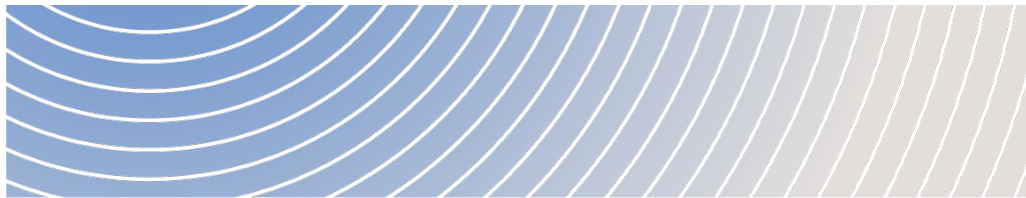




Impact Assessment
Agency of Canada

Agence d'évaluation
d'impact du Canada

Analysis of Proposed Changes to the Lynn Lake Gold Project – Pit Dewatering



FINAL REPORT

May 2025



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List of acronyms

Abbreviation/Acronym	Definition
CIAR	Canadian Impact Assessment Registry
DFO	Fisheries and Oceans Canada
EAC	Environmental Advisory Committee
ECCC	Environment and Climate Change Canada
IAA	<i>Impact Assessment Act</i>
IAAC	Impact Assessment Agency of Canada
MCFN	Marcel Colomb First Nation
TC	Transport Canada

1. Introduction

The Lynn Lake Gold Project (the Project), as proposed by Alamos Gold Inc. (the Proponent) involves the construction, operation, decommissioning, and reclamation of an open pit gold mine and new metal mill located approximately 1000 kilometres north of Winnipeg, near the Town of Lynn Lake, Manitoba. The Project involves the redevelopment of two historical gold mines (the Gordon site and MacLellan site) and has an ore input capacity of 8250 tonnes per day over a 13-year mine life. Components of the Project include new mine infrastructure, a new distribution line, open pits, access roads, an ore milling and processing plant, ore and overburden stockpiles, mine rock storage areas, and a tailings management facility.

The Project was subject to an environmental assessment under the *Canadian Environmental Assessment Act, 2012* (CEAA 2012) conducted by the Impact Assessment Agency of Canada (IAAC). On March 5, 2023, the Minister of Environment and Climate Change issued a [Decision Statement](#) (Canadian Impact Assessment Registry Reference number 80140, Document Number 125) for the Project that contains 177 legally binding conditions, which include mitigation measures and follow-up program requirements that the Proponent must comply with throughout the life of the Project. The Minister issued an [amended Decision Statement](#) on July 26, 2024 (Canadian Impact Assessment Registry Reference number 80140, Document Number 127) to reflect changes to the *Impact Assessment Act* (IAA) pursuant to section 308(1) of the *Budget Implementation Act, 2024*. Based on information provided by the Proponent, construction of the Project began in February 2025.

The Proponent must submit to [IAAC](#) for review any proposed changes to the Project, as required by condition 2.16 of the Decision Statement. On February 9, 2024, The Proponent notified [IAAC](#) of proposed changes to the Project in a document entitled [Lynn Lake Gold Project: Gordon Mine Pit Dewatering Notice of Alteration / Notice of Change](#) (Canadian Impact Assessment Registry (CIAR) Reference number 80140, Document Number 131) which details a change in the discharge location of water from existing flooded pits at the Gordon site. Additional information related to the Project changes were provided [October 18, 2024](#) and [December 20, 2024](#) (CIAR Reference number 80140, Document Numbers 132 & 133).

[IAAC](#) has conducted an analysis of the proposed changes to the Project and the extent to which the effects of those changes are adverse, including additional impacts on the exercise of rights of Indigenous groups, to assess:

- whether the changes constitute a new or different designated project that may require a new impact assessment; and
- whether any changes (including addition or removal of conditions) may be required to the Decision Statement, including the mitigation and follow-up program measures included as conditions, to address the proposed Project changes.

[IAAC](#)'s analysis is summarized in this report.



2. Proposed Project changes

The Project, as originally approved, includes the dewatering of two existing flooded pits at the Gordon site, known as the Wendy and East pits, to allow for the development of an open pit. As part of the existing Project, the water from these pits would be released over the course of several years into Farley Lake, which lies adjacent to the Gordon site, before continuing into the Hughes River via Farley Creek.

To decrease the time required to dewater the Wendy and East pits and the resulting environmental risks associated with dewatering over several years into the Farley Lake/Farley Creek system, the Proponent is proposing to change the pit water discharge location from Farley Lake directly to the Hughes River, at a discharge point roughly 8 km south at the existing Hughes River bridge along the Gordon Site Access Road (Figure 1). The pit water would be transported to the Hughes River using a temporary dewatering system consisting of long segments of hose placed on the ground surface that would run adjacent to the Gordon Site Access Road to the Hughes River bridge. These hoses would be removed following the completion of dewatering. Because of the greater capacity of the Hughes River relative to Farley Creek, dewatering would occur over a period of three months during the construction phase instead of over several years.

Aside from the change in the discharge location and the longer discharge line, the removal of water from the Wendy and East pits for deposit into the receiving environment has already been assessed and approved as part of the [original environmental assessment](#) (CIAR Reference number 80140, Document Number 124). This includes aeration of both pits throughout dewatering to improve the pit water quality and the monitoring of the water quality prior to release into the receiving environment.

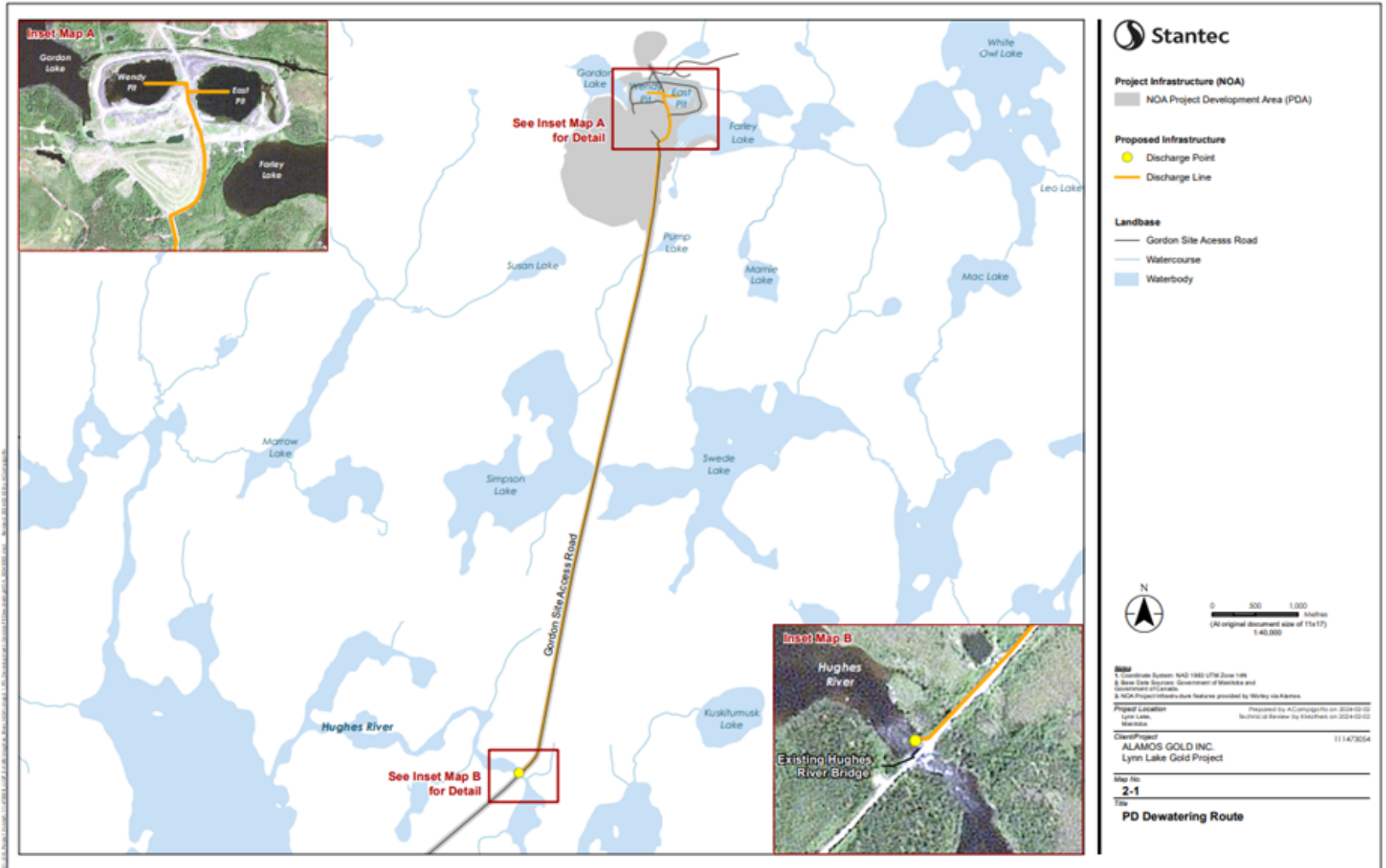


Figure 1. Map of proposed discharge point and discharge line path

3. Consultation and engagement

3.1 Proponent's engagement with Indigenous groups

In its Notice of Change to [IAAC](#), the Proponent indicated that it engaged with the 13 Indigenous groups named in the Decision Statement through the established Environmental Advisory Committee (EAC) for the Project. Indigenous groups were either informed directly during [EAC](#) meetings (held from October 2023 through August 2024) or through distribution of the minutes of these meetings which were shared with all Indigenous groups.

The Proponent conducted additional engagement with Marcel Colomb First Nation (MCFN) on the Project change through [MCFN](#)-specific subcommittee meetings of the [EAC](#) with [MCFN](#) advisors and through meetings with [MCFN](#) community members, leadership and advisors to discuss the details of the Project change, answer questions and address concerns.

3.2 IAAC's engagement on Project change

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

[IAAC](#) engaged with the 13 Indigenous groups listed in the Decision Statement (Barren Lands First Nation, Chemawawin Cree Nation, Hatchet Lake First Nation, Manitoba Métis Federation, Marcel Colomb First Nation, Mathias Colomb Cree Nation, Métis Nation – Saskatchewan Eastern Region 1, Métis Nation – Saskatchewan Northern Region 1, Nisichawayasihk Cree Nation, Northlands Denesuline First Nation, O-Pipon-Na-Piwin Cree Nation, Peter Ballantyne Cree Nation, and Sayisi Dene First Nation) to validate the views presented in this report and invite these Indigenous groups to provide any further comments related to the Project change, [IAAC](#)'s analysis report or recommended amendments to the Decision Statement.

In addition, [IAAC](#) sought comments from the public as part of the public consultation period from March 25 until April 24, 2025.

During the public consultation period, [IAAC](#) received comments from the public, Transport Canada (TC) and the Manitoba Métis Federation. [TC](#) submitted comments regarding the installation of the water outfall diffuser on the Hughes River bridge, highlighting its potential impact on navigation and reminding the Proponent that this work requires approval from [TC](#) under the *Canadian Navigable Waters Act* (CNWA). The Proponent responded to [TC](#) stating that they intend to alert [TC](#) of the activity once they receive approval of the Notice of Alteration / Notice of Change.

A public comment was submitted, but it did not address the proposed changes; instead, it expressed a general opinion on mining operations. The Manitoba Métis Federation agreed with IAAC's proposed amendments. They stated that the Red River Métis use the Hughes River to exercise their rights. They expressed concerns about capacity funding for the Project in general and requested that the Proponent establish a sub-committee with each distinct Indigenous group.

All comments received were incorporated into the analysis of the proposed changes, but did not affect the recommendations for amending the Decision Statement.

4. IAAC's analysis of changes

The *Physical Activities Regulations* (the Regulations) under IAA identify the physical activities that constitute designated projects that may require an impact assessment. IAAC is of the view that the change does not constitute a new or different designated project that may require a new impact assessment.

5. Assessment of potential adverse environmental effects

5.1 Fish and fish habitat

5.1.1 Views of the Proponent

The Proponent indicated that fish and fish habitat could be affected through changes to surface water quantity (i.e., increase in flow) and quality (i.e., change in temperature and concentrations of substances) and disturbances from discharge infrastructure (i.e., installing the dewatering equipment and the discharge line to the Hughes River).

In its analysis, the Proponent predicts effect on surface water flow to be negligible. The Proponent explains that the Hughes River volume is two orders of magnitude greater than pit dewatering flows, such that water quality will be dominated by existing conditions within the Hughes River during dewatering. The Proponent notes that the modelling of water flows corroborates this. During dewatering, flows in the Hughes River are expected to increase between 1% and 2%. The Proponent notes this is well below the 10% change threshold suggested by the DFO and the minimum change to have a detectable impact on an aquatic ecosystem that supports commercial, recreational, or Indigenous fisheries in Canada.

Additionally, effects on surface water quality are also expected to be negligible. Although baseline water quality on the Hughes River exceeds the water quality guidelines for some months at some locations for total aluminum (Al), dissolved lead (Pb), and dissolved zinc (Zn), modelled surface water concentrations for these parameters, as well as dissolved manganese (Mn) and total arsenic (As) did not exceed any of the water quality guidelines for any mixed modeling scenario at any location in the Hughes River downstream of the



discharge location. Impacts to Hughes River water temperature and dissolved oxygen are similarly expected to have negligible effects.

The Proponent also notes that pumping the pit water directly into the Hughes River eliminates the risks to fish and fish habitat within Farley Lake and Farley Creek given the larger volume of water and greater capacity of the Hughes River relative to Farley Lake and Farley Creek. The proposed shorter dewatering timeframe (3 months) avoids sensitive periods for fish, including spring spawning periods, and reduces the associated risks of operating dewatering equipment in the winter months. The Proponent is of the opinion that, overall, this proposed dewatering location change is less harmful to the environment and fish and fish habitat than the original approved discharge location through Farley Lake and Farley Creek.

To mitigate the potential effects to fish and fish habitat through changes in surface water quantity and quality, associated uncertainty with these predictions and disturbances from discharge infrastructure resulting from the proposed change, the Proponent noted a series of mitigation measures that will be applied which include aeration of the Wendy and East pits, installation of end of pipe screens to protect fish, conducting work in and around water within least risk timing windows for fish, implementation of measures for sedimentation and erosion control, and temperature management of pit lake water as required.

5.1.2 Views expressed

[ECCC](#) did not express concerns overall with the change in discharge site location or the rate of discharge following review of the Proponent's Notice of Change and additional materials. [ECCC](#) did note, however, uncertainties associated with only one year of baseline data and the lack of temporal variability it provided. In their review of the Notice of Change, [ECCC](#) highlighted the importance of the pit dewatering monitoring program to reduce uncertainty and monitor discharge quality from the pits and water quality in the Hughes River. [ECCC](#) noted that the monitoring program is not reflected in the existing federal Decision Statement.

[DFO](#) also did not express any concerns overall with the change in discharge site location or the rate of discharge following review of the Notice of Change and additional materials. [DFO](#) did note additional information would be required for the purposes of a *Fisheries Act* authorization, but that it was not necessary for the analysis of impacts related to the Project change. [DFO](#) advised that the changes to the existing mitigation and follow-up measures should be updated in Decision Statement conditions to account for the change in discharge location, including conditions 3.5, 3.5.1, 3.5.2, 3.6, 3.13.1, and 3.14.4. These changes are explained in table 2.

5.1.3 IAAC's analysis and conclusions

Most measures described by the Proponent to mitigate the effects of the Project change were already considered during the original environmental assessment and described in the existing Decision Statement, including aeration of the Wendy and East pits (3.5.1), installation of end of pipe screens to protect fish (3.3), conducting work in and around water within least risk timing windows for fish (3.8.2), and implementation of measures for sedimentation and erosion control (3.11) and temperature management of pit lake water as required (3.5.2). [IAAC](#) is recommending changes to federal conditions within the Decision Statement (see Table 2) to update the definition of Designated Project (1.7) so that the existing conditions apply to the



Project change. In response to advice from [ECCC](#) and [DFO](#), [IAAC](#) is also recommending updating the language related to the location of pit dewatering discharge in mitigation measures and follow-up programs and to reflect the additional monitoring proposed by the Proponent in their dewatering monitoring plan.

5.2 Current use of lands and resources for traditional purposes

5.2.1 Views of the Proponent

Discharge into the Hughes River and any resulting changes to river flow and water quality have the potential to impact the current use of the Hughes River by Indigenous groups, namely [MCFN](#) who fish and camp downstream of the discharge site. However, the Proponent did not identify residual effects on current use of lands and resources for traditional purposes given that residual effects to Hughes River flow and water quality were negligible.

5.2.2 Views expressed

Over the course of the Proponent's engagement on the Project change, [MCFN](#) raised key concerns about long-term impacts to the Hughes River water quality and subsequent impacts to downstream spawning shoals for fish including pickerel (*Sander vitreus*), riparian wildlife and water supply for camps. In November 2024, the [MCFN](#) community held a vote resulting in a collective decision to oppose the proposed change to the Project. This decision was based on the key concerns. Subsequent meetings between the Proponent and [MCFN](#) chief and council, advisors, and community members were held in early 2025 where the Proponent heard more about these concerns and clarified details of the proposed change to the Project and associated effects and mitigation. [MCFN](#) has chosen not to provide comment during the public consultation period on [IAAC](#)'s Analysis of the proposed changes and proposed amended Decision Statement . Table 1 summarizes [MCFN](#)'s key concerns and the explanations provided by the Proponent.

Of the 12 other Indigenous groups consulted, only O-Pipon-Na-Piwin Cree Nation voiced concerns, specifically that discharge would impact South Indian Lake. The Proponent explained that South Indian Lake would not be impacted as it is not in the same watershed.



Table 1 – A summary MCFN’s key concerns related to the proposed change to the Project and the explanation provided by the Proponent

MCFN concerns raised during engagement	Explanation provided by Proponent
<p>Impacts to downstream pickerel (<i>Sander vitreus</i>) spawning areas, riparian wildlife and water supply.</p>	<p>Flows in the Hughes River are expected to increase between 1% and 2%, which is well below the 10% change threshold suggested by the DFO and the minimum change to have a detectable impact on an aquatic ecosystem that supports commercial, recreational, or Indigenous fisheries in Canada.</p> <p>Water quality impacts are also expected to be negligible.</p> <p>Additionally, faster dewatering allows the Proponent to avoid spring spawning periods for fish.</p>
<p>Mobilization of pit sediments in the littoral zone and at the bottom of the pits impacting water quality.</p>	<p>Testing done with the aeration system has indicated that sediment mobilization is limited; however, the Proponent has committed to installing sediment curtains around the littoral zone of the pits during dewatering to isolate suspended sediment should they be needed and raising the intake pipe so it sits closer to the surface.</p> <p>Additionally, not all water from the pits will be discharged into the Hughes River. Towards the end of the dewatering process as water levels approach the bottom, water quality in the pits may not meet regulatory requirements and will thus be pumped to treatment ponds along with other contact water. Some water may remain at the very bottom of the pit.</p>
<p>Shoreline erosion at the discharge point.</p>	<p>Pit water will be discharged with the use of a diffuser pipe suspended above the water surface, along the full width of the channel under the Hughes River bridge.</p>
<p>Acid rock drainage from the pit walls once the pits are drained.</p>	<p>Mining of ore from the pits will begin as soon as the pits are dewatered and it would be several years before any acid rock drainage would occur.</p>
<p>Accelerated timing/rate of discharge from several years to 3 months.</p>	<p>The greater capacity of the Hughes River relative to the much smaller Farley Lake/Farley Creek allows for faster dewatering to occur without any additional adverse environmental risks. Faster dewatering allows the Proponent to avoid spring spawning periods for fish.</p>
<p>Need for clear monitoring protocols to ensure that discharge remains compliant with federal water quality regulations. This includes sampling:</p> <ul style="list-style-type: none"> - in the discharge pipe before Hughes River outlet, 	<p>These elements have been incorporated into pit dewatering monitoring program dated July 2, 2024¹, in addition to existing commitments to monitor water quality in both the pits to verify that pit water meets the requirements of the <i>Fisheries Act</i> prior to discharge into the Hughes River.</p>

¹ [IR response package 1](#). (CIAR Reference number 80140, Document Number 132)

MCFN concerns raised during engagement	Explanation provided by Proponent
<ul style="list-style-type: none"> - upstream of discharge site, and - at three stations downstream, depending on plume. 	
<p>Need to clarify the discrepancy between dissolved and total copper and lead concentrations which occurs in some sampling results from the East Pit Lake and Hughes River.</p>	<p>Additional QA/QC protocols² have been incorporated into monitoring program including a 'filtration control' and split sampling (i.e., sending water samples for testing at multiple laboratories).</p>
<p>Request for an MCFN monitoring program in partnership with the Proponent to engage MCFN community members in the development and carrying out of a dewatering monitoring plan, including capacity funding for this purpose.</p>	<p>The dewatering monitoring program has been further developed and MCFN comments have been incorporated.</p> <p>In addition, the Proponent has noted opportunities to participate in the monitoring described as well as the availability of two paid positions for monitors on the Project, which may be of interest to MCFN community members.</p>

5.2.3 IAAC's analysis and conclusions

[IAAC](#) notes that [MCFN](#) concerns about sedimentation and erosion were considered during the original assessment and addressed in the existing Decision Statement, including requirements to implement measures for sedimentation and erosion control (condition 3.11) and to use diffusers (condition 3.11.2). [IAAC](#) recommends modifications of the existing Decision Statement to incorporate additional Proponent commitments made in response to [MCFN](#)'s concerns, including the addition of the Proponent commitment to avoid discharge during spring spawning (see new 3.5.3), and [MCFN](#)'s requested additional monitoring components related to dewatering (see new 3.12.3). In consideration of [MCFN](#)'s request to participate in the dewatering monitoring program, condition 2.9 of the existing Decision Statement requires the Proponent to discuss opportunities for Indigenous groups to participate in follow-up program activities including monitoring, analysis and reporting, as well as opportunities for training and support. [IAAC](#) has included reference to condition 2.9 in the new condition 3.12.3 to reiterate this requirement in the context of the dewatering monitoring program.

5.3 Other valued components

The Proponent did not identify any additional valued components beyond fish and fish habitat and water quality that would be affected by the Project change. It explained that the Project change impacts are limited to the discharge location and any terrestrial modifications from the temporary pumps and hoses will occur

² [IR response package 1](#). ([CIAR](#) Reference number 80140, Document Number 133)



within an existing disturbed area and developed road right-of-way. No excavation or earth disturbance is proposed. The rationale for exclusion of these valued components is described in Table 3-1 of the Notice of Change.

6. Conclusion

Based on the information provided by the Proponent, federal authorities and Indigenous groups, it is IAAC's conclusion that the proposed changes to the Project are not likely to increase the extent to which the effects described in the original environmental assessment are adverse, taking into account the mitigation measures and follow-up programs included as conditions in the Decision Statement.

Since the proposed changes to the Project are not included in the definition of the Designated Project as currently described in the Decision Statement, IAAC recommends that this definition be modified to include the new discharge location for pit dewatering. This amendment will ensure that the conditions included in the Decision Statement also apply to the proposed changes to the Project.

To reflect the proposed Project changes and to respond to key concerns raised during consultation with Indigenous groups, IAAC proposes amendments to certain existing conditions, as well as the addition of new conditions as shown in table 2. These changes specifically address issues raised by MCFN, including those outlined in their letter of non-consent.

While IAAC acknowledges that consent from MCFN has not been obtained, the proposed new and revised conditions aim to directly respond to MCFN's input and support continued engagement, monitoring, and adaptive management, in line with the Crown's duty to consult and accommodate where appropriate.

Table 2 – Recommended amendments to the Decision Statement

Decision Statement issued March 6, 2023	Recommended amendment to the Decision Statement
<p>1.7 Designated Project means the Lynn Lake Gold Project as described in Chapter 2 of the Environmental Assessment Report prepared by the Impact Assessment Agency of Canada (Canadian Environmental Assessment Registry Reference Number 80140).</p>	<p>1.7 Designated Project means the Lynn Lake Gold Project as described in Chapter 2 of the Environmental Assessment Report prepared by the Impact Assessment Agency of Canada (Canadian Environmental Assessment Registry Reference Number 80140, <u>document 124</u>) <u>as well as the changes to the pit dewatering discharge location as described in Impact Assessment Agency of Canada's Analysis of Proposed Changes to the Lynn Lake Gold Project- Pit Dewatering (Canadian Impact Assessment Registry Reference Number 80140, document 129).</u></p>
<p>3.5 The Proponent shall, when releasing any collected water into Farley Lake and Gordon Lake, including groundwater intercepted pursuant to condition 3.4 and water from dewatering the East and Wendy pit lakes:</p>	<p>3.5 The Proponent shall, when releasing any collected water into Farley Lake, and Gordon Lake, and the Hughes River, including groundwater intercepted pursuant to condition 3.4 and water from dewatering the East and Wendy pit lakes:</p>

Decision Statement issued March 6, 2023	Recommended amendment to the Decision Statement
<p>3.5.1 aerate, or treat by other means, water collected from the East and Wendy pit lakes, prior to release into Farley Lake and Gordon Lake, in accordance with condition 3.7, to precipitate oxides, increase dissolved oxygen concentrations, and prevent chemical stratification; and</p>	<p>3.5.1 aerate, or treat by other means, water collected from the East and Wendy pit lakes, prior to release into <u>the Hughes River Farley Lake and Gordon Lake</u>, in accordance with condition 3.7, to precipitate oxides, increase dissolved oxygen concentrations, and prevent chemical stratification;</p>
<p>3.5.2 release collected water into Farley Lake and Gordon Lake in a manner that maintains the lake temperature at the point of release within baseline temperature variations to protect fish and fish habitat, unless otherwise authorized by Fisheries and Oceans Canada.</p>	<p>3.5.2 release collected water into Farley Lake, and Gordon Lake, <u>and the Hughes River</u> in a manner that maintains the <u>water lake</u> temperature at the point of release within baseline temperature variations to protect fish and fish habitat, unless otherwise authorized by Fisheries and Oceans Canada;</p>
<p>New</p>	<p>New condition:</p> <p>3.5.3 <u>release water collected from the East and Wendy pit lakes into the Hughes River outside the Fisheries and Oceans Canada’s Manitoba restricted activity timing windows for spring spawning fish.</u></p>
<p>3.6 The Proponent shall adjust, during construction, the rate of release of water into Farley Lake and Gordon Lake from dewatering the East and Wendy pit lakes and from groundwater intercepted pursuant to condition 3.4 in order to maintain lake levels within the range of natural variability predicted in Volume 2 Chapter 10 of the Environmental Impact Statement and Appendix A Attachment IAAC-48 of the Proponent’s Information Request Responses Round 1, Package 1 (Canadian Impact Assessment Registry Reference Number 80140, document #54).</p>	<p>3.6 The Proponent shall adjust, during construction, the rate of release of water into <u>the Hughes River Farley Lake and Gordon Lake</u> from dewatering the East and Wendy pit lakes and from into Farley and Gordon Lakes from groundwater intercepted pursuant to condition 3.4 in order to maintain <u>lake water</u> levels <u>in these receiving systems</u> within range of natural variability predicted in <u>Lynn Lake Gold Project: Gordon Mine Pit Dewatering Notice of Alteration / Notice of Change, dated February 9, 2024 (Canadian Impact Assessment Registry Reference Number 80140, document 131)</u> and Volume 2 Chapter 10 of the Environmental Impact Statement Appendix A Attachment IAAC-48 of the Proponent’s Information Request Responses Round 1, Package 1 (Canadian Impact Assessment Registry Reference Number 80140, document #54).</p>
<p>3.12.2 monitor water quality in the East and Wendy pit lakes, newly formed pit lakes, tailings management facility, mine rock storage areas, contact water collection ponds, and receiving water bodies and watercourses upstream and downstream of the Project development areas, including at the edge and downstream of the edge of mixing zones identified pursuant to condition</p>	<p>3.12.2 monitor water quality in the East and Wendy pit lakes, newly formed pit lakes, tailings management facility, mine rock storage areas, contact water collection ponds, and receiving water bodies and watercourses upstream and downstream of the Project development areas, including at the edge and downstream of the edge of mixing zones identified pursuant to condition</p>

Decision Statement issued March 6, 2023	Recommended amendment to the Decision Statement
<p>3.12.1, Arbor Lake, Burge Lake, Cockeram Lake, Ellystan Lake, Farley Creek, Farley Lake, Gordon Lake, the Hughes River, the Keewatin River, the unnamed tributary of the Keewatin River, Minton Lake, Payne Lake, Susan Lake and Swede Lake, for all contaminants that may have adverse effects on fish and fish habitat, including aluminum, antimony, arsenic, calcium, copper, cyanide, fluoride, hexavalent chromium, iron, magnesium, methylmercury, phosphorus, selenium, and total and dissolved cadmium. Monitoring shall be conducted as follows:</p>	<p>3.12.1, Arbor Lake, Burge Lake, Cockeram Lake, Ellystan Lake, Farley Creek, Farley Lake, Gordon Lake, the Hughes River, the Keewatin River, the unnamed tributary of the Keewatin River, Minton Lake, Payne Lake, Susan Lake and Swede Lake, for all contaminants that may have adverse effects on fish and fish habitat, including aluminum, antimony, arsenic, calcium, copper, cyanide, fluoride, hexavalent chromium, iron, magnesium, methylmercury, phosphorus, selenium, and total and dissolved cadmium. Monitoring shall be conducted as follows:</p>
<p>3.12.2.1 beginning during construction and continuing through decommissioning, except in the East and Wendy pit lakes, and the newly formed pit lakes; and</p>	<p>3.12.2.1 beginning during construction and continuing through decommissioning, except in the East and Wendy pit lakes, and the newly formed pit lakes; and</p>
<p>3.12.2.2 beginning during construction in the East and Wendy pit lakes, and beginning during decommissioning and continuing through post-closure in the newly formed pit lakes, until water quality is stable and improving and any contact water or seepage potentially released meets the Canadian Council of Ministers of the Environment's Canadian Water Quality Guidelines of the Protection for Aquatic Life and Manitoba's Water Quality, Standards, Objectives, and Guidelines pursuant to condition 3.7;</p>	<p>3.12.2.2 beginning during construction in the East and Wendy pit lakes, and beginning during decommissioning and continuing through post-closure in the newly formed pit lakes, until water quality is stable and improving and any contact water or seepage potentially released meets the Canadian Council of Ministers of the Environment's Canadian Water Quality Guidelines of the Protection for Aquatic Life and Manitoba's Water Quality, Standards, Objectives, and Guidelines pursuant to condition 3.7;</p>
<p>New</p>	<p>New condition:</p> <p><u>3.12.3 monitor prior to and throughout the process of dewatering, at locations and frequencies described in Lynn Lake Gold Project: Monitoring Program for Gordon Pit Dewatering to the Hughes River (Version 1) (Canadian Impact Assessment Registry Reference Number 80140, document ###) all contaminants that may have adverse effects on fish and fish habitat, including aluminum, antimony, arsenic, calcium, copper, cyanide, fluoride, hexavalent chromium, iron, magnesium, methylmercury, phosphorus, selenium, and total and dissolved cadmium. In doing so, offer any opportunities for Indigenous group participation in this monitoring discussed pursuant to condition 2.9;</u></p>

Decision Statement issued March 6, 2023	Recommended amendment to the Decision Statement
<p>3.13.1 monitor, during all phases of the Designated Project, surface water instantaneous flows, lake levels and pH levels within Arbor Lake, Burge Lake, Cockeram Lake, Ellystan Lake, Farley Creek, Farley Lake, Gordon Lake, the Keewatin River, the unnamed tributary of the Keewatin River, Minton Lake, Payne Lake, Susan Lake, Swede Lake, fish-bearing wetlands within the local assessment areas, the East and Wendy pit lakes, newly formed pit lakes, the tailings management facility, and contact water collection ponds to verify the environmental assessment predictions identified in Volume 2 Chapter 10 of the Environmental Impact Statement and Appendix A Attachment IAAC-48 of the Proponent’s IR Responses Round 1, Package 1 (Canadian Impact Assessment Registry Reference Number 80140, document #54);</p>	<p>3.13.1 monitor, during all phases of the Designated Project, surface water instantaneous flows, lake levels and pH levels within Arbor Lake, Burge Lake, Cockeram Lake, Ellystan Lake, Farley Creek, Farley Lake, Gordon Lake, the Keewatin River, the unnamed tributary of the Keewatin River, Minton Lake, Payne Lake, Susan Lake, Swede Lake, fish-bearing wetlands within the local assessment areas, the East and Wendy pit lakes, newly formed pit lakes, the tailings management facility, and contact water collection ponds, <u>and prior to and during the construction phase and during the first year of the operation phase, the East and Wendy pit lakes and the Hughes River</u>, to verify the environmental assessment predictions identified in Volume 2 Chapter 10 of the Environmental Impact Statement and <u>Lynn Lake Gold Project: Gordon Mine Pit Dewatering Notice of Alteration / Notice of Change, dated February 9, 2024 (Canadian Impact Assessment Registry Reference Number 80140, document 131); Appendix A Attachment IAAC-48 of the Proponent’s IR Responses Round 1, Package 1 (Canadian Impact Assessment Registry Reference Number 80140, document #54)</u></p>
<p>3.14.4 monitor, starting prior to construction and during all phases of the Designated Project, fish habitat quality and quantity end points for all species identified pursuant to condition 3.14.3, in Farley Creek, Farley Lake, Gordon Lake, the Keewatin River, Minton Lake, the new diversion channel, fish-bearing wetlands within and downstream of the Project development areas, and any additional locations identified in consultation with Indigenous groups and relevant authorities.</p>	<p>3.14.4 monitor, starting prior to construction and during all phases of the Designated Project, fish habitat quality and quantity end points for all species identified pursuant to condition 3.14.3, in Farley Creek, Farley Lake, Gordon Lake, the Keewatin River, Minton Lake, the new diversion channel, fish-bearing wetlands within and downstream of the Project development areas, and any additional locations identified in consultation with Indigenous groups and relevant authorities, <u>as well as in the Hughes River prior to and during the construction phase and during the first year of the operation phase.</u></p>