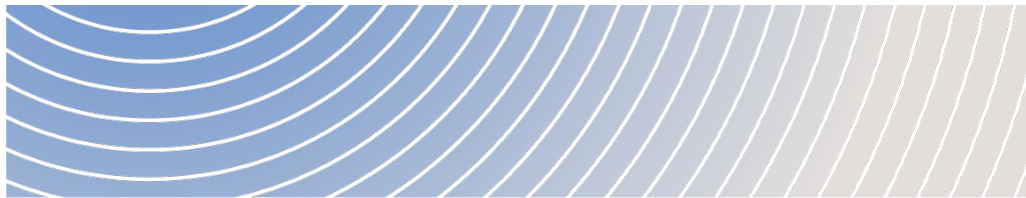




Impact Assessment  
Agency of Canada

Agence d'évaluation  
d'impact du Canada

# Analysis of Proposed Changes to the Lynn Lake Gold Mine Project – MacLellan Site



DRAFT REPORT

October 2025



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# 1. Introduction

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

IAAC conducted an environmental assessment under the *Canadian Environmental Assessment Act, 2012* (CEAA 2012). On March 5, 2023, the Minister of Environment and Climate Change issued a [Decision Statement](#) (Canadian Impact Assessment Registry [CIAR] Reference number 80140, document 125) for the Project that contains legally binding conditions, which include mitigation measures and follow-up program requirements that the proponent must comply with throughout the life of the Project. The Decision Statement was amended on [July 26, 2024](#) and on [August 6, 2025](#) (CIAR Reference number 80140, documents 127 & 143) to reflect changes to the *Impact Assessment Act* (IAA) pursuant to section 308(1) of the *Budget Implementation Act, 2024* and a change to the mine pit dewatering discharge point at the Gordon site, respectively. 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 from what was originally described, as required by condition 2.16 of the Decision Statement. On June 25, 2025, the Proponent notified IAAC of proposed changes to the Project in a document titled *Lynn Lake Gold Project: MacLellan Mine Plan Amendment Notice of Alteration/ Notice of Change* (CIAR Reference number 80140, Document Number [145](#)) which details a change in the Project development area (PDA), location of mine components and the addition of a satellite pit and additional construction laydown area. Additional information related to the Project change was provided July 31, 2025 and September 19, 2025 (CIAR Reference number 80140, Document Numbers 146 and 147).

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 may be required to the Decision Statement, including the modification, addition or removal of mitigation and follow-up program conditions or the modification of the definition of Designated Project in section 1, to address the proposed Project changes.

IAAC's analysis is summarized in this report.



## 2. Proposed Project changes

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

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

The proponent is also proposing to decrease the ore cutoff grade for processing and to enlarge the original open pit. The combination of the new satellite pit, a decrease in the ore cutoff grade, and a larger open pit would result in an approximate 48% increase in total ore production at the MacLellan site from 26.8 to 39.7 megatonnes (Mt) and an approximate 37% increase for the whole project, from 34.8 to 47.7 Mt. Despite this increase in mine tonnage, the daily ore input capacity of the processing plant will increase slightly from 7,500 tonnes per day to approximately 8,000 tonnes per day.

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



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## 2.1 Analysis under the *Physical Activity Regulations*

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

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*19 The expansion of an existing mine, mill, quarry or sand or gravel pit in one of the following circumstances:*

*(c) in the case of an existing metal mine, other than a rare earth element mine, placer mine or uranium mine, if the expansion would result in an increase in the area of mining operations of 50% or more and the total ore production capacity would be 5 000 t/day or more after the expansion;*

*(d) in the case of an existing metal mill, other than a uranium mill, if the expansion would result in an increase in the area of mining operations of 50% or more and the total ore input capacity would be 5 000 t/day or more after the expansion;*

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

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

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

## 3. Consultation and engagement

Indigenous group consultation, input from federal authorities, and public participation will inform IAAC's analysis of the proposed changes and recommendations to the Minister.

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### 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 though May 2025) or through distribution of the minutes of these meetings which were shared with all Indigenous groups. The proponent also engaged with Marcel Colomb First Nation and Matthias Colomb Cree Nation through Nation-specific engagement efforts.

The proponent shared a draft of the Notice of Change with all Indigenous groups but had not received any feedback on it at time of final submission. IAAC notes that wildfires in the area may have affected groups' capacity to engage with the material.

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### 3.2 IAAC's engagement

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

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

In addition, IAAC will be seeking comments from the public on the proposed changes to the Project as part of the public consultation period in mid-October 2025.

Feedback provided during Indigenous consultation and during the public consultation period will be taken into account in IAAC's final analysis report and recommendations for amendments to the Decision Statement on the Project change, which will be provided to the Minister of the Environment and Climate Change to inform decision making.

## 4. Assessment of potential adverse environmental effects

The following is an analysis of whether any of the Project changes would increase the extent to which the effects of the Project, as assessed during the environmental assessment, are adverse. The analysis informs whether modifications to the Project's [Decision Statement](#) are necessary, including the addition, modification or removal of mitigation measures and follow-up requirements and any updates to the definition of the Designated Project. The analysis focuses on potential adverse effects on fish and fish habitat and the health of Indigenous peoples.

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### 4.1 Fish and fish habitat

#### 4.1.1 Proponent's assessment

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

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

#### Water quantity

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

The proponent explained that the impacts described above are unlikely to impact fish and fish habitat. Specifically, the proponent notes that changes in water quantity in Minton Lake and its outlet on fish and fish habitat would be mitigated by the existing vegetation and dominance of beaver dams which control hydraulic conditions. The proponent also notes that predicted flow reductions in the Minton and Dot Lake outlet fall



within the thresholds identified in Fisheries and Oceans Canada's *Framework for Assessing the Ecological Flow Requirements to Support Fisheries in Canada*.

The proponent explained that the predicted increased flows to the unnamed tributary of the Keewatin River and potential drying out of fish bearing wetlands due to groundwater drawdown would be mitigated by habitat offsetting required as part of the Project's *Fisheries Act* authorization. Due to the magnitude of impacts previously predicted as part of the original environmental assessment, the proponent explained that the unnamed tributary of the Keewatin River is already accounted for in their draft offsetting plan. For wetlands of unknown fish-bearing status and unknown connectivity to groundwater, the proponent stated that it is undertaking sampling to determine whether these wetlands provide habitat for fish and has stated that, should these wetlands bear fish, this habitat will be incorporated into the habitat offsetting plan.

## Water quality

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

The proponent noted the following exceedances of water quality guidelines:

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

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

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

## 4.1.2 Views expressed

Environment and Climate Change Canada, Fisheries and Oceans Canada, and Natural Resources Canada expressed views on potential impacts of water quantity and quality changes on fish and fish habitat.

### Water quantity

Fisheries and Oceans Canada, Environment and Climate Change Canada and Natural Resources Canada all expressed concerns about the predicted change in the extent of water table drawdown and noted that the potential impacts on fish bearing wetlands were not clear. Natural Resources Canada and Fisheries and Oceans Canada recommended that the proponent add groundwater quantity and wetland water level monitoring sites within the forecasted extent of groundwater drawdown to effectively verify the predictions in the updated models and Natural Resources Canada recommended two additional monitoring sites. Fisheries and Oceans Canada acknowledged that adequate updated surface water monitoring sites would be required as part of the *Fisheries Act* Authorization application and noted that it did not foresee technical or biological barriers that would prevent the proponent from offsetting these impacts in its offsetting plan for the Project, even if all wetlands are fish-bearing and completely dry by the end of operation.

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

### Water quality

Environmental and Climate Change Canada highlighted that exceedances are predicted to occur earlier than predicted during the environmental assessment, including during operation and that two parameters of potential concern, total cobalt and total phosphorus, were not identified in the environmental assessment as contaminants of concern. Environment and Climate Change Canada recommended that these parameters be reflected in conditions 3.12.2 and 3.12.3, respectively. Additionally, Environment and Climate Change Canada noted that it was unclear in the Notice of Change whether existing measures would be sufficient to be protective of aquatic life. They also indicated that the proponent's approach to applying arsenic source terms during modelling increases the uncertainty of the predicted effects on water quality associated with the Project change.

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

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

### 4.1.3 IAAC's analysis and conclusions

IAAC notes that many measures that would mitigate the effects of the Project change were already considered during the original environmental assessment and are described in the existing Decision Statement, including the requirement to offset for residual effects to fish and fish habitat (3.1), collect and treat contact water and seepage (3.7), manage acid-generating and metal leaching materials (3.10), implement sedimentation and erosion measures (3.11) and monitor and adaptively manage through follow-up programs for water quality (3.12) and water quantity (3.13, 3.15), and fish and fish habitat (3.14). IAAC is recommending changes to federal conditions within the Decision Statement (see Table 1) to update the definition of the Designated Project (1.7) so that these existing conditions apply to the Project change and its adverse federal effects.

IAAC also recommends modifications to the follow-up programs for water quality (3.12), water quantity (3.13) and fish and fish habitat (3.14) to incorporate additional details of the Project change (see Table 1). These adjustments include:

- adding cobalt to the list of contaminants to monitor in condition 3.12.2 and total and dissolved copper to the list of contaminants to monitor at the MacLellan site in condition 3.12.4, adding Payne Lake outlet to the monitoring sites in 3.12.2 and 3.12.4, and updating condition 3.12.6 to reference the updated water modelling results reported in this Notice of Change;
- adding the Minton Lake outlet and Dot Lake outlet to the monitoring locations in condition 3.13.1, adding groundwater quantity monitoring sites within the predicted zone of groundwater drawdown to condition 3.13.2, and updating these conditions to reference the updated water modelling results reported in this Notice of Change; and
- adding Payne Lake Outlet to fish and fish habitat monitoring in conditions 3.14.2 and 3.14.4 and Minton Lake Outlet to 3.14.4.

Overall, IAAC is of the view that the proposed project changes would not change the significance of the project's effects on fish and fish habitat, if the Decision Statement is amended to reflect the changes recommended above (detailed in Table 1).

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## 4.2 Health of Indigenous Peoples

### 4.2.1 Proponent's assessment

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

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

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

The proponent indicated that predicted air quality results, were marginally higher than were assessed as part of the environmental assessment, but there were noted exceedances of the World Health Organization's Global Air Quality Guidelines' exposure limits values at the Indigenous receptor site (i.e. trapping area 12) for maximum concentrations of 1-hour nitrogen dioxide (NO<sub>2</sub>) and 24-hour particulate matter 10 microns or less in size (PM<sub>10</sub>).

The proponent explained however, that the frequency of exceedances for NO<sub>2</sub> remained low making it less likely to cause health impacts. The proponent also explained that existing monitoring and adaptive management measures for air quality parameters, including NO<sub>2</sub> and PM<sub>10</sub>, will remain in place to verify the accuracy of the model predictions and implement modified or additional measures as needed.

## 4.2.2 Views expressed

Environment and Climate Change Canada and Health Canada noted the increased NO<sub>2</sub> concentrations predicted in proximity to areas of Indigenous use as a result of the Project change and flagged the importance of monitoring for NO<sub>2</sub> to verify the effects predictions and adaptively manage effects. ECCC also noted the shift in timing of peak NO<sub>2</sub> emissions corresponding with the shift in peak transport of ore from the Gordon site to the MacClellan site in year 4 instead of year 2 and recommended making this change in the air quality follow-up program in condition 6.3.5. Environment and Climate Change Canada also noted the importance of conducting the two months of monitoring in late autumn/early winter, when concentrations are expected to peak due to seasonal atmospheric conditions.

Health Canada indicated that they support the proponent's proposed location and timing of continuous NO<sub>2</sub> monitoring and ECCC's recommendation to update condition 6.3.5 accordingly.

## 4.2.3 IAAC's analysis and conclusions

IAAC finds that the key effect pathways of the project change on Indigenous health is through predicted changes to air quality. The key measures to mitigate effects to Indigenous health via changes in air quality, including NO<sub>2</sub> and PM<sub>10</sub> are already captured in the existing Decision Statement including through condition 6.1 which requires the proponent to implement measures to mitigate dust and fugitive particulates from the Project. IAAC also notes that additional monitoring and adaptive management for air contaminants including NO<sub>2</sub> and PM<sub>10</sub> are included under condition 6.3. To ensure the monitoring and follow-up program required by condition 6.3 remains effective in mitigating impacts to the health of Indigenous Peoples, IAAC recommends



changing the NO<sub>2</sub> monitoring requirement from year 2 to year 4 to maintain the timing relative to peak ore transport to the MacClellan site, and to add language, clarifying this intent, in case project timelines change. IAAC further recommends clarifying the seasonal timing of NO<sub>2</sub> monitoring, as committed to by the proponent, to ensure the monitoring and follow-up program remains effective in mitigating impacts to the health of Indigenous Peoples. IAAC also recommends adjusting the timing in the conditional clause of condition 6.3.5 to require additional monitoring “each year until the end of mining activity” instead of “during all phases of the project”, to better reflect the timing of potential risks to Indigenous health.

IAAC is of the view that the proposed changes to the Project would not change the significance of the project’s effects on the health of Indigenous Peoples, if the Decision Statement is amended to reflect the changes recommended above (detailed in Table 1).

## 5. Other effects

The proponent indicated that it evaluated impacts of the Project changes on heritage resources and Indigenous current use and socio-economic conditions and explained that the proposed Project changes, including a reduction in the Designated Project area of approximately 23.1 ha, will not result in additional adverse effects within the local assessment area beyond what was assessed during the environmental assessment.

## 6. Conclusion

Based on the information provided by the proponent and federal authorities, IAAC provisionally concludes that the proposed changes to the Project would not likely increase the extent to which the effects described in the original environmental assessment are adverse, if the amendments to the Decision Statement recommended in this report are implemented (see Table 1).

Administratively, to simplify references to multiple notices of change in the conditions, IAAC recommends adding definitions of both the February 2024 and the June 2025 Notice of Change to section 1 of the Decision Statement and replacing references to the February 2024 Notice of Change in conditions 3.6 and 3.13.1 (see Table 1).

**Table 1. Recommended amendments to the Decision Statement.**

Content in Decision Statement issued August 2025	Recommended amendment to the Decision Statement	Recommended content in amended Decision Statement
<p>Definition 1.7:</p> <p>Designated Project means the Lynn Lake Gold Project as described in Chapter 2 of the Environmental Assessment Report prepared by the Impact Assessment Agency of Canada (Canadian Environmental Assessment Registry Reference Number 80140, document 124) as well as the changes to the pit dewatering discharge location as described in IAAC’s Analysis of Proposed Changes to the Lynn Lake Gold Project- Pit Dewatering (Canadian Impact Assessment Registry Reference number 80140, document 142).</p>	<p>Update definition 1.7 as follows:</p> <ul style="list-style-type: none"> <li>Remove “prepared by the Impact Assessment Agency of Canada (Canadian Environmental Assessment Registry Reference Number 80140, document 124)”</li> <li>Add a reference to changes to the MacLellan site as described in section 2 of this report</li> </ul>	<p>Updated definition 1.7:</p> <p>Designated Project means the Lynn Lake Gold Project as described in Chapter 2 of the Environmental Assessment Report as well as the changes to the pit dewatering discharge location as described in IAAC’s Analysis of Proposed Changes to the Lynn Lake Gold Project- Pit Dewatering (Canadian Impact Assessment Registry Reference number 80140, document 142) <b>and changes to the MacLellan site as described in section 2 of IAAC’s Analysis of Proposed Changes to the Lynn Lake Gold Project- MacLellan site (Canadian Impact Assessment Registry Reference number 80140, document 149).</b></p>
<p>N/A – new definition</p>	<p>Add a definition of the “February 2024 Notice of Change”</p> <p>Simplify the reference to the February 2024 Notice of Change in condition 3.6 and 3.13.1</p>	<p><b><i>February 2024 Notice of Change means the February 2024 document entitled Lynn Lake Gold Project: Gordon Mine Pit Dewatering Notice of Alteration / Notice of Change (Canadian Impact Assessment Registry Reference Number 80140, document 131)</i></b></p>
<p>N/A – new definition</p>	<p>Add a definition of the “June 2025 Notice of Change”</p>	<p><b><i>June 2025 Notice of Change means the June 2025 document entitled Lynn Lake Gold Project: MacLellan Mine Plan Amendment Notice of Alteration / Notice of Change (Canadian Impact Assessment Registry Reference Number 80140, document 145)</i></b></p>

Content in Decision Statement issued August 2025	Recommended amendment to the Decision Statement	Recommended content in amended Decision Statement
<p>Condition 3.12.2:</p> <p>monitor water quality in the newly formed pit lakes, tailings management facility, mine rock storage areas, contact water collection ponds, and receiving water bodies and watercourses upstream and downstream of the Project development areas, including at the edge and downstream of the edge of mixing zones identified pursuant to condition 3.12.1, Arbor Lake, Burge Lake, Cockeram Lake, Ellystan Lake, Farley Creek, Farley Lake, Gordon Lake, the Hughes River, the Keewatin River, the unnamed tributary of the Keewatin River, Minton Lake, Payne Lake, Susan Lake and Swede Lake, for all contaminants that may have adverse effects on fish and fish habitat, including aluminum, antimony, arsenic, calcium, copper, cyanide, fluoride, hexavalent chromium, iron, magnesium, methylmercury, phosphorus, selenium, and total and dissolved cadmium. Monitoring shall be conducted as follows: [...]</p>	<p>Update condition 3.12.2 as follows:</p> <ul style="list-style-type: none"> <li>• Add Payne Lake outlet to the monitoring locations</li> <li>• Add cobalt to the list of contaminants to monitor</li> </ul>	<p>Updated condition 3.12.2:</p> <p>monitor water quality in the newly formed pit lakes, tailings management facility, mine rock storage areas, contact water collection ponds, and receiving water bodies and watercourses upstream and downstream of the Project development areas, including at the edge and downstream of the edge of mixing zones identified pursuant to condition 3.12.1, Arbor Lake, Burge Lake, Cockeram Lake, Ellystan Lake, Farley Creek, Farley Lake, Gordon Lake, the Hughes River, the Keewatin River, the unnamed tributary of the Keewatin River, Minton Lake, Payne Lake, <b>Payne Lake outlet</b>, Susan Lake and Swede Lake, for all contaminants that may have adverse effects on fish and fish habitat, including aluminum, antimony, arsenic, calcium, <b>cobalt</b>, copper, cyanide, fluoride, hexavalent chromium, iron, magnesium, methylmercury, phosphorus, selenium, and total and dissolved cadmium. Monitoring shall be conducted as follows: [...]</p>
<p>3.12.4</p> <p>monitor, beginning during construction, water quality in groundwater near the open pits, Farley Lake, Gordon Lake, the Keewatin River, the unnamed tributary of the Keewatin River, Minton Lake, the unnamed lakes northeast of Minton Lake, Payne Lake, Pump Lake and Susan Lake, up and down gradient from the tailings management facility, mine rock storage areas, ore and overburden</p>	<p>Update condition 3.12.4 as follows:</p> <ul style="list-style-type: none"> <li>• Add Payne Lake outlet to the monitoring locations</li> <li>• Add total and dissolved copper to the list of contaminants to monitor at the MacLellan site</li> </ul>	<p>monitor, beginning during construction, water quality in groundwater near the open pits, Farley Lake, Gordon Lake, the Keewatin River, the unnamed tributary of the Keewatin River, Minton Lake, the unnamed lakes northeast of Minton Lake, Payne Lake, <b>Payne Lake outlet</b>, Pump Lake and Susan Lake, up and down gradient from the tailings management facility, mine rock storage areas, ore and overburden stockpiles, and seepage collection systems. Monitoring shall be</p>

Content in Decision Statement issued August 2025	Recommended amendment to the Decision Statement	Recommended content in amended Decision Statement
<p>stockpiles, and seepage collection systems. Monitoring shall be conducted for all contaminants that may have adverse effects on fish and fish habitat, including antimony, arsenic, iron, sodium, sulphate, and uranium at the Gordon site and aluminum, antimony, arsenic, cobalt, total and dissolved copper, total cyanide, iron, lead, nitrate, nitrite, sodium, and sulphate at the MacLellan site;</p>		<p>conducted for all contaminants that may have adverse effects on fish and fish habitat, including antimony, arsenic, iron, sodium, sulphate, and uranium at the Gordon site and aluminum, antimony, arsenic, cobalt, <b>total and dissolved copper</b>, total cyanide, iron, lead, nitrate, nitrite, sodium, and sulphate at the MacLellan site;</p>
<p>Condition 3.12.6: develop, in consultation with relevant authorities, and implement modified or additional mitigation measures, if the results of monitoring conducted pursuant to condition 3.12.2, 3.12.3, 3.12.4 and 3.12.5 demonstrate any unanticipated effects attributable to the Designated Project, taking into account the Canadian Council of Ministers of the Environment’s Canadian Water Quality Guidelines of the Protection for Aquatic Life or Manitoba’s Water Quality Standards, Objectives, and Guidelines, whichever is most protective of fish and fish habitat, and predicted concentrations identified in Volume 1 Chapter 9 of the Environmental Impact Statement.</p>	<p>Update condition 3.12.6 as follows:</p> <ul style="list-style-type: none"> <li>• Add a reference to the updated water modelling results reported in this Notice of Change</li> </ul>	<p>Updated condition 3.12.6: develop, in consultation with relevant authorities, and implement modified or additional mitigation measures, if the results of monitoring conducted pursuant to condition 3.12.2, 3.12.3, 3.12.4 and 3.12.5 demonstrate any unanticipated effects attributable to the Designated Project, taking into account the Canadian Council of Ministers of the Environment’s Canadian Water Quality Guidelines of the Protection for Aquatic Life or Manitoba’s Water Quality Standards, Objectives, and Guidelines, whichever is most protective of fish and fish habitat, and predicted concentrations identified in Volume 1 Chapter 9 of the Environmental Impact Statement <b>and in the June 2025 Notice of Change.</b></p>
<p>Condition 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,</p>	<p>Update condition 3.13.1 as follows:</p> <ul style="list-style-type: none"> <li>• Add the Dot Lake outlet and Minton Lake outlet as monitoring locations</li> </ul>	<p>Updated condition 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, <b>Dot Lake</b></p>

Content in Decision Statement issued August 2025	Recommended amendment to the Decision Statement	Recommended content in amended Decision Statement
<p>Farley Creek, Farley Lake, Gordon Lake, the Keewatin River, the unnamed tributary of the Keewatin River, Minton Lake, Payne Lake, Susan Lake, Swede Lake, fish-bearing wetlands within the local assessment areas, newly formed pit lakes, the tailings management facility, and contact water collection ponds, and prior to and during the construction phase and during the first year of the operation phase, the East and Wendy pit lakes and the Hughes River, to verify the environmental assessment predictions identified in Volume 2 Chapter 10 of the Environmental Impact Statement and 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);</p>	<ul style="list-style-type: none"> <li>• Add the updated water modelling results reported in this Notice of Change to the list of references to take into account</li> <li>• Simplify the reference to the February 2024 Notice of Change</li> </ul>	<p><b>outlet</b>, Ellystan Lake, Farley Creek, Farley Lake, Gordon Lake, the Keewatin River, the unnamed tributary of the Keewatin River, Minton Lake, <b>Minton Lake outlet</b>, Payne Lake, Susan Lake, Swede Lake, fish-bearing wetlands within the local assessment areas, newly formed pit lakes, the tailings management facility, and contact water collection ponds, and prior to and during the construction phase and during the first year of the operation phase, the East and Wendy pit lakes and the Hughes River, to verify the environmental assessment predictions identified in Volume 2 Chapter 10 of the Environmental Impact Statement, <b>the February 2024 Notice of Change, and the June 2025 Notice of Change;</b></p>
<p>Condition 3.13.2: monitor, during all phases of the Designated Project, groundwater levels, gradients and hydraulic conductivity of all hydrogeological units, as identified in the groundwater model in Volume 5 Appendix F and G of the Environmental Impact Statement, with well depths ranging from near surface to a minimum of 115 meters below ground to characterize contaminant transport via groundwater at the depth of the groundwater model for the Designated Project. Monitoring wells shall be installed near the open pits, the tailings management facility, mine rock</p>	<p>Update condition 3.13.2 as follows:</p> <ul style="list-style-type: none"> <li>• Add reference to the updated groundwater modelling results reported in this Notice of Change</li> <li>• Add groundwater quantity monitoring locations in the forecast extent of drawdown related to operation of the pit</li> </ul>	<p>Updated condition 3.13.2: monitor, during all phases of the Designated Project, groundwater levels, gradients and hydraulic conductivity of all hydrogeological units, as identified in the groundwater model in Volume 5 Appendix F and G of the Environmental Impact Statement <b>and in the June 2025 Notice of Change</b>, with well depths ranging from near surface to a minimum of 115 meters below ground to characterize contaminant transport via groundwater at the depth of the groundwater model for the Designated Project. Monitoring wells shall be installed near the open pits, the tailings management facility, mine rock</p>

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storage areas, ore and overburden stockpiles, and fish-bearing wetlands within the local assessment areas that intersect with the Project development areas; and		storage areas, ore and overburden stockpiles, and fish-bearing wetlands within the local assessment areas that intersect with the Project development areas <b>and within the forecast extent of drawdown related to operation of the pit</b> ; and
Condition 3.14.2: monitor total invertebrate density, taxon richness, Simpson’s Evenness Index, Bray-Curtis Index, and chlorophyll a to characterize benthic invertebrate, plankton and periphyton communities in Farley Creek, Farley Lake, Gordon Lake, the Hughes River, the Keewatin River, Minton Lake, the new diversion channel, and any additional locations identified in consultation with Indigenous groups and relevant authorities, for the detection of project-related changes in nutrient and contaminant levels, taking into account predictions in Volume 2 Chapter 10 of the Environmental Impact Statement;	Update condition 3.14.2 as follows: <ul style="list-style-type: none"> <li>• Add the Payne Lake outlet as a monitoring location</li> </ul>	Updated condition 3.14.2: monitor total invertebrate density, taxon richness, Simpson’s Evenness Index, Bray-Curtis Index, and chlorophyll a to characterize benthic invertebrate, plankton and periphyton communities in Farley Creek, Farley Lake, Gordon Lake, the Hughes River, the Keewatin River, Minton Lake, <b>the Payne Lake outlet</b> , the new diversion channel, and any additional locations identified in consultation with Indigenous groups and relevant authorities, for the detection of project-related changes in nutrient and contaminant levels, taking into account predictions in Volume 2 Chapter 10 of the Environmental Impact Statement;
Condition 3.14.4: 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	Update condition 3.14.4 as follows: <ul style="list-style-type: none"> <li>• Add the Minton Lake outlet as a monitoring location</li> <li>• Add the Payne Lake outlet as a monitoring location</li> </ul>	Updated condition 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, <b>the Minton Lake outlet, the Payne Lake outlet</b> , the new diversion channel, fish-bearing wetlands within and downstream of the Project development areas, and any additional locations identified in consultation

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<p>Indigenous groups and relevant authorities, as well as in the Hughes River prior to and during the Construction phase and during the first year of the operation phase.</p>		<p>with Indigenous groups and relevant authorities, as well as in the Hughes River prior to and during the Construction phase and during the first year of the operation phase.</p>
<p>Condition 6.3.5: monitor ambient air concentrations of nitrogen dioxide (NO<sub>2</sub>) at locations identified in consultation with Indigenous groups and relevant authorities, for at least two consecutive months during year 2 of operation, and continue to monitor during all phases of the Designated Project if the monitoring results exceed predicted levels in the atmospheric dispersion model in Volume 1 Chapter 6 of the Environmental Impact Statement;</p>	<p>Update condition 6.3.5 as follows:</p> <ul style="list-style-type: none"> <li>• Add seasonal timing for the two months of monitoring: “between November and January”</li> <li>• Change the year of NO<sub>2</sub> monitoring from year 2 to “year 4 of operation or whichever year the highest truck traffic volume for ore haulage from the Gordon Site to the ore milling and processing plant at the MacLellan site will occur”</li> <li>• Change the timing of the requirement to extend monitoring if predicted levels are exceeded from “during all phases of the Designated Project” to “each year until the end of ore extraction and transport”</li> <li>• Change the referenced atmospheric dispersion model from Volume 1 Chapter 6 of the EIS to “the June 2025 Notice of Change”.</li> </ul>	<p>Updated condition 6.3.5: monitor ambient air concentrations of nitrogen dioxide (NO<sub>2</sub>) at locations identified in consultation with Indigenous groups and relevant authorities, for at least two consecutive months <b>between November and January</b> during year <b>4</b> of operation <b>or whichever year the highest truck traffic volume for ore haulage from the Gordon Site to the ore milling and processing plant at the MacLellan site will occur</b>, and continue to monitor <b>each year until the end of ore extraction and transport</b> if the monitoring results exceed predicted levels in the atmospheric dispersion model in <b>the June 2025 Notice of Change</b>;</p>
<p>Condition 6.3.7: if the monitoring results referred to in conditions 6.3.2 to 6.3.5 exceed predicted levels in the atmospheric dispersion model in Volume 1 Chapter 6 of the Environmental Impact Statement, taking into account the results of monitoring meteorological conditions pursuant to condition 6.3.6, the human health and ecological risk assessment</p>	<p>Update condition 6.3.7 as follows:</p> <ul style="list-style-type: none"> <li>• Change the referenced atmospheric dispersion model from Chapter 6 of the EIS to “the June 2025 Notice of Change”.</li> <li>• Change the “or” to an “and” in the list of factors to take into account.</li> </ul>	<p>Updated condition 6.3.7: if the monitoring results referred to in conditions 6.3.2 to 6.3.5 exceed predicted levels in the atmospheric dispersion model in <b>the June 2025 Notice of Change</b>, taking into account the results of monitoring meteorological conditions pursuant to condition 6.3.6, the human health and ecological risk assessment in Volume 5 of the</p>

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