordance with Section 38, Part 7 of the Petroleum Storage Regulation and Part 8, Section 8.3 Inventory Control, specifically 8.3.4.(1) and 8.3.4.(2) of the CCME Code of Practice (2003).
- Inspection and maintenance requirements are stipulated for storage tanks in accordance with Part 5 of Manitoba Regulation MR 188/2001 Storage and Handling of Petroleum Products and Allied Products Regulation and Part 8 of the CCME Code of Practice (2003).
- Inspection and performance testing must be conducted by an authorized licensed individual (as per Section 51 and 54 of the Regulation) and documented annually.
- Investigate the root causes of the failure and develop and implement measures to reduce the possibility of recurrence.

A leak or spill of diesel fuel from the diesel generators will be rapidly responded to and cleaned up, as required.

***Sewage Pipeline or Tank Failure***

In the event of a sewage pipeline or tank failure, sewage wastewater could be released to the environment. To respond to a sewage pipeline/tank failure, Alamos will:

- Direct leakage either to containment facilities designed to accommodate and contain the wastewater; the pipeline/tank will be equipped with a wireless leak detection system; should issues with the pipeline/tank be detected, pumping would stop, and if required, the pipeline/tank contents can be drained to a water management pond lined with a geomembrane.
- Implement remediation and monitoring of impacted areas, including the water management pond.
- Remediate using mechanical pumping, dredging and excavation as appropriate to make the water management pond available again in the case of another emergency.
- Investigate the root causes of the failure and develop and implement measures to reduce the possibility of recurrence.
- Inspect the sewage pipeline/tank weekly on a year-round basis.

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A leak or spill from the discharge pipeline will release treated effluent that meets the applicable standard for release and will be rapidly responded to and cleaned up, as required.

### **3.3.2 MacLellan Site**

The section below contains information about emergency response, spill prevention and contingency measures to be implemented at the MacLellan site during operation to address the following: TMF malfunction; release of untreated contact water; ore milling and processing plant accident and malfunction; and sewage treatment plant malfunction.

#### ***Tailings Management Facility Failure***

In the event of a failure of the TMF dam, other containment dams or structures, tailings, waste materials or water could be released to the environment. To respond to a failure of the TMF dam, Alamos will:

- Immediately cease the pumping of tailings and contact water to the TMF and, if needed, lower the reclaim pond by pumping to the open pit.
- Notify applicable regulatory authorities and emergency responders.
- Notify local residents, Indigenous Nations, downstream users in the affected area, and the general public that there has been an incident and advise them not to enter or use affected areas (e.g., forest, creek/riverside, lakeshore) until further notice.
- Use earth-moving equipment to construct temporary berms across drainage channels to capture tailings or waste materials where possible and reduce/eliminate further loss/spread.
- Deploy silt fencing and silt curtains using appropriate tools and equipment/vehicles if the TMF water has entered watercourses.
- If water quality is compromised as a result of the incident, provide an alternate water supply until water quality is restored.
- Assess monitoring and remedial requirements and submit plan to the applicable regulatory authority.
- Investigate the root causes of the failure and develop and implement measures to eliminate further occurrence.
- Implement the follow-up and monitoring activities described in Section 4.0 of this Plan, as applicable.

Emergency plans for tailings management facilities will be further developed to include internal emergency response plans and external emergency preparedness plans in consideration of the inundation risk. The emergency plans will be reviewed, tested, and updated annually.

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### ***Ore Milling and Processing Plant Malfunction***

Ore milling and processing will be carried out at the MacLellan site and will include ore crushing; ball milling; pre-thickening; cyanidation for gold recovery (i.e., leaching and carbon-in-pulp); cyanide destruction using a conventional air and sulphur dioxide (Air/SO<sub>2</sub>) oxidation process; and carbon stripping and carbon regeneration, followed by electrowinning and refining. The cyanide will be detoxified in the tailings prior to discharge to the TMF, and a hydrogen cyanide (HCN) gas detector will be present to detect potential HCN gas in the tailings detoxification area. HCN detectors will also be present in the leach area in the event of malfunction resulting in a drop of pH and formation of HCN gas.

The Project will reuse process water, incorporating a closed system for cyanide extraction of gold (limiting exposure within the environment), and managing water to reduce volumes of mine contact water discharging to surface waters. Alamos will use a closed circuit for cyanide use and cyanide destruction in the processing plant (via Air/SO<sub>2</sub> oxidation and precipitation of metals) prior to release to the TMF.

Cyanide handling activities will occur within the process plant using standard management practices. Project activities will be aligned with the International Cyanide Management Code. A release during milling or processing would be contained within the facility which will be designed to meet the capacity to manage a worst-case scenario failure.

Provisions have been made in the ore milling and processing plant design to contain process spills. The floors and sumps are made of materials compatible with the materials being contained. Spill containment sumps will have capacity to hold 125% of the maximum potential spill. Any process spill will be contained, collected in sumps, and pumped back to the process stream. There is provision that a process spill could be pumped to the TMF. Visual observation, level switches and indicators, pressure and flow indicators provide information about process malfunctions and the possibility of a spill, including over-filling. Mill facilities will be constructed with a 2-inch berm or lip to capture a spill and prevent it from entering the natural environment. Mill and bay doors will be equipped with rubber stoppers to act as a seal in case a spill does happen.

Pressure vessels will be designed according to the American Society of Mechanical Engineers Pressure Vessel Code Section VIII, Division 1 (The National Board 2018) to tolerate peak pressures during processing. Pressure, flow switches and alarms, emergency automatic shut-off valves, and chemical detectors are incorporated into the design of the storage vessel and will assist the operator to reduce response times to stop the source and reduce the consequence of any potential incident. All pressure vessels will have designed pressure release systems.

Chemical storage and reagent preparation areas are to be located close to each other to reduce the transportation and handling of bags and drums. Incompatible chemicals and reagents are to be completely isolated from each other (e.g., cyanide and acidic chemicals). The entire area near the mixing and storage areas will have primary and secondary containment to reduce the potential for a spill and release to the environment. The process design will include process alarms, chemical detectors, and emergency shut-off valves.

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Emergency spill response protocols have been established for clean-up and proper follow-up action. All spills will be reported in an Initial Environmental Incident Report. The report includes a flowchart for identifying the steps in spill response as well as the contact information of key personnel. The Incident Report also includes a Risk Assessment to determine the severity of the spill.

Should the spill be reportable to an outside regulatory agency, the Environmental Monitor (or designate), as directed by the HSE Manager, will follow-up the Initial Environmental Incident Report with a detailed written report once all pertinent information has been gathered. These records will form part of the inputs into the annual review of the ERSPCP.

If a spill occurs that requires notification of MECC, both the spill prevention and contingency portions of the plan will be reviewed and revised as required by the HSE Manager. The review will be conducted within one week of the spill so that pertinent details of the incident are not lost.

If an immediate or basic cause relates to prevention (i.e., equipment or process design, preventative maintenance, installation of monitoring systems, etc.), the element will be reviewed and revised as required. The ERSPCP will be updated accordingly, and the revision noted in the Plan. Similarly, if the immediate or basic cause relates to contingency planning (i.e., response procedures, clean-up procedures, clean-up equipment and materials, notification, etc.) the element will be reviewed and revised as required. This portion of the plan will be updated accordingly, and the revision noted.

Elements related to spill prevention and response will be assembled into a formal summary report and provided to interested parties on an annual basis during operation.

### ***Standby Diesel Generator Failure***

In the event of a diesel generator leak or spill, diesel fuel could be released to the environment. To respond to a diesel generator failure, Alamos will:

- Provide spill containment in the form of spill containment basins or drive-through berms; small containment basins are designed to collect small spills or leaks under vehicles, hose valves and tank connections; drive-through berms (or containment berms or spill berms) are used to collect runoff or contain spills from vehicles and equipment.
- Following the decision/communications tree for environmental incidents (i.e., EECP), MECC may be contacted immediately in accordance with Section 38, Part 7 of the Petroleum Storage Regulation and Part 8, Section 8.3 Inventory Control, specifically 8.3.4.(1) and 8.3.4.(2) of the CCME Code of Practice (2003).
- Investigate the root causes of the failure and develop and implement measures to reduce the possibility of recurrence.

A leak or spill of diesel fuel from the diesel generators will be rapidly responded to and cleaned up, as required.

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Inspection and maintenance requirements are stipulated for storage tanks in accordance with Part 5 of Manitoba Regulation MR 188/2001 Storage and Handling of Petroleum Products and Allied Products Regulation and Part 8 of the CCME Code of Practice (2003).

Inspection and performance testing must be conducted by an authorized licensed individual (as per Section 51 and 54 of the Regulation) and documented annually.

### ***Sewage Treatment Plant Malfunction***

The sewage treatment facility will be designed in accordance with applicable regulatory requirements (e.g., Onsite Wastewater Management Systems Regulation under *The Environment Act* of Manitoba) and built to applicable industry standards and codes. The sewage treatment facility will be maintained and inspected on a regular basis and will be built on a pad and surrounded by ditching to provide control/containment of potential releases within the treatment plant area. However, in the event of a failure of the sewage treatment plant, untreated wastewater could still be released to the environment. To respond to a failure of the sewage treatment plant, Alamos will:

- Notify applicable regulatory authorities and downstream users if wastewater enters a waterbody (i.e., Keewatin River).
- Notify local residents, Indigenous Nations, downstream users in the affected area, and the general public that there has been an incident and advise them not to enter or use the affected areas until further notice.
- Use earth-moving equipment to construct temporary berms across drainage channels to capture wastewater where possible and to reduce/eliminate further loss/spread of wastewater.
- Deploy silt fencing and silt curtains if wastewater has entered a waterbody (i.e., Keewatin River).
- If water quality is compromised as a result of the incident, provide an alternate water supply until water quality has been restored.
- Assess monitoring and remedial requirements and submit plan to regulatory authorities.
- Investigate the root causes of the failure and develop and implement measures to eliminate a future occurrence.
- Visually inspect the sewage treatment plant daily on a year-round basis.
- Implement the follow-up and monitoring activities described in Section 4.0 of this Plan, as applicable.

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**3.3.3 Both Sites**

***Release of Untreated Contact Water***

Untreated contact water has potential to contain elevated metal and chemical concentrations that may be harmful to the environment and human health. In the event of a failure of the water collection system (i.e., diversion ditch, collection ditches, culverts, sumps, pipelines, ponds) resulting in a release of untreated contact water to the environment (i.e., water, ground), Alamos will:

- Contain the release as close as possible to the failure point.
- Pump water back into the collection system and repair the failure points in containment structures, if feasible.
- Notify applicable regulatory authorities and emergency responders.
- Notify local residents, Indigenous Nations, downstream users in the affected area, and the general public that there has been an incident and advise them not to enter or use affected areas (e.g., forest, creek/riverside, lakeshore) until further notice.
- Use earth-moving equipment to construct temporary berms across drainage channels to capture untreated contact water or waste materials where possible and reduce/eliminate further loss/spread.
- Deploy silt fencing and silt curtains if the material has entered watercourses.
- If water quality is compromised as a result of the incident, provide an alternate water supply until water quality is restored.
- Soils in the vicinity of a release would be tested for metal and chemical concentrations and excavated and disposed of as required.
- Assess monitoring and remedial requirements and submit plan to regulatory authority.
- Investigate the root causes of the failure and develop and implement measures to eliminate further occurrence.
- Monitor the contact water collection system daily and monthly (depending on season and weather conditions) on a year-round basis.

***Uncontrolled Release of Open Pit Water***

In the event of uncontrolled release of open pit water, untreated pit water could overwhelm the surrounding environment. In this case, the following actions will be undertaken:

- Applicable regulatory authorities and emergency responders will be notified.
- Local residents, Indigenous Nations, downstream users in the affected area, and the general public will be notified that there has been an incident and advised to not enter or use affected areas (e.g., forest, creek/riverside, lakeshore) until further notice.
- Earth-moving equipment will be used to construct temporary berms across drainage channels to capture the released pit water where possible and reduce/eliminate further loss/spread.

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- Silt fencing and silt curtains will be deployed if the pit water has entered watercourses.
- Water quality in the receiving waterbody will be monitored, if compromised from the incident.
- Groundwater wells around the open pit will be monitored for groundwater levels and groundwater quality in terms of any increase in concentrations of parameters at the time of the incident.
- The root causes of the failure will be investigated, and measures developed and implemented to eliminate further occurrence.
- Monitoring and remedial requirements will be assessed, and a plan submitted to the applicable regulatory authority.

### ***Open Pit Slope Failure***

Open pit and satellite pit slope failure could occur due to unanticipated geologic conditions or extreme weather events such as overland flooding. Erosion and sedimentation will be monitored as part of the Erosion and Sediment Control Plan. Alamos will undertake regular slope stability inspections during operation to monitor slope performance.

In the event of an open pit slope failure, rock and water could be released into the working areas of the open pit. This failure would not cause a release to the environment, but it could affect surface infrastructure that may result in a release to the environment. To respond to a failure of the open pit slope, Alamos will:

- Implement measures in response to medical emergencies resulting in injuries and/or fatalities.
- Evacuate the open pit section and cease operations in the affected area.
- Notify regulatory agencies.
- Investigate the root cause of the failure and develop and implement measures to reduce the possibility of recurrence.

### ***Ore, Overburden, and Mine Rock Storage Area Slope Failure***

In the event of the failure in ore, overburden or mine rock/borrow stockpiles/storage areas, ore, overburden, or mine rock could be released to the environment. Mine rock slope failure will be monitored as part of the Acid Rock Drainage and Metal Leaching (ARD/ML) Management and Monitoring Plan. To respond to a failure of the surface stockpiles, Alamos will:

- Immediately cease operations in the affected area.
- Implement measures in response to medical emergencies resulting in injuries and/or fatalities (see Section 3.1.7).
- Notify applicable regulatory authorities and emergency responders.
- Investigate the root cause of the failure and develop and implement measures to reduce the possibility of recurrence.

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***Facility Areas***

The facility area for the Gordon site will consist of a truck shop building and offices, a truck wash building, and an administration and mine dry building. Other facilities include a gate house, a freshwater pumphouse, and a collection pond pumphouse. In addition to the ore milling and processing plant at the MacLellan site, other buildings will consist of an oxygen plant, plant warehouse and workshop, truck shop and truck wash buildings, assay laboratory, administration and mine dry building, gate house, powder magazine, a freshwater pumphouse, a collection pond pumphouse, and e-houses and substation.

Potential accidents, malfunctions and other unplanned events may occur during operation of the various facilities/buildings. Accidents and malfunctions are primarily related to the potential for fuel or other chemical spills, fire, and transportation accidents.

Preventing the release of contaminants into the environment will be achieved through the following means:

- Maintaining compliance with all government legislation.
- Implementation of Safety and Environment Hazard Awareness Training (Field Level Hazard Assessments [FLHA]/tailboards, Joint Hazard Assessment [JHAs,], etc.).
- Preventative maintenance and inspections of vehicles and equipment (including fuel tanks).
- Posted Spill Response Plan.
- Emergency response training.
- Taking immediate action when a release occurs.

Other measures to avoid accidents, malfunctions, or other unplanned events associated with fire/explosion, spills and transportation are as follows:

- Alamos will maintain their own plan related to emergency preparedness, WHMIS and spill response procedures, including a high-level emergency response plan, in keeping with regulatory guidance.
- Alamos will compile a survey of the hazardous substances present on-site. The H&S Coordinator will maintain a list of hazardous materials and SDS for these products and will make available to personnel on-site.
- The spill response plan and emergency response training will cover spills of fuels and fluids associated with construction; medical incidents (including 24-hour emergency transport to hospital); fire response and evacuation; security; and emergency contacts and government, response agency, town, and Indigenous Nations (i.e., Marcel Colomb First Nation) notification.
- Appropriate fire extinguishers will be available on-site during operations and maintained to manufacturer's standards.
- Potentially hazardous materials and chemicals will be stored and handled at dedicated areas and labelled in accordance with applicable regulatory requirements.

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- Hazardous materials will be transported in accordance with the *Dangerous Goods Handling and Transportation Act* and used according to product-use instructions.
- All applicable permits will be obtained, and provincial regulations adhered to for pesticide use.
- Emergency spill kits will be maintained on-site, and staff will be trained to properly deploy spill kit materials and clean-up spills.
- Inspections of hydraulic and fuel systems on equipment and machinery will be undertaken on a regular basis. Leaks detected will be isolated and repairs arranged immediately by trained personnel.
- Above-ground storage tanks and piping will be regularly inspected and maintained to detect/prevent leaks and failures.
- Existing traffic control measures for traveling to and from the mine sites and accessing the mine sites (i.e., speed limits, signage) will be adhered to.
- Personnel and Project vehicles will exercise caution in travelling to and from the mine sites.
- Alamos will apply Health and Safety procedures consistent with provincial policies and programs related to worker health and safety.

### 3.3.3.1 Blasting

Blasting will be conducted in accordance with the Explosive Management Plan (for the safe use and storage of explosives and explosive components at the Project sites). An explosive mixing plant and explosives magazine will be housed separately away from main mine operations. Explosives storage requirements will be determined with the selected explosives supplier and will be established in accordance with the National Standard of Canada document number CAN/BNQ 2910-510 – *Explosives – Quantity Distances*, and the facility will be licensed under the federal *Explosives Act*.

The size, timing, and setback distances of blasting charges will be limited to avoid percussive injuries to fish or damage to incubating eggs. Blasting protocols will be developed during Project permitting, using guidance outlined in the *Guidelines for the Use of Explosives in or Near Canadian Fisheries Waters* (Wright and Hopky 1998).

In the event of an occurrence of over-blasting (i.e., blasting beyond what was intended in area or strength), the appropriate Site Supervisor will notify the ERC who will inform and dispatch the ERSPT, as necessary. The following steps are expected to be taken:

- Immediately cease blasting operations in the area.
- Notify applicable regulatory authorities and emergency responders.
- Implement measures in response to medical emergencies resulting in injuries and/or fatalities (see Section 3.1.7).
- Nearby personnel will make their way to the designated muster point and remain there until authorized to leave the area.

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- The likelihood of further explosions, structural collapses, or other potential hazards will be considered prior to entering the area to assist injured persons.
- Investigate the root cause of the over-blasting and develop and implement measures to reduce the possibility of recurrence.

### **3.4 DECOMMISSIONING/CLOSURE**

Section 3.1 outlines general prevention, response, and contingency measures that are broadly applicable to potential accidents, malfunctions, and emergencies that could occur during all phases of the Project, including the decommissioning/closure phase. These measures will be implemented at both the Gordon site and the MacLellan site as necessary during Project decommissioning/closure. No potential accidents, malfunctions, or emergencies have been identified that would require the implementation of additional prevention, response, or contingency measures specific to Project decommissioning/closure.

As there will be reduced resources (and infrastructure) remaining on site during the decommissioning and closure phases of the project, an update to the contacts list and decision tree will be required.

Follow-up and monitoring activities to be undertaken during active and post-closure, permanent closure, and unexpected early closure are detailed in Section 4.4 and in the Conceptual Closure Plan for the Project.

### **3.5 STANDARD OPERATING PROCEDURES**

In addition to commitments made in the EIS and requirements of EA Approval and other permit conditions, the following standard operating procedures for cyanide management, ammonium nitrate management, and fuel management will apply.

#### **3.5.1 Cyanide Management**

Alamos will incorporate measures in the design, construction, and operation of its facilities at the MacLellan site to prevent cyanide releases to the natural environment and workplace exposures. The unloading, storage, mixing, and use of cyanide in the gold extraction process will be conducted within contained areas of the processing plant. Cyanide management will be conducted in accordance with the requirements of the International Cyanide Management Code (2021).

Considerations to address the potential for cyanide release include the following:

- Concrete impoundments are to be constructed within the Adsorption, Desorption and Recovery (ADR) plant building for the mixing and storage tanks, the elution column, adsorption train tanks, and the barren solution tank.
- All cyanide solution impoundments will be sealed and physically isolated from acids or other incompatible materials.
- Individual containment areas will be sized to accept 110% of the volume of the largest tank within the storage area.

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- Spills are to be captured in sumps that will allow for pumping directly back to the appropriate point in the cyanidation process.
- No residual spill material will be generated during normal operations that will require further management and disposal as waste.
- Potential spills of dry sodium cyanide briquettes in unloading or storage area will be captured and added to the mixing tank.
- Spills of process solution will be captured in the sumps or with portable suction pumps and directed to appropriate locations in the process.
- Containment areas with cleaned-up spills will be washed into sumps within the containment and the collected fluids pumped back into the process.

The individual who discovers a serious incident will call out a “CODE 1” on the radio, stating name, location and nature of assistance required. The H&S Coordinator will respond to the call and will be responsible for coordinating the initial response, mobilizing the ERSPT, and summoning any specialized resources required.

Transport of sodium cyanide will be in accordance with the International Cyanide Management Code. Sodium cyanide is commonly shipped in briquette form making it very stable and reducing susceptibility to a spill. Sodium cyanide will be transported in briquette form in 18-tonne isotainers to the processing plant at MacLellan.

Clean up of a sodium cyanide spill from a transport truck would be the responsibility of the contractor, manufacturer, or supplier transporting the substances, and would be conducted in compliance with applicable federal, provincial, or municipal regulations. On- and off-site spills will be reported immediately to Alamos Senior Management staff, outside regulatory agencies, Indigenous Nations as per the pre-established communications protocol, and other local officials. The applicable Site Supervisor, and/or Contractor representative, will be responsible for spill control measures and/or spill clean-up response as directed by the ERC.

### 3.5.2 Ammonium Nitrate Management

The primary blasting agent used at site will be emulsion – ammonium nitrate dissolved in water and suspended in oil. The oil surface gives emulsion-based products improved water resistance and safety. Packaged ammonium nitrate/fuel oil (ANFO) may also be used to facilitate blasting at the mine sites. Ammonium nitrate will be shipped in prill/flaked (solid) form, in 1,000 kg bags in shipping containers. The ammonium nitrate/fuel oil mixture will be manufactured in an explosives’ mixing plant at the MacLellan site. Complete detonation of emulsion and ANFO produces byproducts (water [H<sub>2</sub>O], carbon dioxide [CO<sub>2</sub>], and nitrogen [N<sub>2</sub>]) which are harmless. Incomplete detonation produces nitrogen dioxide (NO<sub>2</sub>), nitrogen oxide (NO), and carbon monoxide (CO) which are toxic gases in high concentrations. ANFO material will be kept sealed and dry because it is water soluble. Explosives will be managed in accordance with federal and provincial regulations and Fisheries and Oceans Canada’s *Guidelines for the Use of Explosives in or Near Canadian Fisheries Waters* (1998).

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Safe handling procedures for ammonium nitrate products are as follows:

- Keep away from heat and sources of ignition.
- Do not ingest or breathe dust.
- Avoid contact with skin and eyes.
- Store in cool, well-ventilated areas separate from acids, alkalies, reducing agents and combustibles.

High-explosive detonators should be stored in a cool, well-ventilated magazine in closed containers that are kept away from heat, sparks, and flames. Blasting caps should be stored under dry conditions in a cool, well-ventilated magazine. Any spills are to be managed with the clean-up of the spilled materials (as per the Spill Prevention and Contingency Section of this Plan [Section 3.1.3]). Appropriate PPE is to be worn when handling explosive materials and cleaning up spills.

The following procedures will be implemented to prevent or mitigate incidents related to ammonium nitrate management:

- Only double-lined product bags will be used.
- Pallets of stored product are to be shrink-wrapped.
- Caution should be used when loading holes such that the poured product goes into the blast hole and any product surrounding the blast hole should be swept into the hole once loading is complete.
- Caution should be used when carrying product bags during the loading process.
- Pallets of product are to be sheltered from the weather.
- Explosives not immediately used are to be stored in suitable explosives magazine(s).
- Fire extinguishers will be available both inside and outside a facility; fire extinguishers must be compatible with flammable materials (water-based where ammonium nitrate is used).
- Used ANFO bags should be emptied completely and stored outside the facility at a safe distance from explosives to reduce fire hazard risk.
- Post "NO SMOKING" signs at visible locations.
- Use of lighters, matches, mobile phones, or radio transmitters or other items that might conduct electricity is not allowed at explosives storage areas.
- All transportation, storage, use, and handling procedures outlined in this Plan are to be followed.

Clean up of an ammonium nitrate spill from a transport truck would be the responsibility of the contractor, manufacturer, or supplier transporting the substances, and would be conducted in compliance with applicable federal, provincial, or municipal regulations. On- and off-site spills will be reported immediately to Alamos Senior Management staff, outside regulatory agencies, Indigenous Nations as per the pre-established communications protocol, and other local officials. The applicable Site Supervisor, and/or Contractor representative, will be responsible for spill control measures and/or spill clean-up response as directed by the ERC.

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### 3.5.3 Fuel Management

Standards for petroleum storage and handling are specified as per the Storage and Handling of Petroleum Products and Allied Products Regulation, MR 188/2001 under *The Dangerous Goods Handling and Transportation Act*.

Petroleum storage facilities with an aggregate capacity of 5,000 litres (L) to 50,000 L must include the following:

- Provide spill containment at all connection points during a fuel delivery.
- Spill containment is to be provided in the form of spill containment basins or drive-through berms; small containment basins are designed to collect small spills or leaks under vehicles, hose valves and tank connections; drive-through berms (or containment berms or spill berms) are used to collect runoff or contain spills from vehicles and equipment.

For petroleum storage facilities with an aggregate capacity of 50,000 L or greater, one of the following is required:

- Construct a concrete pad sloped in a manner that water and fuel is directed to an oil-water separator or a sump.
- Construct a concrete pad that contains spills or overfills.
- Construct and maintain an impermeable, hydrocarbon resistant, non-combustible barrier that contains spills or overfills that meets a hydraulic conductivity of  $1 \times 10^{-6}$  centimeter per second (cm/s) and is of sufficient thickness so as not to fail when exposed to vehicle traffic.
- Each fuel station will be located outdoors on a concrete housekeeping pad. Spills from fueling station transfers will be contained on the concrete slabs and routed to buried oil-water separators sized to meet the applicable discharge requirements. Each oil-water separator will be checked regularly and skimmed out as required.

For new petroleum storage facilities, a schedule of final installation leak detection will be carried out. The leak detection requirements are stipulated in the Regulation and codes and standards adopted.

- If a leak is discovered, the decision/communications tree for environmental incidents (i.e., EECP) will be followed and MECC may be notified immediately, in accordance with Section 38, Part 7 of the Petroleum Storage Regulation and Part 8, Section 8.3 Inventory Control, specifically 8.3.4.(1) and 8.3.4.(2) of the CCME Code of Practice (2003).

Inspection and maintenance requirements are stipulated for storage tank systems (i.e., aboveground tanks 5,000 L or greater, and/or underground tanks) in accordance with Part 5 of Manitoba Regulation MR 188/2001 Storage and Handling of Petroleum Products and Allied Products Regulation and Part 8 of the CCME Code of Practice (2003). Inspection and performance testing must be conducted by an authorized licensed individual (as per Section 51 and 54 of the Regulation) and documented annually.

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## **4.0 FOLLOW-UP AND MONITORING**

Monitoring (follow-up) is the continuation of observation, measurement, or assessment of environmental conditions at and surrounding the Project, its components, or activities. Two types of monitoring are typically undertaken for environmental assessments: environmental monitoring to verify the accuracy of predictions and implemented mitigation measures; and compliance monitoring for verification of practices or procedures to meet legislated requirements. Components to be monitored have been determined based on regulatory instrument requirements as per legislation, environmental importance, sensitivity and vulnerability, and licence requirements.

Monitoring plans describe sampling procedures, quality control and assurance programs, laboratory methods and protocols, laboratory accreditations, and reporting requirements where applicable. The plans also provide details on the location, design, methods (e.g., parameters to be measured), applicable regulatory instruments, and schedule for the follow-up and monitoring programs. Engagement of Indigenous Nations in monitoring will be incorporated into the monitoring plans where appropriate and applicable.

Elements relevant to the ERSPCP will be assembled into a formal summary report and provided to Indigenous Nations and IAAC on an annual basis during construction and operation, and during decommissioning/closure/post-closure in years when monitoring is carried out.

The specific and measurable end points for concluding the monitoring program will be set to ensure the accuracy of the environmental assessment and the effectiveness of mitigation measures. These end points will be achieved either at permanent closure or earlier if it can be demonstrated that there are no further impacts warranting continued monitoring.

### **4.1 GENERAL**

Section 1.4 outlines training and orientation all employees will receive related to emergency and spill response procedures. The following subsections outline general follow-up and monitoring activities pertaining to vehicle accidents and spills. These activities, which are broadly applicable to potential accidents, malfunctions, and emergencies that could occur during all phases of the Project, will be implemented at both the Gordon site and the MacLellan site as necessary throughout the life of the Project.

#### **4.1.1 Vehicle Accidents**

Elements of the monitoring program with respect to vehicle accidents will include the following:

- Monitoring of incidents related to wildlife traffic mortality on a year-round basis for the life of the Project.
- Monitoring of incidents related to major vehicle accidents on a year-round basis for the life of the Project.

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### **4.1.2 Spill Prevention and Contingency**

Monitoring of spill prevention and contingency planning will be undertaken via routine visual and technical inspections of equipment and systems, to document condition and identify potential hazards or areas of repairs/preventative maintenance, utilizing best management practices to protect the environment and to determine whether new strategies are required. The inspections, including daily inspections, will be the responsibility of the operator under direction from the Environmental Monitor (or designate). In the event of a spill, a post-incident monitoring schedule will be developed on a case-by-case basis in consultation with applicable regulatory agencies depending on the type of the incident and degree of environmental damage.

Should a hazardous substance spill occur, either on land or in water, follow-up monitoring will be instituted, and could include soil or water quality tests to be undertaken at the point of the spill near the ground area, and downstream of the point of entry in the case of a waterbody. In addition, a water quality sample could be collected upstream of the point of entry to demonstrate whether, or not, there has been a water quality effect. Follow-up monitoring could also include the implementation of a groundwater monitoring program to document environment conditions related to a spill.

Elements of the monitoring program with respect to spill incidents will include the following:

- Monitoring groundwater levels, using monitoring wells/drive point piezometers.
- Groundwater quality – samples would be analyzed for general chemistry and select dissolved metals and compared with applicable regulatory standards (i.e., Guidelines for Canadian Drinking Water Quality, Manitoba Water Quality Standards Objectives and Guidelines, Canadian Water Quality Guideline-Freshwater Aquatic Life, and the Ontario Ministry of the Environment GW3 criteria).
- Monitoring of surface water quality at receiving waterbodies (general parameters, anions, metals).
- Monitoring of fish and fish habitat based on a “before-after-exposure-control” approach which will entail comparison of physical habitat metrics important to fish measured before the incident (i.e., baseline) to the same metrics measured after the incident (i.e., quantity of littoral habitats, reduction in quantity and quality of stream habitat [based on water depth and velocity] and overwintering habitat in lakes, and changes in water temperature affecting fish growth and survival).
- Monitoring of impacted areas for re-vegetation success through the application of supplementary mitigation measures such as reseeded. Remediated areas will be considered successfully reclaimed when re-vegetation is assessed to be composed of mostly native species that are self-sufficient.
- Monitoring of fish and fish habitat based on a “before-after-exposure-control” approach which will entail comparison of physical habitat metrics important to the health of fish and fish habitat measured before the incident to the same metrics measured after the incident.

In the event that an unexpected deterioration of the environment is observed as part of follow-up and/or monitoring, intervention mechanisms will include the adaptive management process described in Section 5.0 of this Plan. This may include an investigation of the cause of the deterioration and identification of existing and/or new mitigation measures to be implemented to address it.

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Alamos is committed to continuous improvement and will implement preventative operation and maintenance procedures to reduce the risk of spills, including regular inspection of equipment and hazardous material containment areas and training in proper handling and storage procedures for hazardous materials.

### **4.2 CONSTRUCTION**

Section 4.1 outlines general follow-up and monitoring activities that are broadly applicable to potential accidents, malfunctions, and emergencies that could occur during all phases of the Project, including the construction phase. These activities will be implemented at both the Gordon site and the MacLellan site as necessary during Project construction. No potential accidents, malfunctions, or emergencies have been identified that would require the implementation of additional follow-up or management activities specific to Project construction.

### **4.3 OPERATION**

Subsection 4.3.1 below contains information about site-specific follow-up and monitoring activities to be implemented at the MacLellan site during operation in the event of a TMF failure or a sewage treatment plant malfunction.

Section 4.1 outlines general follow-up and monitoring activities that are broadly applicable to potential accidents, malfunctions, and emergencies that could occur during all phases of the Project, including the operation phase. These activities will be implemented at both the Gordon site and the MacLellan site as necessary during Project operation. Frequent visual and technical inspections of mine infrastructure and equipment to document the condition and identify potential hazards or areas of repairs/preventative maintenance will be conducted in a timely manner.

No potential accidents, malfunctions, or emergencies related to Project operation have been identified that would require the implementation of additional follow-up or management activities specific to the Gordon site.

#### **4.3.1 Tailings Management Facility Failure**

The TMF will be monitored through an independent review/inspection program, and dam instrumentation. In the event of a TMF dam failure, emergency response monitoring would include:

- Monitor surface water quality (e.g., general parameters, anions, metals) in the receiving waterbody if compromised as a result of the incident.
- Monitor groundwater wells around the TMF to monitor groundwater levels and groundwater quality in terms of any increase in concentrations of parameters (e.g., general chemistry, select dissolved metals) at the time of the incident and compare with applicable regulatory standards.

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- Assess monitoring and remedial requirements and submit a specific remedial action plan to regulatory authority and initiate remedial action.
- Investigate the root causes of the failure and develop and implement measures to eliminate further occurrence.

Should such a failure occur, soil or water quality tests will be undertaken at the point of the failure and downstream of the failure on land and in water. In addition, soil and water quality samples would be collected upland and upstream of the point of failure to demonstrate whether, or not, there has been a soil and/or water quality effect. The failure will be reported in an Environmental Incident Report. This record will form part of the input into the annual review of the ERSPCP.

TMF discharge quality will be monitored as part of the Groundwater Management and Monitoring Plan and the Surface Water Management and Monitoring Plan. Follow-up and monitoring for a release could include soil and water sampling near the area of the release as part of a clean-up to ground, or the implementation of a groundwater monitoring program to document the environmental conditions of the release.

### **4.3.2 Sewage Treatment Plant Malfunction**

Effluent/sewage treatment plant discharge quality will be monitored as per the Surface Water Management and Monitoring Plan. Follow-up and monitoring for a release could include soil and water sampling near the area of the release as part of a clean-up to ground. In the event of a major sewage treatment malfunction, soil or water quality tests will be undertaken at the point of the failure and downstream of the failure on land and in water. In addition, soil and water quality samples would be collected upland and upstream of the point of failure to demonstrate whether, or not, there has been a soil and/or water quality effect. The failure will be reported in an Environmental Incident Report. This record will form part of the input into the annual review of the ERSPCP.

## **4.4 DECOMMISSIONING/CLOSURE/POST-CLOSURE**

As per the Conceptual Closure Plan, the ERSPCP will include water chemistry monitoring for surface water quality as follows:

- Surface water monitoring in the case of a spill incident (pit lake water, TMF sediment pond, receiving waterbodies and watercourses upstream and downstream of discharge flows); groundwater monitoring (around open pits, in vicinity of Gordon and Farley lakes and Keewatin River, and monitoring wells upgradient and downgradient of TMF, mine rock storage areas, and other material stockpiles); and water quality (general parameters, anions, metals).

As described in the Conceptual Closure Plan, maintenance and monitoring will continue through Active Closure and Post-Closure while water quality is not of sufficient quality to allow unabated discharge to the environment. Monitoring during mine decommissioning will occur daily and on an annual basis subsequently during active closure and post-closure.

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## **4.5 SCHEDULE**

As outlined in Section 4.1.2, monitoring of spill prevention and contingency planning will be undertaken via routine visual and technical inspections of equipment and systems, to document condition and identify potential hazards or areas of repairs/preventative maintenance, utilizing best management practices to protect the environment and to determine whether new strategies are required. In the event of a spill, a post-incident monitoring schedule will be developed on a case-by-case basis in consultation with applicable regulatory agencies depending on the type of incident and degree of environmental damage.

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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.

### **5.1 THRESHOLDS FOR ADAPTIVE MANAGEMENT**

Although the full range of potential thresholds for adaptive management cannot reasonably be captured in this Plan due to the wide diversity of potential effects that could occur in the event of an accident/malfunction or emergency, thresholds for adaptive management will include (but not be limited to):

- Exceedances of the maximum authorized concentrations that are set out in the MDMER pursuant to the *Fisheries Act*.
- Rapid, or prolonged changes or trends in monitoring parameters (e.g., groundwater level declines or exceedances in the average daily pumped volume from open pits and receptor wells as per the Groundwater Management and Monitoring Plan).
- Exceedance of the water quality limits specified in the terms and conditions of regulatory permits and approvals obtained in support of the Project.
- An incident of non-compliance with other applicable legislated and/or regulatory requirements, including under the federal *Fisheries Act*; the federal *Canadian Environmental Protection Act, 1999*; the federal *Transportation of Dangerous Goods Act, 1992*; or *The Workplace Safety and Health Act* of Manitoba.
- Observation of conditions that could compromise the safety of Project personnel or increase the risk of a potential accident/malfunction, spill, or other emergency associated with Project activities or components.

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## **6.0 REPORTING**

Events that pose a threat to human health or infrastructure, or for which there is a regulatory requirement (e.g., large spill, fire) will be immediately reported to the appropriate regulatory agency, Indigenous Nations, and local residents by following the decision/communications tree for environmental incidents (Appendix E). Report of a fire shall be made to the fire department (911) and the environmental emergency reporting line (204-944-4888 or toll free 1-855-944-4888), identifying the type of materials involved and the location of the fire.

A Schedule of Reportable Quantities as part of Manitoba's Environmental Accident Reporting Regulation (MR 439/87) under *The Dangerous Goods Handling and Transportation Act* is included as Appendix C. Follow-up studies will target valued components that have been, or are likely to be, affected by the event, and the scope, duration, and extent of monitoring will be determined in consultation with the appropriate regulatory agencies, Indigenous Nations, and local residents.

Reports from monitoring programs will be submitted annually to regulatory authorities and shared with interested Indigenous Nations and stakeholders.

Reporting activities will include:

- Timely reporting of incidents and near misses with respect to the following:
  - Release of untreated contact water, TMF malfunction.
  - Sewage discharge pipeline failure, sewage treatment plant malfunction.
  - Fuel and hazardous materials spills.
  - Open pit slope failure, ore, overburden, and mine rock stockpiles/storage areas slope failure.
  - Over-blasting, explosion/fire hazards, vehicle accidents, and natural hazards at the Project sites.
- Elements relevant to the ERSPCP will be assembled into a formal summary report and provided on an annual basis during construction and operation, and during decommissioning/closure/post-closure when monitoring is carried out.
- Receiving, documenting, and responding to communications or complaints will also be part of reporting under the Plan.
- The reporting will be used to inform adaptive management reviews.

In the event of a spill, the relevant procedure/element associated with the incident (whether in this Plan or in a separate Project management plan) will be reviewed and updated, as necessary. Following an accident, lessons learned, and knowledge generated through investigations will be used to increase effectiveness and improve emergency response measures and processes. The ERSPCP will be updated accordingly, and the revision noted in the Plan.

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## **6.1 ENVIRONMENTAL EMERGENCY COMMUNICATION**

An Environmental Emergency Communication Plan (EECP) is an integral part of the ERSPCP (Appendix E). The EECP will:

- Define the types of possible events, such as an event deemed significant, and event deemed an emergency, and an event that is deemed both significant and an emergency.
- Describe the means of communication measures and urgent notification procedures that would be followed in an emergency event.
- Describe the communication measures that will be in place for Indigenous Nations.
- Describe how environmental damage will be reported and how follow-up will be conducted regarding accidents and malfunctions, including with Indigenous Nations.

To provide and maintain effective and available emergency communication in the event of an emergency during construction, Alamos will maintain 20 to 30 radios (each with 14 channels) for safety purposes with a base station placed at Lynn Lake and a repeater station located at the Gordon site. Emergency communication procedures will be instituted for both urgent immediate actions (such as public notification of safety issues, shelter-in-place, and evacuation directions), as well as longer-term actions (such as a general website and hotlines, incident status updates, injured wildlife reporting, etc.).

In the event of an emergency situation that has the potential to affect worker or public safety or has an effect outside of the mine sites (e.g., fire, TMF failure, major spills/explosions), the incident will be reported immediately to emergency site personnel and appropriate external contact resources, including applicable regulatory authorities (e.g., MECC regulators) and external first responders as necessary (e.g., the Town of Lynn Lake Fire Department, the local RCMP detachment, Emergency 911, Lynn Lake District Natural Resources Officers). Depending on the nature and severity of the emergency situation, local residents, Indigenous Nations, downstream users in the affected area, and/or the general public will also be notified that there has been an incident and will be advised not to enter or use affected areas until further notice.

In the event of an incident that could threaten the health or safety of nearby communities or individuals, warning or notice of evacuation may be carried out. Alamos will maintain a contact list for communities, including local Indigenous Nations, local residents, and downstream users in an affected area. This information will be provided to the Manager, Environment & Community Relations to be available for external communication. For non-emergency public warnings, Alamos will coordinate these with the appropriate government agencies. For emergency warnings and evacuations, the Manager, Environment & Community Relations will instruct the ERC to coordinate these with MECC and appropriate government agencies, who would take the lead.

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References

January 30, 2025

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## **Appendix A Maps**

**Project Infrastructure**

Project Development Area

**Environmentally Sensitive Sites**

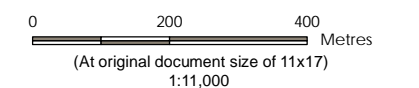
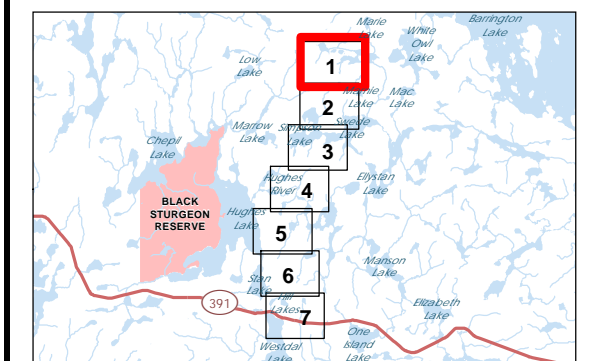
- Watercourse Crossing Location
- Water Features 30m Buffer
- Hunting Area
- Trapping Area
- Wetland Area (interpreted from satellite imagery)

**SOCC Locations**

- Shrubby Willow (*Salix arbusculoides*)
- Boreal locoweed (*Oxytropis borealis*)
- Eyed foam lichen (*Stereocaulon tomentosum*)
- Hairy butterwort (*Pinguicula villosa*)
- Northern ground-cedar (*Diphasiastrum complanatum*)

**Landbase**

- Existing Access Road
- Watercourse



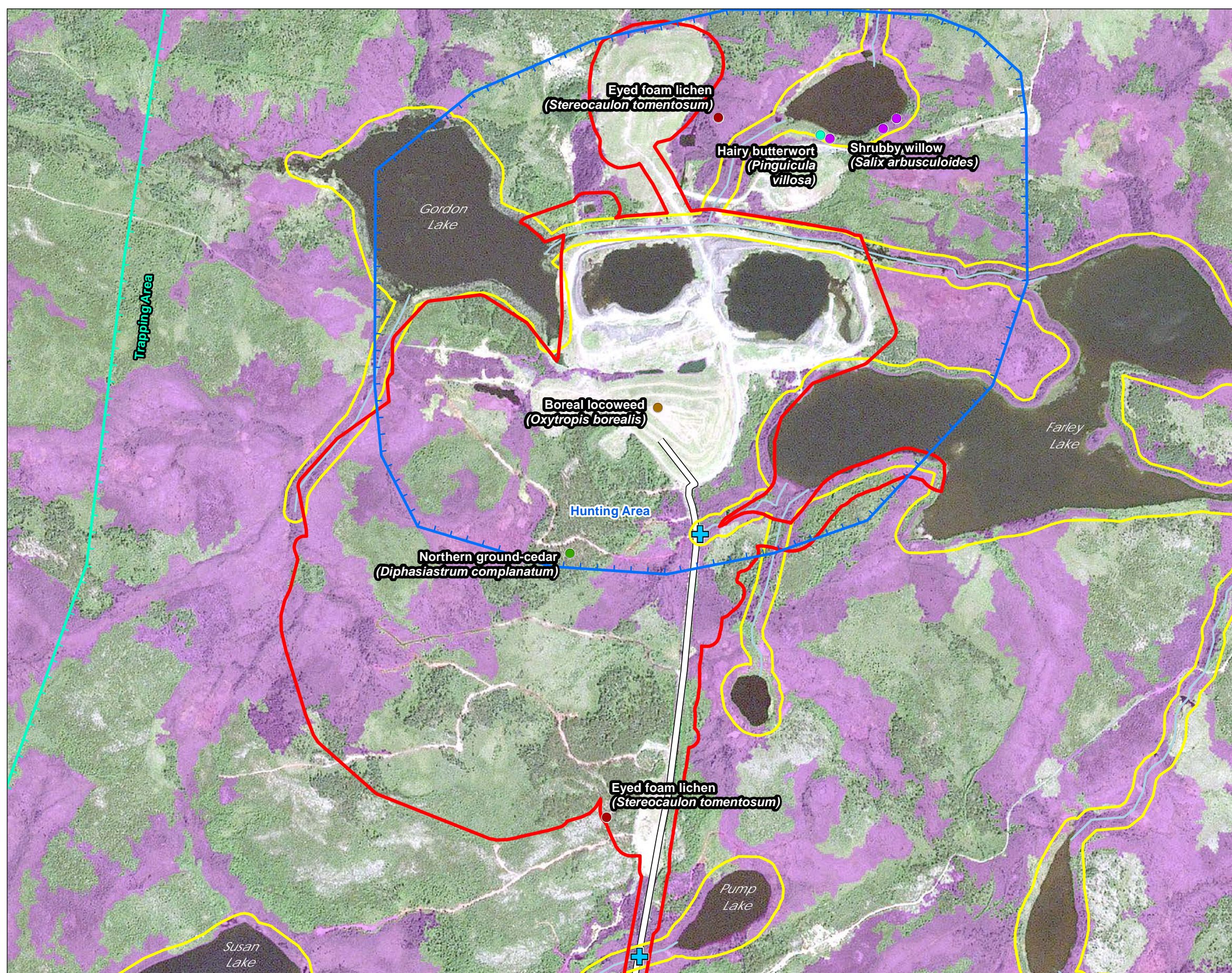
**Notes**  
 1. Coordinate System: NAD 1983 UTM Zone 14N  
 2. Base Data Sources: Government of Manitoba and Government of Canada.  
 3. Imagery: SPOT-7 imagery, BlackBridg Geomatics Corp. July 2015.

**Project Location** Lynn Lake, Manitoba  
 Prepared by ACampigotto on 2023-11-16  
 Technical Review by BKrawchuk on 2023-11-16

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

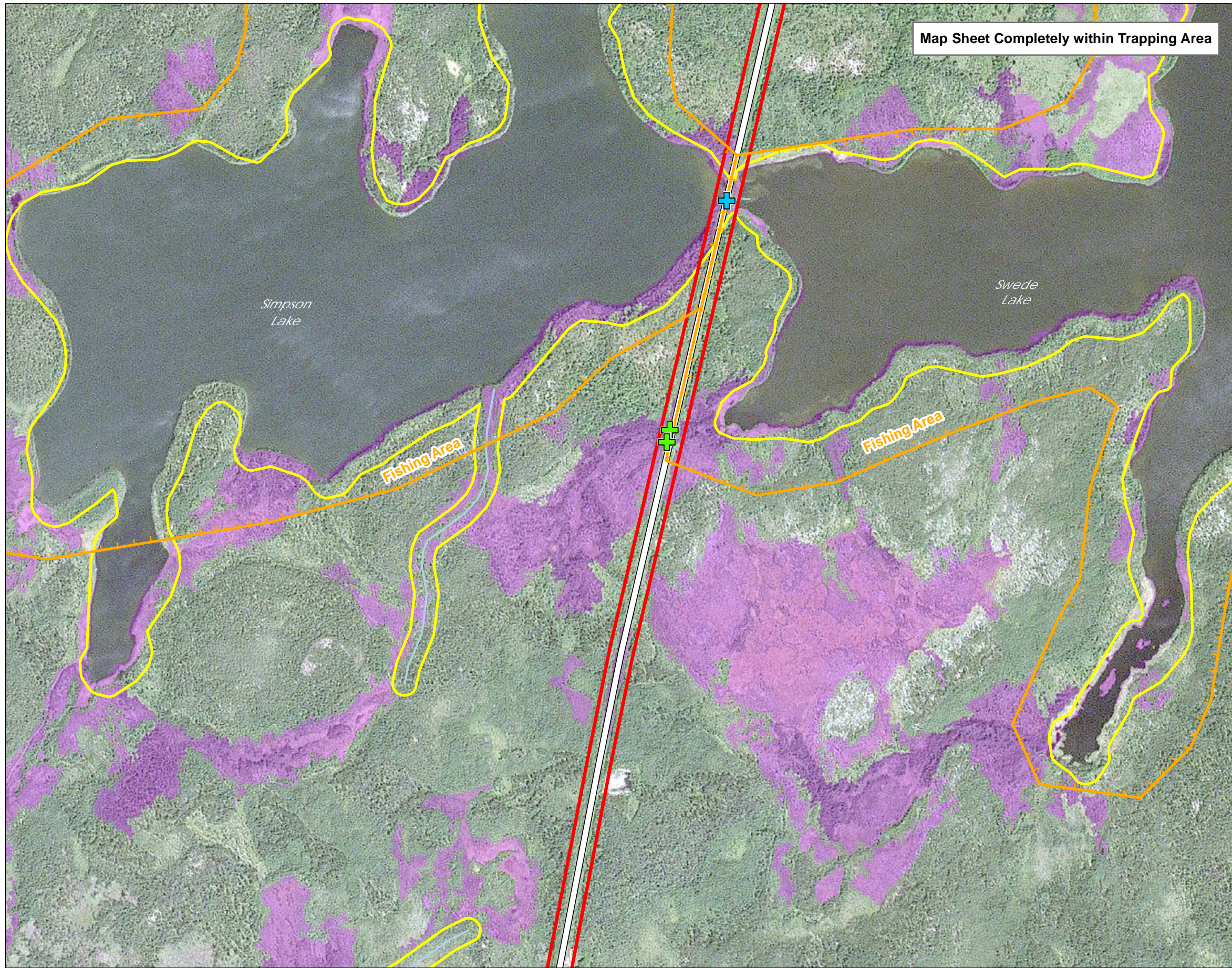
**Map No.** 1a  
**Title**

**Environmentally Sensitive Sites at the Gordon site**





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**Project Infrastructure**

Project Development Area

**Environmentally Sensitive Sites**

Watercourse Crossing Location

Ephemeral Stream

Water Features 30m Buffer

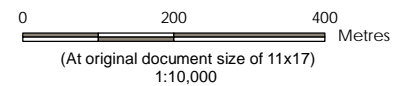
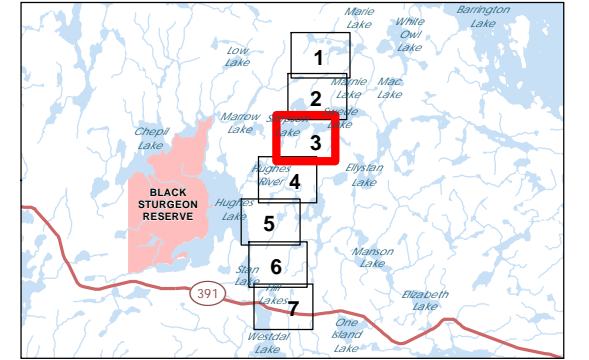
Fishing Area

Wetland Area (interpreted from satellite imagery)

**Landbase**

Existing Access Road

Watercourse



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

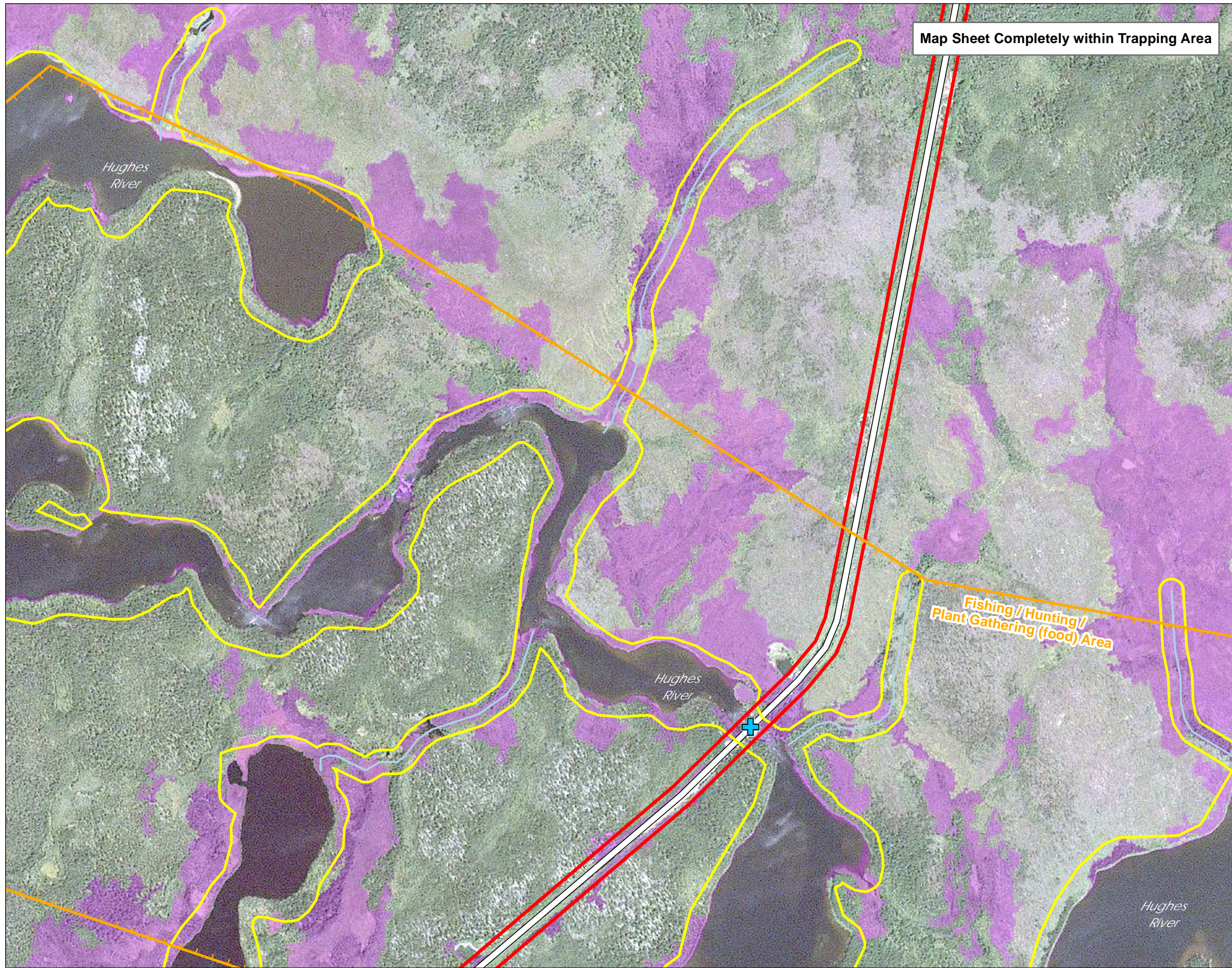
**Project Location** Lynn Lake, Manitoba  
Prepared by ACampigotto on 2023-11-16  
Technical Review by BKrawchuk on 2023-11-16

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

**Map No.**  
1c

**Title**  
Environmentally Sensitive Sites at the Gordon site

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**Project Infrastructure**

Project Development Area

**Environmentally Sensitive Sites**

Watercourse Crossing Location

Water Features 30m Buffer

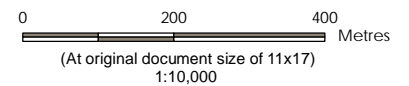
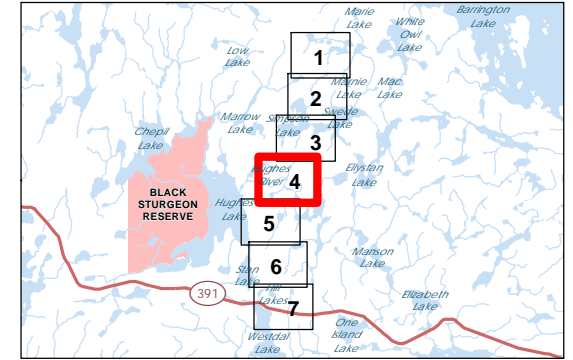
Fishing / Hunting / Plant Gathering (food) Area

Wetland Area (interpreted from satellite imagery)

**Landbase**

Existing Access Road

Watercourse



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

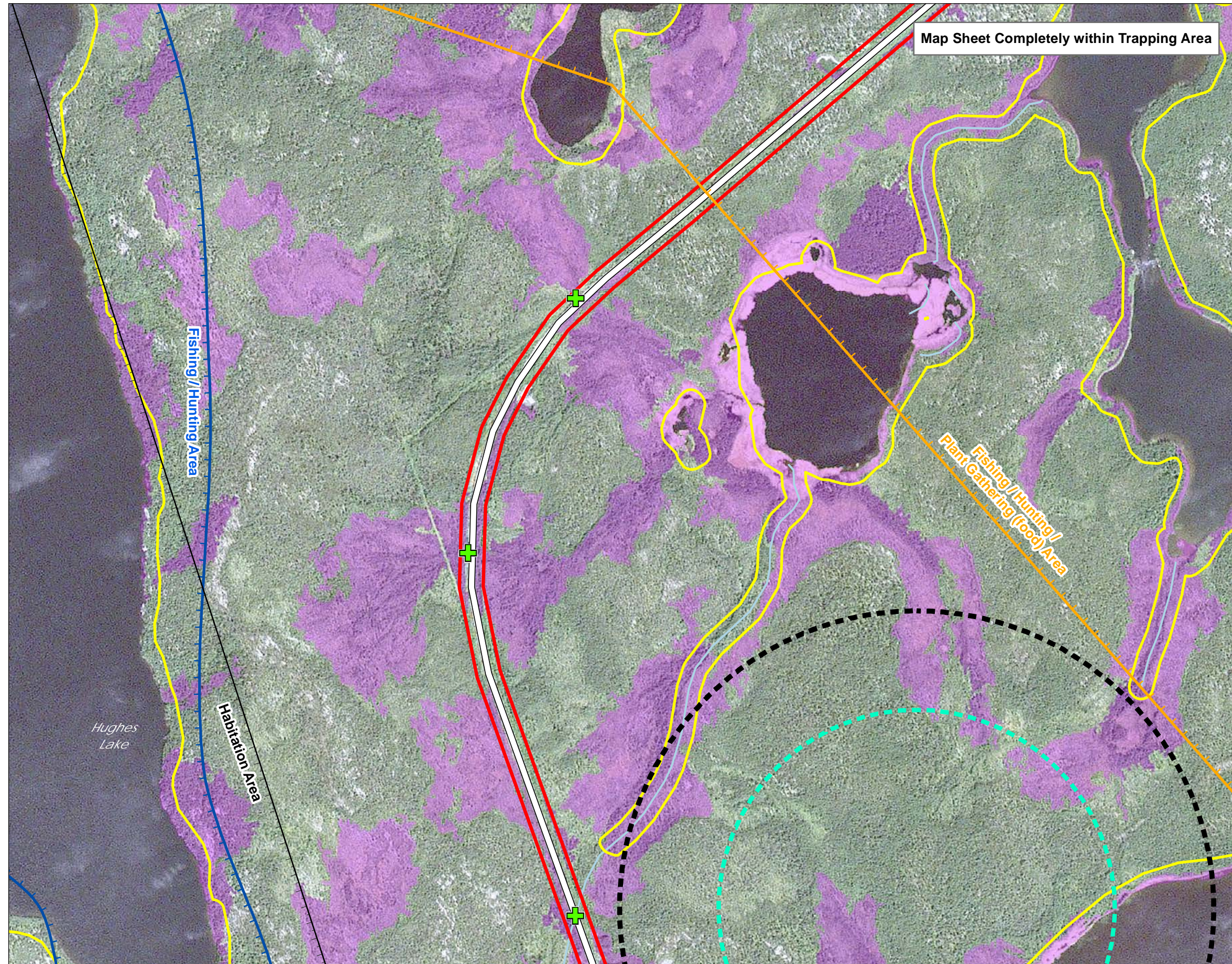
**Project Location** Lynn Lake, Manitoba  
 Prepared by ACampigotto on 2023-11-16  
 Technical Review by BKrawchuk on 2023-11-16

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

**Map No.** 1d  
**Title**

**Environmentally Sensitive Sites at the Gordon site**

Map Sheet Completely within Trapping Area



**Project Infrastructure**

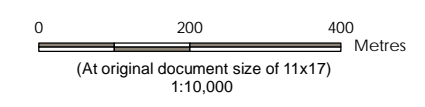
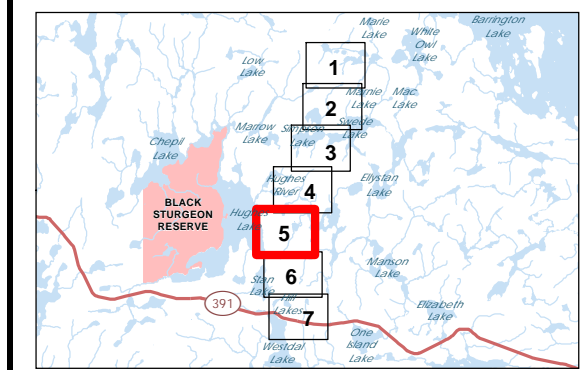
Project Development Area

**Environmentally Sensitive Sites**

- Ephemeral Stream
- Water Features 30m Buffer
- Osprey Nest - 500 m Buffer
- Osprey Nest - 750 m Buffer
- Habitation Area
- Fishing / Hunting / Plant Gathering (food) Area
- Fishing / Hunting Area
- Wetland Area (interpreted from satellite imagery)

**Landbase**

- Existing Access Road
- Watercourse



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

**Project Location** Lynn Lake, Manitoba  
 Prepared by ACampigotto on 2023-11-16  
 Technical Review by BKrawchuk on 2023-11-16

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


**Map No.** 1e

**Title** Environmentally Sensitive Sites at the Gordon site

**Project Infrastructure**


 Project Development Area


**Environmentally Sensitive Sites**


 Ephemeral Stream


 Water Features 30m Buffer

 Osprey Nest - 500 m Buffer


 Osprey Nest - 750 m Buffer

 Habitation Area

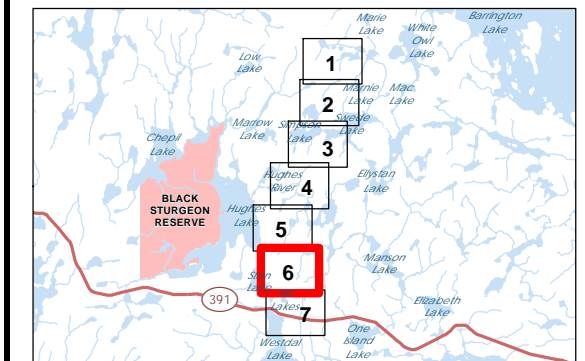
 Fishing / Hunting Area

 Wetland Area (interpreted from satellite imagery)

**Landbase**

 Existing Access Road

 Watercourse



0 200 400 Metres  
(At original document size of 11x17)  
1:10,000

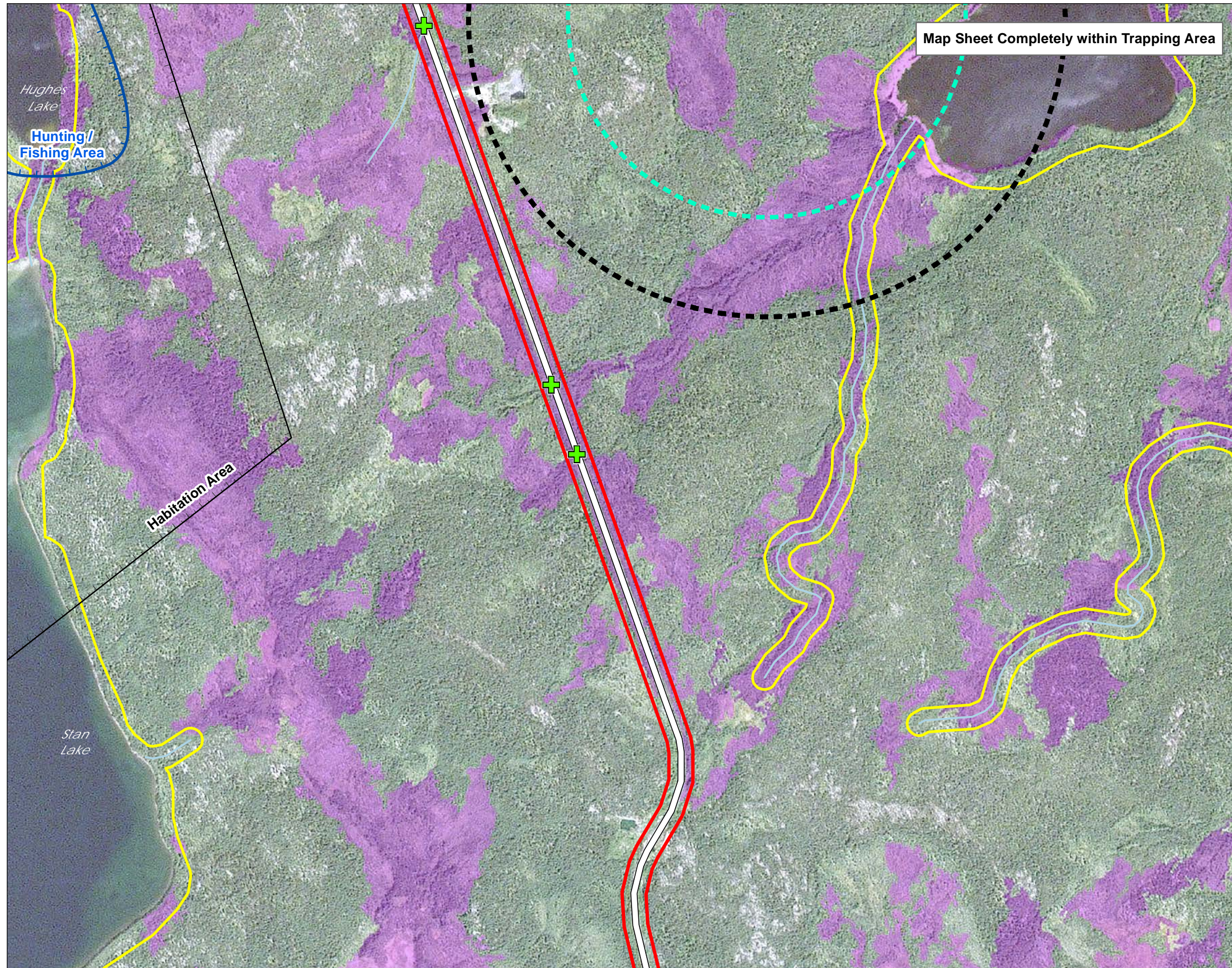
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 3. Imagery: SPOT-7 imagery, BlackBridge Geomatics Corp. July 2015.

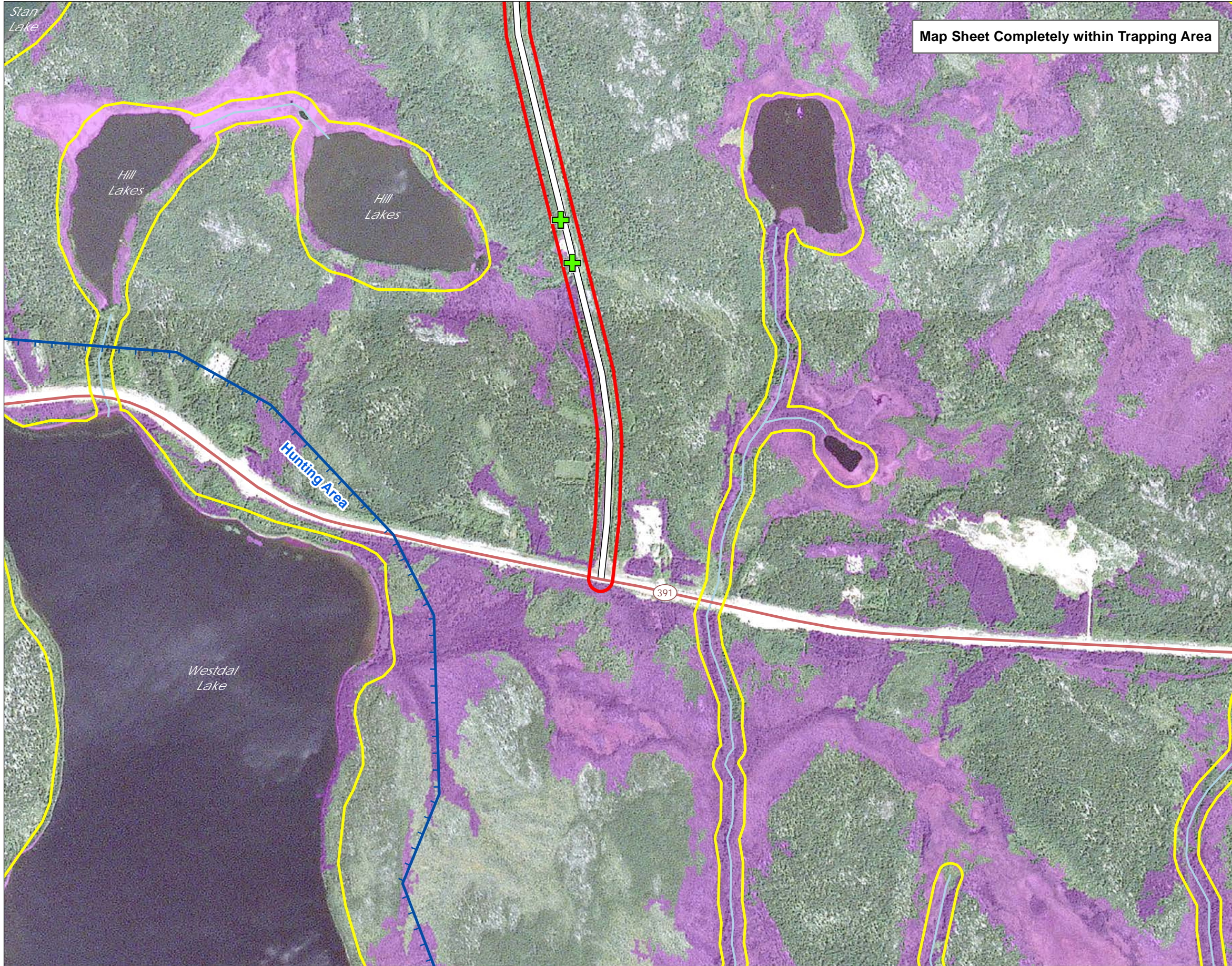
**Project Location** Lynn Lake, Manitoba  
 Prepared by ACampigotto on 2023-11-16  
 Technical Review by BKrawchuk on 2023-11-16

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

**Map No.**  
**1f**

**Title**  
**Environmentally Sensitive Sites at the Gordon site**





**Project Infrastructure**

Project Development Area

**Environmentally Sensitive Sites**

Ephemeral Stream

Water Features 30m Buffer

Hunting Area

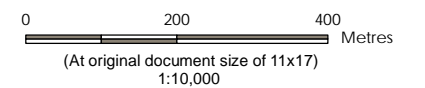
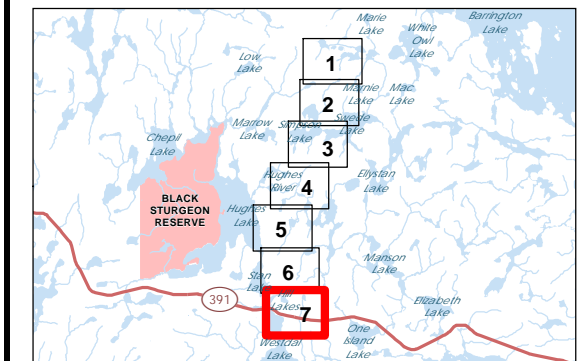
Wetland Area (interpreted from satellite imagery)

**Landbase**

Existing Access Road

Highway

Watercourse



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

**Project Location** Lynn Lake, Manitoba  
 Prepared by ACampigotto on 2023-11-16  
 Technical Review by BKrawchuk on 2023-11-16

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

**Map No.**  
**1g**

**Title**  
**Environmentally Sensitive Sites at the Gordon site**

**Project Infrastructure**

Project Development Area

**Environmentally Sensitive Sites**

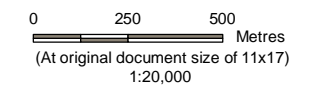
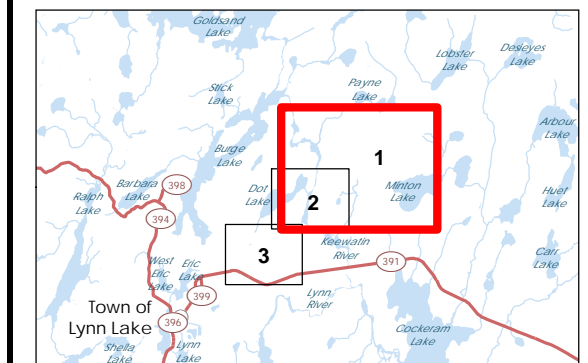
- Archaeological Site
- Watercourse Crossing Location
- Water Features 30m Buffer
- Bald Eagle Nest - 500 m Buffer
- Bald Eagle Nest - 1000 m Buffer
- Hunting / Trapping Area
- Wetland Area (interpreted from satellite imagery)

**SOCC Locations**

- Shrubby Willow (*Salix arbusculoides*)
- Northern Woodsia (*Woodsia alpina*)
- Northern ground-cedar (*Diphasiastrum complanatum*)
- American parsley fern (*Cryptogramma acrostichoides*)
- Eyed foam lichen (*Stereocaulon tomentosum*)

**Landbase**

- Existing Access Road
- Watercourse



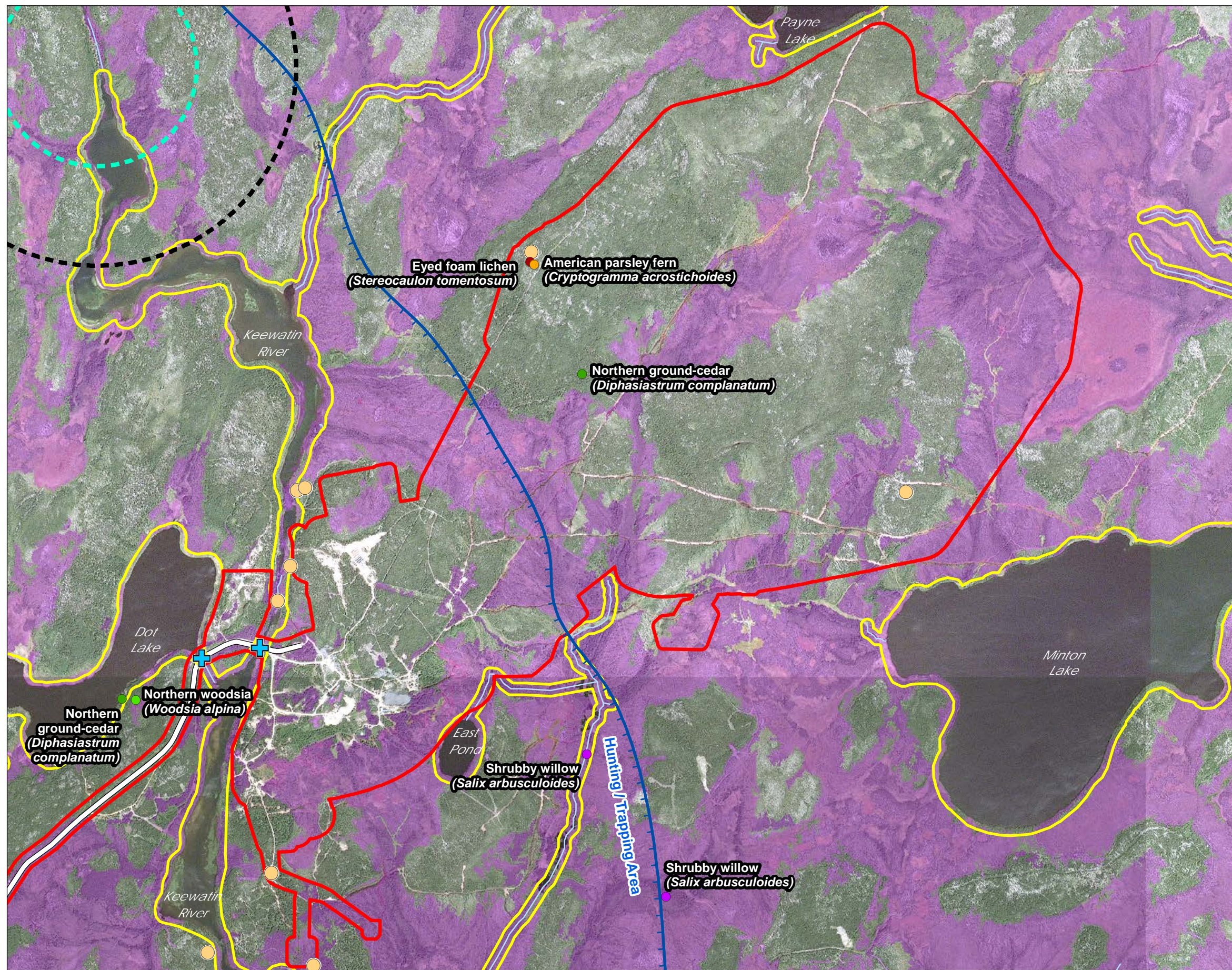
- Notes**
1. Coordinate System: NAD 1983 UTM Zone 14N
  2. Base Data Sources: Government of Manitoba and Government of Canada.
  3. Imagery: SPOT-7 imagery, BlackBridge Geomatics Corp. July 2015.

**Project Location** Lynn Lake, Manitoba  
 Prepared by ACampigotto on 2023-11-16  
 Technical Review by BKrawchuk on 2023-11-16

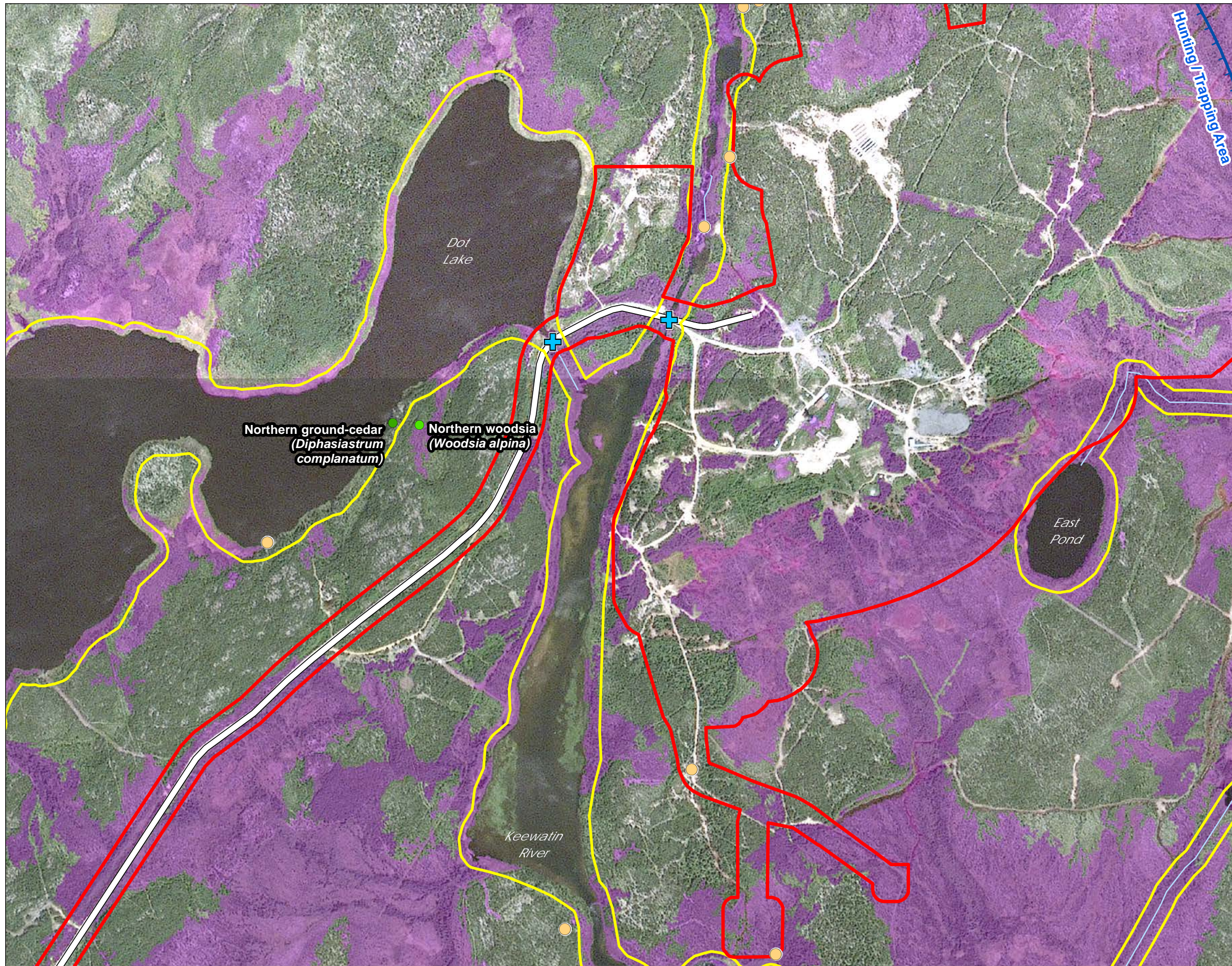
**Client/Project** ALAMOS GOLD INC.  
 Lynn Lake Gold Project  
 111473054

**Map No.** 2a  
**Title**

**Environmentally Sensitive Sites at the MacLellan site**



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**Project Infrastructure**

Project Development Area

**Environmentally Sensitive Sites**

Archaeological Site

Watercourse Crossing Location

Water Features 30m Buffer

Hunting / Trapping Area

Wetland Area (interpreted from satellite imagery)

**SOCC Locations**

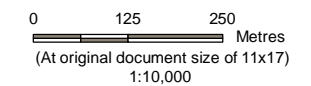
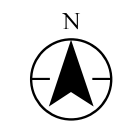
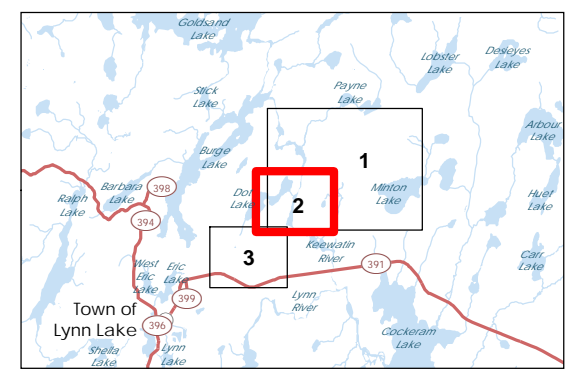
Northern Woodsia (*Woodsia alpina*)

Northern ground-cedar (*Diphasiastrum complanatum*)

**Landbase**

Existing Access Road

Watercourse



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

**Project Location** Lynn Lake, Manitoba  
Prepared by ACampigotto on 2023-11-16  
Technical Review by BKrawchuk on 2023-11-16

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

**Map No.**

**2b**

**Title**  
**Environmentally Sensitive Sites at the MacLellan site**

**Project Infrastructure**

Project Development Area

**Environmentally Sensitive Sites**

Water Features 30m Buffer

Hunting / Trapping Area

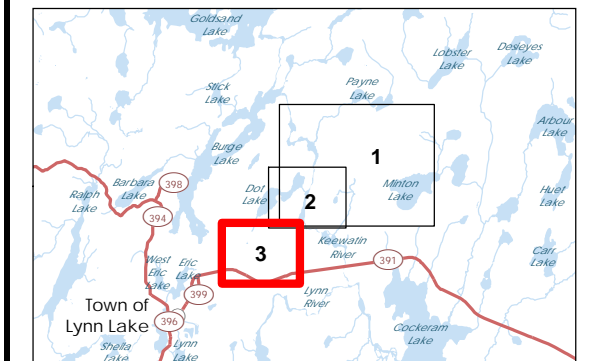
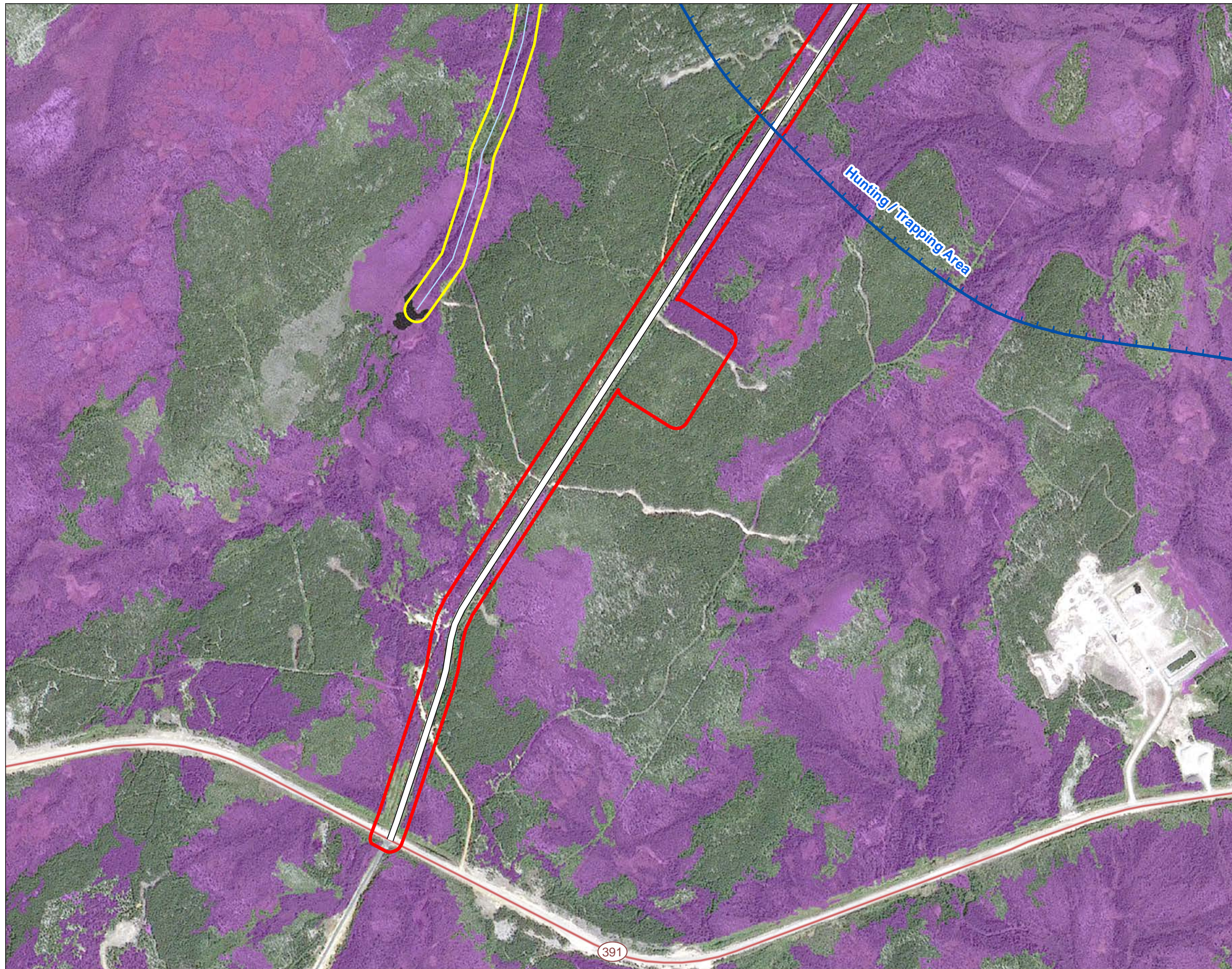
Wetland Area (interpreted from satellite imagery)

**Landbase**

Existing Access Road

Highway

Watercourse



0 125 250 Metres  
(At original document size of 11x17)  
1:10,000

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

**Project Location** Lynn Lake, Manitoba  
 Prepared by ACampigotto on 2023-11-16  
 Technical Review by BKrawchuk on 2023-11-16

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

**Map No.**  
 2c

**Title**  
 Environmentally Sensitive Sites at the MacLellan site

391

## **Appendix B Spill Kit Types**

**LYNN LAKE GOLD PROJECT:  
EMERGENCY RESPONSE AND SPILL PREVENTION AND CONTINGENCY PLAN**

Appendix B Spill Kit Types  
January 30, 2025

## **Types of Spill Kits**

### ***Spill Kits – Land***

For land-based spills, the following spill kits are considered appropriate.

#### Standard Spill Kit

- A 205 L 16-gauge drum 2 closing rings - one for ease of entry into the drum, and the other to ensure absolute containment of hazardous products for transport and temporary storage.
- 1 pair of Neoprene/oil/chemical-resistant gloves.
- 1 protective disposable suit.
- 1 pair of protective goggles.
- 12 m of 12 cm containment boom 25 absorbent pads - approximately 46 cm x 46 cm x 8 mm thick
- 23 m of absorbent blanket - approximately 70 cm x 8 mm thick.
- 2 polyethylene bags approximately – 71 cm x 46 cm x 165 cm to 3 mm thick.
- Shovel.

#### Spill Kit for Limited Fuel Storage (< 1,000 L) Areas

- 1 pair of Neoprene/oil/chemical-resistant gloves.
- 1 pair of protective goggles 10 absorbent pads - approximately 46 cm x 46 cm x 8 mm thick.
- 1 polyethylene bag - approximately 71 cm x 46 cm x 165 cm to 3 mm thick.
- Shovel.

### ***Spill Kits – Water***

As with the land spills, a water spill kit size will depend upon the amount of fuel and other petroleum products stored at the site. Some guidelines for these are set out below.

#### Spill Kits for Limited Fuel Storage (< 2,000 L) Areas

- 1 rope (15 m minimum length).
- 1 container of Gap Seal drum sealant 6 absorbent "socks" (1 m length) 2 mini booms.
- 1 drum roll kit.
- 1 bag of peat moss.
- 5 hazardous waste bags.
- 3 pairs chemical-resistant safety gloves.

**LYNN LAKE GOLD PROJECT:  
EMERGENCY RESPONSE AND SPILL PREVENTION AND CONTINGENCY PLAN**

Appendix B Spill Kit Types  
January 30, 2025

Spill Kits for Extensive Fuel Storage (> 2,000 L) Areas

- 1 x 150 m flotation boom 6 x 15 kg grapnel anchors.
- 3 Norwegian anchor buoys.
- 8 standard marine buoys (yellow) 4 x 100 m coils anchor rope (1 cm) 5 x 200 m coils towline rope (1 cm).
- 1 x 6 m response boat with 80 HP outboard motor 2 lifejackets.
- 20 bags peat moss.
- 1 x 1.3 m absorbent roll.
- 15 absorbent pads.
- 2 fire extinguishers.
- 1 drum skimmer.
- 1 pump Waste Storage: 3 x 175 L drum response kits with lids.

Personal Equipment

- 1 emergency eyewash station 20 pairs POL (Petroleum, Oil, Lubricants)-resistant gloves.
- 7 pairs POL-resistant goggles.
- 1 bag 20 disposable respirators.
- 2 pairs safety hip waders.
- 1 toolbox (assorted tools).
- 2 x 25 L containers with lids.
- 100 m nylon rope (1 cm thick).

***Chemical Spill Kits***

Small Chemical Spill Kit (Lab/work areas)

- Personal Protective Equipment.
  - Chemical Splash Goggles.
  - Lab Coat.
  - Heavy Nitrile or Neoprene Gloves.
  - Respirator Protection if required – \*Annual fit testing and maintenance of the respirator is required.

**LYNN LAKE GOLD PROJECT:  
EMERGENCY RESPONSE AND SPILL PREVENTION AND CONTINGENCY PLAN**

Appendix B Spill Kit Types  
January 30, 2025

- Spill Clean Up Equipment
  - Plastic Dustpan & Brush.
  - Heavy Plastic Bags (at least 3 mil thickness).
  - Universal Spill Absorbent (1:1:1 mix of sodium carbonate: kitty litter: sand), Spill Pillows, or other suitable spill absorbent (enough to absorb a spill of the largest container in the work area).
  - Other absorbents / neutralizers as required for the chemicals in the lab.

Large/Departmental Chemical Spill Kit

- Personal Protective Equipment
  - Half-mask air purifying respirator (2) – Please note annual fit testing and maintenance of the respirator is required.
  - Multi-gas Type Respirator Cartridges (6).
  - Safety goggles (2).
  - Face-shield (1).
  - Disposable coveralls (Tyvek™) (6).
  - Gloves - Neoprene (4) - PVC (4) - PVA (4) - Nitrile (4).
  - Plastic shoe covers (box).
  - Duct tape (roll).
  - Alcohol swabs (box) or respirator disinfectant.
- Spill Clean Up Equipment
  - Chemical absorbent (20 L).
  - Plastic pail (20 L) with lid (2).
  - Felt marking pen (2).
  - Heavy Plastic Bags; at least 3 mil thickness (12).
  - Plastic bucket with handle (1).
  - Long handle sponge mop (1).
  - Extra sponges (4).
  - Plastic dustpan (1).
  - Broom (1).
  - Duct tape (roll).
  - Detergent (box).
  - Citric Acid (500 g).

**LYNN LAKE GOLD PROJECT:  
EMERGENCY RESPONSE AND SPILL PREVENTION AND CONTINGENCY PLAN**

Appendix B Spill Kit Types  
January 30, 2025

- Sodium Bicarbonate (500 g).
- Sodium Thiosulfate (500 g).
- Spill Response Guideline.

***Vehicle/Equipment Spill Kits***

Standard Vehicle Spill Kit

- 1 pair goggles.
- 1 pair Nitrile gloves.
- 1 set of 9 plugs.
- 10 – 38 cm x 48 cm universal pads.
- 2 disposal bags.
- 20 oil only 38 cm x 48 cm pads.
- 3 – 8 cm x 107 cm socks.

Heavy Equipment Spill Kit

- 20 absorbent pads (oil, gas and diesel).
- 2 – 8 cm x 122 cm absorbent socks (oil, gas and diesel).
- 2 HD hazmat disposal bags.
- 1 pair Nitrile gloves.
- 1 spill instruction sheet.

## **Appendix C Schedule of Reportable Quantities**

**LYNN LAKE GOLD PROJECT:  
EMERGENCY RESPONSE AND SPILL PREVENTION AND CONTINGENCY PLAN**

Appendix C Schedule of Reportable Quantities  
January 30, 2025

**SCHEDULE  
REPORTABLE QUANTITIES**

<b>Column I</b>	<b>Column II</b>	<b>Column III</b>
<b>CLASSIFICATION</b>	<b>HAZARD</b>	<b>REPORTABLE QUANTITY OR LEVEL</b>
1	Explosives	All
2.1	Compressed Gas (Flammable)	100 L*
2.2	Compressed Gas	100 L*
2.3	Compressed Gas (Toxic)	All
2.4	Compressed Gas (Corrosive)	All
3	Flammable Liquids	100 L
4	Flammable Solids	1 kg
5.1 Packing Groups I and II Packing Group III	Oxidizer Oxidizer	1 kg or 1 L 50 kg or 50 L
5.2	Organic Peroxide	1 kg of 1 L
6.1 Packing Group I Packing Groups II and III	Acute Toxic Acute Toxic	1 kg or 1L 5 kg or 5 L
6.2	Infectious	All
7	Radioactive	Any discharge or radiation level exceeding 10 m Sv/h at the package surface and 200 uSv/h at 1 m from the package surface
8	Corrosive	5 kg or 5 L
9.1	Miscellaneous (except PCB mixtures)	50 kg
9.1	PCB Mixtures	500 grams
9.2	Aquatic Toxic	1 kg or 1 L
9.3	Wastes (Chronic Toxic)	5 kg or 5 L
<p>Note: * Container Capacity (refers to container water capacity) Source: Province of Manitoba</p>		

***The Dangerous Goods Handling and Transportation Act***

**Environmental Accidents Reporting Regulation MR 439/87**

## **Appendix D Initial Environmental Incident Report**

**LYNN LAKE GOLD PROJECT:  
EMERGENCY RESPONSE AND SPILL PREVENTION AND CONTINGENCY PLAN**

Appendix D Initial Environmental Incident Report  
January 30, 2025

**INITIAL ENVIRONMENTAL SPILL OR INCIDENT REPORTING FORM**

**Provincial Environmental Emergency Response Program: (204) 944-4888**

<b>Date of reporting:</b>	<b>Time of reporting:</b>
<b>Persons reporting the incident:</b>	<b>Phone number:</b>
<b>Address:</b>	<b>Email:</b>
<b>Responsible person (person/company in charge):</b>	<b>Phone number:</b>
<b>Address:</b>	<b>Email:</b>
<b>Date of spill:</b>	<b>Time of spill:</b>
<b>Location of spill site:</b>	
<b>Description of spill location and surroundings:</b>	
<b>Distance to nearest public facility, residence, Indigenous community:</b>	
<b>Distance to nearest stream, waterbodies, sensitive areas:</b>	
<b>Description of source of spill:</b>	
<b>Type of substance spilled:</b>	<b>Quantity of substance spilled:</b>
<b>Description of the circumstances, cause, and adverse effects of the spill:</b>	
<b>Actions taken to address the adverse effect or hazard caused by the spill:</b>	
<b>Check/tick boxes below (advised of spill and present at the spill site):</b> <b>Agencies and name of person advised about the spill:</b> <input type="checkbox"/> Provincial Environmental Emergency Response (204-944-4888); name of person: <input type="checkbox"/> Police/Fire Dept. (911); name of person: <input type="checkbox"/> Environment and Climate Change Canada (Province to notify), name of person: <input type="checkbox"/> CANUTEC Transport Canada (1-888-226-8832); name of person: <input type="checkbox"/> Indigenous Nation; name of person: <input type="checkbox"/> Local government; name of person: <input type="checkbox"/> Others:	
<b>Agencies and name of person at the spill site:</b> <input type="checkbox"/> Provincial Environmental Emergency Response (204-944-4888); name of person: <input type="checkbox"/> Police/Fire Dept. (911); name of person: <input type="checkbox"/> Environment and Climate Change Canada (Province to notify), name of person: <input type="checkbox"/> CANUTEC Transport Canada (1-888-226-8832); name of person: <input type="checkbox"/> Indigenous Nation; name of person: <input type="checkbox"/> Local government; name of person: <input type="checkbox"/> Others:	
<b>Other comments/actions taken:</b>	
<b>Information form completed by:</b>	<b>Phone number:</b>
<b>Title:</b>	<b>Date:</b>

## **Appendix E Environmental Emergency Communication Plan (EECP)**



ALAMOS GOLD INC.

**Lynn Lake Gold Project:  
Environmental Emergency  
Communication Plan [EECP]: For  
Accidents Or Malfunctions With  
The Potential To Cause Adverse  
Environmental Effects**

January 11, 2024



## Introduction

Alamos Gold Inc. (“Alamos”) values open communication with engaged Indigenous Nations, relevant regulatory agencies and other applicable stakeholders and wants all parties to be aware of any accidents or malfunctions with the potential to cause adverse environmental effects that may occur at the Lynn Lake Gold Project (LLGP). Alamos is committed to keeping a transparent relationship with all Indigenous Nations.

## Purpose and Scope

This Communication Plan outlines how Alamos will communicate accidents and malfunctions with the potential to cause adverse environmental effects. This Communication Plan aims to ensure there is clear and direct communication between Alamos and Indigenous Nations, relevant regulatory agencies and other applicable stakeholders in the event of an accident or malfunction with the potential to cause adverse environmental effects.

This Communication Plan fulfills the conditional requirement outlined in Section 12 of the federal Decision Statement and conditional requirements outlined in Clause 4,5 and 9 of the provincial Environmental Act Licences (EAL:3391 and EAL 3390)..

This Communication Plan applies to all phases of the LLGP, including construction, operation, and decommissioning. This plan will work in concert with the Emergency Response and Spill Prevention and Contingency Plan (ERSPCP) and procedures outlined in various plans to ensure a comprehensive and cohesive response to emergencies

## Types of Accidents and Malfunctions Requiring Notification

Events that pose a threat to human health, infrastructure and the environment or events where there is a regulatory requirement for immediate reporting will be communicated as soon as possible to Indigenous Nations. Alamos’ internal reporting structure requires all events classified between a moderate and catastrophic risk rating to be reported. All other accidents or malfunctions that occur will be recorded and reported in an annual report.

Shown below in *Figure 1*. is a decision tree clearly outlining the notification and response process in the event of an accident or malfunction that poses a threat to human health, infrastructure or the environment.

## ENVIRONMENTAL EMERGENCY COMMUNICATION PLAN --DECISION TREE--

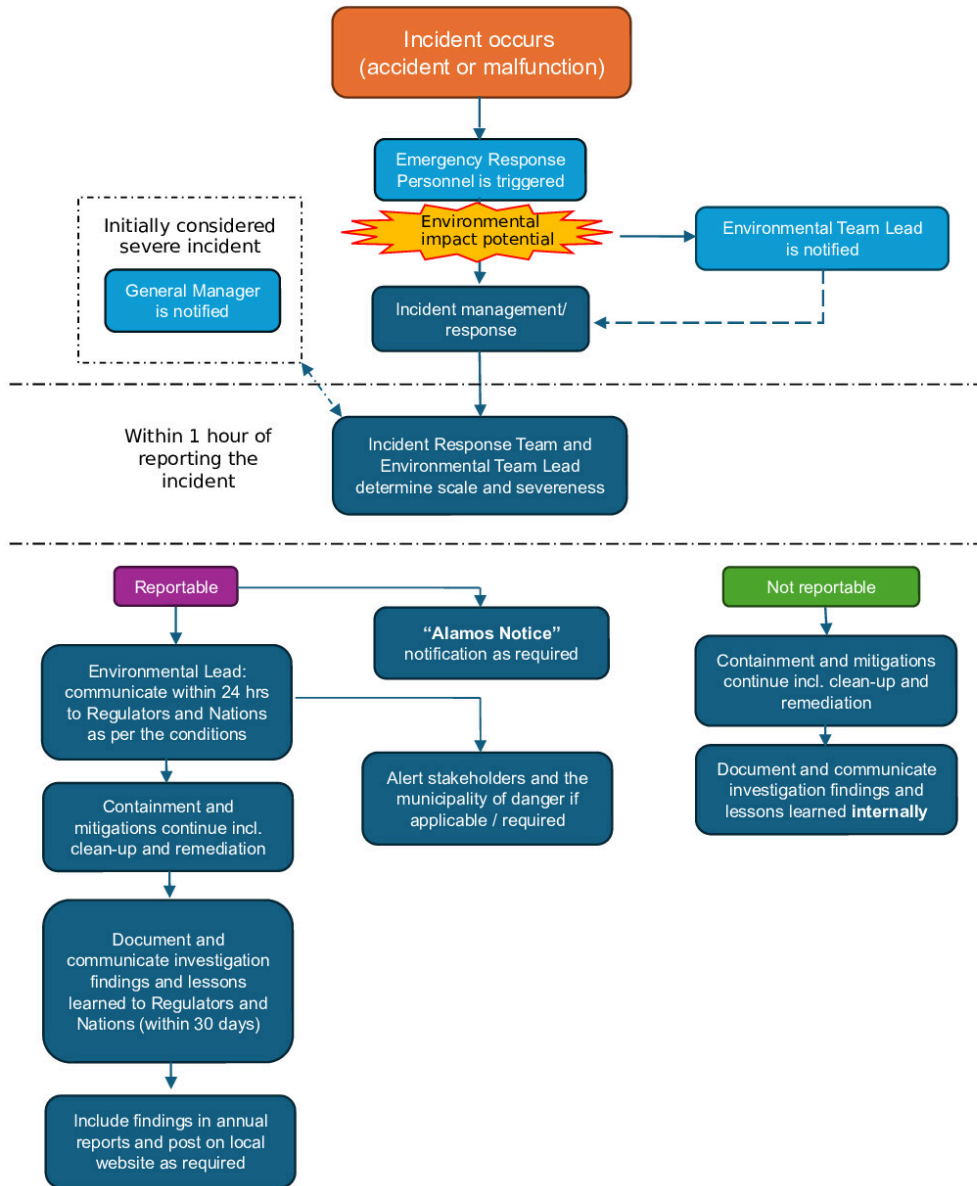


Figure 1. Environmental Emergency Communication Plan Decision Tree

Examples of some events that may trigger notification are:

- Spills:
  - Tailings Management Facility (TMF) Breaches: Including dam breaches or unintended releases from the emergency spillway.
  - Release of untreated contact water (other than associated with the TMF) due to extreme weather (e.g., due to flooding or extreme precipitation).
  - Spills, including fuel and hazardous materials spills.
  - Sewage discharge pipeline failure, sewage treatment plant malfunction.
  - Release due to a physical or mechanical equipment breakdown or process upset where such breakdown or process upset results or may result in the release of a pollutant in an amount or concentration, or at a level or rate of release, that causes or may cause a significant adverse environmental effect.
- Permafrost-Related Incidents: Resulting in structural instability or adverse effects on Indigenous Nation resource and land use.
- Other Environmental Emergencies: over-blasting, explosion, fire (in excess of thirty (30) minutes or requires fire suppression assistance from personnel outside of the facility), vehicle accidents, etc. with the potential to cause adverse environmental effects.

## Notification Procedure

Accidents or malfunctions with the potential to cause adverse environmental effects including where there is an immediate threat to human health or the environment will be communicated by phone and/or by electronic means (e.g., text or email) to relevant Indigenous Nations and Stakeholders when they may be in imminent risk. All other notifications of reportable accidents or malfunctions will be distributed in a timely manner or as defined below either by phone or electronically via email. In addition, Alamos will communicate and document all events through the Environmental Advisory Committee (EAC).

### Who to Notify:

- Indigenous Nations listed in this Communication Plan.
- The Agency (Impact Assessment Agency of Canada).
- The provincial 24-hour environmental accident reporting line (as required)
- Other relevant authorities, including emergency response agencies.

### Timeframe:

- **Indigenous Nations:** As soon as possible.
- **Agency:** Written notification within 24 hours of the incident.
- **Province:** Call to the reporting line within 24 hours for equipment or as soon as possible for fire.
  - Equipment breakdown: Within 24 hours of the incident.

- Immediately if the equipment breakdown results in a release of a pollutant in an amount or concentration, or at a level or rate of release, that causes or may cause a significant adverse environmental effect.
- Fire in excess of 30 min or when assistance from personnel outside of the facility is required: As soon as possible

**Notification Details:**

Related to accidents or malfunctions with the potential to cause adverse environmental effects, report the following:

- Date and time of the incident.
- Location of the incident.
- Summary of the event.
- Substances released (if any).
- Relevant authorities already notified.

Related to equipment breakdown where there is a release of a pollutant in an amount or concentration, or at a level or rate of release, that causes or may cause a significant adverse environmental effect and fires in excess of 30 min or when assistance from personnel outside of the facility is required, following the reporting requirements pursuant to clause 4, 5 and 9 of the EALs:

- Related to release of pollutants following an equipment breakdown, report the following:
  - The nature of the event, the time and estimated duration of the event and the reason for the event.
- Related to a fire, report the following:
  - The type of materials involved and the location of the fire.

**Opportunities for Collaboration:**

- Indigenous Nations will be invited to provide input on proposed response measures.
- Alamos will consider Indigenous Nations assistance in emergency response activities, as appropriate.

**Federal Reporting**

**Initial Report (Within 30 Days)**

- Detailed description of the incident.
- Measures taken to mitigate adverse environmental effects.
- Input from Indigenous Nations and regulatory authorities.
- Identification of residual effects and additional mitigation measures.
- Overview of the implemented accident response plan.

**Follow-Up Report (Within 90 Days)**

- Changes implemented to prevent recurrence.

- Additional mitigation and monitoring measures.
- Progressive reclamation activities as applicable.
- Further input from Indigenous Nations and regulatory authorities since the initial report.

## **Provincial Reporting**

Submit a report to the director about the causes of breakdown and measures taken, within one week of the repairs being done.

## **Roles and Responsibilities**

### **Alamos**

- Coordinate notification and reporting.
- Implement and document mitigation measures.
- Maintain communication with Indigenous Nations and authorities.

### **Indigenous Nations**

- Provide input on response measures and follow-up actions.
- Assist, if applicable, in emergency response activities.

### **Relevant Authorities**

- Respond to emergencies within their jurisdiction.
- Provide expertise and support for environmental remediation.

## **Review Frequency and Update Protocol**

This Communication Plan will be reviewed annually and after each major incident. Updates to the plan will be communicated to the Agency, Indigenous Nation, and relevant authorities within 30 days.

## Names and Contact Information

Alamos will maintain an up-to-date contact list.

### Indigenous Nations

- **Marcel Colomb First Nation**; Lynn Lake, MB; Phone: 204-356-2439
- **Mathias Colomb Cree Nation**; Pukatawagan, MB; Phone: 204-553-2090
- **Nisichawayasihk Cree Nation**; Nelson House, MB; 204-484-2332
- **O-Pipon-Na-Piwin Cree Nation**; South Indian Lake, MB; 204-374-2271
- **Manitoba Métis Federation**; Winnipeg, MB; 204-586-8474
- **Peter Ballantyne Cree Nation**; Pelican Narrows, SK; 306-632-4608
- **Barren Lands First Nation**; Brochet, MB; 204-323-2300
- **Chemawawin Cree Nation**; Easterville, MB; 204-329-2161
- **Métis Nation – Saskatchewan Northern Region 1**; La Ronge, SK; 306-425-4418
- **Métis Nation – Saskatchewan Eastern Region 1**; Cumberland House, SK; 306-609-0110
- **Métis Nation – Saskatchewan**; Saskatoon, SK; 306-343-8285
- **Métis Hatchet Lake First Nation**; Wollaton Lake, SK; 306-633-2003
- **Northlands Denesuline First Nation**; Lac Brochet, MB; 204-337-2270
- **Sayisi Dene First Nation**; Tadoule Lake, MB; 204-684-2022

### Federal Government:

- IAAC
  - [postdecision@iaac-aeic.gc.ca](mailto:postdecision@iaac-aeic.gc.ca)
  - Steven J. Fraser; Senior Enforcement Officer; [Steven.Fraser@iaac-aeic.gc.ca](mailto:Steven.Fraser@iaac-aeic.gc.ca); 613-301-6338
  - David Van Olst; Senior Analyst, Compliance Promotion and Follow-Up Team; [david.vanolst@iaac-aeic.gc.ca](mailto:david.vanolst@iaac-aeic.gc.ca); 613-292-5375

### Provincial Government:

- 24-hour environmental accident reporting line at 204-944-4888 (toll-free 1-855-944-4888)